

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF INTER-COUNTY ENERGY)	
COOPERATIVE CORPORATION FOR A)	CASE NO
GENERAL ADJUSTMENT OF EXISTING)	2018-00129
RATES)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO INTER-COUNTY ENERGY COOPERATIVE CORPORATION

Inter-County Energy Cooperative Corporation (Inter-County Energy), 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 August 14, 2018, pursuant to the Commission's June 13, 2018 Order herein. Responses to requests for information in paper medium 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 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.

Inter-County Energy shall make timely amendment to any prior response if it obtains information that 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 Inter-County Energy 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, Inter-County Energy 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 Inter-County Energy's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1, in which Inter-County Energy indicated that screenshots of the information requested regarding Inter-County Energy's website were provided but in which the screenshots were not provided. Provide the screenshots requested in Staff's Second Request, Item 1.

2. Provide a copy of the compensation study referred to in response to Staff's Second Request, Item 2, when it becomes available to Inter-County Energy.

3. Identify, by position, the annual turnover rate for each of the past five calendar years.

4. Identify, by position, the annual percentage salary increases for each of the past five calendar years.

5. Refer to Staff's Second Request, Item 5a.

a. Describe the typical level of experience for new hires at Inter-County Energy in each of the positions identified in response to that request and for Linemen.

b. Describe the training that Inter-County Energy provides to new hires in each such position (if the training varies explain);

c. Provide the cost associated with training new hires in each such position (if the costs vary explain).

6. Refer to Inter-County Energy's response to Staff's Second Request, Item 8. Describe all projections, if any, made by Inter-County Energy in the two years preceding the filing of this matter and since the filing of this matter regarding expected increases or decreases in the interest rates on its variable rate debt, and explain the basis for those projections.

7. Refer to Inter-County Energy's response to Staff's Second Request, Item 14, in which Inter-County Energy indicated that it has not sought approval of the referenced depreciation rates referred to therein outside of this proceeding.

a. Describe which Commission cases form the basis for Inter-County Energy's contention that the depreciation rates requested by Inter-County Energy for Distribution Plant accounts 370 – Meters and 370 – AMI Meters – substation are consistent with a depreciation rate historically approved by the Commission.

b. Explain why Inter-County Energy contends that the historically approved rates refer by Inter-County Energy should be applied to Inter-County Energy's accounts (is the property at issue identical; is the distribution system similar, etc.).

c. State whether Inter-County Energy sought any information from the manufacturer, vendor or other party regarding the useful life of the property represented

in Distribution Plant accounts 370 – Meters and 370 – AMI Meters – substance. If so, provide and explain any information obtained.

d. State whether Inter-County Energy performed any additional investigation regarding the useful life of the property represented in Distribution Plant accounts 370 – Meters and 370 – AMI Meters – substance. If so, describe the investigation and explain the results of the investigation.

8. Refer to Inter-County Energy’s response to Staff’s Second Request, Item 25.

a. Identify and describe all additional property, equipment, software, etc. necessary to implement the remote connect/disconnect functionality described therein as compared to the AMR system approved in Case No. 2009-00143.¹

b. Identify and describe all costs associated with the implementation of the remote connect/disconnect functionality.

c. Identify and describe all benefits Inter-County Energy contends it received by implementing the remote connect/disconnect functionality.

d. Identify and describe any additional AMR/AMI functionality implemented by Inter-County Energy since the final order in Case No 2009-00143, and identify any additional costs and benefits associated with that functionality.

9. Provide all exhibits and schedules that were prepared in Inter-County Energy’s Response to Commission Staff’s Second Request for Information in Excel

¹ Application of Inter-County Energy Cooperative for a Certificate of Public Convenience and Necessity Pursuant to KRS 278.020(1) and 807 KAR 5:001, Section 9, and Related Sections, Authorizing Certain Proposed Construction Identified as the 2009–2012 Construction Work Plan (Ky. PSC Dec. 23, 2009).

spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible.

10. Refer to the Application Exhibit 14, page 6 of 8, Schedule 2-Small Commercial and Small Power. The Demand Charge lists billing determinants at 70,650.8 for the proposed rates. Refer to Exhibit 14, page 2 of 8. The present rates Demand Charge billing determinants are stated as 33,103.7. Reconcile this difference.

11. Provide all revised exhibits and schedules in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible.



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Executive Director
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P.O. Box 615
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DATED **JUL 3 1 2018**

cc: Parties of Record

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