## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TARIFF FILING OF MEADE COUNTY RURAL )ELECTRIC COOPERATIVE CORPORATION )TO IMPLEMENT DEMAND-SIDE )MANAGEMENT PROGRAMS )

Case No. 2012-00153

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

Meade County Rural Electric Cooperative Corporation ("Meade"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the date of this request. 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 the 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.

Meade 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 Meade fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible.

1. Refer to the proposed tariffs filed on March 20, 2012.

a. Refer to proposed Schedule 26, the High Efficiency Lighting Replacement Program. The "Member Incentives" section states that "[t]he Cooperative will provide to its eligible Customers CFL lamps obtained from Big Rivers." In the High Efficiency Lighting Replacement Program tariff filed by Big Rivers Electric Corporation<sup>1</sup> ("Big Rivers"), the "Member Incentives" section states that "Big Rivers will reimburse a Member the cost of CFL lamps purchased and distributed by the Member to its eligible Rural Customers." In addition, the "Terms & Conditions" section of Big Rivers' proposed tariff states that "a Member must submit to Big Rivers a copy of a paid CFL supplier invoice." Given the language in Big Rivers' proposed tariff, explain why Meade's proposed tariff states that the CFL lamps will be obtained from Big Rivers.

b. Refer to proposed Schedules 27 through 34. In the "Member Incentive" sections of each of these eight schedules, Meade specifies that it must first receive the corresponding incentive payment from Big Rivers before paying the incentive to its customer. Big Rivers' proposed Demand-Side Management program tariffs which correspond with Meade's schedules 27, 28, 29, 31, and 32 state that "Big

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<sup>&</sup>lt;sup>1</sup> <u>See</u> Case No. 2012-00142, Tariff Filing of Big Rivers Electric Corporation to Implement Demand-Side Management Programs, filed March 16, 2012.

Rivers will reimburse a Member an incentive payment . . . ." Explain how Meade can be "reimbursed" from Big Rivers as set out in Big Rivers' proposed tariffs if it must first receive the incentive payment from Big Rivers before providing the payment to its customers.

c. Refer to proposed Schedule 30, the Residential Weatherization Program tariff. Paragraph 2 under the "Terms & Conditions" section states, "[t]he Cooperative will select eligible Customers' names to submit to Contractor." In the Big Rivers' Residential Weatherization Program proposed tariff, paragraph 2 of the "Terms & Conditions" section states that "[t]he Member will promote the program, and select Rural Customer names to submit to Contractor." Explain why the phrasing related to promotion of the program was excluded from Meade's proposed Schedule 30.

d. Refer to proposed Schedule 31, the Touchstone Energy New Home Program tariff. The "Purpose" section references "one of three specified types of Energy Star rated HVAC systems" that could be installed under this program. However, four types are listed in the "Customer Incentives" part of the tariff. Did Meade intend for the "Purpose" section to refer to "one of four specified types of Energy Star rated HVAC systems"? If no, explain.

2. Provide Meade's plans for promoting the programs included in the proposed tariffs.  $\sqrt{\phantom{100}}$ 

Jeff/Dérouen Executive Director Public Service Commission P.O. Box 615 Frankfort, Kentucky 40601

DATED

MAY 0 9 2012

cc: Parties of Record

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