

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DEBORAH B. SCHMIDT AND)	
JOHN R. SCHMIDT)	
)	
COMPLAINANTS)	
)	
v.)	CASE NO. 2004-00454
)	
THE UNION LIGHT, HEAT AND)	
POWER COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
TO THE UNION LIGHT, HEAT AND POWER COMPANY

Pursuant to 807 KAR 5:001, Commission Staff requests that The Union Light, Heat and Power Company ("ULH&P") file the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein should be filed within 14 days of the date of this request. Each copy of the data 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 person who is responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. When information requested herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

1. Provide all correspondence or records of correspondence between ULH&P and Complainants from November 1, 2002 until the present.
2. Provide copies of any payment agreements between ULH&P and Complainants.
3. Provide Complainants' billing history from November 1, 2004 until present.



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED: February 28, 2005

cc: Parties of Record