

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF MEADE)	
COUNTY RURAL ELECTRIC COOPERATIVE)	
CORPORATION FOR A CERTIFICATE OF)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY TO)	2020-00336
CONTINUE WITH THE FULL DEPLOYMENT)	
INSTALLATION OF ITS AUTOMATED)	
METERING AND INFRASTRUCTURE SYSTEM)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

Meade County Rural Electric Cooperative Corporation (Meade County RECC), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due within ten days of the date of this request. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Meade County RECC SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

Meade County RECC shall make timely amendment to any prior response if Meade County RECC obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Meade County RECC fails or refuses to furnish all or part of the requested information, Meade County RECC 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Meade County RECC 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 Application, Exhibit 6, page 1. The document states that Landis & Gyr's support for the Power Line Carrier (PLC) AMR/AMI system would end in 2020.

a. Provide copies of communications from Landis & Gyr to Meade County RECC indicating that Landis & Gyr will cease supporting its TS2 meters after 2020 and that spare parts will no longer be available.

b. Explain in specific detail how Meade County RECC became informed that support of the PLC system would end.

c. Explain in specific detail how Meade County RECC will continue to use its current meters for four years after support ends and replacement parts are sparsely available.

2. Provide a copy of the solicitation sent to prospective vendors and the responses.

3. Provide the number of TS2 meters Meade County RECC has remaining in stock.

4. Provide the analysis that Meade County RECC performed, including the bid evaluation sheets, surveys of other utilities, and a copy of the material supplied to Meade County RECC's Board of Directors, supporting the selection of Landis + Gyr to be the vendor for the AMI System.

5. Explain whether the TS2 meters have been fully depreciated. If not, provide the amount of accumulated depreciation on the TS2 meters, and explain how Meade County RECC intends to recover the undepreciated costs of the TS2 meters.

6. Provide support for the useful life of the proposed AMI meters and components.

7. Provide a detailed timeline for deployment of the meters if the Commission approves the Certificate of Public Convenience and Necessity.

8. Further explain the prepay solution for enrolled members and how this may aid in usage reduction.

9. Provide support for the projected cost savings that are expected from the AMI system when installed.



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DATED NOV 20 2020

cc: Parties of Record

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