

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF INTER- )	
COUNTY ENERGY COOPERATIVE )	
CORPORATION FOR A CERTIFICATE OF )	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY )	2022-000350
AUTHORIZING THE INSTALLATION OF A NEW )	
ADVANCED METERING INFRASTRUCTURE )	
(AMI) SYSTEM )	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO INTER-COUNTY ENERGY COOPERATIVE CORPORATION

Inter-County Energy Cooperative Corporation (Inter-County 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 December 9, 2022. The Commission directs Inter-County Energy to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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 question to which the response is made and 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

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<sup>1</sup> 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).

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 Energy shall make timely amendment to any prior response if Inter-County 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 Inter-County Energy fails or refuses to furnish all or part of the requested information, Inter-County 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, Inter-County 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. Refer to the Application, Exhibit 1, Customer Information Letter. Inter-County Energy states that Landis+Gyr's support for the Automatic Meter Reading (AMR) system would be ending and new meters and parts would no longer be produced.

- a. Provide copies of all communications from Landis+Gyr to Inter-County Energy indicating when meters and parts will no longer be available.

b. Explain in specific detail how and when Inter-County Energy became aware that support of the AMR system would end.

c. Explain in specific detail how Inter-County Energy will continue to use its current meters for three years after support ends and replacement parts are no longer produced.

2. Refer to the Application, Exhibit 1, Request for Proposals (RFP). Provide a list of vendors the RFP was sent to.

3. Provide the number of Landis+Gyr AMR meters Inter-County Energy has remaining in stock.

4. Provide the analysis that Inter-County Energy performed, including the bid evaluation sheets, surveys of other utilities, and a copy of the material supplied to Inter-County Energy's Board of Directors, supporting the selection of Landis+Gyr to be the vendor for the AMI System proposed in this case.

5. State whether obsolescence of the AMR meters was unique to Landis+Gyr AMR meters or the particular AMR model used by Inter-County Energy and explain how you made this determination.

6. State whether any other type (i.e. AMR, mechanical) or model of meters was available and whether it was considered by Inter-County Energy. If so, provide estimated costs of these alternatives and state why they were not chosen.

7. Refer to the Application, page 3, paragraph 7, which states that Inter-County Energy will pay for the proposed project using its general fund until new Rural Utility Service (RUS) loan funds are needed to pay for construction.

a. Provide a detailed breakdown showing the amount of funding from general funds that will be used prior to drawing on RUS loan funds that will be used to pay the cost of the proposed project.

b. Explain how Inter-County Energy will determine when the RUS loan funds will be needed to pay the cost of the proposed project.

c. Explain whether Inter-County Energy will need to file for permission to take on the additional financing from RUS and, if so, when such a filing will be made.

8. Explain in detail Inter-County Energy's plans and related costs for the existing AMR meters that will be replaced, including testing for accuracy in accordance with 807 KAR 5:041, Section 15(3).

9. Explain whether the AMR meters and other components of the AMR system have been fully depreciated, and, if not, provide the gross plant in service and the amount of accumulated depreciation for the AMR meters and other components of the AMR system by plant account and explain how Inter-County Energy intends to recover the undepreciated costs of the AMR meters.

10. Provide support for the useful life of the proposed AMI meters and components.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED NOV 17 2022

cc: Parties of Record

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