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August 30, 2012

Mr. Gerald Wuetcher
PSC Regulations
Kentucky Public Service Commission
211 Sower Boulevard, Box 615
Frankfort, Kentucky 40602-0615

**RE: Proposed 807 KAR5:006 Section 7 (5) (c) and referenced Section 26
Proposed 807 KAR5:006 Section 23 (1) (f)**

Mr. Wuetcher,

I would like to thank the Commission for their willingness to undertake the task of amending administrative regulations and for the opportunity to review and express our thoughts on the proposed changes.

South Kentucky would like to voice our concerns to proposed KAR 5:006 Section 7 (5) (c) and referenced Section 26; which states:

(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 Inspection of Systems, (4) (e) At intervals not to exceed two (2) years, the utility shall inspect all electric facilities from the ground for damage, deterioration and vegetation management consistent with the utility's vegetation management practices.

It appears that these proposed changes would require us to manually read and verify the readings of our electric meters every two (2) years. South Kentucky has gone to great expense to install an Advanced Metering Infrastructure (AMI) which has remote reading capability.

Every electric meter located within South Kentucky RECC's service territory has been calibrated and tested to ensure accuracy. In addition, our members can view the digital display located on their meter at any time and it can be compared to the meter reading on their monthly billing statement to monitor their energy usage and verify the accuracy of the reading.

South Kentucky RECC installed an AMI remote meter reading system to save the cost of a manual meter reading and reduce mistakes and misreads in the reading process. The estimated cost of performing manual reading and verification throughout our system would approach \$200,000 annually. This includes the salary of two new employees, fringe benefits, office space, transportation costs and equipment and software maintenance. Several meters are inaccessible and are located inside a locked building, behind a locked gate or have an unfriendly dog in the area. In these instances there would need to be appointments and/or additional trips made to read the meter. This additional \$200,000 in cost would have to be passed on to the member. Also, the recent murder of a utility worker at East Mississippi Electric Power who was shot while doing a service call to disconnect an account for non-payment demonstrates the dangers associated with on-site visits.

In addition, South Kentucky has concerns with the proposed 807 KAR 5:006 Section 23 (1) (f) which states:

System Maps and Records (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.

While South Kentucky RECC does have electronic maps we do not have historical records on our plant which contains the year and month in which the construction was completed.

Sincerely,



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Chief Executive Officer
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