

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AMY MARIE HEPLER)	
)	
COMPLAINANT)	
)	
v.)	CASE NO. 2001-294
)	
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
DEFENDANT)	

FIRST DATA REQUEST OF COMMISSION STAFF
TO LOUISVILLE GAS AND ELECTRIC COMPANY

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Louisville Gas and Electric Company ("LG&E") file the original and four copies of the following information within 10 days of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility.

1. Provide the complete billing history for Complainant's account including the actual meter readings as well as actual and estimated usages. Also provide the billing of meter #442117 from the ending date of Complainant's service to the present.

2. Provide all documents and correspondence relating to LG&E's attempts to gain access to Complainant's meter.

3. Provide all records regarding the testing of meter #442117.

4. a. Was meter #442117 used at any other location before being set at 910 East Chestnut Street?

b. (1) If no, state the date the meter was placed in service, the name of each customer served through the meter, and each problem reported relating to the meter or service at that address.

(2) If yes, state the number of accounts the meter has served and explain why the meter was moved to 910 East Chestnut Street.

5. What was the meter reading on meter #442117 when it was last tested?

6. Provide the applicable tariffed rates for the billing periods to which LG&E refers in its Answer.

7. At paragraph 4 of its Answer, LG&E states that upon reading the meter on April 25, 2001, it discovered that the meter reading from April 2, 2001 was under-read by 1000 ccf, which was subsequently billed to the Complainant.

a. Explain why, if LG&E discovered the under reading during the April 25 reading of the meter, it waited until July 2001 to bill the Complainant for the 1000 ccf of gas.

b. Explain why LG&E did not reflect the change on the landlord's bill that the meter had been read on April 25 and the reading was 0748.

c. Explain why the landlord's bill, as submitted by the Complainant, reflects an actual reading of 9765 on April 25 if the meter read 0748 on April 25.

d. Explain why LG&E did not indicate on the bill sent at the end of July to the Complainant that the actual reading took place on April 25. Complainant's corrected final bill shows that the actual reading took place on April 2, 2001 and was 0748, whereas her final bill that was sent to her in April stated that the actual reading took place on April 2, 2001 and was 9748.

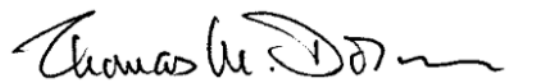
e. Explain how the new tenant's bill, as submitted by the Complainant, reflected an actual reading of 0 on July 11 and July 10, if the meter read 0748, on April 25, 2001.

f. Who (e.g., LG&E employees or contract vendors) reads LG&E's gas meters?

8. a. What training, education, and certification requirements has LG&E established for its meter readers?

b. Provide a copy of all written LG&E standards and requirements that pertain specifically to meter readers employed or contracted by LG&E.

9. Describe LG&E's procedures for preventing, detecting and correcting meter-reading errors. Provide a copy of all written procedures related to meter reading.



Thomas M. Dorman
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DATED: December 19, 2001

cc: Parties of Record