

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF JACKSON)	
PURCHASE ENERGY CORPORATION FOR A)	CASE NO.
DEVIATION FROM THE REQUIREMENT TO)	2021-00351
MANUALLY READ THE CUSTOMER METERS)	

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

Jackson Purchase Energy Corporation (Jackson Purchase Energy), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on November 5, 2021. The Commission directs Jackson Purchase Energy to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Jackson Purchase Energy shall make timely amendment to any prior response if Jackson Purchase Energy obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Jackson Purchase Energy fails or refuses to furnish all or part of the requested information, Jackson Purchase Energy 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. When filing a paper containing personal information, Jackson Purchase Energy shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Identify the total number of customer meters in Jackson Purchase Energy's system and identify the total number of those meters that are Advanced Metering Infrastructure (AMI) meters by brand and model.

2. Explain whether Jackson Purchase Energy is requesting a deviation from 807 KAR 5:006, Section (5)(b), for all customer meters on its system, for all AMI meters, or for some subset of AMI meters. If it is a subset of AMI meters, identify those meters for which it is requesting a deviation.

3. Explain how the meters for which Jackson Purchase Energy is requesting a deviation are read manually.

4. State whether there has ever been a discrepancy between an AMI meter on Jackson Purchase Energy's system being read remotely versus when it was read manually, and if so, identify and describe each such instance and the cause of the discrepancy.

5. If the Commission granted Jackson Purchase Energy's requested deviation, explain when, under what circumstances, and how often, if ever, employees or contractors of Jackson Purchase Energy would check AMI meters manually.

6. Provide documentation supporting Jackson Purchase Energy's "Current Meter Reading Monthly Cost by Outside Contractor" of \$10,000 in its Application and its estimated "Cost per meter" of \$3.33, including any contracts or invoices that support those numbers.

7. Provide any invoices from a meter reading contractor for the last 12 months for meter reading.

8. Assuming the accuracy of Jackson Purchase Energy's cost per meter estimate of \$3.33, confirm that the total annual cost to read 30,339 meters annually would be \$101,028.87 ($30,339 \times \3.33) and would not be the \$1.1 million estimated by Jackson Purchase Energy. If Jackson Purchase Energy is not able to confirm, provide each and every basis for why Jackson Purchase Energy is not able to confirm.

9. Explain each and every basis why Jackson Purchase Energy contends that the deviation is still justified despite the fact that the deviation will result in significantly lower saving than Jackson Purchase Energy indicated in its Application.



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Public Service Commission
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DATED OCT 15 2021

cc: Parties of Record

Case No. 2021-00351

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