

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LICKING VALLEY RURAL	)	
ELECTRIC COOPERATIVE CORPORATION FOR	)	CASE NO.
AN ORDER ISSUING A CERTIFICATE OF	)	2016-00077
PUBLIC CONVENIENCE AND NECESSITY	)	

COMMISSION STAFF'S REHEARING REQUEST FOR INFORMATION TO  
LICKING VALLEY RURAL ELECTRIC COOPERATIVE CORPORATION

Licking Valley Rural Electric Cooperative Corporation ("Licking Valley"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before November 21, 2016. 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.

Licking Valley 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 Licking Valley 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. When filing a paper containing personal information, Licking Valley shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Commission's Order of October 6, 2016, ordering paragraph 2, which directed Licking Valley to file testimony fully addressing the issue of future technical support for the existing TSII Meters. Also refer to the Statement of Laurie Dally filed October 24, 2016, ("Dally Statement") which is unsigned and undated. Pursuant to 807 KAR 5:001, Section 9(7), all testimony given before the Commission shall be given under oath or affirmation. Provide the Commission with testimony, given under oath or affirmation, fully addressing the issue of future technical support for the existing TSII Meters.

2. Refer to the Attorney General's Final Comments, filed June 17, 2016, ("AG's Final Comments") page 4. State whether Landis+Gyr can provide an adequate supply of TS2 meters to meet Licking Valley's needs. If Landis+Gyr cannot provide an adequate supply of TS2 meters, provide verified documents to support that statement.

3. Refer to the AG's Final Comments, page 4. State whether Landis+Gyr can provide technical support for TS2 meters and, if not, on what date the technical support will end. If Landis+Gyr technical support for TS2 meters will cease, provide verified documents to support that statement.

4. Refer to Licking Valley's Response to Commission Staff's First Request for Information ("Response to Staff's First Request"), Item 1a. Explain in specific detail what Licking Valley meant by "discontinuance of support for the TS2 metering platform" and how that relates to Licking Valley's statement that "[t]he industry trend is moving away from power line carrier for metering data."

a. Include in the discussion whether technical support for the TS2 meter and power line carrier system are one in the same, and if not, provide a detailed explanation of the differences;

b. Explain whether Licking Valley has investigated sources of support for the TS2 meter platform other than Landis+Gyr. If so, discuss in specific detail what options were available and why Licking Valley did not pursue those options. If no investigation was conducted into other sources of support, please explain why.

5. Refer to the Dally Statement, paragraphs 1, 2, and 3, which reference the poor performance of "PLC AMI" and refer to "PLC AMI" as dated technology. Explain in specific detail how this relates to the alleged end of technical support for TS2 meters.

6. Refer to the Dally Statement, paragraph 4, which notes the expectation the last shipments of TS2 meters will take place by December 31, 2016. Explain whether this statement means that Landis+Gyr has stopped production of TS2 meters and, if so, whether the last available TS2 meters will ship out by December 31, 2016. If not, explain what is meant by the statement.



Talina R. Mathews  
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Public Service Commission  
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DATED NOV 04 2016

cc: Parties of Record

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