

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KENNETH GERWE)	
)	
COMPLAINANT)	
)	
V.)	CASE NO. 2008-00198
)	
DUKE ENERGY KENTUCKY, INC.)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST DATA REQUEST
TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. ("Duke"), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 6 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before July 14, 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 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.

Duke 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 requests to which Duke 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 should 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. Provide copies of Kenneth Gerwe's monthly gas bills for his residence at 4859 Saddleridge Court, Independence, Kentucky ("Saddleridge") for the period beginning August 2006 and ending March 2008.

2. Provide copies of any and all correspondence between Mr. Gerwe and Duke relating to the billing issues at Saddleridge.

3. Provide copies of any and all audio recordings of telephone conversations between Mr. Gerwe and any representative of Duke relating to the billing issues at Saddleridge.

4. Provide copies of any and all inspection and service records relating to the gas meter at Saddleridge--meter number 752736.

5. In paragraph 2 of Duke's answer dated June 11, 2008, Duke states that, although the communication device and index were replaced on or about December 20,

2007 to be compatible with Mr. Gerwe's meter, the new Advanced Metering Infrastructure ("AMI") communication module number was not updated in Duke's customer management system until February 27, 2008, preventing Duke from obtaining electronic readings until such date. Explain the delay in updating the communication module number of Mr. Gerwe's meter.

6. In paragraph 4 of Duke's answer dated June 11, 2008, Duke states that it did not provide the names of customers who have complained about the communication modules, as requested by Mr. Gerwe.

a. State the number of customers who have complained about or have questioned readings related to the AMI communication modules since Duke began installing these modules.

b. If other complaints have been received about the modules, state whether the complaints involve meters, similar to Mr. Gerwe's meter, that have been found to be incompatible with the AMI module.

7. In paragraph 4 of Duke's answer, Duke states that the serial number for the communication module is necessary to receive electronic readings. Explain whether the module serial number was not included on other customers' accounts and, if so, how many accounts were affected.

8. In Mr. Gerwe's May 27, 2008 letter to the Commission, Mr. Gerwe stated that he heated his home with wood all winter. Explain whether Duke believes this to be a valid reason that Mr. Gerwe's gas consumption dropped. Include in the response whether Duke has any reason to doubt Mr. Gerwe's explanation for the drop in consumption.

9. Provide documentation of the calculations of the unmetered gas usage resulting in the balance due from Mr. Gerwe of \$272.96 as referenced in Duke's April 29, 2008 letter to Mr. Gerwe.



Stephanie Stumbo
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: June 30, 2008

cc: Parties of Record