

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENERGY CORP. FOR AN)	
ORDER ISSUING A CERTIFICATE OF)	CASE NO.
CONVENIENCE AND NECESSITY TO INSTALL)	2014-00376
AN AUTOMATED METERING AND)	
INFRASTRUCTURE SYSTEM)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO KENERGY CORP.

Kenergy Corp. ("Kenergy"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before December 29, 2014. 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 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 the 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.

Kenergy 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 Kenegy fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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.

1. Refer to paragraph (f) of the Application. Provide a cost breakdown for:
 - a. The meter and module;
 - b. Installation;
 - c. End of life testing;
 - d. Operating system and software;
 - e. Communication equipment;
 - f. Member Data Management System ("MDMS"); and
 - g. Training.
2. Resolve the estimated differences between:
 - a. \$9,719,314 shown in paragraph (f) of the Application;
 - b. \$9,094,000 shown in Exhibit 4 of the Application; and
 - c. \$11,160,384 shown in Exhibit 6 of the Application.
3. Refer to Exhibit 1 of the Application.

a. When Kenergy formally began its tollgate process, which Advanced Metering Infrastructure (“AMI”) technologies were evaluated prior to staff determining a radio frequency (“Rf”) system was preferable?

b. Were the 20 benchmarked utilities discussed in the evaluation similar in size and scale to Kenergy and did they deploy AMI technologies?

c. Discuss the benefits of a robust MDMS to Kenergy and its customers.

d. If one of the benefits of MDMS is the customers availability to hourly data, explain the methods by which the customer may access the information.

e. Describe the procedure Kenergy used to develop a distribution vendor list for its June 26, 2014 RFP.

f. How were the AMI vendors selected to participate in the Rf propagation study and was participation required to qualify as a respondent to the June 26, 2014 RFP?

4. Refer to the “AMI Solution – Specifications” section of Exhibit 1 of the Application.

a. Explain the requirement to use specific meter brands.

b. Does Kenergy require that meter manufacturers support multiple software vendor applications/modules? Explain in detail.

c. Clarify the requirement to “utilize [a] 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.”

d. Provide examples and the expected benefits of “downline devices” envisioned by Kenergy to receive DNP3 meter communication.

e. Elaborate on a meter’s ability to allow for “intermittent shutoff.”

f. What is the anticipated life of the Landis+Gyr meter and the related software module?

g. Does Kenergy anticipate selecting a meter which could remain in service as new technology becomes available through a software upgrade?

h. Define and provide information regarding a “CSV” file.

5. Refer to page 2 of Exhibit 3 of the Application. Kenergy states that it will replace a portion of three-phase meters with new digital meters. Is Kenergy anticipating having both new and old meters on its system? Explain in detail.

6. Refer to Exhibit 5 of the Application.

a. Provide a discussion of Kenergy’s “Myaccount” app.

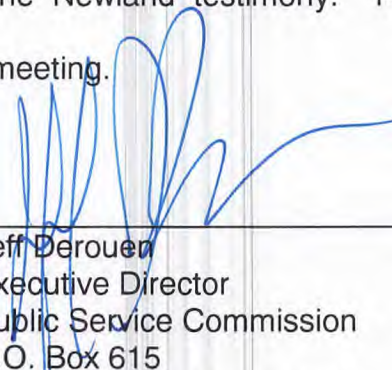
b. Provide Kenergy’s criteria for installing meters with remote connect/disconnect.

7. Refer to the response to Item 6 of the Testimony of John Newland (“Newland Testimony”) which states, “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.” Confirm that all of Kenergy’s meters are manually periodically read and provide a timetable.

8. Refer to the response to Item 7 of the Newland Testimony which states, “RUS has approved a modification to the Kenergy Construction Work Program. Loan

funds will provide 100% of the cost of the project.” Does Exhibit 6 of the Application represent the loan amount requested by Kenergy?

8. Refer to response to Item 8 of the Newland testimony. Provide the minutes of the October 14, 2014 Kenergy Board meeting.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED DEC 15 2014

cc: Parties of Record

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