

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JAN 30 2013

PUBLIC SERVICE  
COMMISSION

In the matter of:

Roy G. Collins )  
(Your Full Name) )  
COMPLAINANT )  
VS. )  
Jackson Purchase Energy Corp. )  
(Name of Utility) )  
DEFENDANT )

COMPLAINT

The complaint of Roy G. Collins respectfully shows:  
(Your Full Name)

(a) Roy G. Collins  
(Your Full Name)

109 Dickenson St., Manchester, KY 40962  
(Your Address)

(b) Jackson Purchase Energy Corp.  
(Name of Utility)

P.O. Box 4030, Paducah, KY 42002  
(Address of Utility)

(c) That: (See Exhibit A)  
(Describe here, attaching additional sheets if necessary,

the specific act, fully and clearly, or facts that are the reason

and basis for the complaint.)

Continued on Next Page

Formal Complaint

Roy G. Collins vs. JPEC

Page 2 of 2

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Wherefore, complainant asks that JPEC be required to refund  
(Specifically state the relief desired.)

the charge of \$6,065.94.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Dated at Manchester, Kentucky, this 29<sup>th</sup> day  
(Your City)

of Jan., 2013.  
(Month)

Roy G. Collins  
(Your Signature\*)

\_\_\_\_\_  
(Name and address of attorney, if any)

\_\_\_\_\_  
Date

\*Complaints by corporations or associations, or any other organization having the right to file a complaint, must be signed by its attorney and show his post office address. No oral or unsigned complaints will be entertained or acted upon by the commission.

## EXHIBIT A

### Collins v. Jackson Purchase Energy Corp.

In August 2012, I began construction of a building at 1400 Carrsville Road near Hampton, Kentucky. When I made the initial call to Jackson Purchase Energy to establish the service, I told the customer service representative that I was building a "barn." I did not want to disclose to anyone the true purpose of the building, which was actually a second home/home office. JPEC sent a staking technician to the site before construction began. He met with my contractor and took measurements to run a line to the site (approx. 1000 feet).

The construction was from a line that runs along an adjacent highway to the rear of the building. Exhibit 1 shows the view from the rear of the building toward the existing line. This photo was taken after the line was installed. The estimate for the costs of construction was \$6,065.94 including labor of \$4,726.61. (See Exhibit 2) Prior to installation of the line, I began trying to work with JPEC to reach an agreement as to the construction costs. I spoke with the CEO of JPEC who mentioned that the construction was a "hunting lodge." I explained to him that this was not a commercial hunting operation, but would be my second home. He told me that JPEC could not afford incur the expense for installation of the service without a reasonable expectation that it would recover the costs. I offered to pay the entire amount, but in return asked for a credit against any future bills. I told him that the building, even if unoccupied, would be climate controlled year-round. He promised to speak with the board and to call me back. I called for him on two other occasions in October and November 2012, but he never returned my calls. I had numerous conversations with others at JPEC who continually referred to my family's second home as a "hunting lodge." In November 2012, I asked that JPEC send someone to look at the structure, but to my knowledge no one did so from the time the estimate was completed until I tendered payment for the installation on December 17, 2012.

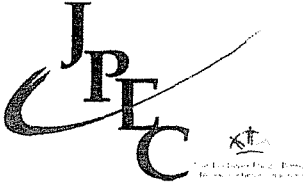
Construction of the home began in September 2012. The project grew into an 1800 square foot home with a complete basement and a "safe room" attached to a 1600 square foot garage that will be used to store farm equipment that is necessary to take care of the surrounding property. Construction came to a halt in December 2012 due to the lack of electricity. I tendered payment to JPEC and advised it that I would dispute the charge before the PSC. (Exhibit 3). Power was not installed until January 14, 2013.

One of the reasons for construction of the new home was the poor utility service we received at our existing structure, a mobile home located on the same property, but accessed by Hill Grove Road. On at least four occasions in the past three years I had arrived to find that the electrical service had been interrupted and that items in the refrigerator and freezer had ruined. This not only resulted in the loss of those items, but several hours of cleanup. On at least two of those occasions, I had to take my family to Paducah to stay in a hotel until the electrical service was restored. I never sought reimbursement by JPEC for any of these expenses.

Please adopt by reference my earlier correspondence to the Public Service Commission, a copy of which is attached hereto as Exhibit 4.



tabbles  
**EXHIBIT**  
1



PLEASE KEEP FOR YOUR RECORDS

# INVOICE

Jackson Purchase Energy Corporation  
2900 Irvin Cobb Drive  
PO Box 4030  
Paducah, KY 42002-4030

DATE: August 24, 2012

TO: Roy Collins

109 Dickerson St  
Manchester, KY 40962

NET 60 DAYS

ORDER DATE  
8/24/2012

ORDER NO.  
C 121946

GENERAL LEDGER ACCOUNT NO.  
107.231

### JOB DESCRIPTION

Install overhead line, transformer and connect temp service.

	DESCRIPTION	AMOUNT
Material		\$1,339.33
Labor		\$4,726.61

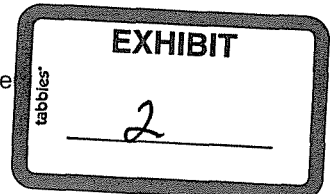
**TOTAL JOB COST      \$6,065.94**

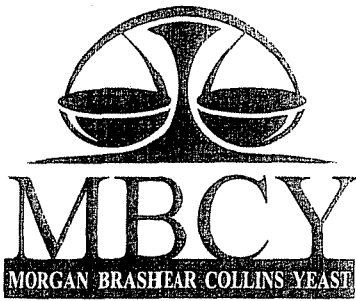
This is an estimate only, not a contract. This estimate is for completing the job described above based on our evaluation. It does not include unforeseen price increases, connection fees, potential increases in account deposits, accounting charges, or additional labor and materials which may be required if problems arise.

Tom Dillwith  
PREPARED BY

08-24-12  
DATE

Please call (your name) at (270) 442-7321 or (800) 633-4044 with any questions or comments.





Manchester Office: 109 Dickenson Street  
Manchester, KY 40962  
(606) 598-2122 • Fax: (606) 598-7842  
Toll Free (877) 809-5352

McKinnley Morgan • Leonard H. Brashear  
Roy G. Collins • Daniel G. Yeast  
Roger Riggs • Wiley G. Vanover



ATTORNEYS AT LAW

December 14, 2012

Jackson Purchase Energy Corporation  
2900 Irvin Cobb Drive  
Paducah, KY 42003

Attn: **Tom Dilworth**

**CERTIFIED MAIL RETURN RECEIPT REQUESTED**

**Re: General Ledger Account No.: 107.231**

Dear Mr. Dilworth:

I have enclosed my check in the amount of \$6,065.94. Please proceed with installation of service at 1400 Carrsville Road, Hampton, Kentucky as quickly as possible. Payment of the installation costs should not be construed as a waiver of any rights I may have before the Public Service Commission. I believe the assessed cost to be unreasonable and unnecessary for the construction of a second home. Members of JPEC have continually referred to this construction as a "hunting lodge." This is not a hunting lodge, but is a residence with 1800 square feet, including a poured basement. It is my belief that the costs assessed are based upon losses that the co-op may have sustained by installing power to semi-permanent structures that may have been used as hunting camps. This building is equipped with central heating and air that will be used year-round for climate control regardless of whether or not the building is occupied. I would expect climate control alone will generate more funds for the co-op than many of its existing customers. As such, I do not believe that the decision to assess such a high installation cost is appropriate.

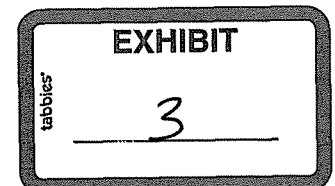
If you have any questions regarding the installation, please refer them to my contractor, Tony Brown. Mr. Brown can be reached at [REDACTED].

Sincerely,

*Roy G. Collins*

Roy G. Collins  
RGC/mas  
Enc.

cc: **Tony Brown**



Annville Office: 4527 Highway 30 West • Annville, KY 40402 • (606) 364-2963 or 364-3933 • Fax (606) 364-2973  
Hazard Office: 21 Grand Oak Lane • Hazard, KY 41701 • (606) 436-1963 • Fax (606) 487-9381  
Hyden Office: 22977 Hwy. 421/Rockhouse • P. O. Box 677 • Hyden, KY 41749 • (606) 672-2142 or 672-3577 • Fax: (606) 672-2142  
London Office: 921 South Main Street • London, KY 40741 • (606) 864-6451 or 877-1401 • Fax: (606) 864-8712  
Mt. Sterling Office: 51 North Maysville Street • Mt. Sterling, KY 40353 • (859) 499-3433 • Fax: (859) 499-3434  
Richmond Office: 1419 Lexington Road • Richmond, KY 40475 • (859) 625-5900 or 625-9933 • Fax: (859) 624-8951  
Somerset Office: 870 South Hwy. 27 • Somerset, KY 42501 • (606) 678-2533 or 678-2530 • Fax: (606) 678-2534

VANDA COLLINS 04-12  
ROY GLENN COLLINS  
5091 HIGHWAY 149  
MANCHESTER, KY 40962-5744

516

21-10/830  
061

12/14/12 Date

Pay to the Order of JDEC

\$ 6,065.94

Six thousand sixty five + 94/100 Dollars



 PNC BANK

PNC Bank, N.A. 050

For under protest

Ray J. Collins MP

Harbor



Manchester Office: 109 Dickenson Street  
Manchester, KY 40962  
(606) 598-2122 • Fax: (606) 598-7842  
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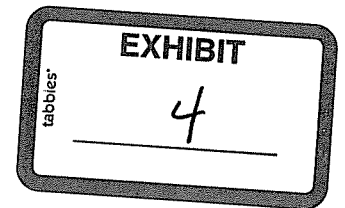


**ATTORNEYS AT LAW**  
December 20, 2012

Kentucky Public Service Commission  
**Attn: Consumer Service**  
P.O. Box 615  
Frankfort, KY 40602

**Re: Jackson Purchase Energy Corporation**

Dear Sir/Madam:



Please accept this letter as a request that the Public Service Commission investigate Jackson Purchase Energy Corporation's charge of more than \$6,000 for installation of electrical service at my home located at 1400 Carrsville Road, Hampton, Kentucky. The home is 1800 square feet with an attached garage of 1600 square feet. The structure is permanent, including a poured basement and storm shelter. I have been in discussions with JPEC since August trying to resolve this situation, but have repeatedly been told that because the structure is a "hunting lodge" that the co-op does not believe it will receive sufficient funds to justify the expense of the installation. The residence is equipped with central heat and air that will be utilized year-round regardless of whether the home occupied. While this will not be my primary residence, it will be used frequently by myself and my family. It is not a commercial hunting operation nor it will only be used during the traditional hunting seasons of October and November.

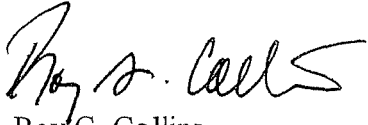
One of the reasons for construction of a new residence was difficulty I had had in the past with electrical service to my existing residence located on Hillgrove Road. During the past three years, on several occasions I had arrived at the residence to find that the power had been off for an extended period. Each time, I was forced to perform extensive clean ups due to loss of refrigerated and frozen items. At no time was I reimbursed by JPEC for any of these losses nor did I file any complaints or seek reimbursement.

I spoke with several representatives of JPEC trying to reach a solution of this matter, including payment of the installation costs with credit towards future expenses, but was unable to reach any type of solution. I have tendered payment of the disputed costs to JPEC because construction on the building is halted awaiting installation of power so that the "finish work" can be done on the home such as installation of drywall and painting. If you need to reach me to discuss this matter further, you can reach me at my office at 606-598-2122 or on my cell phone at 606-599-5739.

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Sincerely,

A handwritten signature in black ink, appearing to read "Roy G. Collins". The signature is written in a cursive style with a large initial "R" and a long horizontal stroke at the end.

Roy G. Collins

RGC/mas

cc: Tom Gilworth  
JPEC