

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
MAY 8 - 2014
PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

ROY G. COLLINS

PSC CASE NO. 2013-00052

v.

JACKSON PURCHASE ENERGY CORPORATION

**JACKSON PURCHASE ENERGY CORPORATION'S RESPONSE
TO COMMISSION STAFF'S POST-HEARING DATA REQUESTS**

Jackson Purchase Energy Corporation ("JPEC") for its Response to Commission Staff's Post-Hearing Data Request states as follows:

1. Can JPEC please identify the witness for the response given to Question 14 of JPEC's Response to First Request for Information?

Response: Scott Ribble, Vice President of Engineering and Operations.

2. Does JPEC have a policy on the review of accounts which either drop or increase in usage?

Response: JPEC performs a number of checks in the preparation of each customer's bill. Section 39 of the tariffs details checks that were in place prior to the conversion by JPEC to a new billing system. Currently JPEC performs the following checks:

- 1. High/Low kWh variance to the period one year ago is reviewed. Any accounts with usage under 50% or over 150% of the year ago period are examined. (These parameters are sometimes temporarily "tightened" to generate more exceptions if they don't yield many exceptions.**
- 2. High/Low kWh variance to the trailing 3 month average is reviewed. Any accounts with usage under 50% or over 100% to the 3 month average are examined. (These parameters are sometimes temporarily "tightened" to generate more exceptions if they don't yield many exceptions.**

3. **Non-demand commercial accounts (C-1 and C-3) are reviewed for kW greater than 25.**
4. **Demand accounts are reviewed for those with usage over 50,000 kWh.**
5. **All demand accounts are reviewed for reasonableness against what JPEC knows about the business.**
6. **Demand accounts are reviewed for accounts with demand less than 25 kW over a 12 month period.**
7. **“High/low” reports are run for usage under and over an amount that is determined each month based on various subjective factors such as weather.**
8. **A missing read report is generated.**
9. **A report listing number of consecutive estimates is generated.**
10. **A report listing demand account without a demand reading is generated.**
11. **Services with meter changes during the month are reviewed.**
12. **Disconnected services during the month are reviewed.**
13. **New connects and reconnects are reviewed.**
14. **Accounts tagged as “Inactive” with usage are reviewed.**
15. **Active accounts with no usage are reviewed.**

JPEC continues to evaluate reporting available with its new billing system and is adding reports and modifying them as is prudent. JPEC has also purchased a Meter Data Management System (MDMS) that allows for accounts to be categorized into user defined classes that allows for improved error detection based on usage patterns each the particular class. At this time, JPEC has not fully installed that system, awaiting available manpower.

It should be noted that the Customer Service Department did detect the zero usage at Hill Grove Road property and investigated whether the mobile home had been removed. This information, like the many hundreds of exceptions they investigate, was not noted on the account however, or communicated to management.

Witness: Charles G. Williamson, III, Vice President of Finance and Accounting.

3. Please provide the exact cost on the overage for the extension of facilities to serve the property located at 1400 Carrsville Road?

Response: The total cost of the job was \$10,376.10. The overage was \$4,310.16.

Witness: Scott Ribble, Vice President of Engineering and Operations.

Respectfully Submitted,

Denton & Keuler, LLP
PO Box 929
Paducah KY 42002-0929
Phone: (270) 443-8253
Fax: (270) 442-6000

By: 

Melissa D. Yates

I hereby certify that the foregoing has been served a true and correct copy via Federal Express:

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

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

MR ROY G COLLINS
109 DICKENSON STREET
MANCHESTER KY 40962

on this 7th day of May, 2014.

By: 

Melissa D. Yates

VERIFICATION

I, Scott Ribble, verify, state, and affirm that I prepared or supervised the preparation of my responses to data requests filed with this Verification, and that data response is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Scott Ribble

Scott Ribble
Vice President of Engineering and Operations

COMMONWEALTH OF KENTUCKY)

COUNTY OF MCCRACKEN)



Subscribed, sworn to, and acknowledged to before me this 24 day of May, 2014, by Scott Ribble, Vice President of Engineering and Operations of Jackson Purchase Energy Corporation.

[Signature]


Notary Public, State at Large

My Commission Expires 3.28.2015

Notary ID 459947

VERIFICATION

I, Charles G. Williamson III, verify, state, and affirm that I prepared or supervised the preparation of my responses to data requests filed with this Verification, and that data response is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

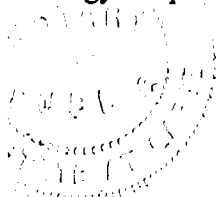


Charles G. Williamson III
Vice President of Finance and Accounting

COMMONWEALTH OF KENTUCKY)

COUNTY OF MCCRACKEN)

Subscribed, sworn to, and acknowledged to before me this 7th day of May, 2014, by Charles G. Williamson, III, Vice President of Finance and Accounting of Jackson Purchase Energy Corporation.



Sonja Collier #507484
Notary Public, State at Large

My Commission Expires 03/21/2018