

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOHN McKEEHAN	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO. 2006-00385
	)	
LOUISVILLE GAS AND ELECTRIC COMPANY	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST DATA REQUEST 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 6 copies of the following information within 20 days of the date of this request, with a copy to each party of record. 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 will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure is legibility.

1. Provide copies of the monthly bills for the addresses listed below for the dates requested. Additionally, provide a detailed analysis of the monthly usage and payment history for each address for the dates listed. The analysis should include the monthly usage for gas and electric listed separately, any other charges separately

identified, and the application of payments to the appropriate account. Indicate the billing and mailing address for each account.

a. 319 M Street, Apartment 1F, account number [REDACTED], from April 1, 1996 to February 20, 1997.

b. 319 M Street, Apartment 2F, account number [REDACTED], from April 1, 1996 to June 2, 1997.

c. 4105 Southern Parkway, account number [REDACTED], from June 19, 1997 to December 17, 1997.

2. Describe the collection efforts made by LG&E before and after the date of the bankruptcy.

3. Provide all correspondence, internal memoranda, electronic mail messages, and other internal documents from April 1996 until the present, in which electric and/or gas service to John or Shannon McKeehan is discussed.

4. Provide the most recent dates of gas and electric service to 319 M Street, Apartment 1F; 319 M Street, Apartment 2F; and 4105 Southern Parkway.

5. Does LG&E have a gas or electric meter located at 319 M Street? If no, provide the date the meter(s) was removed.

6. Provide a copy of any documentation, such as a wrecking permit, pertaining to the demolition of the building at 319 M Street.

7. In its answer to the complaint at page 3, LG&E states that the service at the current address was disconnected for nonpayment. Provide a payment history for the service at the current address from the time the service was connected until the present.

8. 807 KAR 5:006, Section 12(1), states that, if a termination-of-service request is made by telephone, the burden of proof is on the customer to prove that service termination was requested if a dispute arises.

a. Provide the type of proof that LG&E has accepted in the past to determine if a customer requested termination by telephone.

b. Describe the other methods a customer can use to request termination of service.



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

DATED: September 21, 2006

cc: Parties of Record