

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

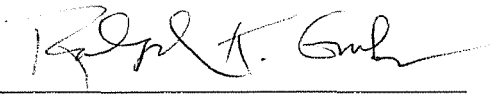
IN THE MATTER OF:

GERALD E. BRIFFA)	
)	CASE NO.
COMPLAINANT)	2008-00488
)	
V.)	
)	
BLUE GRASS ENERGY COOPERATIVE)	
CORPORATION)	
)	
DEFENDANT)	

**DEFENDANT'S RESPONSE TO FIRST DATA REQUEST
OF COMMISSION STAFF**

The Defendant, Blue Grass Energy Cooperative Corporation, makes the following Response to the "First Data Request of Commission Staff", as follows:

1. The witness responsible for responding to the questions asked is Bill Hall, District Manager, Headquarters Office of Blue Grass Energy Cooperation Corporation, Nicholasville.
2. Bill Hall is the person supervising the preparation of the Response on behalf of the Defendant.
3. The Response and Exhibit are attached hereto and incorporated by reference herein.



 CASSIE G. WELLS
 RALPH K. COMBS
 100 United Drive, Suite 4B
 Versailles, Kentucky 40383
 (859) 873-5427
 ATTORNEYS FOR BLUE GRASS ENERGY
 COOPERATIVE CORPORATION

The undersigned, Bill Hall, District Manager, Nicholasville (Headquarters) Office of Blue Grass Energy Cooperative Corporation, being first duly sworn, states that the Response herein is true and accurate to the best of my knowledge, information and belief formed after a reasonable inquiry.

Dated: March 13, 2009.

BLUE GRASS ENERGY COOPERATIVE CORPORATION

By: 
BILL HALL, DISTRICT MANAGER

Subscribed, sworn to and acknowledged before me by Bill Hall, as District Manager for and on behalf of Blue Grass Energy Cooperative Corporation, this 13th day of March, 2009.


NOTARY PUBLIC, STATE AT LARGE, KY
MY COMMISSION EXPIRES: 11/10/2011

CERTIFICATE OF SERVICE

The undersigned counsel certifies that the foregoing Response has been served upon the following:

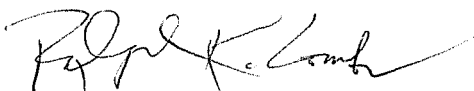
Original and Five Copies

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

Copy

Gerald E. Briffa
4301 Ravens Crest Lane
Lexington, Kentucky 40515

This 13th day of March, 2009.


CASSIE G. WELLS
RALPH K. COMBS
ATTORNEYS FOR BLUE GRASS ENERGY
COOPERATIVE CORPORATION

**BLUE GRASS ENERGY COOPERATIVE
CASE NO. 2008-00488**

RESPONSE TO COMMISSION STAFF'S FIRST DATA REQUEST

Question 1: Refer to Blue Grass Energy's December 18, 2008 Answer, Exhibit D, pages 2, 4, 6 and 8 of 8. Are the automatic meter readings reflected in the "Usage vs. Temperature Analysis" results performed at the same time of day, each day of each month?

Response: Yes, at midnight, each day of each month.

Question 2: Provide all monthly electric usage data for the prior owner of Complainant's residence, if any, at 4301 Ravens Crest Lane, Lexington, Kentucky 40515 for the three years prior to Complainant's account being established at that address.

Response: To the best knowledge and belief of Defendant, based on its own records and the print-out obtained off the website of the Fayette County Property Valuation Administrator, which print-out is attached hereto as Exhibit A, the Briffas were the first owners and residents of this house. The Defendant has no monthly electric usage data for any prior owner at 4301 Ravens Crest Lane, Lexington.

Please see Addendum To Response, attached.

PARID: 38074160
BRIFFA REBECCA M

4301 RAVENS CREST LN

Parcel

Address 4301 RAVENS CREST LN
 Unit
 City LEXINGTON
 Zip Code 40515-
 Neighborhood 960-SOUTHEAST QUADRANT
 Class F-F
 Land Use Code 101-F- GENERAL PURPOSE FARM
 LFUCG Zoning A-R-AGRICULTURAL RURAL
 Usa/Rsa Map 34
 Map Block 402
 Map Scale 400
 PDR

Legal

Tax District 02
 Lot 2
 Block
 Subdivision RAVEN RIDGE ESTATES UNIT 1 SEC 1
 Deeded Acres 11.150
 Deeded Sqft 485694
 Out of L-590
 Frontage 839.9
 Cabinet/Slide L-670

Owner Details

Tax Year 2009
 Jan. 1, 2008 Owner BRIFFA REBECCA M

 Address 4301 RAVENS CREST LN
 Address
 City LEXINGTON
 State KY
 Zip Prefix 40515
 Zip Extension
 Postal Code

LFUCG GIS

LINK TO LFUCG GIS SYSTEM FOR THIS PARCEL.
 TO ACCESS THE PROPERTY MAP FOR THIS RECORD ON THE LFUCG GIS SYSTEM CLICK HERE

Sales

Sale Date	Sale Price	Owner	Previous Owner
24-JUL-06	\$0	BRIFFA REBECCA M	BRIFFA GERALD E & REBECCA
11-JUN-04	\$821,417	BRIFFA GERALD E & REBECCA	CLASSIC IMPACT HOMES LLC
11-JUL-02	\$375,000	CLASSIC IMPACT HOMES LLC	
24-MAR-00		CLASSIC IMPACT HOMES LLC	

Sale Details

Sale Date 24-JUL-06
 Sale Price \$.00
 Owner BRIFFA REBECCA M
 Previous Owner BRIFFA GERALD E & REBECCA
 Sale Validity 09-TRANSFER-TAX NOT PAID
 Instrument Type DEED
 Book 2662
 Page 443
 No. of Parcels

1 of 4

Exhibit "A"

Residential

Card 1
 Stories 1.6
 Exterior Wall 02-BRICK
 Style 1-Single Family
 Year Built 2003
 Res Sqft 3,298
 Basement F-FULL BASEMENT
 Total Bsmt Sqft 1,754
 Finished Bsmt Sqft 1754
 Garage SQFT 780
 Garage Type ATTACHED-ATTACHED GARAGE
 Total Rooms 9
 Bedrooms 3
 Full Baths 4
 Half Baths 1
 Attic 2-UNFIN
 Additional Fixtures 6
 Heating System 1-HOT AIR
 Heat 4-CENTRAL WITH A/C
 Total Fixtures 20
 Masonry Fireplaces 1
 Heating Fuel Type 3-ELECTRIC
 Pre Fab Fireplace 1
 Split Level/Foyer
 Miscellaneous Feature JA-JACUZZI
 Miscellaneous Feature 2 IN-INTERCOM

OBY

Card	Desc	Year Built	Grade	Width	Length	Area
1	RP5-GUNITE POOL	2003	A	20	40	800

Values

Year	2008
Fair Cash Value Total	\$920,000
Agricultural Value Land	\$5,600
Agricultural Value Total	\$725,600
Taxable Value	\$725,600

Values History

Tax Year	FCV Total	AGV Total	Taxable Total
2008	\$920,000	\$725,600	\$725,600
2007	\$920,000	\$725,600	\$725,600
2006	\$821,400	\$698,800	\$698,800
2005	\$821,400	\$698,800	\$698,800
2004	\$274,200	\$150,000	\$150,000
2003	\$124,200	\$0	\$124,200

Addendum To Response:

Counsel for Defendant, by way of informing the Commission as fully as reasonably possible in its consideration of this Complaint, respectfully invites the Commission's attention to the total square footage of this residence as listed by the Fayette County Property Valuation Administrator, on Exhibit A hereto:

Residence:	3298
Full basement:	1754
Garage:	780

For a total of 5832, not 4413, as stated by Complainant in his response to question 1 of the Commission Staff's First Data Request to him dated February 23, 2009.

Respectfully submitted,



Counsel for Blue Grass Energy