## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF MEADE COUNTY RURAL	)	
ELECTRIC COOPERATIVE CORPORATION FOR	)	
A CERTIFICATE OF PUBLIC CONVENIENCE AND	)	
NECESSITY PURSUANT TO KRS 278.020(1) AND	)	CASE NO.
807 KAR 5:001, SECTION 9, AND RELATED	)	2009-00496
SECTIONS, AUTHORIZING CERTAIN PROPOSED	)	
CONSTRUCTION	)	

## FIRST DATA REQUEST OF COMMISSION STAFF TO MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

Pursuant to 807 KAR 5:001, Meade County Rural Electric Cooperative Corporation ("Meade 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 ten days from the date of this request. 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.

Meade 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 Meade County fails or refuses to furnish all or part of the requested information, Meade 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. Refer to Meade County's 2010-2012 Construction Work Plan ("CWP"), item IV-D, page 1. In the section titled Meters and Transformers-RUS Code 601, Meade County states that it projects it will add 3,600 new meters at a projected cost of \$1,227,921. Meade County further states that the system will be completely fitted with automated meter-reading capability during this CWP period. However, in Meade County's 2005-2008 CWP, submitted in Case No. 2005-00522,<sup>1</sup> it was stated that 15,054 new meters at a cost of \$1,710,639 would complete the system's automated meter reading capability.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> Case No. 2005-00522, The Application of Meade County Rural Electric Cooperative Corporation For a Certificate Of Convenience And Necessity Pursuant To KRS 278.020(1) and 807 KAR 5:001, Section 9 and Related Sections, Authorizing Certain Proposed Construction (Ky. PSC Feb. 22, 2006).

<sup>&</sup>lt;sup>2</sup> Meade County's 2005-2008 Construction Work Plan Report, item IV-C, page 1, section Meters and Transformers – RUS Code 601.

a. State whether all 15,054 meters were purchased as described in the 2005-2008 CWP and explain why there is a need for the 3,600 additional meters listed in the current CWP.

b. Explain the nearly threefold increase<sup>3</sup> in the cost per meter for the 3,600 new meters versus the 15,054 meters shown in the 2005-2008 CWP.

Jeff Derouen

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, Ky. 40602

cc: Parties of Record

 $<sup>^{3}</sup>$  \$1,227,921/3,600 = \$341 versus \$1,710,639/15,054 = \$114.

Honorable Thomas C Brite Attorney At Law Brite & Butler P.O. Box 309 Hardinsburg, KY 40143-0309