

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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|-------------------------|---|------------|
| ROY G. COLLINS |) | |
| |) | |
| COMPLAINANT |) | |
| V. |) | CASE NO. |
| |) | 2013-00052 |
| JACKSON PURCHASE ENERGY |) | |
| CORPORATION |) | |
| |) | |
| DEFENDANT |) | |

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

Jackson Purchase Energy Corporation ("JPEC"), pursuant to 807 KAR 5:001, 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 no later than 14 days from the date of issuance 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.

JPEC 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 JPEC fails or refuses to furnish all or part of the requested information, JPEC 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 Roy G. Collins's ("Complainant") complaint ("Complaint") filed January 30, 2013 with the Commission.

a. Did JPEC provide any temporary service while the second home/home office located at 1400 Carrsville Road near Hampton, Kentucky, ("subject property") was under construction?

b. Explain whether the subject property is a permanent structure that could be used as a residence.

c. Does the subject property have climate-control appliances for year-round climate control?

2. Refer to the fourth paragraph of the Complaint. Complainant states that he has an "existing structure, a mobile home located on the same property" as the subject property.

- a. Provide the tariff under which this mobile home is served.
3. Refer to Exhibit 3 of the Complaint. The December 14, 2012 letter from the Complainant's attorney to JPEC.
 - a. State and explain what actions JPEC took with respect to the Complainant's letter.
 - b. Provide copies of any correspondence or any other records JPEC provided to the Complainant as a result of the letter.
4. On page 3, in part 2(g) of its Answer, JPEC admits that the subject property "is not ['Mr. Collins'] primary residence and is his second home."
 - a. Does JPEC presently provide service to any other premises which contain structures identified as a second home?
 - b. If so, does JPEC also classify those homes as non-permanent premises and consider their service to be temporary in accordance with its filed tariff?
5. On page 4, in part 3(c) of its Answer, JPEC claims that construction of the new line was completed and the meter was set on the subject property on January 15, 2013. Provide any and all records to indicate the amount of consumption, to date, at Mr. Collins' premises since the installation of the meter on January 15, 2013.
6. Provide any billing records for the subject property. For the duration of this case, supplement this information as subsequent bills are issued.
7. Provide the tariff under which the subject property is served.
8. How many electric meters serve the subject property? For each meter, describe the type of electrical service provided and the tariff under which the meter is billed.

9. Explain whether JPEC is aware of any other hunting lodges in its service territory that are constructed similarly to the subject property. If so, under what tariff are these served, and what is the average monthly usage of these hunting lodges?

10. If the subject property is served under a residential tariff, state whether the Complaint would receive a portion of the invoiced costs of \$6,065.94 back from JPEC based on paragraph 33, Distribution Line Extension of the Rules and Regulations.

11. Refer to Sections 32 and 33 of the tariff contained in Exhibit B of the Answer of JPEC to the Complaint.

a. Identify generally the procedures and/or criteria utilized by JPEC to determine whether a premise is temporary or permanent in nature.

b. Identify specifically the criteria JPEC used in this case to determine the Complainant's premise was temporary rather than permanent in nature.

c. State the time when a decision is made to classify a premise as temporary rather than permanent.

d. Identify and explain the differences, if any, in the assets deployed to serve temporary and permanent premises.

e. Identify the length of the extension necessary to serve the premises of the Complainant.

f. Explain whether JPEC has procedures in place to verify that a customer has been placed on the correct tariff at the time the installation of an extension is completed.

g. Has JPEC ever changed the classification of a premises under its tariff from temporary to permanent as a result of an inspection of the premises? If so, provide the criteria for making such a change.

h. Assuming the subject property had been determined by JPEC to qualify as a permanent residence under Section 33 of the tariff, identify the assets and associated cost that would have been attributable to JPEC and those attributable to the Complainant.

12. In its response, JPEC asserts that the estimated cost of the proposed construction charged to the subject property was determined in accordance with Section 4, Rules and Regulations, Item 32, titled "Temporary Service," of JPEC's tariff currently on file with the Commission. Specifically, JPEC cites Item 32, with the heading "New Service to Barns, Camps, Pumps and Miscellaneous Service Not Considered Permanent Premises," as the portion of its tariff applicable to the service requested by Mr. Collins.

a. JPEC's Answer specifically references sections A and B of Item 32 in their tariff. Does JPEC believe those to be the applicable sections, or should the reference be to sections A and C of Item 32 instead?

b. Provide some examples of premises currently served by JPEC which are classified by the utility as non-permanent.

13. In the Complaint and in his letter to JPEC dated December 14, 2012, contained in Exhibit 3 to the Complaint, Complainant explains that the subject property 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." Section 4, Rules and

Regulations, Item 32, part A, of JPEC's tariff, as cited in its Answer, states the following:
"This rule shall apply to services where the amount of consumption and/or the permanency of service cannot be reasonably assured as determined by JPEC."

a. What does JPEC define as a reasonable amount of consumption required to classify a service as permanent?

b. Given the dimensions of the subject property as claimed by Complainant, does JPEC believe the amount of consumption needed to climate control the building would be sufficient to re-classify the subject property as permanent?

14. Provide any and all documents on file with JPEC related to Complainant's application for electric service as detailed in Section 4, Rules and Regulations, Item 7 of JPEC's tariff. In addition, provide all correspondence, as well as all design, engineering and work plan documents, related to the service requested and the construction of the new line.



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DATED MAR 13 2013

cc: Parties of Record

Case No. 2013-00052

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