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February 23, 2018

RECEIVED

FEB 23 2018

PUBLIC SERVICE
COMMISSION

Ms. Gwen R. Pinson,
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

Re: The Application of Cumberland Valley Electric, inc. for Commission Approval for a Certificate of Public Convenience and Necessity to Install An Advanced Metering Infrastructure (AMI) System Pursuant to KRS 807 KAR 5:001 AND KRS 278.020

Case No. 2018-00056

Dear Ms. Pinson:

Tendered herewith is an original and ten (10) copies of Cumberland Valley Electric, Inc.'s Motion to Withdraw and Replace Documents and Motion for Confidential Treatment. Accordingly, ten (10) copies of the Motion with the confidential information redacted are included and one copy in a separate envelope marked "confidential" with the confidential information highlighted in yellow.

Should you have any questions or need additional information, please contact my office at 606-546-3811, Phauser@barbourville.com.

Respectfully submitted,


W. Patrick Hauser

WPH/dd

Enclosures

Cc: Mr. Ted Hampton
Cumberland Valley Electric, Inc.

COMMONWEALTH OF KENTUCKY
BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

RECEIVED

FEB 23 2018

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

THE APPLICATION OF CUMBERLAND VALLEY)
ELECTRIC, INC. FOR COMMISSION APPROVAL)
FOR A CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY TO INSTALL AN ADVANCED)
METERING INFRASTRUCTURE (AMI) SYSTEM)
PURSUANT TO KRS 807 KAR 5:001 AND KRS)
278.020)

CASE No. 2018 - 00056

**MOTION TO WITHDRAW AND REPLACE DOCUMENTS
AND
MOTION FOR CONFIDENTIAL TREATMENT**

Comes now Cumberland Valley Electric, Inc. (hereinafter "Cumberland Valley"), by and through counsel, pursuant to KRS 61.878, 807 KAR 5:001, Section 13 and other applicable law, and respectfully moves the Kentucky Public Service Commission ("Commission") to: 1. grant Cumberland Valley permission to withdraw and replace one (1) document previously filed in the public record of this matter; 2. afford confidential treatment to certain portions of the replacement document. In support of these requests, Cumberland Valley respectfully states as follows:

Motion to Withdraw and Replace Documents

1. On January 29, 2018, Cumberland Valley tendered to the Commission an Application for a Certificate of public Convenience and necessity to Install an Advanced Metering Infrastructure (AMI) System. The application was date-stamped received

February 1, 2018 by the Commission. As part of its Application, Cumberland Valley included as Exhibit 6 an Amendment to Current Approved Work Plan.

2. The Amendment to Current Approved Work Plan was mistakenly filed without appropriate redaction or a corresponding request for confidential treatment. As discussed below, Cumberland Valley believes that this document warrants confidential treatment; accordingly, Cumberland Valley respectfully requests that the Commission immediately remove from the public record the Amendment to Current Approved Work Plan and replace same with the redacted version included herewith as Exhibit 1. Of course, even if the Commission later denies Cumberland Valley's request for confidential treatment related to this document, unredacted versions of such document should not be publicly available pending such a determination.

Motion for Confidential Treatment

3. Cumberland Valley requests, pursuant to 807 KAR 5:001, Section 13 and KRS 61.878, that the Commission grant confidential treatment to the Amendment to Current Approved Work Plan that Cumberland Valley filed and marked as Exhibit 6 to its application for a Certificate of Public Convenience and Necessity. The information Cumberland Valley seeks to protect is confidential and hereinafter referred to as the "Confidential Information."

4. Pursuant to 807 KAR 5:001, Section 13, a single copy in a separate envelope with the Confidential Information highlighted in yellow, is being filed with this motion along with ten (10) copies with the Confidential Information redacted.

5. The Confidential Information, if openly disclosed, could permit an unfair advantage to competitors of Cumberland Valley and/or the Vendor, which in this case is

Silver Spring Networks ("Silver Spring") partnering with National Rural Telecommunications Cooperative (NRTC).

6. The information which has been marked for confidential treatment involves competitively bid products and services which could be bid again in the future and, therefore, Confidential Information could be used by competitors to the detriment of Cumberland Valley and Silver Spring. Cumberland Valley and Silver Spring have agreed to keep pricing for products and services confidential.

7. The time period for which the material should be considered confidential is ten (10) years from the date of this motion. This should allow sufficient time for the prices to become outdated and no longer a detriment to Cumberland Valley or Silver Spring.

WHEREFORE, Cumberland Valley believes the Confidential Information is entitled to confidential treatment. However, if the Commission disagrees with Cumberland Valley that this information should be treated as confidential, then Cumberland Valley requests the Commission to hold an informal conference regarding this issue.



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Attorney for Cumberland Valley Electric, Inc.

EXHIBIT 1

**AMENDMENT TO CURRENT
APPROVED WORK PLAN
(Exhibit 6 to Application)**

REDACTED

AMENDMENT TO CURRENT APPROVED WORK PLAN

Work Plan Period: 2016-2019

Amendment: 2018-1

Project: 705

BACKGROUND INFORMATION:

Cumberland Valley Electric is currently using Landis+Gyr's TS2 AMI system for 2-way communications to meters for meter reading, remote connects/disconnects and for load control switches. This system is now considered obsolete by the Kentucky Public Service Commission, has not been sold by L+G in several years, and, according to L+G, will not likely be supported beyond 2020. Therefore, CVE began investigating AMI solutions and their vendors for replacement of the TS2 system in 2017. This investigation led to the release of an RFP to which six vendors responded with proposals. CVE's AMI team evaluated each proposal and selected an RF mesh network system from Silver Spring Networks. A request for a CPCN from the Kentucky PSC will be filed in January 2018. The project is expected to commence by mid-2018 and be completed in 2020.

PROPOSED CHANGES:

This project requires: replacement of CVE's current meter inventory consisting of approx. [redacted] single and polyphase meters at est. cost of [redacted]; installation of [redacted] pieces of network hardware, spare equipment and network testing tools at est. cost of [redacted]; professional services – network design, integration, configuration, optimization, testing, deployment support, project management and training at est. cost of [redacted]. The stated meter quantity and cost thereof will be covered by 740c code 601 loan funds which is in our current work plan. The other items of network infrastructure hardware and professional services are the subject of this Work Plan Amendment establishing code 705 in CVE's work plan.

REASON FOR CHANGES:

AMI system/equipment obsolescence and impending withdrawal of support for same.

METHOD OF FINANCING:

Estimated Cost

[redacted]

Loan Funds

[redacted]

General Funds

\$ 0

Contributions in Aid

[redacted]

STATUS OF BORROWER'S ENVIRONMENTAL REPORT: n/a

REQUESTED BY: Ted J. Angstrom
MDA

DATE: January 16, 2018

APPROVED BY: Mike Norman per Mike Norman

DATE: 01/17/2018

SUBJECT TO ER APPROVAL? YES NO X