

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CUMBERLAND VALLEY ELECTRIC,)	
INC. FOR COMMISSION APPROVAL FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE AND)	CASE NO.
NECESSITY TO INSTALL AN ADVANCED METERING)	2018-00056
INFRASTRUCTURE (AMI) SYSTEM PURSUANT TO)	
KRS 807 KAR 5:001 AND KRS 278.020)	

COMMISSION STAFF'S FIRST POST-HEARING REQUEST FOR
INFORMATION TO CUMBERLAND VALLEY ELECTRIC, INC.

Cumberland Valley Electric, Inc. ("Cumberland Valley"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information. The information requested herein is due on or before June 21, 2018, pursuant to the Commission's May 30, 2018 Order in this matter. Responses to requests for information in paper medium 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.

Cumberland Valley shall make timely amendment to any prior response if it obtains information that 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 Cumberland Valley 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. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, Cumberland Valley shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Identify the number of meters that would be subject to periodic testing pursuant to 807 KAR 5:041, Section 15(3) during the period beginning July 1, 2018, and ending December 31, 2020. Provide the total estimated cost of testing those meters, including the cost of any third party testing provided and any costs incurred directly by Cumberland Valley and explain how Cumberland Valley determined or estimated those costs.

2. Provide all documentation from the manufacturer regarding the useful life of the meters, relays, access points, or other physical assets that are a part of, or make up the advanced metering infrastructure for which a Certificate of Public Convenience and Necessity ("CPCN") is requested in this matter.

3. Provide all contracts and other documents indicating an agreement between Cumberland Valley and the National Rural Telephone Cooperative or other vendors regarding or relating to the CPCN requested in this matter along with any and all other documents that are incorporated therein, including any and all portions of the Master Purchase and Services Agreement not previously provided as part of the record in this matter.

4. Provide all amendments and change orders to any contract or agreement between Cumberland Valley and the National Rural Telephone Cooperative or other vendors regarding or relating to the CPCN requested in this matter, including any amendment or change order regarding or relating to the potential that additional meters, relays, access points, and other advanced metering infrastructure not initially anticipated in the contract or agreement may be necessary as the project is implemented.

5. Provide a net cost-benefit analysis of implementing the advanced metering infrastructure on July 1, 2018, versus July 1, 2019, using actual data when available and reasonable estimates when necessary. Provide supporting details for the cost-benefit analysis, including but not limited to spreadsheets with formulas and variables intact, an explanation of the variables when necessary to understand what is represented by the variables, an explanation of the source of information used to perform the cost-benefit analysis; an explanation of the manner in which any estimates were made, and any further explanation or information that Cumberland Valley contends is necessary to understand or provide context to the cost-benefit analysis. The net cost-benefit analysis should include all costs and all benefits associated with implementing the advanced metering system in July 1, 2018, versus July 1, 2019, with the supporting details described above.

6. State whether Cumberland Valley surveyed or communicated with Landis + Gyr user groups, vendors, utilities, or other industry groups regarding the availability of a secondary market for TSII parts and components.

a. If yes, describe all surveys and communications regarding the availability of a secondary market, and provide copies of Cumberland Valley's findings regarding the availability of a secondary market for TSII equipment.

b. If no, conduct a brief survey of Landis + Gyr user group members and other utilities in Kentucky who are replacing their TSII meters for the purpose of determining the disposition of TSII equipment after it is taken out of service and the availability of a secondary market.



Gwen R. Pinson
Executive Director
Public Service Commission
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DATED JUN 01 2018

cc: Parties of Record

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