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PUBLIC SERVICE
COMMISSION

March 18, 2013

MR JACK CONWAY
ATTORNEY GENERAL
1024 CAPITAL CENTER DRIVE
SUITE 200
FRANKFORT KY 40601-8204

RE: PSC CASE NO. 2012-00428

Dear Mr. Derouen:

Please find enclosed an original and fourteen (14) copies of the responses of Nolin RECC as requested in the above referenced case dated February 27, 2013.

If you have any questions, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Michael L. Miller".

Michael L. Miller
President & CEO

afc

Enclosures

Commonwealth of Kentucky

Before the Attorney General

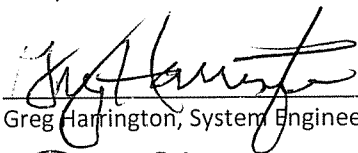
Case No. 2012-00428

VERIFICATION

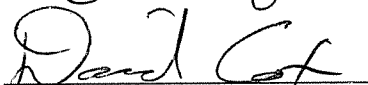
I verify, state and affirm that the testimony filed with this response and for which I am listed as a witness is true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.



Cheryl Thomas, Vice President Office Services – Nolin RECC



Greg Harrington, System Engineer – Nolin RECC

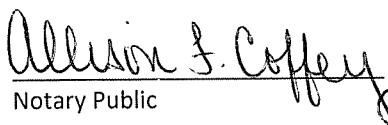


David Cox, Information Technology Director – Nolin RECC

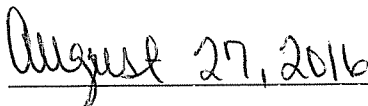
State of Kentucky

County of Hardin

The foregoing was signed, acknowledged and sworn to before me, this 18th day of March, 2013.


Notary Public

My Commission Expires:



Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
Attorney General’s Request Dated February 27, 2013

Question 1:

Since the Commission initiated Consideration of the New Federal Standards of the Energy Independence and Security Act of 2007, Administrative Case No. 2008-00408, has the company changed its position regarding Smart Grid? If so, how?

Answer:

Nolin RECC has not changed its position in regards to Smart Grid, since the Commission initiated Consideration of the *New Federal Standards of the Energy Independence and Security Act of 2007*, Administrative Case No. 2008-00408.

And in addition, Nolin RECC references the response to AG Request #1 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 2:

Are the technologies pertaining to the implementation of Smart Grid definitely known and proven?

- a. *If yes, explain in detail every aspect from the use of each technology from the company to the end-user.*
- b. *If not, explain in detail what technologies are already advancing/improving as well as those that are envisioned on the immediate time horizon.*

Answer:

Nolin RECC is not in a position to comment on whether technologies pertaining to the implementation of Smart Grid are definitely known and proven, but that smart grid has proven beneficial for us.

Nolin has had the Landis & Gyr T52 system full deployed since 2007. The system has worked very well in obtaining meter reads and sending the information back to our office via Power Line Carrier. In July 2011, Nolin started a “pilot” prepay program that allows members to pay as they consume electric power. Most recently, Nolin has filed a rider that will allow us to remotely connect and disconnect the members’ electric meter from our office.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 3:

In light of recent catastrophic storms over the past ten years (for example, the various ice storms, tornadoes, and strong winds), which electric companies have experienced, and for which the company may ultimately have sought regulatory assets, can the company affirmatively state that its basic infrastructure, including all of its generation, transmission and distribution facilities, have proven to be reliable 24 hours a day, seven days a week, 365 days a week? If not, for each and every storm that it affected the utility in excess of two days, please provide the following:

- a. *The number of days before the company's last ratepayer's electricity was restored for each storm.*
- b. *The average number of days, or hours if applicable, that the average ratepayer's outage lasted for each storm.*
- c. *The average financial loss for the average ratepayer for each storm, if known.*

Answer:

Nolin RECC has never sought regulatory assets, therefore, this question is non-applicable.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 4:

Does the company agree with the Attorney General that electricity is not considered a luxury service but a necessary commodity of modern life? If not, why not?

Answer:

Nolin RECC references the response to AG Request #2 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
Attorney General’s Request Dated February 27, 2013

Question 5:

Does the company agree that the fundamental reliability of its electric grid- i.e., the delivery of electricity to the end-user 24/7/365- is paramount to the end-user's ability to monitor and/or conserve his/her demand or electricity consumption? If not, why not?

Answer:

Nolin RECC references the response to AG Request #5 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 6:

Please state whether the company is aware of any cybersecurity breaches effecting the electric and gas industries that have either occurred in the United States or internationally. If the answer is in the affirmative, please explain the details of the breaches without exposing information that is not already in the public domain.

Answer:

Nolin RECC is not aware of any cyber security breaches.

Responding Witness: David Cox, Information Technology Director
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 7:

Please confirm that the company is aware that the prior United States Secretary of Defense Leon Panetta, in speaking on the vulnerability of the nation's electric grid with the consequential safety and security concerns that ensue, warned the Senate Appropriations Committee on Defense that the risk to the United States could even be considered the equivalent of a "digital Pearl Harbor".

- a. Is this concern of the vulnerability of the nation's electric grid shared by the company? If not, why not?*

Answer:

Nolin RECC is not aware of Mr. Leon Panetta’s speaking on the vulnerability of the nation’s electric grid. However any vulnerability of the electric grid is a concern of Nolin RECC.

Responding Witness: David Cox, Information Technology Director
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 8:

With regard to cybersecurity in general, can the company unequivocally confirm that its system reliability is not vulnerable to a cybersecurity attack? If not, what could be the consequences? Please explain in detail as much as possible for the following:

- a. the company, and*
- b. the company’s ratepayers*

Answer:

Nolin RECC cannot unequivocally confirm that our system is not vulnerable to a cyber-security attack. The consequence of vulnerability is the possibility of a security breach.

Responding Witness: David Cox, Information Technology Director
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 9:

Please provide the names of the standards, protocols or policies which the company observes and/or implements in its maintaining its system reliability from cybersecurity threats.

Answer:

Nolin RECC uses reputable vendors in conjunction with industry best practices/protocols in mitigating cyber security attacks.

Responding Witness: David Cox, Information Technology Director
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information -- Case No. 2012-00428
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Question 10:

Please provide copies of the standards, protocols or policies which the company observes and/or implements in its maintaining its system reliability from cybersecurity threats.

Answer:

Because information provided in this case as it pertains to protection from cyber security threats would be subject to access by the public, Nolin will need to obtain confidentiality protection regarding any such information that is provided to the PSC or AG's office.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 11:

With regard to cybersecurity in general, can the company unequivocally confirm that its ratepayers' privacy of data cannot be compromised or otherwise divulged to any individual or entity not associated with the company, or a qualified third-party which has issues a non-disclosure statement or the ratepayers? If not, what could be the consequences? Please explain in detail as much as possible for the following:

- a. the company, and*
- b. the company's ratepayers*

Answer:

Nolin RECC cannot unequivocally confirm that its members' privacy of data cannot be compromised.

Responding Witness: David Cox, Information Technology Director
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 12:

If a qualified third-party that has agreed to a non-disclosure statement and obtains ratepayers' private information, what guarantees exist that the information will not be disclosed, whether intentionally or unintentionally?

Answer:

There is no guarantee that members’ private information will not be disclosed by a qualified third-party.

Responding Witness: David Cox, Information Technology Director
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 13:

Please provide the names of the standards, protocols or policies which the company observes and/or implements in its maintaining its ratepayers' privacy data from cybersecurity threats.

Answer:

Because information provided in this case as it pertains to protection from cyber security threats would be subject to access by the public, Nolin will need to obtain confidentiality protection regarding any such information that is provided to the PSC or AG’s office.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 14:

Please provide copies of the standards, protocols or policies which the company observes and/or implements in its maintaining its ratepayers' privacy data from cybersecurity threats.

Answer:

Because information provided in this case as it pertains to protection from cyber security threats would be subject to access by the public, Nolin will need to obtain confidentiality protection regarding any such information that is provided to the PSC or AG’s office.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 15:

Given the vulnerability of the electric grid to cyberattacks, describe what analog (non-digital) means the company will have in place to insure reliability, including but not limited to the maintenance of legacy systems.

Answer:

Nolin RECC has an analog communication system to help system reliability.

Responding Witness: David Cox, Information Technology Director
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 16:

What are the company's estimated costs to invest in order to fully implement Smart Grid?

Answer:

Nolin RECC references the response to AG Request #16 submitted by EKPC and adopts that response as its own.

- a. *Do any cost estimates include results of any modeling that may show the degree of exposure to the following risks: (a) hacking; (b) electronic magnetic pulses (EMPs, whether related to solar flares or otherwise); and/or (c) weather events? If so, provide a list of the modeling software used to produce any estimates, the scenarios and sensitivities examined, and any and all such results.*

Answer:

Nolin RECC references the response to AG Request #16 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 17:

Please explain in detail what benefits, if any, the company expects its ratepayers to realize because of Smart Grid?

Answer:

Nolin RECC references the response to AG Request #17 submitted by EKPC and adopts that response as its own.

- a. *Does the company believe that societal benefits are to be considered in evaluating benefits? If so, detail those societal benefits and how they may be used in evaluations? If not, why not?*

Answer:

Nolin RECC references the response to AG Request #17 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 18:

Would the company agree to strict limits and/or caps on ratepayer costs? If not, why not?

Answer:

Nolin RECC references the response to AG Request #18 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 19:

Would the company agree to allow ratepayers to opt-out of smart meter deployment? If not, why not?

Answer:

Nolin RECC references the response to AG Request #19 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 20:

Can the company quantify measureable and significant benefits that the ratepayers will realize, including a monetary quantification of net savings (if any) to ratepayers?

Answer:

Nolin RECC references the response to AG Request #20 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 21:

Please explain in detail what detriments, if any, the company expects its ratepayers to realize because of Smart Grid? Include in the explanation both new costs as well as stranded costs.

Answer:

Nolin RECC references the response to AG Request #21 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 22:

What are the company's estimated costs which the company expects the ratepayers to realize?

Answer:

Nolin RECC references the response to AG Request #22 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 23:

What are the company's estimated costs which the company expects its shareholders, if any, to realize? Include in the explanation both new costs as well as stranded costs.

Answer:

Nolin RECC references the response to AG Request #23 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 24:

Does the company agree that its costs to invest and implement Smart Grid will be different than other utility companies? If not, why not?

Answer:

Nolin RECC references the response to AG Request #24 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 25:

Does the company agree that its ratepayers' benefits, whether financial or otherwise, may differ from one utility to another upon implementation of any Smart Grid technology? If not, why not?

Answer:

Nolin RECC references the response to AG Request #25 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 26:

Can the company guarantee that the deployment of Smart Grid will not interfere with the regulatory compact whereby the ratepayers will receive safe, adequate and reliable service at fair, just and reasonable costs? If not, why not? Explain in detail.

Answer:

Nolin RECC references the response to AG Request #26 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 27:

Answer the above question with the definition of "fair, just and reasonable costs" as being economically feasible for the end-user.

Answer:

Nolin RECC references the response to AG Request #27 submitted by EKPC and adopts that response as its own.

- a. Provide any cost-benefit analysis that the company has run or will run to make the determination of economically feasible to the end-user.*

Answer:

Nolin RECC references the response to AG Request #27 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
Attorney General’s Request Dated February 27, 2013

Question 28:

Regarding time of use (TOU) rates, can the company confirm that low-income ratepayers will not be disproportionately affected more than non-low-income customers? If not, why not? (Provide in the answers in any studies, reports, analyses and relevant data.)

Answer:

Nolin RECC does not have a TOU tariff.

Responding Witness: Cheryl Thomas, Vice President Office Services
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 29:

With regard to TOU rates, does the company have any history with any such programs? If so, explain in detail with particular facts as to:

- a. the number of customers who participated;*
- b. whether they remained on the program;*
- c. whether they saved money on their bills; and*
- d. whether the customers ultimately reduced their usage.*

Answer:

Nolin RECC does not have a TOU tariff and therefore has no experience with TOU rates.

Responding Witness: Cheryl Thomas, Vice President Office Services
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 30:

What proposals will the company present to deal with technological impediments to the broad use of Smart Grid, including but not limited to the following:

- a. low and fixed-income individuals who do not have Internet resources at their home;*
- b. multiple forms of telecommunications technology used to access information (i.e., analog, cellular, VOIP); and*
- c. multiple and proprietary technology and software options in the market that may lead to issues of compatibility?*

Answer:

Smart Grid technology is spoken of as though it has been around for several years and the technological advances have stopped. Smart Grid is still a very new concept. With the advances in the technology, what were obstacles six months ago may have been overcome. The obstacles that are presented here have a short shelf life. It is Nolin’s belief that it is only a matter of time before each of these obstacles are overcome as well.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 31:

Assume: Full deployment of Smart Grid at the residential ratepayer level consisting of a household with only Energy Star appliances, an HVAC system with at least a 15 SEERS rating, etc. and any smart grid apparatuses/equipment for interconnectivity with the electricity provider (including generation, transmission and distribution).

- a. *Does the company agree that if full deployment of the magnitude described in the above question occurs, the average residential ratepayer could experience a significant capital outlay?*

Answer:

Nolin RECC references the response to AG Request #31 submitted by EKPC and adopts that response as its own.

- b. *If so, what are the projected costs?*

Answer:

Nolin RECC references the response to AG Request #31 submitted by EKPC and adopts that response as its own.

- c. *If no costs are anticipated by the electric provider, why not?*

Answer:

Nolin RECC references the response to AG Request #31 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 32:

In regard to appliances, such as refrigerators or lighting, does the company agree that in the long run, it is cheaper for the end-user himself/herself to make that capital outlay for the purchase of the appliance or lighting than have the company provide the appliance(s) and build the costs into the company's ratebase which would then include a profit component for the company on an on-going basis?

Answer:

Nolin RECC references the response to AG Request #32 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 33:

Confirm that the Smart Grid depends, at least in part, if not exclusively, on telephony (whether landline, fiber optic, wireless or VOIP) at the end-user level for the end-user to participate in his/her altering his/her electricity usage patterns or behavior.

Answer:

Nolin RECC partially affirms that, currently, “at least in part” that the Smart Grid depends on telephony at the end-user level for the end-user to participate in altering their electricity usage patterns or behavior. A technology not mentioned here is satellite and the opportunities are not yet realized with that technology.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 34:

If the answer to the above question is in the affirmative, confirm that limited access or even complete absence of access to telephony will interfere with, if not prevent, the deployment of the Smart Grid at the end-user level.

Answer:

Nolin RECC will not confirm that limited access to telephony will prevent the deployment of the Smart Grid at the end-user level. The obstacle presented here will have a short shelf life; it’s only a matter of time before this obstacle is overcome. That being said, that does not mean that technologies such as satellite will not cost more to reach an end-user, but that is an option.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 35:

If the company intends to install infrastructure/software allowing for the transmission of Smart Grid/Smart Meter data over its distribution/transmission conductors and networks, provide estimates, or actual numbers, for the costs of doing so.

Answer:

Nolin RECC has no plans to install infrastructure or software allowing for the transmission of Smart Grid or transmission conductors and networks. Nolin did install an AMR system that started in 2003 and was fully deployed prior to 2007, at the time the cost of the system was approximately \$4.6 million.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 36:

Is there a standard communications' protocol that the company will deploy in its Smart Grid that will be interoperable regardless of the communications provider?

- a. If not, explain how the company plans on addressing any problems that might arise.*

Answer:

Nolin RECC is not aware of a standard communication protocol that has been developed yet from the EISA 2007. Nolin has been communicating with both meters and substations since the start of our deployment in 2003 and we have not had any issues.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 37:

If improved reliability is the goal of Smart Grid/Smart Meter, would it not be more cost-effective to invest in infrastructure hardening (for example, utilizing protocols and standards developed and implemented by many utilities in hurricane-prone regions)?

Answer:

Nolin RECC’s belief is that improved reliability is one of many benefits and not the ultimate goal of Smart Grid. Nolin’s goal for Smart Grid is to improve the quality of living in our communities by providing safe, reliable, cost-effective services and products valued by our members and customers.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 38:

Describe the company's plans to avoid obsolescence of Smart Grid/Smart Meter infrastructure (both hardware and software) and any resulting stranded costs. (This question and the subparts should be construed to relate to both the Smart Grid Investment Standard as well as the Smart Grid Information Standard.)

- a. Describe who would pay for stranded costs resulting from obsolescence.*

- b. With regard to the recovery of any obsolete investment, explain the financial accounting that should be used (as in account entry, consideration of depreciation, time period involved, etc.).*

Answer:

Nolin RECC references the response to AG Request #38 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 39:

With regard to interoperability standards, does the company agree that Smart Grid equipment and technologies as they currently exist, and are certain to evolve in the future, are not a one size fits all approach to the Commonwealth?

Answer:

Nolin RECC references the response to AG Request #39 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 40:

Is dynamic pricing strictly defined as TOU?

- a. *If not, explain why not.*
- b. *Is the company requesting that dynamic pricing be voluntary or involuntary, if at all?*

Answer:

Nolin RECC references the response to AG Request #40 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 41:

Please explain in detail whether the company has any dynamic programs in place in Kentucky.

- a. For each program, provide the number of participants.*
- b. For each program, state whether those participants on aggregate have saved costs on their bills.*
- c. For each program, state whether those participants on aggregate have saved costs on their bills.*
- d. For each program, state whether each participant has saved costs on his/her/its bills. (The question is not intended to request any private identifier information.)*

Answer:

Nolin RECC does not have a TOU tariff.

Responding Witness: Cheryl Thomas, Vice President Office Services
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 42:

Does the company recommend the Commission to formally adopt the EISA 2007 Smart Grid Investment Standard? If not, why not?

Answer:

Nolin RECC references the response to AG Request #42 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 43:

Does the company recommend the Commission to formally adopt the EISA 2007 Smart Grid Information Standard? If not, why not?

Answer:

Nolin RECC references the response to AG Request #43 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 44:

Does the company recommend issuing an IRP Standard?

- a. If so, what concerns does the company have with a standard, including "priority resource," especially as it relates to cost-effectiveness?*
- b. What concerns would the company have with a standard as it affects CPCN and rate applications?*

Answer:

Nolin RECC references the response to AG Request #44 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
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Question 45:

Does the company agree that any investment in grid modernization infrastructure should be done before deploying TOU rates or dynamic pricing? If not, why not?

Answer:

Nolin RECC references the response to AG Request #45 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

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Question 46:

Regarding the Kentucky Smart Grid Roadmap Initiative (KSGRI), does the company believe that it provides the fundamental basis for the Commonwealth as a whole to proceed with Smart Grid given its lack of incorporating all electric utilities such as municipalities and the TVA, along with its distribution companies? If yes, please explain why. If not, please explain why not.

Answer:

Nolin RECC references the response to AG Request #46 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 47:

Does the company believe that the Commonwealth's electric industry is, or will become, so interconnected that all electric entities in any way involved or associated with the generation, transmission and/or distribution of electricity should be included and participate to some degree with Smart Grid if it is to come to fruition? If yes, please explain why. If not, please explain why not.

Answer:

Nolin RECC references the response to AG Request #47 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 48:

*Does the company believe that any Smart Grid Investment will trigger a CPCN case?
If not, why not?*

Answer:

Nolin RECC references the response to AG Request #48 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
Attorney General’s Request Dated February 27, 2013

Question 49:

Does the company believe that Dynamic Pricing should be economically feasible for the end-user and be supported by a cost- benefit analysis?

Answer:

Nolin RECC references the response to AG Request #49 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation

Nolin Rural Electric Cooperative Corporation
Initial Request for Information – Case No. 2012-00428
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Question 50:

If additional education is contemplated with the deployment of the Smart Grid, please explain in detail if known or contemplated.

Answer:

Nolin RECC references the response to AG Request #50 submitted by EKPC and adopts that response as its own.

Responding Witness: Greg Harrington, System Engineer
Nolin Rural Electric Cooperative Corporation