COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

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	Sanctuary Church COMPLAINANT) PUBLIC SERVICE) COMMISSION
VS.) CASE NO.) 2018-00181
	Louisville Gas and Electric (LG&E))
	DEFENDANT	ý

SANCTUARY CHURCH'S INITIAL REQUEST FOR INFORMATION TO LOUISVILLE GAS AND ELECTRIC

Comes the Complainant, Sanctuary Church, by counsel, submits these requests for information to Louisville Gas and Electric (LG&E) pursuant to 807 KAR 5:001 Sec. 4(12) and in conformance with the Appendix to the Order dated August 13, 2018 entered by the Kentucky Public Service Commission.

As set forth in the Commission's August 13, 2018 Order:

- Responses to requests for information shall be appropriately bound, tabbed, and indexed, with copies to all parties, and the original and five copies to the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.
- 2. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or an 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.

- A party 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.
- 4. For any request to which a party fails or refuses to furnish all or part of the requested information, that party shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.
- 5. 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.

In addition, where the response to the requests consists of information or a statement that is already in the Commission's record or is otherwise publicly available, provide a detailed citation to the document or other resource that contains the information. Such citation shall include the title of the document and the relevant page number. If the document is publicly available online, provide the URL and a notation of when the URL was last accessed by LG&E.

In the event any document sought by Sanctuary Church has been destroyed, specify the date and the manner of such destruction, the person directing or authorizing the destruction, and the custodian of the document at the time of its destruction.

2

REQUESTS

- Provide all bills, including total usage, billing rate and total amount from August
 1, 2013 to July 31, 2018 for 930 Mary Street Louisville, KY 40204.
- Provide a copy of all correspondence between LG&E and Sanctuary Church related to the account at issue.
- Provide the source documentation for the statements in paragraph (c) of LG&E's Answer related to "grandfathering" policies and procedures.

Dated at Lexington, Kentucky, this 27th day of August, 2018.

Sanctuary Church Bv: Andre F. Regard

Attorney:

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