

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
BLUE GRASS ENERGY COOPERATIVE CORPORATION

Blue Grass Energy Cooperative Corporation ("Blue Grass Energy"), 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 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

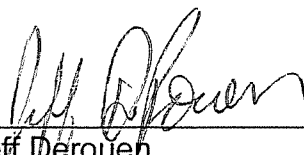
accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Blue Grass Energy 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 Blue Grass Energy fails or refuses to furnish all or part of the requested information, Blue Grass Energy 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 Blue Grass Energy's December 18, 2008 Answer, Exhibit D, pages 2, 4, 6 and 8 of 8. Are the automatic meter readings reflected in the "Usage vs. Temperature Analysis" results performed at the same time of day, each day of each month?

2. Provide all monthly electric usage data for the prior owner of Complainant's residence, if any, at 4301 Ravens Crest Lane, Lexington, Kentucky 40515 for the three years prior to Complainant's account being established at that address.



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

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