

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF INTER-COUNTY ENERGY)	
COOPERATIVE FOR A CERTIFICATE OF)	
CONVENIENCE AND NECESSITY PURSUANT)	
TO KRS 278.020(1) AND 807 KAR 5:001,)	CASE NO.
SECTION 9, AND RELATED SECTIONS,)	2009-00143
AUTHORIZING CERTAIN PROPOSED)	
CONSTRUCTION IDENTIFIED AS THE 2009-)	
2012 CONSTRUCTION WORK PLAN)	

FIRST DATA REQUEST OF COMMISSION STAFF
TO INTER-COUNTY ENERGY COOPERATIVE

Pursuant to 807 KAR 5:001, Inter-County Energy Cooperative (“Inter-County”) is to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due on or before August 14, 2009. 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 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 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 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 Inter-County fails or refuses to furnish all or part of the requested information, Inter-County shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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.

1. Section 1-A, page 2, of Inter-County's Construction Work Plan indicates that an automated meter reading ("AMR") program will be implemented throughout the Inter-County system. Describe the AMR program in detail.

2. State whether Inter-County has performed a cost-benefit analysis of the AMR program. If so, provide the results of this analysis. If no cost-benefit analysis has been performed, explain why it was not.

3. Other than having the ability to perform off-site, automated meter reading, provide the operational benefits to Inter-County from the installation of the AMR.

4. Section 3-B1 of the Construction Work Plan shows that 1,272 meters will be replaced at an average cost between \$180 and \$203 and 24,800 will be "AMR retrofit meters" at an average cost of \$146.

a. Explain what is meant by "AMR retrofit meters".

b. Explain why Inter-County is replacing some meters and retrofitting others.

5. Will all customer meters be AMR capable by the end of 2012? If no, explain why not.

6. Provide the depreciable life of any new AMR meters.

7. Provide any changes to the depreciable life of existing meters being retrofitted.

8. Explain how Inter-County plans to account for the meters being replaced and retrofitted.

9. Does Inter-County plan to retire any meters in association with the replacement or retrofit? If so, what are Inter-County's plans regarding recovery of the costs relating to any meters being retired (and the associated accumulated depreciation)?

10. In Case No. 2003-00070¹, Inter-County requested and received Commission authorization to implement an AMR lease option in its tariff. This lease option gives members who have or wish to have limited access to their property an option for meter reading and voltage reporting, as well as an automated outage notification system. Members requesting this option are billed \$5.15 per month.

¹ Case No. 2003-00070, The Tariff Filing of Inter-County Energy Cooperative Corporation for Approval of an Automatic Meter Reading Lease Option for its Members/Owners (Ky. PSC May 13, 2003).

a. Provide the number of customers currently being billed under this tariff.

b. Explain the necessity of this tariff upon approval of the AMR program as part of the Construction Work Plan.



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DATED JUL 31 2009

cc: All parties

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