

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
MAY 06 2013
PUBLIC SERVICE
COMMISSION

In the Matter of:

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

**JACKSON PURCHASE ENERGY CORPORATION'S
RESPONSE TO COMMISSION STAFF'S SECOND REQUEST
FOR INFORMATION DATED APRIL 23, 2013**

COMES Jackson Purchase Energy Corporation (hereinafter "JPEC") through the undersigned counsel, and submits herein its responses to information requested in Commission Staff's Second Request for Information to the Commission's date April 23, 2013.

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?

Response: Classification of a property during construction is, out of necessity, done on a prospective basis. There is no means for JPEC to ascertain the intended use of a property aside from the statements made by a member. In this instance, JPEC relied upon, and continues to rely upon, statements made by Mr. Collins that the subject property will only be occupied in less than full-time capacity. Observation of the property during the course of this inquiry, and Mr. Collins' own statements in his response to the Staff's data request, confirm that the building is used as a part-time residence rather than a permanent, full-time residence. Mr. Collins decision to change his initial description of the property does

not change the premises to a permanent residence. Accordingly, JPEC maintains that its initial classification was the correct one.

Witness: Charles Williamson, Vice President Finance & Accounting

2. Refer to the response to Item 9 of Staff's First Request. In Exhibit G of 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.

Response: Generally speaking, these properties were classified for tariff when the account was opened based on the member's representation. Please see JPEC's answer to Item number 9 in JPEC's First Response to the Commission Staff's First Request for Information dated March 13, 2013 for a complete explanation. The list referred to in this question was generated during remarks recorded by contracted meter readers. The classifications were not changed according to the description given by the contracted meter readers because there is no standard definition available which was applied to the meter readers' assessments. JPEC has no means at its disposal to do so because observations of the property are not, when taken alone, sufficient to determine how a property is being used. In a situation like Mr. Collins', JPEC must often rely on how the member describes the intended and actual use of the property. In this instance, Mr. Collins indicated this would be a hunting lodge and would not be used as a permanent residence. Based on his own representations in his response to the Staff's data request, Mr. Collins use of the premises appears to be consistent with his initial description to JPEC personnel. As such, JPEC maintains that the initial classification of the property was correct.

Witness: Charles Williamson, Vice President Finance & Accounting

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.

Response: Supplemental bills for the billing periods of February 25 to March 25, 2013 and March 25 to April 25, 2013 for both the subject property and the mobile home on Hill Grove Road are

attached hereto and incorporated herein by reference as Exhibit "A" and "B", respectively. Future bills will be provided to the Commission upon issuance of the same.

Witness: Scott W. Ribble, Vice President of Engineering & Operations

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.

Response: JPEC installed a single phase service only to the subject premises.

Witness: Scott W. Ribble, Vice President of Engineering & Operations

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

Response: The meter installed is an ITRON form 2S single phase meter.

Witness: Scott W. Ribble, Vice President of Engineering & Operations

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.

Response: Karen Karnes, a JPEC Customer Service Representative, wrote the note in question. This was further documented in a typewritten note which was attached to JPEC's previously provided data request response. For convenience a copy of the typewritten note is attached hereto and incorporated herein by reference as Exhibit "C".

Witness: Charles Williamson, Vice President Finance & Accounting

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

Response: JPEC believes both notes were made in response to a phone call received from Mr. Collins on November 29, 2012.

Witness: Charles Williamson, Vice President Finance & Accounting

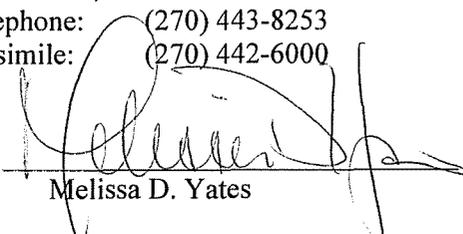
c. Identify what steps, if any, JPEC took in response to the language on the document.

Response: As background, that note was written to document statements made by Mr. Collins to Ms. Karnes. Mr. Collins told Ms. Karnes that he had spoken to Kelly Nuckols and told him that the building was a residence now instead of a hunting lodge. Mr. Collins then claimed that Mr. Nuckols told him that the rate would be different if the premises is a residence. Mr. Collins explained that it was now going to be a residence, not a hunting lodge because they are building an 1800 square foot living space. Ms. Karnes told Mr. Collins she would verify what he had explained to her and that a determination would have to be made as to whether that would change the construction cost. She informed him that she would speak to Mr. Dillworth, a JPEC staker, and call him back. When Ms. Karnes spoke to Tom Dillworth, she learned there was a dispute over what the proper classification of the property was. Mr. Dillworth suggested that Ms. Karnes talk with Craig Gerke, a JPEC engineer. Ms. Karnes was unable to reach Mr. Gerke that day. Therefore, in an effort to keep Mr. Collins informed, she called Mr. Collins to let him know that she had not spoken to Mr. Gerke about the classification but that Mr. Gerke would call him regarding this matter. Finally, a review of all information and a discussion between staff and Mr. Nuckols about his call with Mr. Collins, confirmed that the property was not a full-time residence and could not qualify to receive service under the "R" tariff. Craig Gerke spoke to Mr. Collins and informed him that the classification of the property would not change and that he would be responsible for the contribution in aid of construction consistent with JPEC's tariffs.

Witness: Charles Williamson, Vice President Finance & Accounting

Respectfully submitted,

DENTON & KEULER
P.O. BOX 929
PADUCAH, KY 42002-0929
Telephone: (270) 443-8253
Facsimile: (270) 442-6000

By: 
Melissa D. Yates

ATTORNEY FOR JPEC

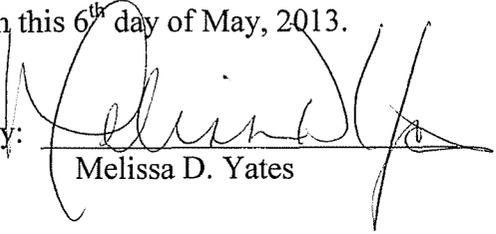
I hereby certify that the foregoing has
been served by hand delivering a true and
correct copy to:

MR JEFF DEROUEN
KENTUCKY PUBLIC SERVICE COMMISSION
211 SOWER BLVD
FRANKFORT KY 40602

And by delivering a copy via U.S. Mail to:

MR ROY G COLLINS
109 DICKENSON STREET
MANCHESTER KY 40962
Via U. S. Postal

on this 6th day of May, 2013.

By: 
Melissa D. Yates

VERIFICATION

The undersigned, **SCOTT RIBBLE**, states under oath that he is the Vice President of Engineering & Operations of Jackson Purchase Energy Corporation and that the information set forth in Jackson Purchase Energy Corporation's Response to the information requested in the Commission Staff's Second Request for Information dated April 23, 2013, is true and correct to the best of his information and belief.

Scott Ribble

Scott Ribble,
Vice President Engineering & Operations
Jackson Purchase Energy Corporation

STATE OF KENTUCKY

COUNTY OF MCCRACKEN

The foregoing was signed, acknowledged, and sworn to before me by Scott Ribble this 2nd day of May, 2013.

My commission expires: 12-22-15

Notary ID: 457050

Vanessa Blagg

Notary Public, State of Kentucky at Large



(seal)

VERIFICATION

The undersigned, **CHARLES WILLIAMSON**, states under oath that he is the Vice President of Jackson Purchase Energy Corporation and that the information set forth in Jackson Purchase Energy Corporation's Response to the information requested in the Commission Staff's Second Request for Information dated April 23, 2013, is true and correct to the best of his information and belief.



Charles Williamson,
Vice President Finance and Accounting
Jackson Purchase Energy Corporation

STATE OF KENTUCKY

COUNTY OF MCCRACKEN

The foregoing was signed, acknowledged, and sworn to before me by Charles Williamson this 2nd day of May, 2013.

My commission expires: 12-22-15

Notary ID: 457050



(seal)

Vanessa Blagg
Notary Public, State of Kentucky at Large

EXHIBIT

A



Jackson Purchase Energy Corporation
 P.O. Box 4030 2900 Irvin Cobb Drive
 Paducah, KY 42002-4030
 270-442-7321 800-633-4044

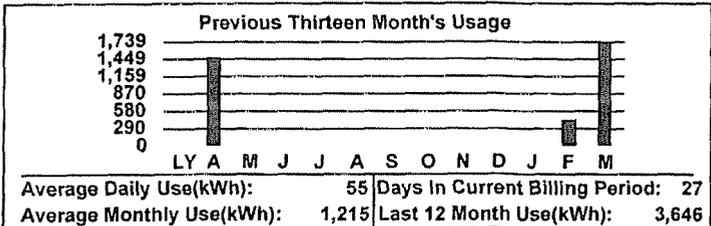
Your Touchstone Energy® Partner
 The power of human connections

Visit Our Web Site www.JPEnergy.com



Your Account Information At A Glance		
Account Number: 1- [REDACTED]	Meter #: [REDACTED]	Account Type: SMALL COMMERCIAL (SCH-C1)
Customer Name: ROY G COLLINS	Current Reading (03/24) 20973	
Service Address: HUNTING LODGE 1400 CARRSVILLE RD HAMPTON KY	Previous Reading (02/25) 19500 1,473	
Primary Phone: [REDACTED]	Meter Multiplier x 1	
Secondary Phone: [REDACTED]	Meter kWh Usage: 1,473	

Your Account Information In Detail	
Previous Month's Balance	\$147.51
Payment / Thank You 03/07/13	(147.51) CR
Balance After Payment	0.00
REVENUE RECOVERY per PSC Case No. 2011 - 00057	2.12
Facilities Charge	10.53
kWh Charge 1,473 x 0.077791 =	114.60
Fuel Adjustment Clause (FAC) .002016	2.97
Environmental Surcharge Rate (ES) .002310	3.40
Unwind Surcredit Adjustment Clause (USAC) (.002724)	(4.01) CR
Rebate Adjustment (RA) (.000000)	(.00) CR
Member Rate Stability Mechanism (MRSM) (.005274)	(7.77) CR
Rural Economic Reserve (RER) (.000000)	(.00) CR
Non-Smelter Non-Fac Purchase Power Adjustment (PPA) (.001189)	(1.75) CR
Subtotal of Unwind Transactions	(7.16) CR
3% School Tax	3.60
6% Kentucky Sales Tax	7.42
Total Amount Due By 04/18/13	\$131.11
Total Amount Due After 04/18/13	\$137.11



Important Information

JPEC is offering a HVAC Tune-Up incentive for residential members, \$25 per unit (max of 3 per account). Contact any CSR for info or go to www.JPEnergy.com

www.JPEnergy.com

Keep UPPER PORTION for your records.
 Please return LOWER PORTION with your payment.

Check Cash

Jackson Purchase Energy Corporation
 P.O. Box 4030 2900 Irvin Cobb Drive
 Paducah, KY 42002-4030
 270-442-7321 800-633-4044

Account Number:	[REDACTED]
Payment Due Date:	04/18/13
Previous Balance:	\$0.00
Amount Due By 04/18/13	\$131.11
Amount Due After 04/18/13	\$137.11

If Your Account Information Is Incorrect
 Please Check Here And Complete The Reverse Side

0000002620

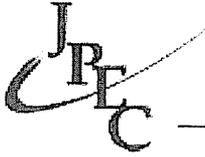
ROY G COLLINS
 109 DICKENSON ST
 MANCHESTER KY 40962



Jackson Purchase Energy Corporation
 P.O. Box 4030
 Paducah, KY 42002-4030

EXHIBIT A

[REDACTED] 0013111 0013711



Jackson Purchase Energy Corporation

P.O. Box 4030 2900 Irvin Cobb Drive
Paducah, KY 42002-4030
270-442-7321 800-633-4044

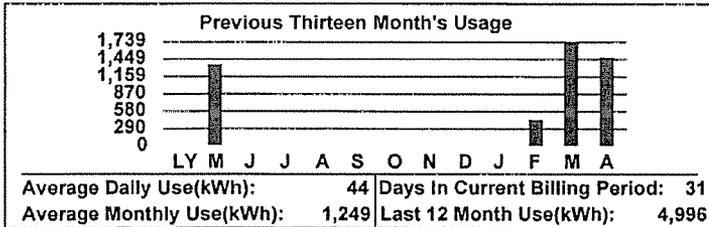


Your Purchase Energy Partner
The power of human connections

Visit Our Web Site www.JPEnergy.com

Your Account Information At A Glance		
Account Number: [REDACTED]	Meter #: [REDACTED]	Account Type: SMALL COMMERCIAL (SCH-C1)
Customer Name: ROY G COLLINS	Current Reading (04/24) 22323	
Service Address: HUNTING LODGE 1400 CARRSVILLE RD HAMPTON KY	Previous Reading (03/24) 20973 1,350	
Primary Phone: [REDACTED]	Meter Multiplier x 1	
Secondary Phone: [REDACTED]	Meter kWh Usage: 1,350	

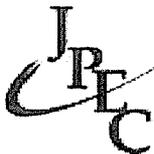
Your Account Information In Detail	
Previous Month's Balance	\$131.11
Payment / Thank You 04/08/13	(131.11) CR
Balance After Payment	0.00
REVENUE RECOVERY per PSC Case No. 2011-000057 @ 0.0014369	1.94
Facilities Charge	10.53
kWh Charge 1,350 x 0.077791 =	105.03
Fuel Adjustment Clause (FAC) .002259	3.05
Environmental Surcharge Rate (ES) .002084	2.81
Unwind Surcredit Adjustment Clause (USAC) (.001876)	(2.53) CR
Rebate Adjustment (RA) (.000000)	(.00) CR
Member Rate Stability Mechanism (MRSM) (.005343)	(7.21) CR
Rural Economic Reserve (RER) (.000000)	(.00) CR
Non-Smelter Non-Fac Purchase Power Adjustment (PPA) (.000929)	(1.25) CR
Subtotal of Unwind Transactions	(5.13) CR
3% School Tax	3.37
6% Kentucky Sales Tax	6.94
Total Amount Due By 05/18/13	\$122.68
Total Amount Due After 05/18/13	\$128.30



Important Information
Make plans to attend the JPEC Annual Meeting on June 13, 2013. Doors will open at 4:30 PM.
www.JPEnergy.com

Keep UPPER PORTION for your records.
Please return LOWER PORTION with your payment.

Check Cash



Jackson Purchase Energy Corporation
P.O. Box 4030 2900 Irvin Cobb Drive
Paducah, KY 42002-4030
270-442-7321 800-633-4044

Account Number:	[REDACTED]
Payment Due Date:	05/18/13
Previous Balance:	\$0.00
Amount Due By 05/18/13	\$122.68
Amount Due After 05/18/13	\$128.30

If Your Account Information Is Incorrect
Please Check Here And Complete The Reverse Side

0000002620

ROY G COLLINS
109 DICKENSON ST
MANCHESTER KY 40962

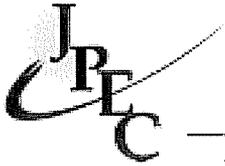


Jackson Purchase Energy Corporation
P.O. Box 4030
Paducah, KY 42002-4030

[REDACTED] 0012268 0012830

EXHIBIT

B

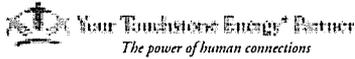


Jackson Purchase Energy Corporation

P.O. Box 4030 2900 Irvin Cobb Drive

Paducah, KY 42002-4030

270-442-7321 800-633-4044



Visit Our Web Site www.JPEnergy.com

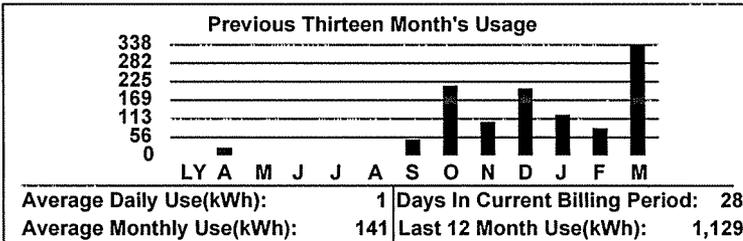


Your Account Information At A Glance

Account Number: [REDACTED]	Meter #: [REDACTED]	Account Type: RESIDENTIAL
Customer Name: ROY G COLLINS	Current Reading (03/25) 8944	(SCH-R)
Service Address: HILL GROVE RD HAMPTON KY	Previous Reading (02/25) <u>8921</u>	
		23
Primary Phone: [REDACTED]	Meter Multiplier x <u>1</u>	
Secondary Phone: [REDACTED]	Meter kWh Usage: 23	

Your Account Information In Detail

Previous Month's Balance	\$34.33
Payment / Thank You 03/07/13	<u>(34.33) CR</u>
Balance After Payment	0.00
REVENUE RECOVERY per PSC Case No. 2011 - 00057	0.03
Facilities Charge	9.48
kWh Charge 23 x 0.076728 =	1.76
Fuel Adjustment Clause (FAC) .002016	.05
Environmental Surcharge Rate (ES) .002310	.05
Unwind Surcredit Adjustment Clause (USAC) (.002724)	(.06) CR
Rebate Adjustment (RA) (.000000)	(.00) CR
Member Rate Stability Mechanism (MRSM) (.005274)	(.12) CR
Rural Economic Reserve (RER) (.000000)	(.00) CR
Non-Smelter Non-Fac Purchase Power Adjustment (PPA) (.001189)	(.03) CR
Subtotal of Unwind Transactions	(0.11) CR
3% School Tax	<u>0.33</u>
Total Amount Due By 04/18/13	<u>\$11.49</u>
Total Amount Due After 04/18/13	<u>\$12.05</u>



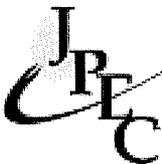
Important Information

JPEC is offering a HVAC Tune-Up incentive for residential members, \$25 per unit (max of 3 per account). Contact any CSR for info or go to www.JPEnergy.com

www.JPEnergy.com

Keep UPPER PORTION for your records.
 Please return LOWER PORTION with your payment.

Check Cash



Jackson Purchase Energy Corporation

P.O. Box 4030 2900 Irvin Cobb Drive

Paducah, KY 42002-4030

270-442-7321 800-633-4044

Account Number:	[REDACTED]
Payment Due Date:	04/18/13
Previous Balance:	\$0.00
Amount Due By 04/18/13	\$11.49
Amount Due After 04/18/13	\$12.05

If Your Account Information Is Incorrect
 Please Check Here And Complete The Reverse Side

0000002170



Jackson Purchase Energy Corporation

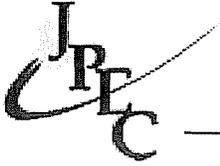
P.O. Box 4030

Paducah, KY 42002-4030

ROY G COLLINS
 109 DICKENSON ST
 MANCHESTER KY 40962

EXHIBIT B

[REDACTED] 0001149 0001205



Jackson Purchase Energy Corporation

P.O. Box 4030 2900 Irvin Cobb Drive
Paducah, KY 42002-4030
270-442-7321 800-633-4044

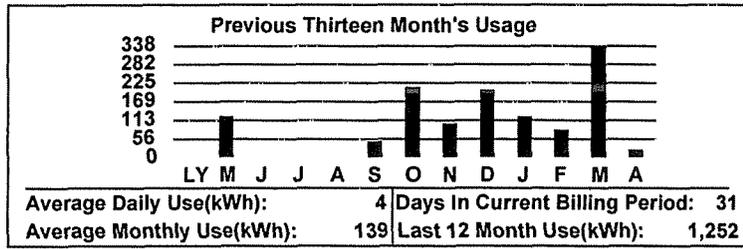


Your Touchstone Energy Partner
The power of human connections

Visit Our Web Site www.JPEnergy.com

Your Account Information At A Glance		
Account Number: [REDACTED]	Meter #: [REDACTED]	Account Type: RESIDENTIAL (SCH-R)
Customer Name: ROY G COLLINS	Current Reading (04/25) 9067	
Service Address: HILL GROVE RD HAMPTON KY	Previous Reading (03/25) 8944	
		123
Primary Phone: [REDACTED]	Meter Multiplier x 1	
Secondary Phone: [REDACTED]	Meter kWh Usage: 123	

Your Account Information In Detail	
Previous Month's Balance	\$11.49
Payment / Thank You 04/08/13	(11.49) CR
Balance After Payment	0.00
REVENUE RECOVERY per PSC Case No. 2011-000057 @ 0.0014369	0.18
Facilities Charge	9.48
kWh Charge 123 x 0.076728 =	9.44
Fuel Adjustment Clause (FAC) .002259	.28
Environmental Surcharge Rate (ES) .002084	.26
Unwind Surcredit Adjustment Clause (USAC) (.001876)	(.23) CR
Rebate Adjustment (RA) (.000000)	(.00) CR
Member Rate Stability Mechanism (MRS) (.005343)	(.66) CR
Rural Economic Reserve (RER) (.000000)	(.00) CR
Non-Smelter Non-Fac Purchase Power Adjustment (PPA) (.000929)	(.11) CR
Subtotal of Unwind Transactions	(0.46) CR
3% School Tax	0.56
Total Amount Due By 05/18/13	\$19.20
Total Amount Due After 05/18/13	\$20.13



Important Information
Make plans to attend the JPEC Annual Meeting on June 13, 2013. Doors will open at 4:30 PM.
www.JPEnergy.com

Keep UPPER PORTION for your records.
Please return LOWER PORTION with your payment.



Check Cash



Jackson Purchase Energy Corporation
P.O. Box 4030 2900 Irvin Cobb Drive
Paducah, KY 42002-4030
270-442-7321 800-633-4044

Account Number:	[REDACTED]
Payment Due Date:	05/18/13
Previous Balance:	\$0.00
Amount Due By 05/18/13	\$19.20
Amount Due After 05/18/13	\$20.13

If Your Account Information Is Incorrect
Please Check Here And Complete The Reverse Side

000002170

ROY G COLLINS
109 DICKENSON ST
MANCHESTER KY 40962



Jackson Purchase Energy Corporation
P.O. Box 4030
Paducah, KY 42002-4030

EXHIBIT

C

ID-JBL009

11/29/12 USER: KAREN

JACKSON PURCHASE E.C.
JOB ORDER 12-0016498

11:36:14

KEYED BY: ANGIE CHITTENDEN

REQUESTED BY: ROY COLLINS

DATE KEYED: 8/08/12

DESIRED PRINT DATE: 8/09/12

TIME KEYED: 8:42:37

* REPRINT *

CREW NUMBER: _____

ASSOCIATED WITH SERVICE ORDER: 12-0016496

NEW SERVICE
SERVICEMAN READ

CC#: 2023562
0 00 0
COLLINS/ROY G

1400 CARRSVILLE RD
HAMPTON KY 42047-0000

PHONE: 606 596-0908 HOME
COUNTY:
DESIRED COMPLETION DATE: 8/09/12

- Contractor

FIELD REP-CALL TONY 859-533-1714 ABOUT
EITHER OH OR URD SERV FOR A HUNTING LODGE
CLOSE TO 5-44-1-WILL HAVE LIVING QTRS

SUBSTATION:
FEEDER:

MAILING ADDRESS

109 DICKENSON ST
MANCHESTER KY 40962-0000

NEW SERVICE

NOTES.....

CONSTRUCTION COMP BY _____ DATE _____

Budget Code: _____

TEMP INSP# _____ DATE _____

Work Order No: _____

TEMP METER# _____ READ _____

Budget Code: _____

TEMP METER SET BY _____ DATE _____

Work Order No: _____

DEMAND? __, PH? __, MULT BY? __, KVA SIZE? _____

PERM INSP# _____ DATE _____

TEMP METER LAST READ _____ DATE _____

PERM METER# _____ READ _____

PERM METER SET BY _____ DATE _____

CO/SCH_LS# _____ POLE# _____ URD? __ DIR__

***** RETURN TO STAKER? Y OR N *****

TAILGATE DISCUSSION

Crew Leader: _____ Unit#: _____

No. Of Crew Members: _____ Date: _____

Names: _____

Comments

Unusual Conditions: _____

Existing Hazards: _____

Work Procedures: _____

Energy Source Controls: _____

Traffic Control: _____

Rescue: _____

*Roy-
606.599.5739*

*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 chg E1 to R?*

3/14/13

Service Order Notepad 12-0016496

14:41:00
JBL191FM

07- 11/29/12 ROY COLLINS CALLED TO LET US KNOW THAT HE HAS CHANGED HIS MIND
ABOUT THIS BEING A HUNTING LODGE IT'S GOING TO BE A RESIDENTIAL HOUSE
WANTED TO KNOW IF THE CONST COST WILL CHANGE TALKED TO TOM AND HE SAID TO
TALK TO CRAIG ABOUT IT- CAUSE THIS HAS BEEN SOMETHING THAT HAS BEEN UP IN
THE AIR ABOUT WHAT IS ACTUALLY GOING ON AT THIS LOCATION- ROY SAID HE HAD
ALREADY BEEN TALKING TO KELLY NUCKOLS ABOUT IT

30-TONY BROWN-BUILDER CALLED TO SEE WHEN SVC WILL BE CONN SAID MR COLLINS
MAILED CK FOR CONST COST LAST THURS-PER L REED HAS NOT BEEN REC'D YET JOB
ORDER SHOWS STILL WITH STAKER MR BROWN WILL CALL BACK WED/12/19 TO SEE IF
CK REC'D & WHEN WILL BE CONNECTED S HALL 12/17/12

+