

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DANVILLE FRIENDS RETIREMENT HOUSING, INC.)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	89-247
KENTUCKY UTILITIES COMPANY)	
)	
DEFENDANT)	

O R D E R

IT IS ORDERED that Danville Friends Retirement Housing, Inc. ("Danville Friends") shall file the original and 12 copies of the following information with the Commission within 20 days from the date of this Order with a copy to all parties of record. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information requested herein has been provided along with the original application, in the format requested herein, reference may be made to the specific location of said information in responding to this information request. If the information cannot be provided by the stated date, Danville Friends should submit a

motion for an extension of time stating the reason a delay is necessary and a date by which the information will be furnished. Such a motion will be considered by the Commission.

1. Has Wilmington Monthly Meeting of Friends, Inc. ever applied to any state utility regulatory commission for approval to mastermeter facilities similar to Coffee Tree Square Apartments? If yes, identify these state regulatory commissions and provide a copy of any decision on these requests.

2. Refer to T. K. Adkinson's letter of December 21, 1989, a copy of which is attached to Danville Friends' Response to the Commission's Order of December 8, 1989.

(a) How were labor costs for the multi-meter and the single meter concepts derived? State all assumptions made in arriving at this estimate.

(b) Provide a breakdown of all costs included in the \$73,197 cost for materials if the multimetering concept is employed. State all assumptions made in arriving at these amounts.

(c) Provide a breakdown of all costs included in the \$11,658.78 cost for materials if the single metering concept is employed. State all assumptions made in arriving at these amounts.

3. Provide a copy of the audit report prepared by Laventhol & Horwath on Richard Coleman's cost and budget calculations for Coffee Tree Square Apartments?

4. How much would the average resident of Coffee Tree Square Apartments pay for his electricity consumption if

mastermetering is permitted? State all assumptions made in arriving at your answer. Show all calculations.

5. How much would the average resident of Coffee Tree Square Apartments pay for his electricity consumption if individual metering is required? State all assumptions made in arriving at your answer. Show all calculations.

6. In an August 1, 1989 letter to Larry Barker, a copy of which is attached to Danville Friends' Amended Complaint, John Putnam stated that the annual utility cost of the proposed Coffee Tree Square Apartments would be "in the \$48,000.00 to \$50,000.00 range" if the Encon 3200 system were installed. In a letter to Richard G. Coleman, a copy of which is attached to Danville Friends' Response to the Commission's Order of December 8, 1989, Mr. Putnam estimates the annual utility cost for Coffee Tree Square Apartments to be approximately \$64,000 if the Encon 3200 system is installed. Explain the difference in these estimates.

7. What total annual operating costs associated with the metering of electricity will be incurred by Danville Friends if individual metering of Coffee Tree Square Apartments was required? Show all calculations. State all assumptions made in arriving at this amount. Provide a breakdown of all costs.

8. What total annual operating costs associated with the metering of electricity will be incurred by Danville Friends if mastermetering of Coffee Tree Square Apartments is permitted? Show all calculations. State all assumptions made in arriving at this amount. Provide a breakdown of all costs.

9. How does Danville Friends plan to recover the total meter cost, including materials and labor, associated with mastermetering? How is this recovery of costs a benefit to the consumers of the electricity as compared to individual metering where the utility could directly bill the consumer?

10. Refer to John Putnam's letter to Richard G. Coleman, a copy of which is attached to Danville Friends' Response to the Commission's Order of December 8, 1989.

(a) How was Coffee Tree Square Apartments' maximum monthly demand determined to be 350 KW in winter months?

(b) Why does Danville Friends believe that Coffee Tree Square Apartments' maximum monthly demand for 8 months of each year will not exceed 75 percent of its winter maximum monthly demand?

(c) Why does Danville Friends expect that its maximum monthly demand for electricity during summer months will not vary from demand during other non-winter months?

11. Has Danville Friends performed any study to determine the long-run benefits of individual metering to the residents of the Coffee Tree Square Apartments? If yes, provide a copy of such study. If no, why does Danville Friends believe that long-run benefits of individual metering are exceeded by the cost of installing individual meters?

12. Provide a circuit diagram for Coffee Tree Square Apartments' proposed electrical system.

13. Has Danville Friends developed a design for Coffee Tree Square Apartments' electrical system which allows for

multimetering installation? If yes, provide a copy of such circuit diagram.

Done at Frankfort, Kentucky, this 31st day of January, 1990.

PUBLIC SERVICE COMMISSION


For the Commission

ATTEST:


Executive Director