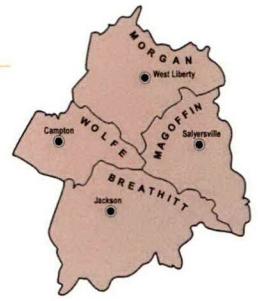




LICKING VALLEY
RURAL ELECTRIC COOPERATIVE CORPORATION
P. O. Box 605 • 271 Main Street
West Liberty, KY 41472-0605
(606) 743-3179



October 21, 2016

Executive Director
Kentucky Public Service Commission
PO Box 615
Frankfort KY 40602-0615

RE: Case No. 2016-00077

To Whom It May Concern:

Enclosed are an original and ten (10) copies of Licking Valley Rural Electric Cooperative Corporation's response to the above referenced case number in the Commission Staff's Request addressing the issue of future technical support for existing TSII Meters dated October 06, 2016.

Please find attached statement from Laurie Dally, PMP, Senior Product Manager- PLC Hardware, employed by Landis+Gyr.

Please advise if further information is needed.

Sincerely,

Kerry K. Howard
General Manager/CEO
kkhoward@lvrecc.com
Fax – 606-743-7775

KKH:mn

Enclosures

RECEIVED

OCT 24 2016

Public Service
Commission

RECEIVED

OCT 24 2016

Public Service
Commission



Kentucky utilities were early adopters of Landis+Gyr's PLC AMR and even today have maintained a large percentage of their meter population with the one-way meters. They conservatively deployed Landis+Gyr's early 2-way PLC technology, by installing network equipment into their substations over several years. Because of slow, careful deployments, their equipment is reaching its life expectancy of seven years for network equipment, and 15 years for AMR/AMI communication modules. Much of their meter population is dated, providing low functioning, energy only metering.

Kentucky utilities in particular have experienced a significant increase in "cross-talk" with their two-way PLC AMI which has resulted in poor logging performance, and they are unable to obtain 99% billable readings in a 24-hour period. Cross-talk occurs because the dated technology transmits downstream signals on the same frequency. To modify the system to work on an alternate frequency, for use by a specific utility, is cost prohibitive to do in production; therefore, the utility has to manually add the alternate frequency to each and every meter it deploys or replaces. The concept is plausible, however, it is unsustainable.

Due to the dated technology, these utilities are unable to replace failing meters with new functionality and are forced to waste their investment on more low-end technology to keep their AMI system running. Due to the limited capacity of the AMI system, they are limited to providing a meter reading to their customers that are days old. They are only able to retrieve 2-3 data items from a meter on a daily basis, and can only achieve hourly intervals on a subset of their meters on each substation.

Landis & Gyr anticipates the last shipments of TS2 enabled S4e meters (used for three phases applications) to take place by December 31, 2016.

Landis & Gyr has not sold a PLC system in the past 6 years and has stopped spending any R&D money on the TS2 product line.

Laurie Dally, PMP
Senior Product Manager—PLC Hardware
Landis+Gyr