

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF INTER-COUNTY ENERGY)	
COOPERATIVE FOR A CERTIFICATE OF)	
CONVENIENCE AND NECESSITY PURSUANT)	
TO KRS 278.020(1) AND 807 KAR 5:001,)	CASE NO.
SECTION 9, AND RELATED SECTIONS,)	2009-00143
AUTHORIZING CERTAIN PROPOSED)	
CONSTRUCTION IDENTIFIED AS THE 2009-)	
2012 CONSTRUCTION WORK PLAN)	

SECOND DATA REQUEST OF COMMISSION STAFF
TO INTER-COUNTY ENERGY COOPERATIVE

Pursuant to 807 KAR 5:001, Inter-County Energy Cooperative (“Inter-County”) is to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due on or before September 25, 2009. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person’s knowledge, information, and belief formed after a reasonable inquiry.

Inter-County shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Inter-County fails or refuses to furnish all or part of the requested information, Inter-County shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. In its response to question 1 of the Commission Staff's first data request ("Staff's First Request") Inter-County states that "Board of Directors, staff and management have been reviewing various AMR vendors and asked for vendor quotes, as well as quotes for meter testing and meter change outs."

a. What are the specifications that Inter-County has given the vendors regarding the AMR meters it plans to purchase? Explain in detail.

b. Identify all vendors contacted by Inter-County regarding the supply of AMR meters. Include in your response a copy of all materials supplied by the vendors detailing the specific equipment to be supplied.

2. The response to question 3 of Staff's First Request provided detailed information with respect to the capabilities of the new AMR meters at implementation.

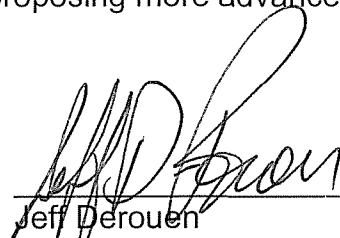
a. Beyond its installation of the AMR equipment, describe what plans, if any, Inter-County has for future installation of Advanced Metering Infrastructure ("AMI").

b. Explain if additional equipment would be needed to complete the plans identified in response to a. above. If additional equipment would be necessary, state whether the AMR meters as proposed are capable of being retrofitted to complete these plans or if the AMR meters as proposed would have to be replaced to complete these plans. Explain.

3. Section 3-B1 of the Construction Work Plan shows an average meter replacement cost between \$180 and \$203.

a. If known, identify and describe any future upgrades that will be necessary to implement the AMI plan described in the response to 2. a. of this request.

b. If known, provide the cost difference between the AMR meters as proposed in the application and those that would be considered the most advanced AMI meters currently available. Also, if known, provide the cost difference between the proposed AMR meters and those AMI meters that are capable of providing the functions required to meet Inter-County's AMI plan, but are not considered the most advanced AMI meters available. If the AMR meters proposed by Inter-County are not the most advanced available, explain why Inter-County is not proposing more advanced meters.



Jeff Derouen
Executive Director
Public Service Commission
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DATED SEP - 8 2009

cc: All parties

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