COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:		RECEIVED
ROY G. COLLINS)	NOV 0 4 2013 PUBLIC SERVICE COMMISSION
COMPLAINANT)	ONNISSION
V.)	CASE NO. 2013-00052
JACKSON PURCHASE ENERGY CORPORATION)	2013 00032
DEFENDANT)	

JACKSON PURCHASE ENERGY CORPORATION'S INITIAL REQUEST FOR INFORMATION TO COMPLAINANT ROY G. COLLINS

Comes Jackson Purchase Energy Corporation ("JPEC"), pursuant to the Commission's Order dated October 17, 2013, and propounds the following requests for information to the complainant, Roy G. Collins.

- 1. When you initially contacted JPEC regarding service for the 1400 Carrsville Road (hereinafter the "subject premises"), did you indicate that this premises would be used as a full-time residence?
- 2. When you initially contacted JPEC for service, did you indicate that you would primarily utilize the subject premises as a place for you and friends to use when deer hunting?
- 3. During your initial contact with JPEC, did you indicate that you would be using the subject premises only about thirty (30) days per year?

4. Do you receive any monthly statements for other utilities to the subject premises at the 1400 Carrsville Road address or do you have them forwarded to your address in

Manchester, Kentucky?

5. How many days this year have you and/or your family visited the subject

premises?

6. Do you consider the subject premises your home or primary residence?

7. Do you or any member of your family reside at the subject premises on a full-time

basis?

8. Do you or any member of your family utilize the 1400 Carrsville Road address as

their home address?

9. Are you registered to vote? In what county are you registered to vote?

10. Have you or any member of your immediate family ever been registered to vote in

Livingston County? If so, please give their names and state whether they are currently registered

to vote in Livingston County.

11. What address is listed on your driver's license as your home address?

Respectfully submitted,

DENTON & KEULER

P.O. BOX 929

PADUCAH, KY 42002-0929

Telephone: (270) 443-8253

Facsimile: (270) 442-6000

Bv:

Melissa D. Yates

ATTORNEY FOR JPEC

I hereby certify that the foregoing has been served a true and correct copy via Federal Express:

MR JEFF DEROUEN KENTUCKY PUBLIC SERVICE COMMISSION 211 SOWER BLVD FRANKFORT KY 40602

And by delivering a copy via email and U.S. Mail to:

MR ROY G COLLINS 109 DICKENSON STREET MANCHESTER KY 40962 Roy.collins@mmbcylaw.com

on this 1st day of November, 2013.

Melissa D. Vates