

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BRENDA JOYCE CLAYTON)	
)	
COMPLAINANT)	
V.)	CASE NO.
)	2011-00211
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S SECOND INFORMATION REQUEST
TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due on or before 14 days from the date of this request. 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, LG&E 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 the response to Item 5 of Commission Staff's First Information Request to LG&E ("Staff's First Request").

a. Refer to the attachment to the response to Item 5.a. and the response to Item 5.b. The table at the bottom of the attachment to Item 5.a. provides a breakdown of the \$601.19 credited to Ms. Clayton's bill that was due October 13, 2009. The table shows that the \$601.19 consists of a \$485.79 outstanding balance from account 1447, \$75.37 for electric service, \$21.20 for natural gas, a \$4.83 late payment penalty, a \$135.00 electric deposit, a \$29.00 electric reconnection fee, and a credit for a \$150.00 payment. The response to 5.b. states that the \$601.19 credit "represents the split of Ms. Clayton's gas service obligations from her account."

(1) Explain why \$75.37 of electric service, a \$135.00 electric deposit, and a \$29.00 electric reconnection fee were included in the credit that was meant to split gas service obligations from electric service.

(2) The response to Item 5.b. states that “Ms. Clayton’s gas usage that comprises the \$601.19 was incurred prior to June 2009 when she requested the shut off and split account.” Confirm that the amount of gas usage that was incurred prior to June 2009 was \$485.79 and not \$601.19. If this cannot be confirmed, explain.

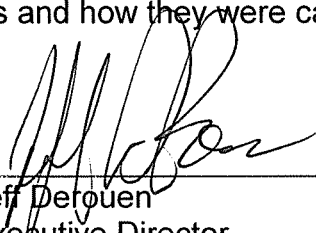
b. Refer to the response to Item 5.d. LG&E was asked to explain why the \$485.79 outstanding gas balance was transferred to Account 7727. An explanation was not provided. Although it appears that the \$485.79 outstanding balance was credited to Ms. Clayton as part of the \$601.19 credit to her bill in the same month, explain why it was necessary to transfer the \$485.79 to the new account that was set up to split the electric service from the natural gas service and then immediately remove it.

2. Refer to the response to Item 10 of Staff’s First Request. The response states that “the lock that had been placed on Ms. Clayton’s account pending her informal complaint was allowed to lapse on April 15, 2011.” Explain why the lock was set to lapse on April 15, 2011 (i.e., how was the date chosen). Include in your response LG&E’s current practice when setting lapse dates for accounts that are locked pending a complaint.

3. Refer to the copies of Ms. Clayton’s bills attached to LG&E’s Answer filed on September 12, 2011. The “Other Charges” section of the bills for January through April 2010 service, as well as the bill for February 2011 service, include charges and

credits that net to zero and which are identified as being related to an installment plan.

Explain the purpose of each of these charges and credits and how they were calculated.



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cc: Parties of Record

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