

A Touchstone Energy Cooperative

RECEIVED

NOV 07 2006

PUBLIC SERVICE COMMISSION

November 1, 2006

Beth O'Donnell Executive Director Public Service Commission PO Box 615 Frankfort, KY 40602

Dear Ms. O'Donnell,

Case No. 2006-00468

As you are fully aware, Owen Electric Cooperative is currently testing meters in compliance with the Sample Test Program Guidelines. This procedure serves us very well, but at this time, we would like to request a temporary deviation from this program. We ask that this deviation be effective for a period of three years, 2007 thru 2009.

Owen Electric Cooperative is about to begin an aggressive implementation program for automated meter reading. We have selected the Cannon AMR System, which is a power line carrier. The decision has been made to install all solid-state meters for the new system. We plan to have all our meters changed out and the AMR system completely installed in three years. We have nearly 55,500 meters in service and plan on changing out one-third of the meters per year.

Realistically speaking, at some point during the next three years every meter on our system, from single-phase to poly-phase will receive an "as found test". This conversion to AMR will completely upgrade our system and absolutely no meter will be in-service with a test date older than three years at the completion of this project. For the reasons outlined above, Owen Electric Cooperative respectfully requests this deviation from sample testing.

For any further information, please contact the undersigned at 1-800-372-7612, ext. 3559 or the Meter Department Supervisor, Theresa S. Raines at extension 3556.

Sincerely,

**Owen Electric Cooperative** 

James R. Williams

Manager of Construction

Operations and Engineering Department



A Touchstone Energy Cooperative



A Touchstone Energy" Cooperative



\$ 00.390 NOV 06 2006 SEMOB ABILIA

8205 Hwy 127N PO Box 400

Owenton KY 40359 A CONTO

BETH O'DONNELL
EXECUTIVE DIRECTOR
PUBLIC SERVICE COMMISSION
PO BOX 615 FRANKFORT KY 40602

> PUBLIC SERVICE COMMISSION NOV 0 7 2006

ACTOR BIROSACOTOR