

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 SECOND 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 February 15, 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 KU's responses to items 2 and 3 of Commission Staff's First Data Request ("Staff's First Request"). In response to item 2, KU states that the complainant, Ewing Brown, was inaccurately advised on September 4, 2009 that he had a credit balance of \$78.96. The response also states that Mr. Brown would only have a credit balance if he paid the \$189 budget bill amount and that, "[b]ecause the September bill was not reversed, the system was expecting payment in the amount of \$189."

a. Explain what is meant by "the September bill was not reversed."

b. Explain why the September bill was not reversed.

c. In response to item 3, KU states that there is no notice requirement with starting or discontinuing budget billing. Given that no notice is required, state whether KU believes the September bill should have been reversed.

d. Had the September bill been reversed, would Mr. Brown have owed \$110.04 instead of the \$189? If no, provide the amount.

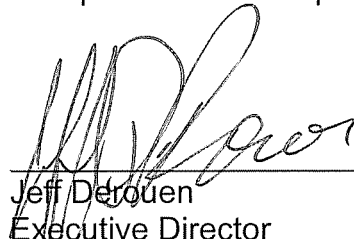
2. Provide a copy of the bills for which Mr. Brown made the September 4, 2009 payments.

3. Starting with the bills provided in response to item 2 above, provide a billing history for Mr. Brown to date. Include in this response a narrative description of the billing history.

4. State whether there is a dollar amount in dispute in this complaint. If so, provide the amount and how it was calculated.

5. Refer to the CD-ROM provided in response to item 7 of Staff's First Request, Track 6. Starting at approximately 1:19, Mr. Brown makes repeated requests for the Commission's telephone number. KU's customer service representative stated each time that she did not have the telephone number. 807 KAR 5:006, Section 9 states that, "[i]f a telephonic complaint is not resolved, the utility shall provide at least oral notice to the complainant of his right to file a complaint with the commission and the address and telephone number of the commission." Explain why KU's representative was unable to provide Mr. Brown with the Commission's telephone number.

6. In his response to Commission Staff's First Data Request, Mr. Brown requested a hearing in this matter. Provide KU's response to that request.



Jeff Derouen
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Public Service Commission
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DATED: FEB - 4 2010

cc: Parties of Record

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