## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	
RUSSELL D. ALRED	)
COMPLAINANT	)
V.	) CASE NO. 2008-00142
KENTUCKY UTILITIES COMPANY	)
DEFENDANT	)

## FIRST DATA REQUEST OF COMMISSION STAFF TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company ("KU"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 5 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before September 19, 2008. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KU shall make timely amendment to any prior responses if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which KU fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

- 1. Refer to the complaint of Russell D. Alred ("Complainant") which states that "KU has unlawfully billed and required me and companies I own to pay a 'Fuel Adjustment Charge' in violation of existing law" and which requests reimbursement of "all the monies I have paid to KU for fuel adjustment charges since I have been a customer."
- a. How long has Complainant been a customer of KU at any address?

  Provide the dates when Complainant's service by KU began and ended.
- b. Identify companies currently or previously owned by Complainant that are, or have been, served by KU. Provide the names of all such companies and the dates when their service by KU began and ended.
- c. For the period of time that Complainant or any companies owned by Complainant were KU customers, provide the energy usage of each.

d. For the period of time that Complainant or any companies owned by Complainant were KU customers, provide the net amount of all charges and credits billed to Complainant and each Complainant-owned company through KU's Fuel Adjustment Clause.

Stephanie Stumbo

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED: August 22, 2008

cc: Parties of Record