COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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SHERRY ANN GOOD D/B/A SUN PALACE)
COMPLAINANT)
V.) CASE NO. 2006-00496
KENTUCKY UTILITIES COMPANY)
DEFENDANT)

COMMISSION STAFF'S FIRST DATA REQUEST TO KENTUCKY UTILITIES COMPANY

Pursuant to 807 KAR 5:001, Commission Staff requests that Kentucky Utilities Company ("KU") file the original and 5 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 the questions related to the information provided. Careful attention should be given to copied material to ensure it is legible. Where 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.

- Provide copies of all correspondence between Sherry Ann Good d/b/a
 Sun Palace ("Sun Palace") and KU relating to billing and electric service issues at 1906
 Cumberland Avenue, Middlesboro, Kentucky.
- 2. Provide documentation stating the number of electric meters KU currently has in service for Sun Palace at 1906 Cumberland Avenue. If there is more than one meter, provide the relevant meter numbers and account numbers.
- 3. Provide copies of service records indicating problems with the meter(s) at Sun Palace from February 1, 2003 to August 23, 2005.
- 4. Refer to Exhibit B of KU's original answer and to the Sun Palace bill with a due date of July 22, 2005 showing \$649.76 as the total amount due. Subsequent bills contain no indication that this amount was satisfied. Explain why KU does not consider this amount to be in arrears.
- 5. Refer to Exhibit B of KU's original answer and to the Sun Palace bill with a due date of July 25, 2005. Explain why two bills with the same account number were issued to Sun Palace within the same billing period for two different amounts.
- 6. Provide copies of all KU's records that document a change of the name(s) of the person(s) responsible for the electric service account for Sun Palace at 1906 Cumberland Avenue from February 1, 2003 to August 23, 2005.
- 7. Provide documentation outlining the previous test history of meter #M408432 (the meter formerly located at 1906 Cumberland Avenue) and furnish the results of those tests.

8. State how KU alters the "Estimated Usage" procedure for commercial businesses that operate on a seasonal basis (i.e., open only a few months per year) or

that have many clients during certain periods of the year.

9. If settlement discussions have previously taken place regarding this case,

describe the results of those discussions.

Beth O'Donnell

Executive Director

Public Service Commission

P. O. Box 615

Frankfort, KY 40602

DATED: __January 23, 2007_

cc: Parties of Record