

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S SECOND 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 the response to Item 1.b. and c. of Staff's First Request for Information ("Staff's First Request"). Has JPEC done any further research or inquiries to determine if the subject premises is classified under the appropriate tariff?

2. Refer to the response to Item 9 of Staff's First Request. In Exhibit G of the JPEC's Response, under the column entitled "Billing Rate," some of the customers are listed as "R" whereas some are listed as "C1." Explain the criteria JPEC utilizes to determine which customers are subject to each classification.

3. Refer to the response to Item 6 of Staff's First Request. Provide an update to the response for the most recent billing period, "February 25 to March 25,

2013.” For the duration of this case, supplement this information as subsequent bills are issued.

4. Refer to the response to Item 8 of Staff’s First Request and also refer to Commission Staff’s First Request for Information to Roy G. Collins, Item 7.

a. Explain whether JPEC can confirm that Mr. Collins has three-phase electrical service to his garage.


b. Provide a description and type of meter located at the service address of 1400 Carrsville Road.

5. Refer to the response to Item 14 of Staff’s First Request. On the first page of Exhibit I of JPEC’s response there is a note stating, “Said this is a Residential not going to be Hunting Lodge Roy has already talked to Kelly N. Will price of const. Cost change? Do we cha C1 to R?”

a. Identify the person who wrote the language on the document.

b. Identify the date the language was written on the document.

c. Identify what steps, if any, JPEC took in response to the language on the document.



Jeff Denouen
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DATED APR 23 2013

cc: Parties of Record

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