



A Touchstone Energy Cooperative 

August 30, 2012

Mr. Jeff Derouen
Executive Director
Ky Public Service Commission
P O Box 615
Frankfort KY 40602

Dear Mr. Derouen:

Please accept the following written comments on the proposed administrative regulations.

Sincerely,

Chris Perry
President & CEO

COMMENT 1:

RE: 807 KAR 5:006, Section 7 2(c) {Page 8, Lines 10-12}

"Each customer meter using remote reading technology shall be inspected for proper working condition and readings verified at the intervals established in Section 26 of this administrative regulation."

Fleming-Mason Energy will be using only solid-state meters when fully deployed with a new AMI system. Solid-state meters have proven to be much more accurate than the traditional electromechanical meters. Solid-state meters, when used in conjunction with an AMI system, will always transmit the same reading as is registering on the display. It is FME's contention that electric utilities that have installed solid-state meters should receive exempt status from a manual meter reading requirement. FME estimates that the cost to physically read and record 24,000 meters bi-annually would cost in excess of \$111,000. Since it is not possible for a solid-state meter to transmit a reading different than the display, this regulation would place an undue burden on the utility and an unnecessary expense on its consumers.

In addition to the increased cost of meeting this requirement, FME does not believe that any operational efficiency or safety is added from this requirement. At this time, FME uses Itron ERT modules to perform remote meter readings on customer meters that may pose safety risks to field personnel. For example, residences that may have animals that pose risk to field staff may be retrofitted with an ERT module.

Finally, the meter accuracy and ultimate customer bill will not be impacted by the verification of the meter reading in the field. The digital meters and meter reading modules that FME will be installing will report the same reading. FME has controls in place to determine if the readings received are within reasonable limits. There are audits performed by FME staff prior to bills being sent to ensure that the measured usage is consistent with the usage patterns for a customer location. In addition to pre-bill audits, FME will be visiting meters for other reasons that make this requirement unnecessary. Meter failures, customer relocations, disconnect, and meter sample testing requires visual and safe inspections performed by FME staff.

COMMENT 2:

RE: 807 KAR 5:011, Section 6 2(b) {Page 7, Lines 1-2}

“By issuing and filing with the commission a new tariff or revised sheet of an existing tariff and providing notice to the public and statutory notice to the commission.”

Fleming-Mason feels that providing notice to the public for text changes in the tariff where the rates remain the same, would place an undue burden on the utility.