

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

EWING LEE BROWN)	
)	
COMPLAINANT)	
V.)	CASE NO.
)	2009-00421
KENTUCKY UTILITIES COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST DATA REQUEST
TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company ("KU"), pursuant to 807 KAR 5:001, is to file with the Commission the original and four copies of the following information, with a copy to all parties of record. The information requested herein is due on or before January 22, 2010. 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 response 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 Answer of Kentucky Utilities Company ("KU's Answer"), paragraph 3.a. On what date did Mr. Brown visit the KU Lexington Service Center and ask to be taken off the budget billing plan?

2. Refer to KU's Answer, paragraph 3.c.

a. State whether Mr. Brown's two accounts have the same meter reading and due dates or whether they differ.

b. Explain how Mr. Brown's home account was mistakenly removed from budget billing.

c. When was the mistake discovered?

d. Explain why KU was unable to properly and timely address Mr. Brown's concerns.

3. Refer to KU's Answer, paragraph 3.d. Is there a 30-day notice requirement related to starting or discontinuing budget billing? If yes, explain.

4. Refer to KU's Answer, paragraph 3.f. Provide the time that service to Mr. Brown's home was disconnected on September 26, 2009.

5. Refer to KU's Answer, First Affirmative Defense. KU states that it has attempted to contact Mr. Brown several times to discuss the complaint. Provide the methods used by KU to attempt to contact Mr. Brown.

6. Provide copies of any and all correspondence between Mr. Brown and KU relating to the complaint.

7. Provide copies of any and all audio recordings of telephone conversations between Mr. Brown and any representative of KU relating to the complaint.



Jeff Derouen
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED: JAN - 8 2010

cc: Parties of Record

Lonnie E Bellar
VP - State Regulation
Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

Ewing Brown
824 Sunset A
Lexington, KY 40502