

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF JACKSON PURCHASE)	
ENERGY CORPORATION FOR APPROVAL OF)	CASE NO.
FLOW THROUGH RATES PURSUANT TO KRS)	2011-00057
278.455)	

COMMISSION STAFF'S FIRST INFORMATION REQUEST
TO JACKSON PURCHASE ENERGY CORPORATION

Pursuant to 807 KAR 5:001, Jackson Purchase Energy Corporation ("Jackson Purchase") is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before July 1, 2011. 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.

Jackson Purchase 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 Jackson Purchase fails or refuses to furnish all or part of the requested

information, Jackson Purchase 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 Exhibits A and B of the application. In Case No. 2010-00512,¹ the Commission approved new rates for Jackson Purchase for service rendered on and after June 1, 2011. The current rates presented in the tariffs provided in Exhibits A and B do not reflect the rate change approved in that case. Provide revised Exhibits A and B which include the revised current rates.

2. Refer to Exhibit A of the application.

a. Refer to PSC No. 7, Sheet No. 110, Schedule PPA – Non-Smelter Non-FAC Purchase Power Adjustment (“Non-FAC PPA”). Jackson Purchase uses the abbreviation “F(b)” in the Non-FAC PPA formula. Given that this abbreviation is used in the formula in Jackson Purchase’s Fuel Adjustment Clause tariff, state whether Jackson Purchase intended to use the abbreviation “PPA(b)” in the Non-FAC PPA formula instead of “F(b)”.

¹ An Examination of the Application of the Fuel Adjustment Clause of Jackson Purchase Energy Corporation from July 17, 2009 through October 31, 2010 (Ky. PSC May 31, 2011).

b. Refer to PSC No. 7, Sheet No. 111. Paragraph No. 3 refers to “Rate Schedule (1) above” and “Rate Schedule (2) above”. Did Jackson Purchase intend to reference “Section 1 above” and “Section 2 above”?

3. Refer to Exhibit A of the application, PSC No. 7, Sheet No. 113, Schedule G-1 – Renewable Resource Energy Service.

a. Explain how the Renewable Resource Energy Service rates are calculated.

b. Explain why Jackson Purchase is not proposing changes in the Schedule G-1 – Renewable Resource Energy Service rates as a result of the increase from its wholesale supplier, Big Rivers Electric Corporation.

4. Refer to the Pre-filed Testimony of James R. Adkins.

a. Refer to page 3 of 6. Beginning at line 5, Mr. Adkins states that he will “explain and support” the Non-FAC PPA. Provide the location of this explanation and support in Mr. Adkins’ testimony.

b. Refer to page 5 of 6, lines 2 and 3. Explain the “68 determination” reference on these lines.

c. Throughout his testimony, Mr. Adkins makes reference to Attachments A, B, C, and D; however, there are no attachments to the testimony. Provide the referenced attachments after updating for rates approved in Case No. 2010-00512 as discussed in Item 1 above. Provide the attachments in both hard copy and electronic format with the formulas intact and unprotected.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: JUN 20 2011

cc: Parties of Record

Case No. 2011-00057

G. Kelly Nuckols
President & Ceo
Jackson Purchase Energy Corporation
2900 Irvin Cobb Drive
P. O. Box 4030
Paducah, KY 42002-4030

Melissa D Yates
Attorney
Denton & Keuler, LLP
555 Jefferson Street
P. O. Box 929
Paducah, KENTUCKY 42002-0929