



two inches near the back wall of the store causing the removal of a large, four (4) four door three (3) phase cooler which housed over one ton of soft drinks and bottled water and three (3) large freezers containing a variety of perishable items. The removal of said equipment occurred approximately three (3) years ago. Mr. Bill's also stopped using a large walk in (10' x 12') three (3) phase meat cooler as it became too expensive to continue to repair. The disuse of this cooler occurred about 3-4 years ago.

**b. State whether the damage is ongoing or has been resolved.**

Response: Damage to so is ongoing inside the store and a lawsuit has been filed in Jackson Circuit Court. All equipment is still not in use.

**c. Provide the date the damage occurred , and if resolved, provide the date it was resolved.**

Response: The damage to the foundation, due to the bridge, occurred in mid 2009. The damage caused under the store due to the severed drain pipe occurred in April-May 2011. The drain pipe was repaired in April of 2012, however the damage to drop in the floor and damage to the foundation have not been repaired at this time.

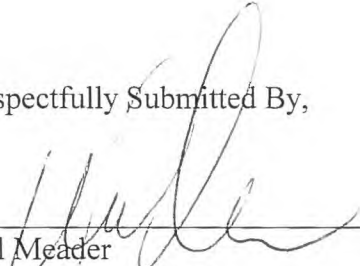
**2. List any major changes in equipment used at Complainant's business in the last 60 months that would have had a material impact on its electric bill (i.e., new refrigeration units, new lighting, expansion/reduction of operations, etc.).**

Response: See Response a. above. As indicated above, there has been no use of three(3) large freezers, a three (3) phase large five door cooler and a 10' x 12' three (3) phase meat cooler since April of 2011.

3. Except for changes and timing noted above, was there an unexplained decrease in the monthly electric bill, and if so, when?

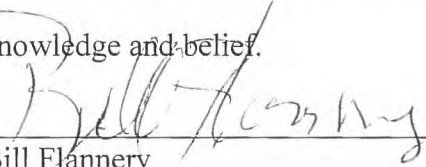
Response: No.

Respectfully Submitted By,

  
\_\_\_\_\_  
Bill Meader  
Meader Law Offices  
P.O. Box 1038  
Booneville, Kentucky 41314  
Phone: (606) 593-5054  
Fax: (606) 593-5044  
E-mail: meader\_law@hotmail.com.

**VERIFICATION**

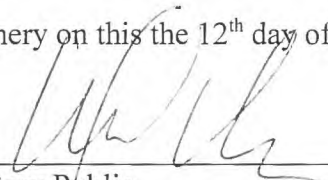
The undersigned, Bill Flannery, states under oath that he is the sole owner of Bill's Grocery and that the information set forth in these Responses to the Commission's First Request for information are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
Bill Flannery

STATE OF KENTUCKY

COUNTY OF OWSLEY

Subscribed and sworn to before me by Bill Flannery on this the 12<sup>th</sup> day of September, 2014.

  
\_\_\_\_\_  
Notary Public  
My Com. Expires: 6-25-2015

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies hat a true and correct copy of this Response to Information was served by mailing a copy of same by first class mail, postage prepaid , to the following:

Original and Seven Copies to:

Mr. Jeff R. Derouen  
Kentucky public Service Commission  
P.O. Box 615  
211 Sower Blvd.  
Frankfort, Kentucky 40602-0615

Copy to:

Hon. Clayton Oswald  
P.O. Box 3440  
1306 W. 5<sup>th</sup> St., Suite 100  
London, Kentucky 40743-3440

on this the 12<sup>th</sup> day of September, 2014.

  
\_\_\_\_\_  
Attorney for Mr. Bill's Grocery