

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION  
CASE NO. 2013-00052

RECEIVED  
MAR 27 2013  
PUBLIC SERVICE  
COMMISSION

In the Matter of:

ROY G. COLLINS,

COMPLAINANT

V.

JACKSON PURCHASE ENERGY CORPORATION, DEFENDANT

**PLAINTIFF'S RESPONSE TO FIRST REQUEST FOR  
INFORMATION BY COMMISSION STAFF**

Comes Roy G. Collins and for his response to first request for information by Commission staff and states as follows:

1. Refer to the second paragraph of Exhibit A, attached to your complaint, where it states, "I told him that the building, even if unoccupied, would be climate controlled year-round."

a. Does this indicate that you will be using continuous service at the second home/home office, located at 1400 Carrsville Road, Hampton, KY 42047 ("subject property")?

**RESPONSE: Yes.**

2. Provide the approximate frequency of visits to the subject property since power was installed.

**RESPONSE: I have visited the property approximately four times since the power was installed.**

3. Provide the approximate duration of visits to the subject property since power was installed.

**RESPONSE: I have been at the property approximately eight days since the power was installed.**

4. If construction has not been completed at the subject property, describe what construction remains to be completed.

**RESPONSE: At this time, the only remaining construction is installation of the septic tank and the final paint/trim.**

5. Describe the type of climate control appliances at the subject property for year-round climate control.

**RESPONSE: The structure is equipped with a three ton heating/air conditioning unit.**

6. State whether the 1,600-square-foot attached garage has electrical service.

**RESPONSE: Yes.**

7. State whether the 1,600-square-foot attached garage has three-phase electrical service.

**RESPONSE: Yes.**

8. State whether the "safe room" attached to the 1,600-square-foot garage has electrical service.

**RESPONSE: The "safe room" is attached to the walkout basement. It is equipped with electrical service.**

9. Provide the frequency of visits to the mobile home located on the same property as the subject property.

**RESPONSE: During 2012, I probably spent between 45 to 40 days at the mobile home located on the same property as the new residence.**

10. Provide the address of the mobile home located on the subject property.


**RESPONSE: Hillgrove Road, Hampton, Kentucky.**

11. Provide monthly electric bills for the mobile home located on the same property as the subject property for the last two years.

**RESPONSE: I do not have the bills for the past two years, but have made the following payments for service to the mobile home over the past several months:**

9-12-12	\$38.21
10-14-12	\$25.47
11-16-12	\$17.33
12-9-12	\$24.73
1-8-13	\$18.43
2-6-13	\$15.55

The Carrsville Road residence payment for January to February was \$69.68. The combined payment for both on March 4, 2013 was \$181.84.

  
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ROY G. COLLINS  
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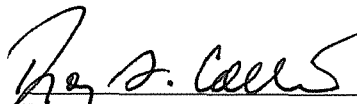
CERTIFICATE

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 25<sup>th</sup> day of March, 2013.

  
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ROY G. COLLINS