



SALT RIVER ELECTRIC

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RECEIVED

MAR 20 2013

PUBLIC SERVICE
COMMISSION

March 20, 2013

Mr. Jeff Derouen
Executive Director
KY Public Service Commission
PO Box 615
Frankfort KY 40602-0615

Re: Case No. 2012-00428
Consideration of the Implementation
of Smart Grid and Smart Meter
Technologies

Dear Mr. Derouen:

Attached are the original and 14 copies of Salt River Electric Cooperative Corporation's Responses to the Attorney General's Initial Requests for Information to the Companies.

If you have any questions about these responses, please contact this office.

Sincerely,

Larry Hicks
President and CEO

Enclosures

RECEIVED

MAR 20 2013

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

CONSIDERATION OF THE IMPLEMENTATION OF) CASE NO.
SMART GRID AND SMART METER TECHNOLOGIES) 2012-00428

SALT RIVER ELECTRIC COOPERATIVE CORPORATION'S
RESPONSES TO COMMISSION STAFF'S
FIRST REQUEST FOR INFORMATION



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Case No. 2012-00428

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

CONSIDERATION OF THE)	
IMPLEMENTATION OF SMART)	CASE NO.
GRID AND SMART METER)	2012-00428
TECHNOLOGIES)	

Larry Hicks, President and CEO of Salt River Electric Cooperative Corporation, being duly sworn, states that by order of the Commission dated February 27, 2013, Salt River Electric Cooperative Corporation hereby files the requested information in Case No. 2012-00428. That he supervised the preparation of the responses contained herein, that the witness prepared to answer questions concerning each request is Salt River Electric's Chief Operating Officer Timothy J. Sharp PE, and that the matters and items set forth are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

SALT RIVER ELECTRIC COOPERATIVE CORP.



Larry Hicks, President and CEO

STATE OF KENTUCKY
COUNTY OF NELSON

Subscribed and sworn to before me this 20th day of March, 2013, by Larry Hicks, President and CEO of Salt River Electric Cooperative Corporation, to be his voluntary act and deed.



Notary Public KY State at Large

My Commission Expires: 12/16/2014

Request 98. With regard to calendar years 2007 through 2012, identify and discuss what Smart Grid and/or Smart Meter initiatives the utility implemented. The discussion should include but not be limited to the reasons why each initiative qualifies as a Smart Grid and/or Smart Metering initiative; the date of installation; the total cost of installation; and any benefits resulting from the initiatives, quantifiable or otherwise, received by both the utility and the customers.

Salt River Electric installed a Power Line Carrier AMI system throughout its entire system. Both single-phase and three-phase metering were converted to this technology. The installation has allowed for the remote collection of metering data including KWH, KW Demand, and voltage readings on all Salt River customers. The project began in 2007 and ended in 2011 at an approximate cost of \$6 million. Benefits have been seen through labor savings in the reduction of personnel required to obtain readings. AMI has allowed Salt River to realize a reduction in line losses. Salt River has also been able to address customer usage issues through the data available. Accuracy has improved and Salt River has been able to identify metering issues in a timely manner. Voltage and outage data have improved Salt River's ability to verify system models and assist in outage restoration. Salt River Electric installed 29 automated switches under a Department of Energy grant. The purpose of the switches is to address reliability issues and provide an automated manner of restoration. The project commenced in January 2012 and will be completed in July 2013 at an anticipated cost of \$1.3 million. Switches have operated four times during this period affecting 1,178 customers and reducing those customers' outage time by an average of 44 minutes.

Salt River Electric installed mobile capabilities in several vehicles to improve the efficiency of field personnel. The project began and was completed in 2012 at a cost of approximately \$65,000. Benefits have been seen in a more productive work force with fewer errors per order processed.

Request 99. With regard to calendar years 2013 through 2018, identify and discuss what additional Smart Grid and/or Smart Meter initiatives the utility has forecasted to be implemented. The discussion should include but not be limited to why each forecasted initiative qualifies as a Smart Grid and/or Smart Metering initiative; the forecasted date of installation;

the forecasted total cost of installation; and any forecasted benefits to result from the initiatives, quantifiable or otherwise, received by both the utility and the customers.

Salt River Electric currently has plans to expand the mobile capabilities of its workforce, but a definitive time table has not been set.

Request 100.

With regard to DA Smart Grid Initiatives provide the following:

- a. the number of DA systems installed as of December 31, 2012, along with the associated benefits realized.

Salt River Electric has the following installed automated systems:

**Metering
Switches
SCADA
Mapping
Outage Management
Mobile Computing**

Benefits have been seen in all of these areas with a more productive workforce. Additionally, more data is available to respond to customers' needs.

- b. the number of DA systems to be installed in the next five years.

The only planned project is an expansion to the mobile computing platform.

- c. the total number of DA systems to be installed when the DA system is completely deployed.

At this time, the number of current programs is expected to remain the same as in Request 101(a) response.

Request 101.

With regard to Volt/VAR Optimization, provide the following:

- a. the number of Volt/VAR Optimization systems installed as of December 31, 2012, along with the associated benefits realized.

Salt River Electric does not have a system to perform Volt/Var optimization.

- b. the number of Volt/VAR Optimization systems to be installed in the next five years, along with the forecasted in-service date.

Salt River Electric is currently looking at systems, but does not have a timeline for implementation.

- c. the total number of Volt/VAR Optimization systems to be installed when the Volt/VAR Optimization system is completely deployed.

Salt River Electric does not have a timeline for implementation of this system.

Request 102. With regard to Supervisory Control and Data Acquisition ("SCADA") Smart Grid Initiatives, provide the following:

- a. the number of SCADA systems installed as of December 31, 2012, along with the associated benefits realized.

Salt River Electric has one installed SCADA system. Benefits have been seen from a more efficient workforce. More data is available for engineering planning and studies. The system has greatly enhanced Salt River's ability to use real time data to aid in the restoration of service during outages.

- b. the number of SCADA systems to be installed in the next five years, along with the forecasted in service date.

Salt River Electric has no plans to change the current system.

- c. the total number of SCADA systems to be installed when the SCADA system is completely deployed.

One.

Request 103. As it relates to Dynamic Pricing (where rates are established hourly throughout the day) Tariffs or TOU Tariffs, provide the following:

- a. the number of customers the utility has or had on these types of tariffs, identified separately by specific tariff.

None.

- b. whether these customers shifted load from high-price times periods to lower-priced time periods.

See Request 103(a) response.

- c. whether these customers consumed more, less or the same number of kWh.

See Request 103(a) response.

- d. whether the utility reached any findings or conclusions based on its experience with customers on Dynamic Pricing and/or TOU Tariffs.

See Request 103(a) response.

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

Salt River has developed a cyber-security guide following NRECA guidelines.

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.

Interoperability between software and Smart Grid equipment is achieved using the Multi-Speak model. When reviewing software and/or hardware, Salt River evaluates the ability for either to integrate using the model. Communication between systems is limited to the ports required for communication. Firewalls on the company network attempt to prevent attacks and unwarranted data exchange between public and private systems.

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.

Salt River Electric references the response to 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.

Salt River Electric references the response to 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.

Salt River Electric references the response to 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.

Salt River Electric references the response to 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.

Salt River Electric references the response to Request 110 submitted by EKPC and adopts that response as its 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.

Salt River Electric currently has no time-of-use customers participating in its programs.

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.

The following six pages contain Salt River Electric's current rate tariffs showing the time-differentiated rates available to its customers.

**Pages 6a – 6c: FARM AND HOME SERVICE (TIME OF DAY)
SCHEDULE A-5-TOD**

**Pages 6d – 6f: FARM AND HOME SERVICE TAXABLE (TIME OF DAY)
SCHEDULE A-5T-TOD**

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SALT RIVER ELECTRIC
Name of Issuing Corporation

P.S.C. No. 12
3rd Original Sheet No. 5
Canceling P.S.C. No. 12
2nd Original Sheet No. 5

CLASSIFICATION OF SERVICE

FARM AND HOME SERVICE (TIME OF DAY) SCHEDULE A-5-TOD

APPLICABLE

In all territory served by Salt River Electric.

AVAILABILITY

Available to members of the Cooperative for all Farm and Home uses subject to the established rules and regulations of the Seller. The capacity of individual motors served upon this schedule shall not exceed 10 h.p. Consumer must remain on this tariff for a one (1) year minimum and must provide a sixty (60) day notice to change from this tariff to another one.

TYPE OF SERVICE

Single phase, 60 Hertz, at available secondary voltage.

RATES*

Consumer must select Option A or Option B.

Option A - Applicable complete year

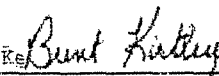
Customer Charge	\$11.60 per month	
On-Peak energy	\$ 0.10117 per kWh	(R)
Off-Peak energy	\$ 0.05634 per kWh	(R)

Winter season on-peak and off-peak hours are provided on the third page of this tariff.

DATE OF ISSUE: June 14, 2011 DATE EFFECTIVE: Service rendered on and after

ISSUED BY /s/ Larry Hicks

Issued by authority of an order of the Public Service Commission of Kentucky
Case No. 2010-00508 Dated: May 31, 2011

KENTUCKY PUBLIC SERVICE COMMISSION	
JEFF R. DEROUEN EXECUTIVE DIRECTOR	
DATE OF ISSUE: June 14, 2011 DATE EFFECTIVE: Service rendered on and after	TITLE: President
ISSUED BY <u>/s/ Larry Hicks</u>	TITLE: President
 EFFECTIVE 6/1/2011 PURSUANT TO 807 KAR 5:011 SECTION 9 (1)	

SALT RIVER ELECTRIC
Name of Issuing Corporation

P.S.C. No. 12
3rd Original Sheet No. 6
Canceling P.S.C. No. 12
2nd Original Sheet No. 6

CLASSIFICATION OF SERVICE

FARM AND HOME SERVICE (TIME OF DAY) SCHEDULE A-5-TOD (cont)

Option B - Time-of-Day-Rates Applicable only for Winter Season
Customer Charge \$11.60 per month

Energy Rates

- 1. Winter Season (October-April)
 - On-Peak Energy \$ 0.10117 per kWh (R)
 - Off-Peak Energy \$ 0.05634 per kWh (R)
- 2. Summer Season (May-September)
 - All Energy \$ 0.07952 per kWh (R)

Winter season on-peak and off-peak hours are provided on the third page of this tariff.

MINIMUM CHARGE

The minimum monthly charge under the above rate shall be \$11.60 where 25 KVA or less transformer capacity is required. For members requiring more than 25 KVA transformer capacity, the minimum monthly charge shall be increased at the rate of \$.75 of each additional KVA or fraction thereof required. Payment of the minimum charge shall entitle the member in all cases to the use of the number of kilowatt hours, corresponding to the minimum charge in accordance with the foregoing rate.

DATE OF ISSUE: June 14, 2011 DATE EFFECTIVE: Service rendered on and

ISSUED BY /s/ Larry Hicks

Issued by authority of an order of the Public Service Commission of Kentucky
Case No. 2010-00508 Dated: May 31, 2011

KENTUCKY PUBLIC SERVICE COMMISSION	
JEFF R. DEROUEN EXECUTIVE DIRECTOR	
TARIFF NO. _____ BRANCH _____	
TITLE: President <i>Beant Kintley</i>	
EFFECTIVE 6/1/2011 PURSUANT TO 807 KAR 5:011 SECTION 9 (1)	

FORM FOR FILING RATE SCHEDULES

FOR ENTIRE TERRITORY SERVED
Community, Town or City

SALT RIVER ELECTRIC
Name of Issuing Corporation

P.S.C. No. 12
1st Original Sheet No. 7
Canceling P.S.C. No. 10
Original Sheet No. 39

CLASSIFICATION OF SERVICE

FARM AND HOME SERVICE (TIME OF DAY) SCHEDULE A-5-TOD (cont)

TERM OF PAYMENT

The above rates are net. A 5% penalty will be assessed if a customer fails to pay a bill for services by the due date shown on the customer's bill.

*FUEL ADJUSTMENT CLAUSE

The above rate may be increased or decreased by an amount per kWh equal to the fuel adjustment amount per kWh as billed by the Wholesale Power Supplier plus an allowance for line losses. The allowance for line losses will not exceed 10% and is based on a twelve month moving average of such losses.

ENERGY EMERGENCY CONTROL PROGRAM

This tariff is subject to the Energy Emergency Control Program as filed with the Kentucky Energy Regulatory Commission (now the Public Service Commission) on February 23, 1981, in Administrative Case No. 240, and as approved by the Commission Order of March 31, 1981.

ON-PEAK HOURS AND OFF-PEAK HOURS

In Peak Hours

May through September 10:00 a.m. to 10:00 p.m. EST
October through April 7:00 a.m. to 12:00 noon EST
5:00 p.m. to 10:00 p.m. EST

Off-Peak Hours

May through September 10:00 p.m. to 10:00 a.m. EST
October through April 12:00 noon to 5:00 p.m. EST
10:00 p.m. to 7:00 a.m. EST

DATE OF ISSUE: October 11, 2010

DATE EFFECTIVE: November 11, 2010

ISSUED BY Larry Hicks

TITLE: President & CEO

11/1/2010

Issued by authority of an order of the Public Service Commission of Kentucky
Case No. 2010- Dated: Pursuant to 807 KAR 5:011 SECTION 9 (1)

KENTUCKY PUBLIC SERVICE COMMISSION
JEFF R. DEROUEN EXECUTIVE DIRECTOR
TARIFF BRANCH
<u>Brent Kintley</u>
EFFECTIVE
11/1/2010

SALT RIVER ELECTRIC
Name of Issuing Corporation

P.S.C. No. 12
3rd Original Sheet No. 8
Canceling P.S.C. No. 12
2nd Original Sheet No. 8

CLASSIFICATION OF SERVICE

FARM AND HOME SERVICE TAXABLE (TIME OF DAY) SCHEDULE A-5T-TOD

APPLICABLE

In all territory served by Salt River Electric.

AVAILABILITY

Available to members of the Cooperative for all Farm and Home uses subject to applicable state tax and subject to the established rules and regulations of the Seller. The capacity of individual motors served upon this schedule shall not exceed 10 h.p. Consumer must remain on this tariff for a one (1) year minimum and must provide a sixty (60) day notice to change from this tariff to another one.

TYPE OF SERVICE

Single phase, 60 Hertz, at available secondary voltage.

RATES*

Consumer must select Option A or Option B.

Option A - Applicable complete year

Customer Charge	\$11.60 per month	
On-Peak energy	\$ 0.10117 per kWh	(R)
Off-Peak energy	\$ 0.05634 per kWh	(R)

Winter season on-peak and off-peak hours are provided on the third page of this tariff.

DATE OF ISSUE: June 14, 2011 DATE EFFECTIVE: Service rendered on and after

ISSUED BY /s/ Larry Hicks

TITLE: President

Issued by authority of an order of the Public Service Commission of Kentucky
Case No. 2010-00508 Dated: May 31, 2011

KENTUCKY PUBLIC SERVICE COMMISSION	
JEFF R. DEROUEN EXECUTIVE DIRECTOR	
	TARIFF BRANCH
<i>Burt Kirtley</i>	
EFFECTIVE 6/1/2011 PURSUANT TO 807 KAR 5:011 SECTION 9(1)	

SALT RIVER ELECTRIC
Name of Issuing Corporation

P.S.C. No. 12
3rd Original Sheet No. 9
Canceling P.S.C. No. 12
2nd Original Sheet No. 9

CLASSIFICATION OF SERVICE

FARM AND HOME SERVICE TAXABLE (TIME OF DAY) SCHEDULE 1-5T-TOD

Option B - Time-of-Day-Rates Applicable only for Winter Season
Customer Charge \$11.60 per month

Energy Rates

- 1. Winter Season (October-April)
 - On-Peak Energy \$ 0.10117 per kWh (R)
 - Off-Peak Energy \$ 0.05634 per kWh (R)
- 2. Summer Season (May-September)
 - All Energy \$ 0.07952 per kWh (R)

Winter season on-peak and off-peak hours are provided on the third page of this tariff.

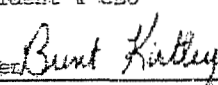
MINIMUM CHARGE

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DATE OF ISSUE: June 14, 2011 DATE EFFECTIVE: Service rendered on and after

ISSUED BY /s/ Larry Hicks

Issued by authority of an order of the Public Service Commission of Kentucky
Case No. 2010-00508 dated: May 31, 2011

KENTUCKY PUBLIC SERVICE COMMISSION	
JEFF R. DEROUEN EXECUTIVE DIRECTOR	TARIEF BRANCH PRESIDENT
 EFFECTIVE 6/1/2011 PURSUANT TO 807 KAR 5:011 SECTION 9 (1)	

FORM FOR FILING RATE SCHEDULES

FOR ENTIRE TERRITORY SERVED
Community, Town or City

SALT RIVER ELECTRIC
Name of Issuing Corporation

P.S.C. No. 12
1st Original Sheet No. 10
Canceling P.S.C. No. 10
Original Sheet No. 42

CLASSIFICATION OF SERVICE

FARM AND HOME SERVICE TAXABLE (TIME OF DAY) SCHEDULE A-5T-TOD

TERM OF PAYMENT

The above rates are net. A 5% penalty will be assessed if a customer fails to pay a bill for services by the due date shown on the customer's bill.

*FUEL ADJUSTMENT CLAUSE

The above rate may be increased or decreased by an amount per kWh equal to the fuel adjustment amount per kWh as billed by the Wholesale Power Supplier plus an allowance for line losses. The allowance for line losses will not exceed 10% and is based on a twelve month moving average of such losses.

ENERGY EMERGENCY CONTROL PROGRAM

This tariff is subject to the Energy Emergency Control Program as filed with the Kentucky Energy Regulatory Commission (now the Public Service Commission) on February 23, 1981, in Administrative Case No. 240, and as approved by the Commission Order of March 31, 1981.

ON-PEAK HOURS AND OFF-PEAK HOURS

In Peak Hours

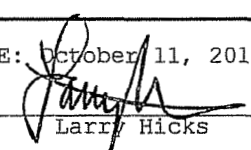
May through September 10:00 a.m. to 10:00 p.m. EST
October through April 7:00 a.m. to 12:00 noon EST
5:00 p.m. to 10:00 p.m. EST

Off-Peak Hours

May through September 10:00 p.m. to 10:00 a.m. EST
October through April 12:00 noon to 5:00 p.m. EST
10:00 p.m. to 7:00 a.m. EST

DATE OF ISSUE: October 11, 2010

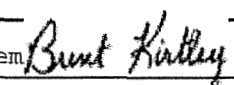
DATE EFFECTIVE: November

ISSUED BY 
Larry Hicks

TITLE: President & CEO

11/1/2010

Issued by authority of an order of the Public Service Commission of Kentucky
Case No. 2010- Dated: PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

KENTUCKY PUBLIC SERVICE COMMISSION
JEFF R. DEROUEN EXECUTIVE DIRECTOR
TARIFF BRANCH

EFFECTIVE
11/1/2010
PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

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.

All meters are currently AMI capable. The current configuration was chosen based on capabilities desired going forward. There are no plans to change in the future.

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.

Salt River Electric has had approximately five customers call expressing concerns about RF issues. Salt River Electric serves over 48,000 customers.

- b. how the complaints were addressed by the utility.

Salt River Electric explained to the customers that its system does not use RF for communications but is based on power line carrier technology.

- c. a detailed explanation as to whether customers should have the ability to opt out of using either AMR or AMI metering.

Salt River Electric believes that any customer who chooses to opt out should be responsible for the additional cost incurred with providing service.

- 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.

Salt River Electric believes that customers who choose to opt out of the AMI program should pay for the additional cost incurred due to non-participation in the AMI system.

- ii. an explanation as to whether these opt-out customers could still receive benefit from the utility using either AMR or AMI metering.

All customers will receive an indirect benefit from the efficiencies gained from using an AMI system.

- 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.

Salt River Electric believes that the percentage of opt-out customers would have to be fairly large to make this an issue.

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.

See Request 104 response.

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

Salt River Electric believes any opt-out provision should address the recovery of additional costs incurred by opt-out customers.



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**Ranie Wohnhas
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**Carol Wright
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**Albert Yockey
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Henderson, KY 42419-0024**