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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

JUL 01 2014
PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

ROY G. COLLINS

PSC CASE NO. 2013-00052

v.

JACKSON PURCHASE ENERGY CORPORATION

**REPLY BRIEF OF JACKSON PURCHASE
ENERGY CORPORATION**

Comes Jackson Purchase Energy Corporation (hereinafter "JPEC"), by and through Counsel, and pursuant to the briefing schedule established at the close of the formal hearing in the above referenced case on April 28, 2014, hereby submits its reply brief.

In his brief, Mr. Collins erroneously states that JPEC once classified the service as temporary. However, as explained in detail in JPEC's response to question number ten to the Staff's First Data Request, there was a numbering error in JPEC's tariff which made it appear that the classification was under Section 32 of JPEC's Tariff which is entitled "Temporary Services". However, JPEC has never contended the service was a temporary one and has consistently applied the same section which is now correctly numbered as Section 33 "New Service to Barns, Camps, Pumps and Miscellaneous Services Not Considered Permanent Premises". Mr. Collins fails to recognize that a permanent premises, as explained repeatedly by JPEC, is one which is occupied as a primary residence. As explained by Mr. Nuckols, a temporary service under section 32 is one which is sometimes used during the construction

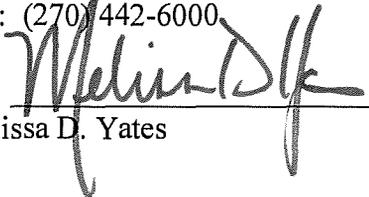
phase.¹ As further explained by Mr. Nuckols, Mr. Collins did not a temporary service during the construction phase.²

Finally, Mr. Collins stated in his brief that the property is classified as commercial. Because the premises is not Mr. Collins' primary residence it does not qualify for the residential rate. Therefore, pursuant to JPEC's tariffs, the premises has been placed on the C-1 rate for service rendered. However, it does not follow that JPEC believes he is running any type of business operation from the location.

WHEREFORE, Jackson Purchase Energy Corporation respectfully requests that this Commission enter an order determining that Jackson Purchase Energy Corporation as fair, just, and reasonable, and denying Mr. Collins' request for a refund.

Respectfully Submitted,

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By: 
Melissa D. Yates

1 Hearing testimony of Kelly Nuckols 4/28/ 2014 at 14:34:44

2 Hearing testimony of Kelly Nuckols 4/28/ 2014 at 14:36:18

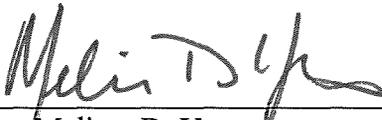
I hereby certify that 10 copies of the foregoing were filed with the Public Service Commission via Federal Express to:

JEFF DEROUEN EXEC DIR
PUBLIC SERVICE COMMISSION
211 SOWER BLVD
P O BOX 615
FRANKFORT KY 40601

True and correct copies of the foregoing have been mailed to:

MR ROY G COLLINS
109 DICKENSON STREET
MANCHESTER KY 40962

on this 30th day of June, 2014.

By: 

Melissa D. Yates