

Request 104: Describe precautions taken and/or standards developed by the utility to address concerns regarding cybersecurity and privacy issues.

RESPONSE 104: Big Sandy RECC follows the Red Flag Rules and has put in place (IPS) Intrusion Prevention Service by Dell Secureworks who monitor outside of our firewall (Cisco 5510 Series).

Request 105: Provide a discussion and details of progress made regarding the concern raised by the utilities as it relates to the interoperability standards for Smart Grid equipment and software.

RESPONSE 105: The only equipment and software Big Sandy RECC has experience with is Aclara systems. Big Sandy has experienced no interoperability of equipment and software.

Request 106: Provide a discussion concerning how the costs (investment and operating and maintenance costs) associated with the installation of Smart Grid facilities should be recovered from the ratepayers.

RESPONSE 106: Big Sandy RECC references the response to PSC Request 106 submitted by EKPC and adopts that response as its own.

Request 107: State whether the utility would favor a requirement that it report to the Commission so that the Commission is aware of the jurisdictional Smart Grid and/or Smart Meter activities within the Commonwealth. As a specific example, the requirement could order that a report be provided each September regarding the Smart Grid and/or Smart Meter activities the utility is planning to perform during the upcoming calendar year, followed by an April report of the Smart Grid and/or Smart Meter activities the utility completed the preceding calendar year.

RESPONSE 107: Big Sandy RECC references the response to PSC Request 107 submitted by EKPC and adopts that response as its own.

Request 108: State whether the utility believes KRS 278.285 is an appropriate approach to recovering the costs (investment and operation and maintenance) associated with Smart Grid investments.

RESPONSE 108: Big Sandy RECC references the response to PSC Request 108 submitted by EKPC and adopts that response as its own.

Request 109: State whether the utility believes a tracking mechanism as described beginning on page 3 of the Wathen Testimony on behalf of Duke Kentucky is an appropriate approach to recovering the costs associated with Smart Grid investments.

RESPONSE 109: Big Sandy RECC references the response to PSC Request 109 submitted by EKPC and adopts that response as its own.

Request 110: State whether the utility has commissioned a thorough DSM and Energy Efficiency ("DSM-EE") potential study for its service territory. If the response is yes, provide the results of the study. If no, explain why not.

RESPONSE 110: Big Sandy RECC references the Request 110 submitted by EKPC and adopts that response as our own.

Request 111: Refer to the Munsey Testimony on behalf of Kentucky Power, page 10, lines 11-19 regarding the Green Button initiative. Describe the extent of your utility's participation in this industry-led effort.

RESPONSE 111: Big Sandy RECC has not participated in the Green Button initiative thru the present time.

Request 112: Refer to the Roush Testimony on behalf of Kentucky Power, DMR Exhibit 1. Provide a similar exhibit containing a list of time-differentiated rates available to your customers.

RESPONSE 112: Big Sandy RECC's only time differentiated rates are based on EKPC's E-2 Rates, which are all of Big Sandy RECC's scheduled rates with the exception of Industrial Schedules I and II.

Request 113: Provide a description of the type of meters (mechanical, electro-mechanical, AMR [one-way communication], AMI [two-way communication]) currently used by the utility. Include in the description the reasons the current meters were chosen and any plans to move to a different type of metering configuration.

RESPONSE 113: Big Sandy RECC uses AMI metering that utilizes two way communications known as “Power Line Carrier”. The system is supported by Aclara (TWACS). Big Sandy RECC has approximately 20% of its residential meters that are electro mechanical fitted with a solid state module. The remaining meters are solid state electronic meters with a (TWACS) electronic module installed.

The initial implementation of (TWACS) meters included both types. Big Sandy shifted to the solid state meters because we experienced an approximate 3% failure of the retrofitted meters upon installation and less than 1% upon installation of solid state meters.

We have plans to gradually replace all retrofitted meters with solid state meters. We do not have any plans to switch to a different AMI system.

Request 114: If either AMR or AMI metering is in use, state whether the utility has received any customer complaints concerning those meters. If the response is yes, provide the following:

- a. the number of complaints, separated by gas and electric if a combination utility, along with the total number of customers served.
- b. how the complaints were addressed by the utility.
- c. a detailed explanation as to whether customers should have the ability to opt out of using either AMR or AMI metering.
- d. If customers were to be given the opportunity to opt out of using either AMR or AMI metering, provide:
 - i. an explanation as to whether the utility should establish a monthly manual metering reading tariff or charge applied to the opt-out customers to recover the costs associated with manually reading the non-AMR or -AMI accounts.
 - ii. an explanation as to whether these opt-out customers could still receive benefit from the utility using either AMR or AMI metering.
 - iii. an explanation addressing the point at which opt-out customers, either in terms of number of customers or a percent of customers, affect the benefits of the utility using either the AMR or AMI metering.

RESPONSE 114: Big Sandy RECC has received no complaints.

Request 115: In testimony, each utility cited cybersecurity as an area of concern related to the implementation of Smart Grid technologies. Provide and describe your company's policy regarding cybersecurity or the standard your company has adopted governing cybersecurity. If your company has not adopted any policy or standard, identify and describe any industry or nationally recognized standards or guidelines that you may be aware of that the Commission should consider relating to cyber security issues and concerns.

RESPONSE 115: Along with the Red Flag Rules that we follow, Big Sandy RECC has passwords to help keep data safe and any papers that have information are scanned into a secure e-filing system and the papers are destroyed.

Request 116: If not previously addressed, provide a detailed discussion of whether deployment of smart meters should allow for an opt-out provision.

RESPONSE 116: It is Big Sandy RECC's opinion that there is no reasonable situation where a customer should be allowed to opt out. The AMI system is detrimental to all consumers because the Co-op cannot collect necessary information without it.