

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|-------------------------------------|---|---------------------|
| NORMAN D. VERNON |) | |
| |) | |
| COMPLAINANT |) | |
| |) | |
| v. |) | |
| |) | CASE NO. 2010-00130 |
| LOUISVILLE GAS AND ELECTRIC COMPANY |) | |
| |) | |
| DEFENDANT |) | |
| |) | |

COMMISSION STAFF'S FIRST DATA REQUEST TO
LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company ("LG&E") is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due no later than July 2, 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 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.

LG&E 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 LG&E 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. Refer to Part C, page 2, of the Vernon complaint. Can LG&E confirm or does it deny that the complainant expressed his concern regarding high usage to LG&E customer service on a yearly basis? Provide all LG&E customer service records for the Vernon account at 116 Cherry Hills Lane.

2. Explain LG&E's policy concerning customer complaints or inquiries regarding high usage and possible meter inaccuracies.

3. Explain whether Mr. Vernon was ever offered a meter test prior to his meter being changed in February 2009.

4. Can LG&E confirm the usage data for the three customers shown on the third page of Part C of the Vernon complaint? If the usage data is correct, to what does LG&E attribute the change in usage patterns for 116 Cherry Hills Lane in comparison to

114 and 119 Cherry Hills Lane? Can LG&E supply monthly usage data for these three addresses for the time period of January 2005 to the most current reading?

5. State whether LG&E has tested the new meter (No. 630843) and verified that it is reading usage accurately since its installation.

6. In 2000, the Commission approved a statistical meter sampling plan for LG&E on a continuing basis. Pursuant to the plan, LG&E stated that its gas meter populations would be classified into homogeneous control groups of like meters installed in like years. Provide the history of the statistical meter sampling for the meter type installed at the Vernon residence. The history should include, but not be limited to, identification of the meter type, the average life of that meter type, and the performance level of that meter group, including the number of meters in that group that failed.

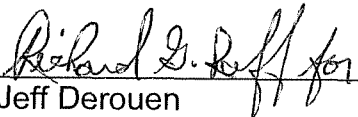
7. State whether the Vernon Meter 517508 was tested before installation. If yes, provide the testing results and state whether the testing was performed by LG&E or the manufacturer.

8. Refer to the Answer of LG&E, item 3.a., wherein LG&E states that it is its policy to retire the meters that have been removed from service and that the meters are either disposed of or sent off to be remanufactured.

a. According to Exhibit A, page 1 of 3, Mr. Vernon's meter was "junked." Since Mr. Vernon's meter was operating within acceptable limits, explain LG&E's decision to "junk" the meter.

b. Explain the criteria used for determining whether a meter will be remanufactured or disposed.

c. Explain why a meter would be remanufactured if it is retired once it is removed from service.



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cc: All Parties

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