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September 27, 2006

Ron Sheets, President  
Kentucky Association of Electrical Cooperatives  
4515 Bishop Lane  
Louisville, KY 40218

Dear Mr. Sheets:

On August 8, 2006 Commission staff met with you and representatives of the Kentucky Association of Electrical Cooperatives (KAEC) to discuss, among other things, the interpretation of 807 KAR 5:006 Section 6(5) as it relates to solid-state AMR electric meters. This regulation states:

*Each utility, except if prevented by reasons beyond its control, shall read customer meters at least quarterly, except that each utility using customer-read meter information shall read each revenue related meter on its system at least once during each calendar year....*

KAEC had stated that since the solid-state AMR electric meters provided the same information at the central office as they do at the customer's location, and that the information is recorded at least daily, there is no need for somebody to record the meter reading at the customer's location.

Commission staff agrees with KAEC's interpretation of the meter reading requirement in the case of AMR meters, which transmit the register information to a central recording location. However, in the case of a meter which sends a signal that is generated by some source other than the actual register reading, such as a pulse signal from a passing mark on a rotating disc, reading the register at the customer's location is still required.

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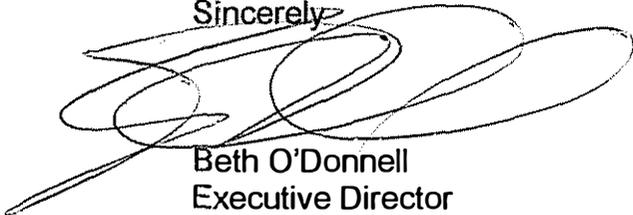
Staff takes this opportunity to point out the requirements of 807 KAR 5:006 Section 24(4)(d):

*At intervals not to exceed two (2) years, the utility shall inspect electric lines operating at voltages of less than sixty-nine (69) KV, including insulators, conductors and supporting facilities.*

We point out that this inspection should include service lines up to the point of service.

This letter represents Commission Staff's interpretation of the law. This opinion is advisory in nature and not binding on the Commission. If you have any further questions, please contact Jim Welch, Director of Engineering, at (502) 564-3940 or [jamesa.welch@ky.gov](mailto:jamesa.welch@ky.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Beth O'Donnell", is written over the word "Sincerely,". The signature is stylized and somewhat illegible due to overlapping loops.

Beth O'Donnell  
Executive Director  
Kentucky Public Service Commission

BOD/JAW  
C: E.On  
Duke-Kentucky  
Kentucky Power