

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JEFFREY AND CHRISTY VICE)	
)	
COMPLAINANTS)	
)	
V.)	CASE NO.
)	2013-00010
)	
FLEMING-MASON ENERGY)	
COOPERATIVE INC.)	
)	
DEFENDANT)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO FLEMING-MASON ENERGY COOPERATIVE INC.

Fleming-Mason Energy Cooperative Inc. ("Fleming-Mason"), pursuant to 807 KAR 5:001, shall file with the Commission the original and eight copies of the following information with a copy to all parties of record. The information requested herein is due within 14 days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Fleming-Mason shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Fleming-Mason fails or refuses to furnish all or part of the requested information, Fleming-Mason shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to Fleming-Mason's Answer to Complaint filed on February 1, 2013. In the "Narrative" section on page 2, Fleming-Mason states "the PSC's investigations found nothing to suggest that the circuit serving the Vices was inconsistent with the NESC and/or PSC Regulations." Explain whether Fleming-Mason believes Commission Staff conducted an inspection of the circuit design and construction as part of its investigation as indicated in this statement.

a. If yes, identify the findings within the Complaint Investigation Report which indicate that the circuit was in compliance with National Electric Safety Code ("NESC") Regulations. Also, identify the findings that indicate the circuit was in compliance with the Commission Regulations.

b. If no, provide the basis for Fleming-Mason's statement.

2. Refer to page 3 of Fleming-Mason's Answer and the statement, "Fleming-Mason cannot be and is not required to be the guarantor of uninterrupted service nor is it to be financially responsible for any losses, even if the losses and causation could be proven, from such events." Confirm whether Fleming-Mason believes that it could be held responsible for losses resulting from an event caused by Fleming-Mason's equipment failure.

3. Refer to page 4 of Fleming-Mason's Answer and the statement, "Line technicians and engineering staff were dispatched to investigate causes of interruptions over the period described in the report." Provide detailed outage information, including cause, duration and dispatches, for outages occurring on the line serving Jeffrey and Christy Vice's ("Vices") home from 2010 to the date of this Request for Information.

4. Refer to page 4 of Fleming-Mason's Answer. Fleming-Mason claims that the line providing service to the Vices' home has been inspected twice in the last two years and is currently being inspected more frequently than required by Commission Regulations. Pursuant to 807 KAR 5:006, Section 26(3), Fleming-Mason should be maintaining appropriate records of these inspections. Provide inspection records for the distribution line servicing the Vices' home from 2009 to the date of this Request for Information.

5. Refer to page 5 of Fleming-Mason's Answer. Fleming-Mason states that "the length in lineal miles from the source impacts reliability of a distribution circuit." Fleming-Mason also claims the distribution line serving the Vices' home is part of a long circuit which affects reliability through a higher probability of unforeseen problems affecting the service provided by the line.

a. Provide the System Average Interruption Frequency Index ("SAIFI"), System Average Interruption Duration Index ("SAIDI"), and Customer Average Interruption Duration Index ("CAIDI") for the distribution circuit which includes the line servicing the Vices' home for each year from 2009 to 2012. Also, include the major outage category identified for each index.

b. Provide what corrective action was taken, if any, to address any concerns related to the SAIFI, SAIDI, or CAIDI values for this circuit.

c. Provide voltage charts for all phases of the circuit, beginning at the substation, feeding the Vices' home from 2009 to the present day.

6. Refer to the discussion beginning on page 5 of Fleming-Mason's Answer regarding the Homeguard voltage surge suppression equipment installed by Fleming-Mason at the Vices' home. Fleming-Mason indicates that installation of the Homeguard equipment involved placing one surge suppressor at the meter base and other protective devices on specific equipment in the home. Refer also to Item 6 in Section III of Fleming-Mason's Answer on page 9, and the statement, "Fleming-Mason simply installed the portion that went into the meter base." Explain why Fleming-Mason delayed sending the suppressor installed at the meter base for testing until after the Commission's investigation which occurred on August 8, 2012.

7. Refer to page 6 of Fleming-Mason's Answer. Fleming-Mason claims that the protective devices utilized in the Vices' home showed no sign of overvoltage, and thus, no overvoltage should have been seen by the device installed at the meter base. Additionally, Fleming-Mason explains that the meter base equipment is designed to

produce an audible alarm when an overvoltage occurs, but claims that the device failed to produce the alarm in this instance indicating damage to the meter base equipment.

a. Explain how an overvoltage experienced on the line would not be experienced at the home by the device at the meter base prior to reaching the devices located within the home itself.

b. Explain how Fleming-Mason is certain that the alarm did not produce the audible indication of an issue as designed.

c. State how long the audible alarm on the meter base equipment is designed to sound in the event of an overvoltage at the meter base.

8. Refer to page 7 of Fleming-Mason's Answer. Fleming-Mason claims that the issue in this complaint is a "momentary interruption," and that such interruptions can be frustrating for customers and staff. Additionally, Fleming-Mason states "we cannot and are not required to guarantee and insure against service interruptions and momentary voltage fluctuations which are inherent in the service of the distribution of electricity." The Commission addresses specific voltage requirements for utilities in 807 KAR 5:041, Section 6(2). State if Fleming-Mason believes the requirements noted specifically in 807 KAR 5:041, Section 6(2)(c), which address the issue of a flicker on a customer's service line, would be applicable in this matter along with the justification for its position.

9. Refer to Fleming-Mason's statement in its March 15, 2013 Supplemental Answer that "Fleming-Mason has pulled usage data for other homes in this subdivision and the Vice's usage is not substantially different than other homes built around the same time frame in this area." Provide a side-by-side comparison of the Vices' average

usage data compared to those homes Fleming-Mason in this statement for the period from (March 2010 through March 2013).

10. Refer to Attachment B of the Order to Satisfy or Answer filed January 23, 2013.

a. Provide monthly data showing the number of customers who participated in the Homeguard program from 2009 until the program was discontinued.

b. State if Fleming-Mason has received any requests from customers to remove any products associated with the Homeguard program after it was discontinued.

c. State if Fleming-Mason has received complaints from other customers regarding the Homeguard system.

11. State if Fleming-Mason distributes warranty or other information regarding the Homeguard system to customers either before or at the time of installation. If yes, provide written documentation that the Vices received a copy of the information.

12. Provide a copy of any contract(s) between Fleming-Mason and EFI Electronics Corporation regarding the Homeguard system.



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DATED JUL 03 2013

cc: Parties of Record

Case No. 2013-00010

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