

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2013-00052

RECEIVED  
NOV 12 2013  
PUBLIC SERVICE  
COMMISSION

In the Matter of:

ROY G. COLLINS,

COMPLAINANT

V.

JACKSON PURCHASE ENERGY CORPORATION, DEFENDANT

**COMPLAINANT'S RESPONSE TO FIRST SET OF REQUEST FOR INFORMATION**

Comes Roy G. Collins and for his response to first request for information by Jackson Purchase Energy Corporation and states as follows:

1. When you initially contacted JPEC regarding service for the 1400 Carrsville Road (hereinafter the "subject premises"), did you indicate that this premises would be used as a full-time residence?

**RESPONSE: I do not recall an indication one way or the other.**

2. When you initially contacted JPEC for service, did you indicate that you would primarily utilize the subject premises as a place for you and friends to use when deer hunting?

**RESPONSE: I remember telling someone at JPEC that one of the uses for the residence would be a place for my friends and I to stay during deer season, but I do not recall indicating that this would be the "primary" purpose.**

3. During your initial contact with JPEC, did you indicate that you would be using the subject premises only about thirty (30) days per year?

**RESPONSE: I do not recall mentioning 30 days as a specific number, but that would have been consistent with the prior use of the Hill Grove Road address.**

4. Do you receive any monthly statements for other utilities to the subject premises at the 1400 Carrsville Road address or do you have them forwarded to your address in Manchester, Kentucky?

**RESPONSE: All of my mail is received at 109 Dickenson Street, Manchester, Kentucky, my office address. I do not have a mail receptacle either at the Carrsville Road property or at my other home that is located on 42 Bray Creek Road in Manchester, Kentucky.**

5. How many days this year have you and/or your family visited the subject premises?

**RESPONSE: 45 days.**

6. Do you consider the subject premises your home or primary residence?

**RESPONSE: My family and I consider this to be our home.**

7. Do you or any member of your family reside at the subject premises on a full-time basis?

**RESPONSE: No.**

8. Do you or any member of your family utilize the 1400 Carrsville Road address as their home address?

**RESPONSE: There is no mail receptacle at the Carrsville Road address. There was no mail receptacle at the Hill Grove Road address where our prior second residence was formerly located.**

9. Are you registered to vote? In what county are you registered to vote?

**RESPONSE: I am registered to vote in Clay County.**

10. Have you or any member of your immediate family ever been registered to vote in Livingston County? If so, please give their names and state whether they are currently registered to vote in Livingston County.

**RESPONSE:** Neither my wife nor I have ever been registered to vote in Livingston County. During the time we were billed at residential rates for the Hill Grove Road property, neither my wife nor I nor any member of my immediate family including my mother, father or grandparents were registered to vote in Livingston County.

11. What address is listed on your driver's license as your home address?

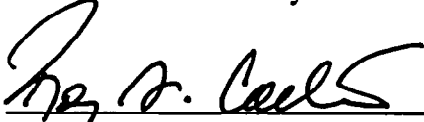
**RESPONSE:** The address on my driver's license is 109 Dickenson Street, Manchester, Kentucky 40962. This is my professional address. I spend more time at that address than any other.



ROY G. COLLINS  
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VERIFICATION

The foregoing answers are true and correct as I verily believe.

  
\_\_\_\_\_  
ROY G. COLLINS

COMMONWEALTH OF KENTUCKY

COUNTY OF Clay

Subscribed to and sworn before me by Roy G. Collins on this 5<sup>th</sup> day of  
Nov., 2013.

  
\_\_\_\_\_  
NOTARY PUBLIC, STATE AT LARGE

My Commission Expires:

12-29-15

CERTIFICATE

This is to certify that I have served a true and correct copy of the foregoing by mailing the same to the following:

Jeff Derouen  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602

Melissa D. Yates  
Denton & Keuler  
P.O. Box 929  
Paducah, KY 42002-0929

This 5<sup>th</sup> day of Nov., 2013.

  
\_\_\_\_\_  
ROY G. COLLINS