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MAY 16 2008

**PUBLIC SERVICE
COMMISSION**

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**APPLICATION OF BLUE GRASS ENERGY }
COOPERATIVE CORPORATION FOR AN }
ORDER INTERPERTING KRS 278.225 }**

CASE NO. 2008-00086

MOTION FOR RECONSIDERATION

Comes now Blue Grass Energy Cooperative Corporation (hereinafter called Blue Grass Energy) through counsel, and states as grounds for its Motion for Reconsideration:

1. Blue Grass Energy filed its Application in this case on March 10, 2008, alleging that interpretation of KRS 278.225 required that Blue Grass Energy bill its members for services within two (2) years of the providing of such services, and that Blue Grass Energy had a right, under the statute, to bill Ms. Davis for the differential between what was paid by her and by what should have been paid by her during the two (2) year window provided by the statute.

2. The member, Phyllis Davis, through counsel, Charles W. Kuster, Jr., filed a Response which was mailed to the Commission and to counsel for Blue Grass on March 20, 2008.

3. The Commission in its Order of April 14, 2008, as understood by counsel for the Applicant, ruled that it could not decide whether or not Ms. Davis owed for unbilled services due to its finding that a billing dispute is not ripe for decision by the Commission until such time as the bill is actually rendered and disputed by the customer.

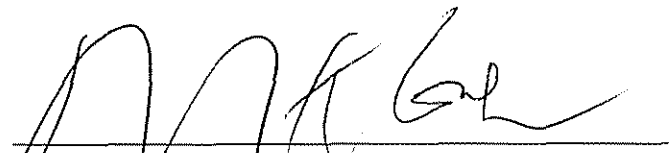
4. In fact, Blue Grass Energy has billed Ms. Davis for the differential, as reflected in copies

submitted herewith of bills for service marked Exhibits A, B and C, representing billing periods, cumulatively, from December 10, 2007 through March 10, 2008. As can be seen, the differential is shown on each of these bills. These bills also reflect payment by Ms. Davis for services current to the particular month billed, but no payment whatsoever on the differential. Therefore, bills have been rendered and disputed by Ms. Davis, which fact counsel for Blue Grass Energy should have emphasized in the original Petition.

Now therefore, Blue Grass Energy, through counsel, respectfully requests that the Commission reopen this case to consider the additional information submitted hereby by the Applicant. Counsel for Ms. Davis would of course have the right to respond.

Respectfully submitted by the Applicant, through counsel, on the 30th day of April, 2008.

BLUE GRASS ENERGY COOPERATIVE CORPORATION
BY: COMBS & HOFFMAN



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Versailles, Kentucky 40383
(858) 873-5427

Court4/BGE MotionforRecon Davis
CC: Charles W. Kuster, Jr.
#35438

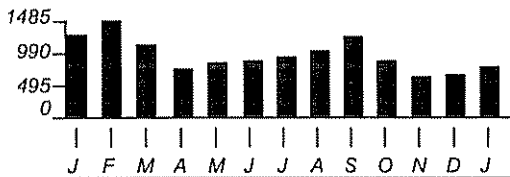


P.O. Box 990 1201 Lexington Road Nicholasville KY 40340-0990
 For Bill Questions Or Disputes Please Contact Your Local Office
 Nicholasville: (859) 885-4191
 Madison: (859) 623-1582
 Harrison: (859) 234-3131 or (800) 842-7481
 Fox Creek: (502) 839-3442 or (800) 372-7160
 Office Hours Monday-Friday 7:30 a.m. to 4:30 p.m.

ACCOUNT NUMBER		ACCOUNT NAME			RATE	TYPE	TELEPHONE	SERVICE ADDRESS		
1304412101		DAVIS PHYLLIS			13	0		P O BOX 123		
SERVICE FROM	SERVICE TO	PREVIOUS READING	PRESENT READING	NO. DAYS	BILL DATE	MULTI	METER NUMBER	KWH USAGE	CHARGES	
12/10/07	01/10/08	20188	20952	31	01/16/08	1	91154532	764	66 03	
0 000710		PER KWH FUEL ADJUSTMENT						837	0 59	
		ENVIRONMENTAL SURCHARGE 5.97%							4 54	
		1.175W MV						73	9 51	
		3% SCHOOL TAX							2 42	
		TOTAL CURRENT BILL DUE 02/03/08							83 09	
		PREVIOUS AMOUNT DUE							1870 18	
		THANK YOU FOR YOUR PAYMENT 01/04/08							-31 34	
		PREVIOUS UNPAID BALANCE							1838 84	
		TOTAL AMOUNT DUE							1921 93	
(PREVIOUS UNPAID BALANCE IS SUBJECT TO DISCONNECTION)										

COMPARISONS	DAYS SERVICE	TOTAL KWH	AVG KWH/DAY	COST PER DAY	TOTAL DUE NOW		\$
							1921 93
CURRENT BILLING PERIOD	31	764	24	2 14	DUE DATE	02/03/08	BILL IS DELINQUENT AFTER DUE DATE
PREVIOUS BILLING PERIOD	30	634	21	55.35	AFTER DUE DATE PAY		\$ 1925 96
SAME PERIOD LAST YEAR	29	1243	42	0.19			

Your Electricity Use Over The Last 13 Months



IMPORTANT NOTICE FOR THOSE WHO PAY THEIR BILLS WITH CREDIT CARDS. THE DESCRIPTION ON YOUR CREDIT CARD STATEMENT WILL SHOW PAYMENT WAS MADE TO SEDC INSTEAD OF BLUE GRASS ENERGY

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Alternate Payment Locations

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- Town Square Bank
- Madison--People's Bank & Trust
- Fayette--Central Bank & Trust
- Franklin--Farmers Bank & Capital Trust
- Woodford--United Bank & Trust
- Harrison--Kentucky Bank
- Bracken--First National Bank of Brooksville

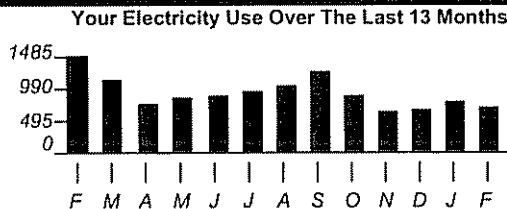
TO REPORT POWER OUTAGE CALL YOUR LOCAL OFFICE OR 1-800-655-4243	RATE SCHEDULE AVAILABLE UPON REQUEST	TYPE OF BILL	
		0 Regular Bill	1 Estimated
		2 Estimated	3 Minimum
		4 Final	5 Prorated
		6 Prorated Min	7 Levelized



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ACCOUNT NUMBER		ACCOUNT NAME				RATE	TYPE	TELEPHONE	SERVICE ADDRESS		
1304412101		DAVIS PHYLLIS				13	0	(859) 235-9158	P O BOX 123		
SERVICE FROM	SERVICE TO	PREVIOUS READING	PRESENT READING	NO. DAYS	BILL DATE	MULTI	METER NUMBER	KWH USAGE	CHARGES		
01/10/08	02/10/08	20952	21604	31	02/14/08	1	91154532	652	57 68		
0 001380		PER KWH FUEL ADJUSTMENT						725	1 00		
		ENVIRONMENTAL SURCHARGE 5 80%							3 96		
		1 175W MV						73	9 51		
		3% SCHOOL TAX							2 16		
		TOTAL CURRENT BILL DUE 03/03/08							74 31		
		PREVIOUS UNPAID BALANCE							1925 96		
		TOTAL AMOUNT DUE							2000 27		
(PREVIOUS UNPAID BALANCE IS SUBJECT TO DISCONNECTION)											

COMPARISONS	DAYS SERVICE	TOTAL KWH	AVG KWH/DAY	COST PER DAY	TOTAL DUE NOW		\$
CURRENT BILLING PERIOD	31	652	21	1 89	DUE DATE	03/03/08	BILL IS DELINQUENT AFTER DUE DATE
PREVIOUS BILLING PERIOD	31	764	24	2.14	AFTER DUE DATE PAY		\$ 2003 87
SAME PERIOD LAST YEAR	31	1483	47	0.24			



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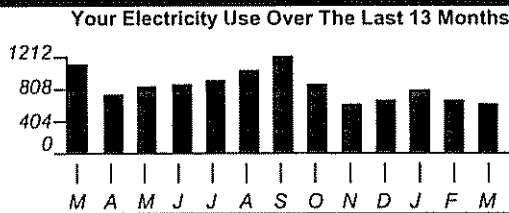
TO REPORT POWER OUTAGE CALL YOUR LOCAL OFFICE OR 1-800-655-4243	RATE SCHEDULE AVAILABLE UPON REQUEST	TYPE OF BILL 0 Regular Bill 1 Estimated 2 Estimated 3 Minimum 4 Final 5 Prorated 6 Prorated Min 7 Levelized
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1304412101		DAVIS PHYLLIS			13	0	(859) 235-9158		997 GAINESWAY LN	
SERVICE FROM	SERVICE TO	PREVIOUS READING	PRESENT READING	NO. DAYS	BILL DATE	MULTI	METER NUMBER	KWH USAGE	CHARGES	
02/10/08	03/10/08	21604	22185	29	03/14/08	1	91154532	581	52 39	
0 006030 PER KWH FUEL ADJUSTMENT									3 94	
ENVIRONMENTAL SURCHARGE 4 97%									3 27	
1 175W MV									9 51	
3% SCHOOL TAX									2 07	
TOTAL CURRENT BILL DUE 04/03/08									71 18	
PREVIOUS AMOUNT DUE									2003 87	
THANK YOU FOR YOUR PAYMENT 03/03/08									-157 40	
PREVIOUS UNPAID BALANCE									1846 47	
TOTAL AMOUNT DUE									1917 65	
(PREVIOUS UNPAID BALANCE IS SUBJECT TO DISCONNECTION)										

COMPARISONS	DAYS SERVICE	TOTAL KWH	AVG. KWH/DAY	COST PER DAY	TOTAL DUE NOW		\$
							1917 65
CURRENT BILLING PERIOD	29	581	20	1 94	DUE DATE	04/03/08	BILL IS DELINQUENT AFTER DUE DATE
PREVIOUS BILLING PERIOD	31	652	21	1.89	AFTER DUE DATE PAY		\$ 1921 10
SAME PERIOD LAST YEAR	28	1093	39	0.24			



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