

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

FILING OF OWEN ELECTRIC COOPERATIVE, INC.)	
TO IMPLEMENT AN ADVANCED METERING)	CASE NO.
SYSTEM (AMS) OPT-OUT TARIFF)	2018-00354

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

Owen Electric Cooperative, Inc. (Owen Electric), pursuant to 807 KAR 5:001, is to file with the Commission an original and ten copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due no later than December 6, 2018. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the individual responsible for responding to 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 Electric 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

Electric 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, Owen Electric shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. State whether Owen Electric has received any requests from members to opt-out of the Advanced Metering System (AMS). If so, state how many such requests Owen Electric has received and when those requests were received.

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


3. Provide an explanation as to why Owen Electric believes using information from the year ending December 31, 2007, is reasonable.

4. Confirm that the AMS is fully deployed in Owen Electric's service territory. If this cannot be confirmed, provided the estimated date when Owen anticipates full deployment.

5. Explain why Owen Electric is proposing an opt-out fee and how the proposed opt-out fee addresses this need.

6. Explain if Owen Electric has estimated the number of opt-outs and how these opt outs will impact the robustness of the system. Provide supporting work papers which quantify any effect.

7. Provide the non-recurring cost incurred for information technology required for the opt-out program.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED NOV 19 2018

cc: Parties of Record

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