

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|-------------------------------------|---|---------------------|
| BRIAN AND AMY COLLINS |) | |
| |) | |
| COMPLAINANTS |) | |
| |) | |
| v. |) | CASE NO. 2003-00032 |
| |) | |
| LOUISVILLE GAS AND ELECTRIC COMPANY |) | |
| |) | |
| DEFENDANT |) | |

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

Pursuant to 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 the date 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. Refer to LG&E s response to the Commission s Order to Satisfy or Answer dated February 10, 2003. Concerning LG&E s application of 807 KAR 5:006, Section 10, to the Brian and Amy Collins (Collinses) complaint:

- a. Explain in detail how LG&E addressed subsection (1) through (11) of the Administrative Regulation.
 - b. Explain in detail why the LG&E Customer Information System automatically adjusted the recorded usage to zero.
 - c. Provide the written procedures for handling the alert issued and the rationale behind zeroing the recorded usage.
 - d. What actions did LG&E undertake concerning the alert issued?
2. The Usage Analysis provided by LG&E did not include degree-days or make an adjustment for the 10 days that the Collinses were on vacation in July. Provide the degree-days for July 2000, 2001, and 2002 and an adjustment for the Collinses vacation in July 2002.
 3. Provide all facts concerning the disconnection of the Collinses service on October 17, 2002. Include the Collinses payment history from January 2002 through August 2002, and show the kWh usage by month.
 4. Provide the meter testing results for the Collinses that support LG&E's position that the meter was within 2 percent tolerance.
 5. Explain how LG&E has determined that 24 working days is considered a timely response to a customer's complaint.
 6. Explain LG&E's procedure for estimating a bill.
 7. Provide the amount of the bill that was not paid by the Collinses that resulted in LG&E terminating service.
 8. Has the Collinses electric service been reconnected?

9. Supply a copy of the meter test performed on the Collinses meter that LG&E replaced.

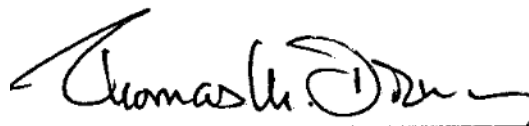
10. Provide the Collinses bills for February, March, April, and May 2002.

11. Provide the per-kWh dollar amounts used by LG&E to determine the energy charge, fuel adjustment charge, residential DSM, environmental surcharge, merger surcredit and value delivery surcredit for the February, March, April, and May 2002 bills.

12. Refer to LG&E's response to Staff's first data request in Case No. 2002-00367,¹ Tab KPSC1, Question 1(a).

a. Major Accountabilities states that employees of the Customer Service Center have thorough knowledge of related systems (CIS, etc.). Explain why the Customer Service Representative would not be able to determine if a meter had been read or the usage had been estimated.

b. Provide all entries logged into the appropriate system related to the Collinses complaint.



Thomas M. Dorman
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, Kentucky 40602

DATED: April 18, 2003

cc: Parties of Record

¹ Case No. 2002-00367, The Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company.