

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JIM DEVERS )  
 )  
COMPLAINANT )  
 )  
V. ) CASE NO. 2008-00199  
 )  
KENTUCKY UTILITIES COMPANY )  
 )  
DEFENDANT )

SECOND 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 October 3, 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 KU's response to Commission Staff's First Data Request, Question No. 4, page 2. Provide a detailed explanation of the information labeled "Readings Installed" and "Readings Removed" and how it is pertinent to Jim Devers' usage calculation and the meter testing procedure.

2. Explain why Mr. Devers' meter was not removed for testing prior to April 2008, given that the higher than average usage occurred in June 2007.

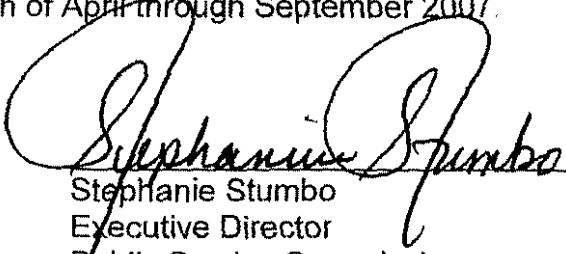
3. Does KU have a policy in place as required by 807 KAR 5:006, Section 10(3) to monitor customers' usages for unusual deviations? If yes, did KU perform any timely investigation to determine the reasons for Mr. Devers' unusual usage deviations?

a. If yes, describe in detail the steps taken to determine the reason for the unusual deviations.

b. If no, explain fully the reasons why no such investigation was carried out.

4. Mr. Devers stated that he sold his house on July 2, 2007 and requested termination of his electric service on the same date. Provide information on the usage amount and total billing for Mr. Devers' former residence at 126 Cherry Hill Drive, Georgetown, Kentucky for the three months following his request to terminate service at that address under his name, i.e., the remainder of July, August, and September of 2007.

5. Provide information on the usage amount and total billing of any and all of Mr. Devers' immediate neighbors for each month of April through September 2007.

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

DATED: September 24, 2008

cc: Parties of Record

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