

**INTER-COUNTY ENERGY COMMENTS AS A FOLLOW-UP TO THE MONDAY,
SEPTEMBER 27, 2012 ADMINISTRATIVE REGULATIONS HEARING**

COMMENT 1:

In regards to:

807 KAR 5:006

Section 18. Meter Test Records

1(b) The complete record of tests of each meter shall be continuous for at least two (2) periodic test periods and shall in no case be less than two (2) years.

Inter County Energy is concerned that new meters that are tested under the current sample meter test program, will have only one (1) record of test. Therefore we would not be in compliance because not all of the records we have are continuous for two (2) periodic test periods.

COMMENTS 2 & 3:

In regards to:

807 KAR 5:006

Section 20. Access to Property. The utility shall at all reasonable hours have access to meters, service connections and other property owned by it and located on customer's premises for purposes of installation, maintenance, meter reading, operation, replacement or removal of its property when service is to be terminated. Any employee of the utility whose duties require him to enter the customer's premises shall wear a distinguishing uniform or other insignia, identifying him as an employee of the utility, or show a badge or other identification which will identify him as an employee of the utility.

COMMENT 2:

Inter County Energy has concern that this section could possibly be interpreted as meaning that the access rights are only “when service is to be terminated”

COMMENT 3:

Inter County Energy representatives watched the live webcast of the PSC Regulations Hearing on Monday 27, 2012 regarding the proposed revision to the Kentucky Administrative Regulations and are in agreement with the following concerns from other utilities as summarized as follows:

- The PSC requirement for verifying AMI meter readings. (Inter County Energy recently completed the installation of the same AMI system used by Bluegrass Energy. Like Bluegrass Energy, we would also face additional re-occurring charges for reads in addition to upfront costs for additional equipment and work force.)

- The PSC should clarify what constitutes a “Commission-readable GIS file.”
- The PSC should clarify whether a utility is required to identify all plant items by year and month of construction when some plant facilities may be older than the archived records. (Inter County Energy does not have the majority of its plant listed by year and month)
- The PSC should clarify whether a utility must give public notice regarding all minor or nonsubstantive changes to a tariff, as strict compliance with giving public notice for all tariff changes would impose a significant administrative burden.
- The PSC should not require the annual filing of audit reports in addition to the certified reports that are already filed in the annual reporting process and in rate cases.
- The PSC should not limit the protection of confidential materials to 2 years. Protection should be indefinite, or a utility should specify a reasonable period for which confidentiality is sought.
- The PSC should not require the filing of an additional paper copy of filings in a case approved for electronic filing.
- The PSC should not require the signature of identified utility representatives on customer payment plans longer than 30 days