

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

ROY G. COLLINS )  
COMPLAINANT )  
V. )  
JACKSON PURCHASE ENERGY )  
CORPORATION )  
DEFENDANT )

CASE NO.  
2013-00052

**JACKSON PURCHASE ENERGY CORPORATION'S RESPONSES  
TO ROY G. COLLINS' INITIAL REQUESTS FOR INFORMATION**

COMES Jackson Purchase Energy Corporation (hereinafter "JPEC") through the undersigned counsel, and submits herein its responses to information requested by Roy G. Collins' Initial Requests for Information.

**1. What was JPEC's classification of the mobile home formerly located on Hill Grove Road?**

Response: The mobile home located on Hill Grove Road is billed at JPEC's residential (schedule R) tariff.

Witness: Scott Ribble, Vice President Engineering & Operations

**2. State the reasons supporting the classification of the mobile home formally located on Hill Grove Road.**

Response: When the application was formally applied for on May 16, 1994, the determination of tariff was an R (residential) at that time based the tariffs in effect at that time.

Witness: Scott Ribble, Vice President Engineering & Operations

**3. Has JPEC billed the Hill Grove Road address as residential since the mobile home has been removed from the property? If so, why?**

Response: JPEC has not been notified of any change in status regarding the property on Hill Grove Road. JPEC will continue to bill the account until there is a formal request for disconnect.

Witness: Scott Ribble, Vice President Engineering & Operations

**4. Did JPEC classify the mobile home formerly located on Hill Grove Road either as a permanent residence or primary residence?**

Response: It is unclear which timeframe this question references. However, under the current tariffs, a mobile home would be classified and billed in accordance with the mobile home tariff. Pursuant to that tariff, a mobile home may be either a temporary service or a permanent home, depending upon its setup.

Witness: Kelly Nuckols, President & CEO

**5. Did JPEC ever classify the mobile home formerly located on Hill Grove Road as commercial?**

Response: No, refer to answer 2 above.

Witness: Scott Ribble, VP Operations & Engineering

**6. Please state the section of the tariff applicable to the Carsville Road property that requires it to be the primary residence of the customer before Jackson Purchase Energy Corporation is responsible for the installation costs of the first 1000 feet of line.**

Response:

According to the PSC approved tariff, Section 33 of the Rules and Regulations Item A:

*"This rule shall apply to services where the amount of consumption and/or the permanency of service cannot be reasonably assured as determined by JPEC."*

During his initial contact with JPEC, Mr. Collins claimed that the subject property would be used as a "hunting cabin" and that his presence at the cabin would be sporadic or less than full-time occupancy. As such, JPEC deemed the amount of consumption could not be reasonably assured, as it is when someone lives in a residence on a permanent basis, leading to the classification in accordance with Section 33 of the Rules and Regulations.

Witness: Kelly Nuckols, President & CEO of JPEC

**7. Identify the section of the tariffs that apply to either the Hill Grove Road property or the Carrsville Road property that define "permanent residence" or "primary residence."**

**Response:** There is no section of the tariff that defines what a permanent or primary residence is. However, JPEC believes that common usage of the term "primary residence" indicates that someone occupies a premises on a full-time basis rather than intermittently meaning that the electrical usage of a premises can be reasonably assured.

Witness: Kelly Nuckols, President & CEO of JPEC

Respectfully submitted,

DENTON & KEULER  
P.O. BOX 929  
PADUCAH, KY 42002-0929  
Telephone: (270) 443-8253  
Facsimile: (270) 442-6000

By: 

Melissa D. Yates

ATTORNEY FOR JPEC

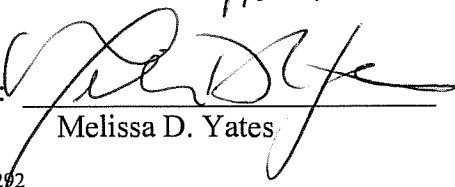
I hereby certify that the foregoing has  
been served a true and correct copy via  
Federal Express:

MR JEFF DEROUEN  
KENTUCKY PUBLIC SERVICE COMMISSION  
211 SOWER BLVD  
FRANKFORT KY 40602

And by delivering a copy via U.S. Mail and email to:

MR ROY G COLLINS  
109 DICKENSON STREET  
MANCHESTER KY 40962  
*Via U. S. Postal Service*

on this 22<sup>nd</sup> day of November, 2013.

By:   
Melissa D. Yates  
167292

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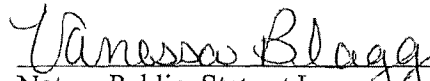
VERIFICATION

I, Kelly Nuckols, verify, state, and affirm that I prepared or supervised the preparation of my data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

  
\_\_\_\_\_  
Kelly Nuckols

COMMONWEALTH OF KENTUCKY    )  
COUNTY OF MCCRACKEN        )

SUBSCRIBED AND SWORN TO before me by Kelly Nuckols on this 22 day  
of November, 2013.

  
\_\_\_\_\_  
Notary Public, State at Large 457050  
My Commission Expires 12-22-15

JACKSON PURCHASE ENERGY CORPORATION

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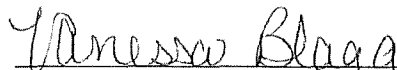
VERIFICATION

I, Scott Ribble, verify, state, and affirm that I prepared or supervised the preparation of my data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

  
\_\_\_\_\_  
Scott Ribble

COMMONWEALTH OF KENTUCKY    )  
COUNTY OF MCCRACKEN        )

SUBSCRIBED AND SWORN TO before me by Scott Ribble on this 22 day of November, 2013.

  
\_\_\_\_\_  
Notary Public, State at Large    457050  
My Commission Expires 12-22-15