COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TARIFF FILING OF JACKSON ENERGY COOPERATIVE CORPORATION TO REVISE ITS NET METERING TARIFF)	CASE NO. 2013-00004
)	
)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO JACKSON ENERGY COOPERATIVE CORPORATION

Jackson Energy Cooperative Corporation ("Jackson Energy"), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due on or before March 11, 2013. 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.

Jackson Energy shall make timely amendment to any prior responses 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

Jackson Energy 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. 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. Provide a copy of the current Schedule NM-Net Metering tariff ("Net Metering Tariff") indicating the proposed revisions by italicized inserts or underscoring and striking over the proposed deletions.
- 2. Explain why the terms "inspect" and "inspection" were changed throughout the Net Metering Tariff to "examine" and "examination."
- 3. Provide a detailed explanation of Jackson Energy's rationale to require a potential net metering customer to have \$500,000 of liability insurance for a Level 1 system installed by a licensed installer, including, but not limited to, the following: (1) A discussion of the need to require a set amount of insurance coverage for potential net metering customers; (2) A discussion of how Jackson Energy arrived at the \$500,000 coverage requirement, including whether Jackson Energy considered the insurance premium costs and its impact on net metering participation; and (3) How Jackson Energy defines the term "licensed installer."
- 4. Provide a detailed explanation of Jackson Energy's rationale to require a potential net metering customer to have \$1,000,000 of liability insurance for a Level 1

system installed by a non-licensed installer, including, but not limited to, the following:

(1) A discussion of the need to require a set amount of insurance coverage for potential net metering customers; (2) A discussion of how Jackson Energy arrived at the \$1,000,000 coverage requirement, including whether Jackson Energy considered the insurance premium costs and its impact on net metering participation; (3) Why this level of coverage is greater than the proposed coverage requirement a Level 1 system installed by a licensed installer; and (4) How Jackson Energy defines the term "non-licensed installer."

- 5. Provide a detailed explanation of Jackson Energy's rationale to require a potential net metering customer to have \$1,000,000 of liability insurance for a Level 2 system including, but not limited to, the following: (1) A discussion of the need to require a set amount of insurance coverage for potential net metering customers; (2) A discussion of how Jackson Energy arrived at the \$1,000,000 coverage requirement, including whether Jackson Energy considered the insurance premium costs and its impact on net metering participation; (3) Why this level of coverage is greater than the proposed coverage requirement for a Level 1 system installed by a licensed installer; and (4) Why there was no distinction in terms of coverage for a Level 2 system installed by a licensed installer versus a non-licensed installer, as was proposed for the Level 1 system.
- 6. Provide a history of any liability insurance claim associated with any Jackson Energy customer arising from a net-metered electric generating system, including a description of the claim, the amount of the original claim, and the settlement amount, if known.

7. Is Jackson Energy aware of any electric utility in Kentucky that currently

requires a set level of insurance coverage for net metering? If yes, provide the name of

the electric utility and the amount of coverage required by that utility.

8. How many net metering customers does Jackson Energy currently have?

9. Has Jackson Energy required a minimum level of insurance coverage for

any of its past or current net metering customers? If yes, provide the number of

customers and the amount of insurance coverage that each customer was required to

carry.

10. Has Jackson Energy required a set level of insurance coverage as part of

its past Net Metering Tariff? If yes, provide the amount of coverage required, a

discussion of how that amount was determined, and the time period that the Net

Metering Tariff was in effect.

11. Did Jackson Energy conduct any research concerning requirements for

minimum levels of insurance coverage against loss arising out of the use of a net

metered facility in other states? If yes, provide a discussion of that research and the

findings resulting therefrom.

12. Provide an explanation of a net metered facility that is certified to meet the

requirements of Underwriters Laboratories Standard 1741.

Jeff Derdylen

Executive Director

Public Service Commission

211 Sower Boulevard

P.O. Box 615

Frankfort, KY 40602

DATED FEB 2 2 2013

cc: Parties of Record

Donald R Schaefer Jackson Energy Cooperative Corporation 115 Jackson Energy Lane McKee, KY 40447