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## CUMBERLAND VALLEY ELECTRIC

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March 29, 2012

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PUBLIC SERVICE  
COMMISSION

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

RE: Second Data Request for Administrative Case No. 2011-00450

Dear Mr. Derouen,

Please find enclosed, the original and 10 copies of Cumberland Valley Electric's responses to Commission staff's second data request associated with the above subject case. Mark D. Abner, Engineering Manager, is the sole respondent.

Sincerely,



Mark D. Abner  
Engineering Manager  
Cumberland Valley Electric

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Response to Commission Staff's Second Data Request

1. The following questions relate to the use of a five-year average of System Average Interruption Duration Index ("SAIDI"), System Average Interruption Frequency Index ("SAIFI"), and Customer Average Interruption Duration Index ("CAIDI") on a circuit basis as a benchmark to determine the relative reliability of an individual circuit.

a. In your opinion, is it reasonable for the Commission to require each utility to develop and report a five-year average SAIDI on a circuit-by-circuit basis as a benchmark for comparison purposes? Explain your answer.

b. In your opinion, is it reasonable for the Commission to require each utility to explain why a particular circuit has a higher SAIDI than the utility's five-year average SAIDI for that circuit? Explain your answer.

c. In your opinion, is it reasonable for the Commission to require each utility to explain the planned corrective measures for the circuit with a higher SAIDI than the five-year average? Explain your answer.

d. In your opinion, is it reasonable for the Commission to require each utility to develop and report a five-year average SAIFI on a circuit-by-circuit basis as a benchmark for comparison purposes? Explain your answer.

e. In your opinion, is it reasonable for the Commission to require each utility to explain why a particular circuit has a higher SAIFI than the utility's five-year average SAIDI for that circuit? Explain your answer.

f. In your opinion, is it reasonable for the Commission to require each utility to explain the planned corrective measures for the circuit with a higher SAIFI than the five-year average? Explain your answer.

g. In your opinion, is it reasonable for the Commission to require each utility to develop and report a five-year average CAIDI on a circuit-by-circuit basis as a benchmark for comparison purposes? Explain your answer.

h. In your opinion, is it reasonable for the Commission to require each utility to explain why a particular circuit has a higher CAIDI than the utility's five-year average SAIDI for that circuit? Explain your answer.

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i. In your opinion, is it reasonable for the Commission to require each utility to explain the planned corrective measures for the circuit with a higher CAIDI than the five-year average? Explain your answer.

**Response 1:**

- a. CVE does not believe it reasonable for the Commission to make such a requirement. CVE's current system of interruption tracking and reporting is not designed to track interruptions at the circuit level. This requirement would necessitate the redesign of CVE's existing tracking and reporting system. The effort required to produce five year data for each circuit would be burdensome. CVE believes the Commission should only request such information on an as needed basis, such as would be the case when the Commission receives an inordinate number of consumer complaints arising from a particular utility or from specific areas served by a utility. Requiring such detailed data and analyzing it as a routine matter would be particularly burdensome to utilities and the Commission.**
- b. It is unreasonable for the Commission to require such explanations. Please see response to 1.a. above.**
- c. It is unreasonable for the Commission to require an explanation of planned corrective measures. Please see response to 1.a. above.**
- d. It is unreasonable for the Commission to require this information. Please see response to 1.a. above.**
- e. It is unreasonable to require this explanation. Please see response to 1.a. above.**
- f. It is unreasonable for the Commission to require such explanations. Please see response to 1.a. above.**
- g. It is unreasonable for the Commission to require this data. Please see response to 1.a. above.**
- h. It is unreasonable for the Commission to require such explanations. Please see response to 1.a. above.**

**i. It is unreasonable for the Commission to require such explanations. Please see response to 1.a. above.**

2. KRS 61.870 through KRS 62.884 address open records of public agencies and 807 KAR 5:001, Section 7, pertains to confidential material submitted to the Commission. Do you anticipate that some information submitted concerning the utility's circuits, whether with regard to SAIDI, SAIFI, CAIDI, or other reporting, could contain confidential, proprietary, or critical infrastructure information for which a petition for confidential information may also be submitted? Explain your answer. In your answer, provide examples of the type of information for which you may seek confidential protection.

**Response 2:**

**CVE does not anticipate the need of a petition for confidentiality in regard to SAIDI, SAIFI or CAIDI reporting. However, the required content of "other reporting" may require assessment regarding confidential handling.**

3. Please describe your utility's current capacity to compose electronic documents.

a. Is the utility familiar with or currently using Microsoft Office products such as MS Word or Excel? If so, include the name and version(s) of the software currently used.

b. Describe your utility's current internet connectivity status, including connection speed.

c. Is the utility familiar with the Commission's website?

d. Has your utility registered on the PSC website and does it have a valid username and password? (This registration would currently be used for Electronic Case Filing, Annual Reports, and Tariff Filings).

e. If recommended, would your utility have technical staff available to interface with the PSC Information Services Team to assist in the

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design and implementation of an automated process for uploading data to the Commission?

**Response:**

**a. Yes. CVE uses the MicroSoft Office suite of products, primarily Word, Excel and Access. Versions in use are 2003, 2007 and 2010.**

**b. CVE has a dedicated fiber optic line for high speed internet connectivity which runs at 3 MBs/3 MBs. This service is backed up by two bonded T1's.**

**c. Yes.**

**d. CVE recently registered on the PSC website and does therefore have a valid username and password.**

**e. Yes.**

4. The following questions relate to the manner by which the utility tracks SAIDI, SAIFI, and CAIDI as stated in response to Items 2. (a) and (b) of the Commission's Order of January 11, 2012.

a. This question applies to Kentucky Power Company ("Kentucky Power"), Big Sandy Rural Electric Cooperative Corporation, Blue Grass Energy Cooperative Corporation, Clark Energy Cooperative, Inc., Duke Energy Kentucky, Inc. ("Duke"), Farmers Rural Electric Cooperative Corporation, Fleming-Mason Energy Cooperative, Inc., Grayson Rural Electric Cooperative Corporation, Inter-County Energy Cooperative Corporation, Jackson Energy Cooperative Corporation, Jackson Purchase

Energy Corporation, Kenergy Corp., Kentucky Utilities Company ("KU"), Louisville Gas and Electric Company ("LG&E"), Meade County Rural Electric Cooperative Corporation, Nolin Rural Electric Cooperative Corporation, Owen Electric Cooperative, Inc., Salt River Electric Cooperative Corporation, Shelby Energy Cooperative, Inc., South Kentucky Rural Electric Cooperative Corporation, and Taylor County Rural Electric Cooperative Corporation all of which reported that they tracked SAIDI, SAIFI, and CAIDI using an outage management system or an

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outage management system in conjunction with an Excel spreadsheet.

(1) Does your utility have the ability to export (or upload) the data to another data base or data system (including an Excel spreadsheet) maintained by the Commission? If not, explain why.

**Response: This question is not applicable to Cumberland Valley Electric.**

(2) If not identified elsewhere, identify the file formats to which your utility has the ability to export data.

**Response: This question is not applicable to Cumberland Valley Electric.**

b. This question applies to Cumberland Valley Electric, Inc. and Licking Valley Rural Electric Cooperative Corporation, who reported that they tracked SAIDI, SAIFI, and CAIDI manually. Does your utility have the ability to export (or upload) the data to another data base or data system (including an Excel spreadsheet) maintained by the Commission? If not, explain why.

**Response:**

**CVE can export its data to an MS Excel spreadsheet or an MS Access database only. Any other system would require evaluation to determine whether or not data can be transferred.**

8. Explain how the SAIDI, SAIFI, and CAIDI indices influence the allocation of capital for system improvement projects within the utility. For the Investor-Owned Utilities Kentucky Power, Duke, KU, and LG&E, explain the manner in which the parent company influences the amount and allocation of capital for system reliability improvements.

**Response:**

**CVE does not generally use these indices for the purpose of allocation of capital for system improvement projects. These type projects are identified by our work plan process wherein the system is studied under projected loading according to RUS guidelines. These numbers would generally be more useful in aiding in the allocation of maintenance dollars, such as would be the case,**

**for instance, in deciding where to direct vegetation management money.**

9. Does the utility currently share other types of data with entities outside your organization? If yes, describe those other sharing systems and data, and with whom your utility shares the information.

**Response: No.**

10. Identify any disadvantages to making the reliability index numbers available on the Commission's website.

**Response:**

**CVE believes it disadvantageous to post reliability index numbers on the Commission's web site because typical consumers will not understand the meaning of the data, how it is calculated or how to use it to arrive at useful comparisons. If data is presented at the substation or even circuit level, they will have no means of knowing which substation or circuit serves their particular premise, rendering the data useless to them.**

11. Identify any advantages to making the reliability index numbers available on the Commission's website.

**Response:**

**CVE is not aware of any advantages to making reliability index numbers available on any web site.**

12. In your opinion, what information would the utility's customers be most interested in having easily accessible? In your opinion, is it more appropriate to have this information available by circuit or system averages? How does your utility relay reliability information to your customers? Explain your answers.

**Response:**

**CVE does not believe its members would be interested in accessing any of the reliability indices.**

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**Neither circuit nor system-wide averages are appropriate as the consumer is not likely to understand either.**

**CVE does not relay reliability indices information to its members on a wholesale basis. CVE would only relay reliability information to a member if it were requested by the member and that transaction would likely take the form of a printed report. CVE is not aware that any of its members has ever asked for this information.**

13. If not identified elsewhere, describe the reliability information available for public review on your utility's website.

**Response:**

**CVE does not post reliability information on its web site.**

14. If the utility's customer requests information from the utility on reliability measures, do you provide it? Explain your answer.

**Response:**

**If a CVE member requested such information, it would be provided. However, it is our belief that no member or prospective member has ever requested this information.**

15. Does the utility have a suggestion for a better or more efficient method or manner for reporting or providing reliability information to the public?

**Response: No.**



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