

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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MAY 29 2014
PUBLIC SERVICE
COMMISSION

In the Matter of:

MR. BILL'S GROCERY
COMPLAINANT

V.

JACKSON ENERGY COOPERATIVE
CORPORATION
DEFENDANT

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CASE NO: 2014-00194

FORMAL COMPLAINT

Comes the Complainant, Bill's Grocery (hereinafter referred to as "Mr. Bill's Grocery" or "Complainant"), by and through counsel, and for its Formal Complaint against the Defendant, Jackson Energy Cooperative Corporation, states as follows:

1. That the Complainant, Mr. Bill's Grocery, is a domestic corporation, licensed to do business in the state of Kentucky with the mailing address of P.O. Box 812, McKee, Kentucky 40447. That Mr. Bill's Grocery Store sells perishable items, canned goods, meats, fish and poultry, household goods and firearms;

2. That the Defendant, Jackson Energy Cooperative Corporation (hereinafter referred to as "Jackson Energy"), is a licensed domestic corporation in the state of Kentucky and is a provider of electricity to Jackson County and to the Complainant. That a copy of the Formal Complaint has been sent to the Hon. Clayton Oswald, Attorney At Law, P.O. Box 3440,

London, Ky 40741;

3. That the Complainant has been a customer of Jackson Energy for 22 years.

4. That on the 21st day of August, 2013, the Complainant received a bill from Jackson Energy stating that there has been an equipment malfunction at Mr. Bill's Grocery Store and that Jackson Energy had not properly billed the Complainant for the amount of electricity being used by the store for a period of over two years. That Jackson Energy advised the Complainant that they believed that, with no fault of his own and because of an Jackson Energy equipment malfunction the Complainant now owes a bill for approximately \$4,779.94 for electricity allegedly used by the Complainant which had not been properly billed or calculated by Jackson Energy. That the Defendant, advised the Complainant that if he did not pay the past due amount bill its electricity would be suspended;

5. That the Complainant advised the Defendant that he did no believe that Jackson Energy's calculation was accurate. That the Complainant did not owe for past electricity but in fact due, to certain unrelated damage to the store, past and current electrical usage was less that in previous years;

6. That the Complainant has requested the Defendant to explain how it calculated the past due amount that it believed the Complainant now owes from the improper calculation of electricity usage from its defective equipment and offer proof of an accurate re-calculation of electric usage. The Defendant continues to advise the Complainant that if the past due amount is not paid that its electrical service will be suspended. That the Complainant has been forced to pay \$99.58 a month in addition to its regular monthly bill to prevent termination and suspension of its electrical service;

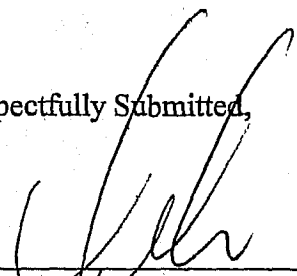
7. That the Complainant request a formal hearing before the Public Utility Commission

so as to resolve this matter. That such dispute of the alleged past electricity bill and increased additional payment of \$99.58 per month has caused emotional distress, humiliation and damage to the Complainant's good name and reputation.

WHEREFORE, the Complainant respectfully demands as follows:

1. An immediate formal hearing.

Respectfully Submitted,



Hon. Bill Meader
P.O. Box 1038
Booneville, Kentucky 41314
PH: (606)593-5054
Fax:(606) 593-5044
Email: meader_law@hotmail.com



JACKSON ENERGY COOPERATIVE

115 Jackson Energy Lane
McKee, Kentucky 40447
Telephone (606) 364-1000 • Fax (606) 364-1007

August 21, 2013

Billy Flannery
Mr. Bill's Gas and Grocery
PO Box 812
McKee, KY 40447

Subject: Defective metering installation

Mr. Flannery:

Last month a field test of the metering installation serving your business revealed a defective current transformer which has been subsequently replaced and your electric account has just billed using a full month of recorded kilowatt hours with the new current transformer (C.T.) in place. You will note a substantial increase in this August bill compared to previous months bills reflecting the fact of under billing of consumption at your business location dating back to June 2010. Unfortunately we are obligated by the Kentucky Public Service Commission to recover under billed kilowatt (kwh) consumption upon discovery. Such bill back is limited to 24 months while it appears that the C.T. has been defective for approximately 36 months. We have calculated the under billed kwh consumption to be 38% resulting in a total bill back amount of \$4,779.94 covering a period of 24 months.

We understand that this will no doubt add an unexpected financial obligation to your business operations and we will gladly work with you to arrive at a mutually acceptable repayment plan. Presently we have set-up the bill back to occur as an addition to your monthly electric bill in the amount of \$199.16 for a period of 24 months beginning with your regular September electric bill.

We sincerely regret this metering/billing error. I am sure you will want to discuss this issue in greater depth so do not hesitate to contact me at your convenience.

Respectfully,

Larry Lakes

Vice President of Consumer Services

Hon. Bill Meader
P.O. Box 1038
Booneville, KENTUCKY 41314

Carol Wright
President & CEO
Jackson Energy Cooperative Corporation
115 Jackson Energy Lane
McKee, KY 40447