




Rural Electric Cooperative Corporation

A Touchstone Energy[®] Cooperative 

March 9, 2011

MR JEFF DEROUEN
EXECUTIVE DIRECTOR
PUBLIC SERVICE COMMISSION
PO BOX 615
FRANKFORT KY 40602

RECEIVED

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**PUBLIC SERVICE
COMMISSION**

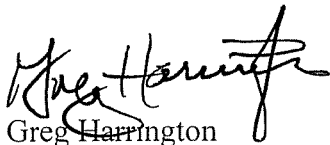
RE: PSC CASE NO. 2010-00518

Dear Mr. Derouen:

Please find enclosed an original and five (5) copies of our responses of Nolin RECC as requested in the above referenced case.

If you have any questions, please let me know.

Sincerely,



Greg Harrington
Engineering Superintendent

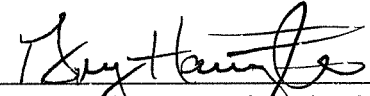
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Enclosures

Commonwealth of Kentucky
Before the Public Service Commission
Case No. 2010-00518

VERIFICATION

I verify, state and affirm that the testimony filed with this verification and for which I am listed as a witness is true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.

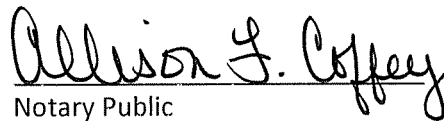


Greg Harrington, Engineering Superintendent

State of Kentucky

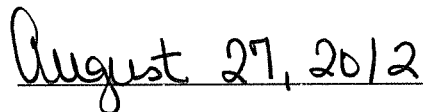
County of Hardin

The foregoing was signed, acknowledged and sworn to before me by Greg Harrington, this 9th day of March, 2011.



Notary Public

My Commission Expires:



August 27, 2012

Nolin Rural Electric Cooperative Corporation
First Information Request – Case No. 2010-00518
Public Service Commission Staff Request Dated March 3, 2011

Question 1a:

1. *Refer to attached copy of Nolin's 2011-2013 Construction Work Plan ("CWP"), which was included by Nolin as an extra copy of the CWP filed with its application in this matter on December 22, 2010. The attached copy of the CWP is different in many respects from the original copy of Nolin's 2011-2013 CWP, which was filed with the application in this matter; e.g., the attached copy of the CWP does not contain pages 37-41 of the CWP that was part of the filed application, and the cell of the spreadsheet on page 7 of the attached copy labeled "Meters-AMR" reads "2106," whereas the copy filed with the application reads "2250." The pagination is also different in a number of places. For example, the last paragraph on page 4 of the attached copy which reads, "[n]ew distribution, transmission, and power supply requirements..." is on page 5 of the version attached to the filed application.*
 - a. *Explain in detail whether the attached copy of the CWP or the copy filed with the December 22, 2010 application in this matter (which can be viewed on the Commission's website at:
http://www.psc.ky.gov/PSCSCF/2010%20cases/2010-00518/20101222_nolin%20application.pdf), is the correct version of the CWP for purposes of the Commission's review of the application in this matter.*

Answer:

The copy of the CWP filed with the PSC stamp dated December 22, 2010 and the application with the PSC stamp dated December 20, 2010 is the correct CWP version; the attached copy to your information request is not the correct version. What is found on the PSC web-site is the correct version. The corrections made prior to the second submission of the CWP created additional "spacing" errors not detected prior to the second submission of the CWP to the PSC.

Responding Witness: Greg Harrington, Engineering Superintendent
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
First Information Request – Case No. 2010-00518

Public Service Commission Staff Request Dated March 3, 2011

Question 1b:

1. *Refer to attached copy of Nolin's 2011-2013 Construction Work Plan ("CWP"), which was included by Nolin as an extra copy of the CWP filed with its application in this matter on December 22, 2010. The attached copy of the CWP is different in many respects from the original copy of Nolin's 2011-2013 CWP, which was filed with the application in this matter; e.g., the attached copy of the CWP does not contain pages 37-41 of the CWP that was part of the filed application, and the cell of the spreadsheet on page 7 of the attached copy labeled "Meters-AMR" reads "2106," whereas the copy filed with the application reads "2250." The pagination is also different in a number of places. For example, the last paragraph on page 4 of the attached copy which reads, "[n]ew distribution, transmission, and power supply requirements..." is on page 5 of the version attached to the filed application.*
 - b. *If known, explain in detail why the attached copy of the CWP is different from the copy filed with the December 22, 2010 filed application and how it came to be included with Nolin's application.*

Answer:

Initially only one original CWP was filed with the application for a certificate of convenience and necessity and no additional copies were submitted. The Public Service Commission then requested that Nolin RECC submit (10) copies of the CWP. A mathematical error, margin errors and "white" space issues were detected in the first submission of the CWP and were corrected prior to the second PSC submission.

Responding Witness: Greg Harrington, Engineering Superintendent
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
First Information Request – Case No. 2010-00518

Public Service Commission Staff Request Dated March 3, 2011

Question 1c:

1. *Refer to attached copy of Nolin's 2011-2013 Construction Work Plan ("CWP"), which was included by Nolin as an extra copy of the CWP filed with its application in this matter on December 22, 2010. The attached copy of the CWP is different in many respects from the original copy of Nolin's 2011-2013 CWP, which was filed with the application in this matter; e.g., the attached copy of the CWP does not contain pages 37-41 of the CWP that was part of the filed application, and the cell of the spreadsheet on page 7 of the attached copy labeled "Meters-AMR" reads "2106," whereas the copy filed with the application reads "2250." The pagination is also different in a number of places. For example, the last paragraph on page 4 of the attached copy which reads, "[n]ew distribution, transmission, and power supply requirements..." is on page 5 of the version attached to the filed application.*
 - c. *Refer to the Table of Contents at page 3 of either version of the CWP. Item Nos. 4 and 5 of the Table of Contents do not appear to be included in either the attached copy of the CWP or the CWP filed with the application. If sections of the CWP pertaining to Item Nos. 4 and 5 were inadvertently omitted, provide the omitted pages.*

Answer:

These pages were not inadvertently omitted; Nos. 4 and 5 are data calculated using MilSoft's WindMil Engineering Analysis Model (version 7). This model consists of 5,000+ pages of WindMil Calculations that are used to determine problem areas within the Nolin RECC System. Normally a hard copy of the WindMil Model is not included as part of the CWP because of the volume of paper needed; the model is saved as a PDF file for viewing if needed.

Responding Witness: Greg Harrington, Engineering Superintendent
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
First Information Request – Case No. 2010-00518
Public Service Commission Staff Request Dated March 3, 2011

Question 2a:

2. *Refer to the Summary of Proposed 3 Year Construction With Cost, at pages 7 and 8 of the original version of the work plan filed with the application. On page 8 under Code 704, Load Management does not include any expenditure for any projects as part of this work plan. However, in section of the CWP for “Required Line Construction Items,” at page 39, a project for CFR Code 704, “Load Management/SCADA-Self Healing Project” in the amount of \$2,999,998 is included.*

a. Is it Nolin’s intention that this project be included in this work plan?

Answer:

No.

Responding Witness: Greg Harrington, Engineering Superintendent
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
First Information Request – Case No. 2010-00518

Public Service Commission Staff Request Dated March 3, 2011

Question 2b:

2. *Refer to the Summary of Proposed 3 Year Construction With Cost, at pages 7 and 8 of the original version of the work plan filed with the application. On page 8 under Code 704, Load Management does not include any expenditure for any projects as part of this work plan. However, in section of the CWP for “Required Line Construction Items,” at page 39, a project for CFR Code 704, “Load Management/SCADA-Self Healing Project” in the amount of \$2,999,998 is included.*

b. If yes, does its inclusion increase the cost of the CWP to \$15,916,336?

Answer:

N/A

Responding Witness: Greg Harrington, Engineering Superintendent
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
First Information Request – Case No. 2010-00518
Public Service Commission Staff Request Dated March 3, 2011

Question 2c:

2. *Refer to the Summary of Proposed 3 Year Construction With Cost, at pages 7 and 8 of the original version of the work plan filed with the application. On page 8 under Code 704, Load Management does not include any expenditure for any projects as part of this work plan. However, in section of the CWP for “Required Line Construction Items,” at page 39, a project for CFR Code 704, “Load Management/SCADA-Self Healing Project” in the amount of \$2,999,998 is included.*
- c. If yes, did RUS’s December 8, 2010 approval include approval to proceed with the “Load Management/SCADA-Self Healing Project?”

Answer:

N/A

Responding Witness: Greg Harrington, Engineering Superintendent
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
First Information Request – Case No. 2010-00518
Public Service Commission Staff Request Dated March 3, 2011

Question 2c (1):

2. *Refer to the Summary of Proposed 3 Year Construction With Cost, at pages 7 and 8 of the original version of the work plan filed with the application. On page 8 under Code 704, Load Management does not include any expenditure for any projects as part of this work plan. However, in section of the CWP for “Required Line Construction Items,” at page 39, a project for CFR Code 704, “Load Management/SCADA-Self Healing Project” in the amount of \$2,999,998 is included.*
 - c. If yes, did RUS’s December 8, 2010 approval include approval to proceed with the “Load Management/SCADA-Self Healing Project?”
 1. If no, has RUS given Nolin its approval to proceed with the “Load Management/SCADA-Self Healing Project” since December 8, 2010?

Answer:

No

Responding Witness: Greg Harrington, Engineering Superintendent
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
First Information Request – Case No. 2010-00518
Public Service Commission Staff Request Dated March 3, 2011

Question 2c (2):

2. *Refer to the Summary of Proposed 3 Year Construction With Cost, at pages 7 and 8 of the original version of the work plan filed with the application. On page 8 under Code 704, Load Management does not include any expenditure for any projects as part of this work plan. However, in section of the CWP for “Required Line Construction Items,” at page 39, a project for CFR Code 704, “Load Management/SCADA-Self Healing Project” in the amount of \$2,999,998 is included.*

c. If yes, did RUS’s December 8, 2010 approval include approval to proceed with the “Load Management/SCADA-Self Healing Project?”

(2.) If RUS has given Nolin its approval to proceed with the “Load Management/SCADA-Self Healing Project,” provide a copy of the document in which RUS states its approval of the project.

Answer:

N/A

Responding Witness: Greg Harrington, Engineering Superintendent
Nolin Rural Electric Cooperative Corporation