

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

MAR 27 2013

CASE NO. 2013-00052

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

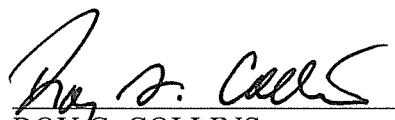
11-16-12 \$17.33

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.



ROY G. COLLINS
MORGAN, BRASHEAR, COLLINS & YEAST
ATTORNEYS AT LAW
109 DICKENSON STREET
MANCHESTER, KENTUCKY 40962
(606) 598-2122
FAX # 598-7842
EMAIL: roy.collins@mmbcylaw.com

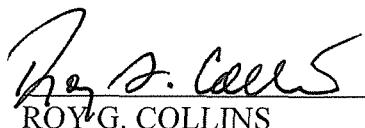
CERTIFICATE

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 25th day of March, 2013.



ROY G. COLLINS