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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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|--|---|---------------------|
| APPLICATION OF OWEN ELECTRIC |) | |
| COOPERATIVE FOR REVISIONS TO ITS METER |) | |
| READING TARIFF TO ACCOMMODATE MANUAL |) | |
| METER READING CHARGES IN INSTANCES WHERE |) | CASE NO. 2012-00468 |
| ITS ADVANCED METERING INFRASTRUCTURE IS |) | |
| PROHIBITED FROM BEING UTILIZED FOR ITS |) | |
| INTENDED PURPOSE |) | |

ATTORNEY GENERAL'S
MOTION TO INTERVENE AND COMMENTS

MOTION TO INTERVENE

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and pursuant to KRS 367.150(8), which grants him the right and obligation to appear before regulatory bodies of the Commonwealth of Kentucky to represent consumers' interests, hereby moves the Public Service Commission to grant him full intervenor status in this action pursuant to 807 KAR 5:001(8).

COMMENTS

The Attorney General hereby files his comments objecting to the request by Owen Electric Cooperative ["Owen"]. Succinctly stated, Owen has sought and received approval to institute advanced meter infrastructure from the Commission. However, **outside of the context of a general rate case**, Owen wishes to recover revenue

associated with manual meter reading¹. Specifically, Owen requests approval to charge customers an exorbitant fee of \$30.00 per occurrence to read a meter because those customers who do not wish to have an automatic meter have not acquiesced to the AMI.² This approach, if adopted by the Commission, would enable Owen as well as other utility companies, to obviate a rate case for single issue ratemaking. Without a complete review of the revenues generated, if any, the impact on general rates is inconclusive, ill contrived and could lead to unfair, unjust, and unreasonable rates.³ Moreover, as to the specific charge, a full review of the associated costs, **and savings**, is warranted and does not appear to be in the record.⁴

Further exacerbating the single issue rate making approach undertaken by Owen is its current application for general adjustment of rates.⁵ Owen should not be allowed to carve out a meter reading tariff that generates revenues from a general rate/revenue case. Indeed, if Owen needs to revise its tariff, the general rate case is the appropriate manner in which to do so.

Last, Owen appears to attempt to circumvent the Commission's comprehensive review of the electric industry as it relates to the Smart Grid and its many intricacies, including but not limited to advanced meters and the associated infrastructure along

¹ See Owen Response to Commission Staff's First Information Request, question 2.

² See Owen Response to Commission Staff's First Information Request, question 1.d. See also Owen Comments Relating to Questions Addressed at Informal Conference 14 and Owen Application at Exhibit B.

³ See Owen Response to Commission Staff's Second Information Request, question 3 where Owen lists costs for meter reading expenses but no off-setting savings that one would surely anticipate, assuming the AMI is done correctly. See also Owen Comments Relating to Questions Addressed at Informal Conference, questions 10 and 19 for costs associated with AMI.

⁴ Id.

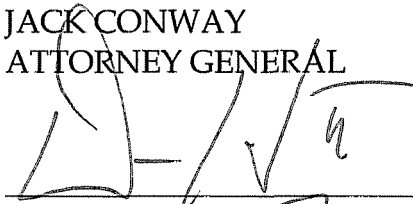
⁵ See Case No. 2012-00448.

with the costs and benefits.⁶ Because this comprehensive docket is underway, and explores that which Owen wants to get a first bite at the apple, the Commission should refrain from granting Owen the relief which it seeks in the instant matter.

WHEREFORE, the Attorney General respectfully requests the Commission DENY Owen's application.

Respectfully submitted,

JACK CONWAY
ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read 'JACK CONWAY', is written over a horizontal line.

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⁶ See Case No. 2012-00428 in general and Commission Staff's First Request for Information questions 98, 99, 106, 107, 108, 109, 113, 114 and 116.


Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Hon. James A. Crawford
523 Highland Avenue
P.O. Box 353
Carrolton, KY 41008

Mark Stallons
Owen Electric Cooperative, Inc.
PO Box 400
Owenton, KY 40359

this 27th day of March, 2013.



Assistant Attorney General