

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

GERALD E. BRIFFA)	
)	
COMPLAINANT)	CASE NO. 2008-00488
)	
V.)	
)	
BLUE GRASS ENERGY)	
COOPERATIVE CORPORATION,)	
INC.)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST DATA REQUEST
TO GERALD E. BRIFFA

Complainant, Gerald E. Briffa, pursuant to 807 KAR 5:001, is to file with the Commission the original and 5 copies of the following information, with a copy to all parties of record. The information requested herein is due within 21 days from the date of this request. 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. Mr. Briffa shall make timely amendment to any prior response if he 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 Mr. Briffa fails or refuses to furnish all or

part of the requested information, Mr. Briffa shall provide a written explanation of the specific grounds for his 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.

1. Provide the square footage of the residence at 4301 Ravens Crest Lane, Lexington, Kentucky 40515 (“the house”), including, if known, the square footage of liveable space.

2. What year was the house built?

3. Did Complainant purchase the house newly built or previously owned?

4. What year did Complainant purchase the house?

5. If the house was previously owned, how many prior owners has the house had?

6. When was each of the three heat pump systems at the house installed?

7. Does the house have a programmable thermostat to control the heating and air conditioning units?

8. What temperature settings do you normally maintain during the morning, daytime, evening, and night hours during the months of December, January, and February?


9. What temperature settings do you normally maintain during the morning, daytime, evening, and night hours during the months of March, April, and May?

10. What temperature settings do you normally maintain during the morning, daytime, evening, and night hours during the months of June, July, and August?

11. What temperature settings do you normally maintain during the morning, daytime, evening, and night hours during the months of September, October, and November?

12. On weekdays, are members of your household regularly at the house during daytime hours (8:00 a.m. to 5:00 p.m.)?

13. Refer to Exhibit B attached to Blue Grass Energy Cooperative Corporation's December 18, 2008 Answer. Does the May 8, 2008 letter from Joe Burgess concerning a home energy audit performed at the house refer to the same energy audit referenced in the February 6, 2009 Response to Motion to Dismiss ("Joe Burgess tested my house and found it to be energy efficient . . .")?



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

DATED: FEBRUARY 23, 2009

cc: Parties of Record

Case No. 2008-00488

Daniel W Brewer
President and CEO
Blue Grass Energy Cooperative Corp.
P. O. Box 990
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Gerald E Briffa
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