

807 KAR 5:006 - General Rules

Section 7(5)(c) - Billings, Meter Readings and Information

Word Document reference: Page 8

(5) Frequency of meter reading.

(c) 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.

Section 26(4)(e) - Inspection of Systems

Word Document reference: Page 40

(4) Electric utility inspection

(e) At intervals not to exceed two (2) years, the utility shall inspect all electric facilities operating at voltages of less than sixty-nine (69) KV, to the point of service including insulators, conductors and supporting facilities from the ground for damage, deterioration and vegetation management consistent with the utility's vegetation management practices.

COMMENT 1:

This section will require Jackson Energy to verify all meter readings by comparing the reading on the face of the meter with the reading obtained via AMI. In order to accomplish that task, it requires a person in the field to read the face of the meter and a second person in our office to verify the reading via telephone or two-way radio communication. The person in the office would remotely read the meter and compare the field reading with the remote AMI reading. This task will require Jackson Energy to employ a minimum of three (3) additional full time employees: two field employees and one office employee. In addition to the three (3) employees, two vehicles would be required for transporting the field employees. This ruling would force Jackson Energy to hire additional personnel and vehicles for the sole purpose of meeting this requirement. The estimated annual recurring cost of meeting this requirement is \$300,000, which includes wages and benefits for the additional 3 employees and all transportation costs. Jackson Energy feels that this requirement places an unnecessary financial burden on our membership that would result in increased rates to our members.

Jackson Energy began installing the TWACS AMI system in 2003 and completed the installation in 2007. There has not been an issue with the meter display reading differing from the meter reading via AMI since 2003.

In addition, the justification for continuing to implement Smart Grid technology is questionable if utilities must meet this requirement. One of the cost benefits of AMI was the elimination of manual meter readings. If the Smart Grid technology is not trusted or there is a misunderstanding regarding the technology, then all Smart Grid initiatives should be halted.

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Section 18(2)(c) - Meter Test Records

Word Document reference: Page 34

(2) Historical records.

(c) These records shall also contain condensed information concerning all tests and adjustments including dates and general results of the adjustments. The records shall reflect the date of the last test and indicate the proper date for the next periodic test required by the applicable commission administrative regulation.

COMMENT 2:

Jackson Energy uses a random sample meter testing methodology approved by the Commission. Since the testing is random, it is not possible to know the next meter test date for each meter. Utilities that have filed random sample meter testing plans cannot comply with this regulation.

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Section 23(1)(f) - System Maps and Records

Word Document reference: Page 37

(1) Each utility shall have on file at its principal office located within the state and shall file upon request with the commission a map or maps of suitable scale of the general territory it serves or holds itself ready to serve. If the maps are available in electronic format, they shall be filed as a PDF file or as a commission readable geographic information system (GIS) file. Maps generated on and after the effective date of this regulation shall be filed as a PDF file and as a commission readable geographic information system (GIS) file. The following data shall be available on the map or maps:

(f) Date of construction of all items of plant by year and month.

COMMENT 3:

Jackson Energy needs clarification to the generation of maps as a “commission readable” GIS file.

Jackson Energy does not have historical records for all its plant dated back to 1938 and therefore, cannot include the date of construction for all its plant by year and month.

807 KAR 5:011 - Tariffs

Section 1 - Definitions.

Word Document reference: Page 2

(9) "Tariff" means a utility's schedule of each of its rates, charges, tolls, maps, terms, and conditions of service over which the commission has jurisdiction.

Section 6(2)(b) - Tariff Addition, Revision, or Withdrawal.

Word Document reference: Page 6 & 7

(2) A new tariff or revised sheet of an existing tariff shall be issued and placed into effect:

(b) 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.

Section 8 - Notices.

Word Document reference: Page 7

A utility shall give notice to the public as required by this section.

COMMENT 4:

Jackson Energy interprets that this regulation change would require each utility to notify the public of any changes to existing tariff sheets. We interpret this to mean public notification for a minor text change to any tariff sheet, which would require public notification even if one word is changed.

What is the commission's definition of public notification?

Can any changes be posted on our website to meet this requirement?

807 KAR 5:011 - Tariffs

Section 4. - Contents of Schedules.

Word Document reference: Page 2

(2)(e) Late payment charge: state the amount;

COMMENT 5:

Jackson Energy does not state the late payment amount on each tariff but refers to a late payment rider.

Under the proposed regulation changes, will this still be allowed?