

DORSEY, GRAY, NORMENT & HOPGOOD

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October 24, 2011

**FEDEX**

Mr. Jeff DeRouen  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40602-0616

Case No. 2014-00376

RECEIVED

OCT 27 2014

PUBLIC SERVICE  
COMMISSION

Re: Kenergy Corp.  
Application for Certificate of Convenience and  
Necessity – Automated Metering Infrastructure System

Dear Mr. DeRouen:

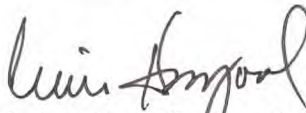
Enclosed are the original and 10 copies of Kenergy Corp.'s Application for an Order granting a Certificate of Convenience and Necessity regarding a program to install an Automated Metering and Infrastructure System.

Your assistance in this matter is appreciated.

Very truly yours,

DORSEY, GRAY, NORMENT & HOPGOOD

By



J. Christopher Hopgood  
Attorney for Kenergy Corp.

JCH/cds  
Encls.

**COMMONWEALTH OF KENTUCKY  
BEFORE THE  
KENTUCKY PUBLIC SERVICE COMMISSION**

**RECEIVED**

OCT 27 2014

PUBLIC SERVICE  
COMMISSION

**In the matter of:**

**THE APPLICATION OF KENERGY CORP. )  
FOR AN ORDER ISSUING A CERTIFICATE )  
OF PUBLIC CONVENIENCE AND )  
NECESSITY )**

**CASE NO. 2014-00376**

**APPLICATION**

(a) The applicant Kenergy Corp. (“Kenergy”) is a nonprofit electric cooperative organized under KRS Chapter 279 and is engaged in the business of distributing retail electric power to member consumers in the Kentucky counties of Daviess, Hancock, Henderson, Hopkins, McLean, Muhlenberg, Ohio, Webster, Breckinridge, Union, Crittenden, Caldwell, Lyon, and Livingston. This application is submitted pursuant to KRS 278.020 and 807 KAR 5:001(9).

(b) The post office address of Kenergy is Post Office Box 18, Henderson, Kentucky 42419-0018.

(c) Kenergy is the consolidation successor of Green River Electric Corporation and Henderson Union Electric Cooperative Corp. Kenergy’s Articles of Consolidation are on file with the Commission in Case No. 99-136, and under KRS 279 were filed on June 22, 1999. Kenergy attests that it is in good standing.

(d) The applicant seeks a certificate of public convenience and necessity (“CPCN”) to install an Advanced Metering Infrastructure system (“AMI”) to begin in 2015 and continue through 2016.

(e) Kenergy will construct the proposed AMI project with RUS loan funds. Kenergy’s Construction Work Plan has been modified to reflect this project. RUS approval has been received.

(f) The estimated cost of the project is:

<u>DESCRIPTION</u>	<u>ESTIMATED COST</u>
Meters including Installation Costs, End of Life Testing with 3 months of storage -	\$ 6,691,924.00
Communications Equipment, Operating System, Software, Meter Data Management System, Miscellaneous Material and Training -	2,959,011.00
Annual Maintenance for Software (excluded above) -	<u>68,379.00</u>
TOTAL ESTIMATE	<u>\$ 9,719,314.00</u>

(g) Attached hereto and made a part of this Application are the following:

- EXHIBIT 1 Applicant research, vendor assessment and vendor choice process
- EXHIBIT 2 Description of the AMI technology
- EXHIBIT 3 Proposed Statement of Work
- EXHIBIT 4 Financial Analysis
- EXHIBIT 5 Projected Benefits for Applicant and its Members
- EXHIBIT 6 Copy of RUS Amendment to Current Approved Construction Work Plan

EXHIBIT 7 Testimony of John Newland

(h) Applicant is requesting relief from annual periodic and statistical testing of meters 807 KAR 5:041 Section 16) for the duration of implementation and verification, as all meters in Applicant's service territory will be changed and tested. All testing will resume in January 2018.


**WHEREFORE**, Applicant asks that the Public Service Commission of the Commonwealth of Kentucky make its order issuing a certificate of convenience and necessity authorizing the applicant to install an AMI system as outlined in the CWP and applicant further requests all proper relief.

**DORSEY, GRAY, NORMENT & HOPGOOD**  
**318 Second Street**  
**Henderson, Kentucky 42420**  
**Telephone 270-826-3965**  
**Telefax 270-826-6672**  
**Attorneys for KENERGY CORP.**

By   
\_\_\_\_\_  
**J. Christopher Hopgood**  
**chopgood@dkgnlaw.com**

**VERIFICATION**

The undersigned hereby verifies that the statements and information set forth in the foregoing application are true and correct to the best of my knowledge and belief.

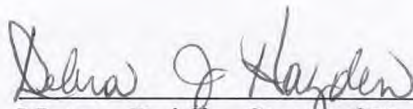
  
\_\_\_\_\_  
Gregory Starheim, President and CEO  
Kenergy Corp.

STATE OF KENTUCKY

COUNTY OF Daviess\_\_\_\_\_

The foregoing was signed, acknowledged and sworn to before me by **GREGORY STARHEIM, President and CEO of KENERGY CORP.**, this 24th day of October, 2014.

My commission expires 5-24-2015\_\_\_\_\_

  
\_\_\_\_\_  
Notary Public, State of Kentucky at Large



(seal)



### **Technology Research, Vendor Evaluation and Vendor Recommendation Process**

Kenergy Corp. has been researching and assessing various AMR/AMI solutions for the past 9 years. This includes talking with vendors, researching through trade publications and conducting a pilot with 2 AMR solutions.

In February 2014, Kenergy Corp. began a formal tollgate process for evaluating the current technology and vendor offerings in an effort to deploy AMI technology in support of the corporate mission of providing "Best in Class" member service. The team that was formed included employees from Operations, Engineering, Technical Services, Human Resources, Accounting, Member Services, Member Accounting and Procurement departments.

The team benchmarked and appraised various AMI systems with over 20 utilities to gain firsthand experience with the different technologies. The team was quickly convinced that Radio Frequency (RF) technology reduced latency of data communication as well as provided flexibility for future advanced grid applications without investing in additional costly infrastructure. Additionally, the team began to focus on a deployment strategy that compressed deployment to 12 months in an effort to combat confusion during transition as Kenergy is currently a member-read system. Finally, the team recommended that a Meter Data Management System (MDMS) be deployed along with the AMI solution in an effort to provide, at minimum, hourly data to the members.

Several radio frequency AMI providers were contacted and preliminary propagation studies were received from 6 vendors. A Request for Proposal (RFP) was established by the Director of Procurement and the team. The RFP was distributed to 7 RF AMI vendors, 10 Meter Installation/ End of Life Testing vendors and 3 MDMS vendors on 6/26/14. The specifications that the team felt were essential for the AMI solution is as follows.

#### AMI Solution - Specifications:

System must:

- Be a radio frequency (RF) AMI solution with two-way communication.
- Be capable of 15 min interval data
- Achieve:
  - 100% Coverage (all deployed meters are active on RF mesh network)
  - 99.9% delivery of billing determinants every 72 hours
  - 95% on-demand request
  - Utilize Elster, GE, Itron, Icon or Landis+Gyr meters
  - Utilize design which results in no more than 8 hops per meter and allows each meter's "last gasp" to be delivered to Milsoft's OMS
  - provide integration to NISC's SmartHub and iVUE systems, and Milsoft's GIS/OMS system
- Be capable of sending and receiving DNP3 communication to control downline devices
- Utilize meter that when equipped with a disconnect/reconnect switch will display the open/closed status of the switch on the meter display
- Utilize meters which have the ability to collect and report kWh, kW and voltage
- Utilize poly phase meters which have the ability to collect and report power factor at peak kW and shall be auto-ranging in voltage (120-480V)

In addition to the formal specification, the bids that were received on 8/7/14 were scored using a Quality Functional Deployment (QFD) process. The team utilized the process to reach desired levels for the system and to make the vendor selection as objective as possible. In addition to cost, items that were thoroughly evaluated for the AMI solution are as follows.



AMI Solution - Additional QFD Criteria Used in Evaluation:

- Technical Support - Contact Accessibility
- Business Stability
- Flexibility for Future Electrical Grid Applications
- User Training
- Meter & Module Lifecycle per Manuf.
- Hardware Warranty
- Storage Capability at the Meter
- Equipment Available and Capable of Downline Control Through DNP3
- Ability for Coop to Control Demand at Member Level (Demand Response)
- System Allows Intermittent Shutoffs (Current Limiting)
- Accuracy of Meter Data (All Parameters)
- Data Storage Intervals: kW, kWh, voltage, blinks, PF, KVA
- Response Time for On Demand Data Retrieval
- Data Security/ Cyber Security
- Auto-Detection of 0-usage (inoperable or out of Spec Meters)
- Tamper Alerts
- Total System Read Processing Time
- Battery Failure Alarm

After full evaluation, including utilizing the QFD process, the AMI vendor chosen was Landis+Gyr, (800 Duncan Road, Lafayette, Indiana, 47904). Landis+Gyr will provide a two-way data communications network to monitor and control Kenergy's electric meters using their Gridstream Platform coupled with their Gridstream RF Mesh network solution. This WAN, LAN, HAN communications system operates in the license free 902-928 MHZ bands utilizing IP based network equipment, either individually or in combination with Kenergy's private microwave & fiber optics field network infrastructure. This network will unite Kenergy's applications, making advanced metering, outage management, power quality monitoring and load control cost-effective and practical throughout Kenergy's service territory as well as allowing for future expansion and application enhancements.

In addition to cost, items that were thoroughly evaluated for the Meter Installation and End of Life Testing solutions are as follows.

Meter Installation and End of Life Testing - Specifications:

- Deployment shall take no longer than 12 months
- Installer shall submit required CSV file within 48 hours following meter exchange
  - During installation through Kenergy's acceptance, a single point of contact with 24/7 accessibility will be provided
- End of life testing:
  - Test facility and meter testers shall have certification from the Kentucky Public Service Commission
  - All meter testing data shall be submitted in a CSV file as specified in Exhibit C
  - All meters shall be tested and results returned to Kenergy within fourteen (14) days following removal
  - All meters shall be tested for accuracy and stored for three (3) months; If meter shows an average meter error that is two (2) percent or greater fast or slow, or if the meter is stuck or dead, the meter should be returned to Kenergy's Owensboro Meter Shop Office within 48 hours following testing

Meter Installation and End of Life Testing - Additional QFD Criteria Used in Evaluation:

- Business Stability
- GPS Data
- Digital Images
- Employee Background Screening
- Employee Training
- Technology used for change out

The Meter Installation vendor chosen was Apex CoVantage, LLC (200 Presidents Plaza, 198 Van Buren Street, Herndon, VA 20170). The End of Life Testing vendor chosen was Luthan Electric Meter Testing (625 Birkhead Ave., Owensboro, KY 42303).

In addition to cost, items that were thoroughly evaluated for the MDMS solution are as follows.

MDMS - Specifications:

- The consumer information, service delivery point information, and meter information contained in the MDMS must be integrated to NISC's SmartHub and CC&B modules, and Milsoft's GIS/OMS system
- The MDMS must supply billing determinants to NISC's iVUE as needed for billing

MDMS - Additional QFD Criteria Used in Evaluation:

- Business Stability
- Ease of use for Members through MyAccount Apps
- Ease of Use for Coop (cross departmental access)
- Dynamic Pricing (TOU, Critical Peak, Peak Rebate, Real-time Pricing)
- Communication w/Smarthub
- User Training
- Support of Prepaid Metering (MDM)
- Distribution Analytics Module

The MDMS vendor chosen was National Information Solutions Cooperative (NISC) (1 Innovation Circle, Lake St Louis, MO 63367).



**Description of the AMI Technology**

Gridstream RF is a multi-functional solution supporting advanced multi-energy metering, personal energy management and distribution automation applications. Gridstream residential and commercial metering solutions support up to 5-minute interval data collection, load management, home area networking and outage management applications.

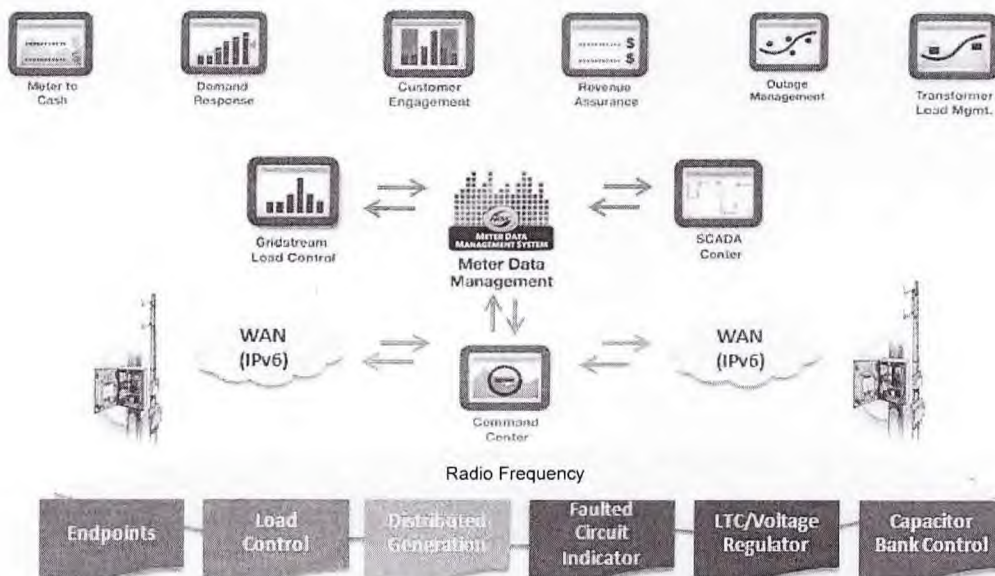
At the center of the Gridstream RF Mesh solution is a true mesh, peer-to-peer network where each endpoint, device and router communicates in a peer-to-peer fashion, extending the coverage and reliability of the network. The asynchronous, multi-channel communication structure allows for increased data throughput and opens more paths to the data collector.

The self-healing network features dynamic routing messages that automatically adjust for changes to endpoints and the introduction of obstructions, such as foliage or new construction. System routers utilize one watt of power to increase transmit distance and throughput, while data collectors support up to 25,000 meters, further minimizing infrastructure and maintenance costs.

**Key Features Include:**

- True wireless, peer-to-peer mesh network
- Remote programmability
- “Plug-and-work” auto-registering endpoints and devices
- Dynamic routing, self-healing network
- Support for 15-minute interval data
- Integrated disconnect meter option
- ZigBee®-enabled home area network capability

Landis+Gyr's vision for global development of their various business units, has resulted in a strong and reliable product offering and interfacing capabilities as outlined in the diagram below.



Kenergy selected the Gridstream solution based on its capability to directly support real-time Advanced Grid applications for the following uses:

- Meter register reads including daily kWh, time-of-use registers and demand
- Interval data for billing, customer information, load studies, and engineering and rate studies
- Service connect/disconnect and service limiting capability
- Power outage notification
- Direct customer engagement
- Pre-payment
- Load control with individual device current and duty-cycle reporting
- Critical peak/time-of-use pricing
- Capacitor bank and voltage regulator, monitoring
- Faulted circuit indicator and transformer monitoring
- End-to-End security
- Voltage monitoring for Conservation Voltage Reduction and Dynamic Voltage Management
- Interfacing with NISC's MDMS Data Analytics to leverage system data for operational use



## Proposed Statement of Work

### 1. Introduction

Kenergy proposes to deploy an Advanced Metering Infrastructure (AMI) solution utilizing a radio frequency (RF) mesh two-way network to support key utility applications including advanced metering, demand response and distribution automation.

### 2. Responsibilities

#### 2.1 Landis &Gyr (L&G) will:

- Deliver their Gridstream RF two-way AMI head-end solution.
- Support the integration of the head-end system with the MDMS, CIS, GIS and other appropriate systems.
- Commission the RF network.
- Perform System Acceptance Testing (SAT) based on a mutually agreed upon Plan.
- Train Kenergy personnel on the installation and maintenance of network devices, DA radios and RF field tools and on the use of Command Center head-end software for utility operations and network administration.
- Provide ongoing technical support for the duration of deployment.

#### 2.2 Apex CoVantage will:

- Remove existing meters and install AMI meters.
- Provide five photographs of each meter installation to verify site and meter conditions.
- Integrate with Kenergy's CIS to ensure accurate and timely delivery of meter installation data.

#### 2.3 Luthan Electric Meter Testing will:

- Test all removed meters for accuracy.
- Return to Kenergy any meter with an average meter error that is two (2) percent or greater fast or slow, or if the meter is stuck or dead.
- Store all removed meters not returned to Kenergy for three (3) months.
- Dispose of all meters after the required three (3) month storage.

#### 2.4 National Information Solutions Cooperative (NISC) will:

- Deliver the Meter Data Management System (MDMS).
- Support the integration of the MDMS with the head-end system, CIS and other appropriate systems.
- Perform System Acceptance Testing (SAT) based on a mutually agreed upon Plan.
- Train Kenergy personnel on the on the use of the MDMS software.
- Provide ongoing technical support for the duration of deployment.



2.5 Kenergy will:

- Prepare facilities for the installation of the head-end system and network infrastructure.
- Install network devices.
- Provide existing communication infrastructure for use as the AMI system communication backhaul.
- Remove a portion of existing three-phase meters and replace with AMI meters.
- Provide project oversight and management.

2.6 Projected Timeline

Milestone	Date
First delivery of AMI network infrastructure equipment	March 2015
First delivery of meters	Mid April 2015
Begin meter installation - Kenergy	Late April 2015
Gridstream system installation complete	May 2015
Begin meter installation - Contractor	June 2015
Integration with MDMS complete	June 2015
Meter installation complete	May 2016
Project Wrap-up with Vendors (System Installed, Tested, Functional and Accepted by Kenergy)	July 2016
Project Completion – Transferred to Production Team & Performance Monitoring Implemented	Mid 2017

**Financial Analysis**

**AMI INVESTMENT  
ESTIMATED MONTHLY INCREASE PER METER**

					year 1-2	year 3-15
		cost	life		<u>annual impact</u>	<u>annual impact</u>
<b>1. <u>Purchase and Install New Meters</u></b>						
Depreciation	\$	9,094,000	15	= \$	606,000	\$ 606,000
<b>2. <u>Retire Existing Meters</u></b>						
Depreciation	\$	4,500,000	20	= \$	(225,000)	\$ (225,000)
Amortization of loss	\$	3,800,000	10	= \$	380,000	\$ 380,000
<b>3. <u>Finance Cost of New Meters</u></b>						
		loan amount	rate			
	\$	9,094,000	5%	= \$	454,700	\$ 454,700
15 yr. loan						
<b>4. <u>Savings</u></b>						
a. Productivity Savings(through attrition)						
Billing - Full Time Positions			-3			
Operations - Full Time Positions			-3			
Operations- Full Time Position (New)			<u>1</u>			
Net Reduction			<u>-5</u>	\$ 87,000.0 =		\$ (435,000)
			hours			
b. Overtime hours reduction			(607)	\$ 50.0		\$ (30,350)
c. Power cost reduction - load control						\$ (175,000)
d. Transportation costs - fewer trips to reconnect/disconnect						\$ (70,000)
e. Eliminate annual reading of meters by contractor				\$	(89,000)	\$ (89,000)
<b>5. <u>Maintenance/Software Fees, etc.</u></b>				\$	100,000	\$ 100,000
<b>6. <u>Reduction in revenue - fees</u></b>				\$	117,000	\$ 117,000
Fees charged for reading meters						
<b>7. <u>Increase Interest Income</u></b>						
reduce billing lag 20 days*						
one time cash infusion of	\$	7,000,000		5%		\$ (350,000)
invested in cushion of credit						
<b>Net annual cost increase</b>				\$	1,343,700	\$ 283,350
<b>Total Meters</b>					56,000	56,000
<b>Avg. Monthly Increase per Meter</b>				\$	2.00	\$ 0.42

\* Application for tariff change to correct billing lag to follow



### **Projected Benefits for Applicant and its Members**

#### **Enhance/ Improve Member Satisfaction:**

Members will no longer be required to read, record and report their meter reading monthly. Data collected from the AMI system will be accurate and available for members to access via Kenergy's MyAccount App. The access to hourly usage data will allow members to make more informed decisions on energy usage. This will help members to become more energy efficient and to see cost savings from their informed choices. Additionally, the Landis+Gyr solution will position Kenergy to eventually provide members an avenue for load control in their homes.

The data from the AMI system will also help Kenergy to operate more efficiently which will have a positive effect for members. Being a member-read cooperative there is potential for billing errors. By automating billing reads through the AMI system this mitigates the risk of incorrectly keying a meter reading. Additionally, Member Service Representatives will have access to the hourly usage and historical data of members and will be able to help members manage their usage.

The AMI system will allow for automated detection of outages. This will allow Kenergy to direct crews and work outages more efficiently and ultimately improve system SAIDI. Additionally, the AMI system will verify whether all members on a line have been restored when a repair is completed.

Kenergy is proposing the installation of a portion of meters with remote connect and disconnect features. With this capability, the cooperative will be able to connect and disconnect accounts on the same day. This will make work processes more efficient, as well as improve member satisfaction.

Due to the proposed system's capability, Kenergy plans to evaluate and eventually roll out a Pre-Pay Metering program. This has the potential to aid enrolled members in usage reduction, as well as eliminate the requirements for deposits.

#### **Reduce Safety Risk to Employees and Members:**

The AMI system will allow Kenergy Corp, to work more efficiently and safely. Since meter reading will be automated, there will be less truck rolls which are likely to result in fewer automobile accidents as well as injury from animals, etc. Additionally, by utilizing the available AMI system alarms, the cooperative will be alerted to potential energy theft and will be able to know the situation prior to going on site to address it.

#### **Enhance and Improve Data:**

The AMI system will greatly improve the accuracy of available data for system analysis. This includes the prediction of future load, the depiction of load at critical times and identifying trouble areas, such as low voltage or overloaded transformers, on the system. Ultimately, this will aid Kenergy in reducing outages.

Additionally, through use of the AMI system and the MDMS the potential to evaluate alternative rate structure in the future will be available.

#### **Cost-Savings Benefits:**

The AMI system will eliminate the need for manual meter reads on 3 phase accounts, manual reads on accounts requiring a visit due to being estimated for 6 months and for service connections and disconnections to the majority of residential properties. Detection of tampering and unauthorized access to meters will generate an alarm to System Operators, thus reducing opportunity for energy theft. The system and the software will improve response time to malfunctioning meters. Additionally, the proposed Landis+ Gyr system will allow Kenergy to control voltage over the distribution system. By having the ability to control down-line regulators the cooperative will be capable of load shaving and ultimately avoid costs.



Amendment of Current Approved  
Construction Work Plan

Amendment # 1

Borrower Designation: KY 65

Work Plan Period: 2013-2017

**Change(s) Proposed**

Add AMI conversion project consisting of 56,000 meters. Add additional funds to Code 601 in the amount of \$7,725,000 for the meters and conversion, and Code 705 in the amount of \$3,435,384 for AMI equipment except meters and retrofits not included under Code 601. Total AMI project conversion cost is \$11,160,384.

**Reasons for Changes**

KY 65 will be purchasing and installing AMI meters and related equipment to allow two way communications with members to receive monthly meter readings, outage information, remote disconnects, prepaid billing programs, time of day rates, downstream voltage regulation and other benefits.

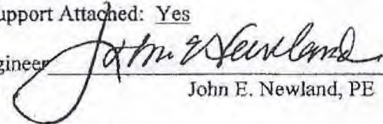
**Method of Financing**

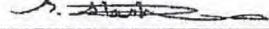
Loan Funds:	100%
General Funds:	0%
Contributions in Aid:	0%

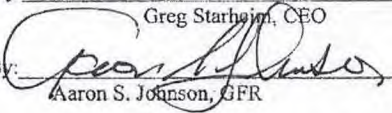
Status of Environmental Report: ER not required per §1794.21 (b) (9) SCADA and energy management systems involving no new external construction; (15) Categorical excluded proposals without an ER, phase or voltage conversions, reconductoring or upgrading of existing electric distribution lines.

Estimated Cost: \$11,160,384

Engineering Support Attached: Yes

Registered Engineer  9692  
(as required) John E. Newland, PE (P.E. number)

Requested By:  Date: September 22, 2014  
Greg Starheim, CEO

Approved By:  Date: September 22, 2014  
Aaron S. Johnson, GFR

Subject to ER approval? No, AMI conversion on existing facilities with no disturbed ground.

Status of Construction: Not yet started

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**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE**  
**KENTUCKY PUBLIC SERVICE COMMISSION**

7 **In the matter of:**

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10 **FOR AN ORDER ISSUING A CERTIFICATE** )  
11 **OF PUBLIC CONVENIENCE AND NECESSITY**

12  
13 **TESTIMONY OF JOHN NEWLAND**  
14

15 Q1. Please state your name, business address and position with Kenergy Corp.  
16 ("Kenergy").  
17

18 A. John Newland, 6402 Old Corydon Road, Henderson, Kentucky 42420. I am Vice  
19 President of Engineering of Kenergy.  
20

21 Q2. What is your educational background?  
22

23 A. BSEE, University of Kentucky.  
24

25 Q3. What is your work experience?  
26

27 A. I have worked for Kenergy and its predecessor, Henderson Union Electric  
28 Cooperative Corporation since September 1978.  
29

30 Q4. Have you previously submitted testimony before the Kentucky Public Service  
31 Commission?  
32

33 A. Yes, I presented testimony in Construction Work Plan Approval and Territorial  
34 Dispute hearings for Henderson Union/Kenergy and for other utilities in prior 39  
35 years.  
36

37 Q5. What is Kenergy requesting in this case?  
38

39 A. Kenergy is requesting a certificate of public convenience and necessity to install  
40 an Advanced Metering Infrastructure system ("AMI").

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Q6. Why is Kenergy seeking the certificate?

A. Kenergy is the only rural electric cooperative in Kentucky that requires its members to submit meter readings. Adding AMI will allow members to rely upon the metering system for their monthly usage. In addition an AMI system will allow Kenergy to analyze its system more efficiently and should improve reliability through shorter response times and fewer truck rolls, thereby reducing the risk of accidents. An AMI system will eliminate the need for manual reads for three (3) phase accounts and accounts that have been estimated for six (6) months. It will also enable remote connection and disconnections for most situations. The proposed AMI system will generate an alarm in the event of tampering and unauthorized access; will decrease the response time for malfunctioning meters; and will provide Kenergy with the ability to control distribution assets so as to maximize the capacity and efficiency of system devices.

Q7. How will Kenergy pay for the AMI system?

A. RUS has approved a modification to the Kenergy Construction Work Program. Loan funds will provide 100% of the cost of the project.

Q8. Has Kenergy's Board approved the AMI project?

A. Yes, at the October 14, 2014, board meeting.

Q9. Does this conclude your testimony?

A. Yes.



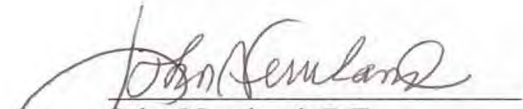
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2  
3 **COMMONWEALTH OF KENTUCKY**  
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6 **BEFORE THE PUBLIC SERVICE COMMISSION**

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10 **A CERTIFICATE OF PUBLIC )**  
11 **CONVENIENCE AND NECESSITY ) CASE NO. 2014-00\_\_**

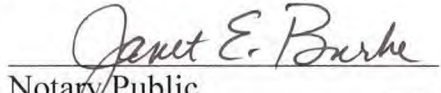
12  
13 **VERIFICATION OF JOHN NEWLAND**

14  
15 I, John Newland, Vice-President of Engineering of Kenergy Corp.  
16  
17 (“Kenergy”) hereby state that I have read the foregoing  
18  
19 Testimony and that the statements contained therein are true  
20  
21 and correct to the best of my knowledge and belief on this the 24<sup>th</sup> day  
22  
23 of October, 2014.

24  
25   
26 John Newland, P.E.  
27 Vice-President, Engineering  
28 Kenergy Corp.  
29

30 COMMONWEALTH OF KENTUCKY  
31 COUNTY OF HENDERSON  
32

33 The foregoing verification statement was SUBSCRIBED AND SWORN to  
34 before me by John Newland, Vice-President of Engineering,  
35 Kenergy Corp. on this the 24<sup>th</sup> day of October, 2014.

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37   
38 Notary Public  
39 My commission expires: 8-9-2018  
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