

OWEN *Electric*

A Touchstone Energy Cooperative 

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PUBLIC SERVICE
COMMISSION

Case No. 2012-00468

**1st INFORMATION REQUEST
FOR COMMISSION STAFF
OWEN ELECTRIC COOPERATIVE INC**

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PO Box 400
Owenton, KY 40359
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November 8, 2012

Mr. Jeff R. Derouen, Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

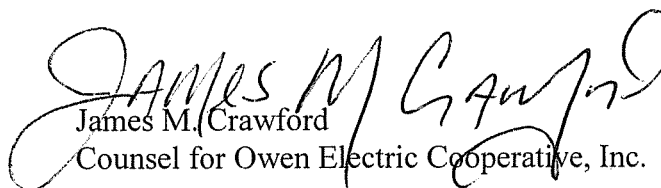
RE: **Owen Electric Cooperative, Inc.**
Case No. 2012-00468

Dear Mr. Derouen:

Please find enclosed an original and six copies of the responses of Owen Electric Cooperative, Inc's, to the Commission Staff's First Information Request in Case No. 2009-00468.

Respectfully yours,

CRAWFORD & BAXTER, P.S.C.


James M. Crawford
Counsel for Owen Electric Cooperative, Inc.

JMC/mns

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF OWEN ELECTRIC COOPERATIVE)
CORPORATION FOR REVISIONS TO ITS METER)
READING TARIFF TO ACCOMMODATE MANUAL METER) CASE NO.
READING CHARGES IN INSTANCES WHERE ITS) 2012-00468
ADVANCED METERING INFRASTRUCTURE IS)
PROHIBITED FROM BEING UTILIZED FOR ITS)
INTENDED PURPOSE)

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO OWEN ELECTRIC COOPERATIVE, INC.

Owen Electric Cooperative, Inc. ("Owen") pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Owen shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Owen fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond. Careful attention shall be given to copied material to ensure that it is legible.

1. Refer to Exhibit B of the application, the Prepared Testimony of James R. Adkins. Mr. Adkins states on page 1 of his testimony that "several members" of Owen do not wish to be metered using advanced metering infrastructure ("AMI").

a. State the number of customers who do not wish to be metered using AMI.

b. State whether all remaining customers are currently metered using AMI. If they are not, explain.


c. State whether meters are currently being read remotely for all customers who are equipped with AMI. If they are not, explain.

d. State what efforts have been made by Owen to encourage those members who do not wish to be metered using AMI to acquiesce. If none, explain.

2. Owen filed its intent to file a general rate case, Case No. 2012-00448, on October 1, 2012. Explain why Owen has filed for this change to its meter reading tariff as a separate proceeding, given that, if approved, it would impact revenues.

3. Provide the amount of meter reading expense included in Owen's current base rates and provide the test year from which it was determined.

4. Provide the start date of the deployment of Owen's AMI and the date it was completed.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40601

DATED OCT 30 2012

cc: Parties of Record

Case No. 2012-00468

Honorable James M Crawford
Attorney At Law
Crawford & Baxter, P.S.C. Attorneys at Law
523 Highland Avenue
P. O. Box 353
Carrollton, KENTUCKY 41008

Affiant, Michael Cobb, states that the answers given by him to the foregoing questions are true and correct to the best of his knowledge and belief.



Michael Cobb


Subscribed and sworn to before me by the affiant, Michael Cobb, this 8th
day of November, 2012.

Notary Melissa K Moore

State-at-Large

My Commission expires April 14th, 2015 .

Affiant, Mark A Stallons, states that the answers given by him to the foregoing questions are true and correct to the best of his knowledge and belief.



Mark A Stallons

Subscribed and sworn to before me by the affiant, Mark A Stallons, this
8th day of November, 2012.

Notary Melissa R Moore

State-at-Large

My Commission expires April 14th, 2015.

Affiant, James R Adkins, states that the answers given by him to the foregoing questions are true and correct to the best of his knowledge and belief.

James R Adkins
James R Adkins

Subscribed and sworn to before me by the affiant, James R Adkins, this 8th day of November, 2012.

Notary Melissa R Moore
State-at-Large

My Commission expires April 14th 2015.

OWEN ELECTRIC COOPERATIVE
CASE NO 2012-00468
RESPONSE TO COMMISSION STAFF'S FIRST INFORMATION REQUEST

Refer to Exhibit B of the application, the Prepared Testimony of James R. Adkins. Mr. Adkins states on page 1 of his testimony that "several members" of Owen do not wish to be metered using advanced metering infrastructure ("AMI").

a. Question:

State the number of customers who do not wish to be metered using AMI.

Response:

To date, six (6) Owen members have indicated that they do not wish to be metered using AMI.

b. Question:

State whether all remaining customers are currently metered using AMI. If they are not, explain.

Response:

Yes

c. Question:

State whether meters are currently being read remotely for all customers who are equipped with AMI. If they are not, explain.

Response:

No, Owen presently has approximately 600 residential meters that we are unable to read on a consistent basis due to communication issues. Owen is continuing to trouble shoot and address these communication issues and is making progress to reduce number of meters we are unable to read remotely.

OWEN ELECTRIC COOPERATIVE
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RESPONSE TO COMMISSION STAFF'S FIRST INFORMATION REQUEST

d. Question:

State what efforts have been made by Owen to encourage those members who do not wish to be metered using AMI to acquiesce. If none, explain.

Response:

Owen has undertaken several education and communication efforts to help these members to understand that Owen's AMI system is safe and does not invade their privacy. Personal discussions, letters, and emails have been used to address concerns over the use of Owen's AMI program.

OWEN ELECTRIC COOPERATIVE
CASE NO 2012-00468
RESPONSE TO COMMISSION STAFF'S FIRST INFORMATION REQUEST

Question:

Owen filed its intent to file a general rate case, Case No. 2012-00448, on October 1, 2012. Explain why Owen has filed for this change to its meter reading tariff as a separate proceeding, given that, if approved, it would impact revenues.

Response:

Owen has filed for this tariff in order to be responsive to its members requests and would like to have a resolution to the matter sooner than would be probable in a general rate case.

OWEN ELECTRIC COOPERATIVE
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RESPONSE TO COMMISSION STAFF'S FIRST INFORMATION REQUEST

Question:

Provide the amount of meter reading expense included in Owen's current base rates and provide the test year from which it was determined.

Response:

Meter reading expenses included in Owen's base rates are \$225,481. These were approved in Case No, 2011-00037, which utilized a test year ending December 31 2009.

OWEN ELECTRIC COOPERATIVE
CASE NO 2012-00468
RESPONSE TO COMMISSION STAFF'S FIRST INFORMATION REQUEST

Question:

Provide the start date of the deployment of Owen's AMI and the date it was completed.

Response:

Owen's AMI deployment date was July 2006 and meter installations were completed November 2008.