COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CUMBERLAND VALLEY)	
ELECTRIC, INC. FOR COMMISSION APPROVAL)	
FOR A CERTIFICATE OF PUBLIC CONVENIENCE)	CASE NO.
AND NECESSITY TO INSTALL AN ADVANCED)	2018-00056
METERING INFRASTRUCTURE (AMI) SYSTEM)	
PURSUANT TO KRS 807 KAR 5:001 AND KRS 278.020)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO CUMBERLAND VALLEY ELECTRIC, INC.

Cumberland Valley Electric, Inc. ("Cumberland Valley"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due on or before May 25, 2018. 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 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.

Cumberland Valley 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 Cumberland Valley fails or refuses to furnish all or part of the requested information, it 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 filling a paper containing personal information, Cumberland Valley shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

- Refer to Cumberland Valley's response to Staff's First Request for Information ("Staff's First Request"), Item 9.
- a. Explain why Cumberland Valley will not know the undepreciated costs of the TSII meters until the proposed project has been substantially completed.
- b. State when Cumberland Valley will determine whether it will immediately expense the undepreciated costs of the TSII meters once they are taken out of service, or will amortize the undepreciated costs.
- c. Explain the factors that will guide Cumberland Valley's decision to either immediately expense or to amortize the undepreciated costs of the TSII meters.
- d. Confirm that Cumberland Valley does not seek the Commission's approval to record the remaining net book value as an extraordinary retirement and amortize the undepreciated costs at this time, but instead will request Commission approval if Cumberland Valley determines that it will amortize the undepreciated costs.

2. Refer to Cumberland Valley's response to Staff's First Request, Item 12, which was non-responsive. Also refer to the Application, Exhibit 5, which listed a narrative of projected benefits from the proposed Advanced Metering Infrastructure ("AMI") project, but failed to include a cost-benefit analysis. Provide the quantified financial benefit that Cumberland Valley expects to receive from the proposed project, including, but not limited to, cost savings from eliminating manual meter reads, eliminating manual service connections and disconnections, and reduced energy theft.

3. Provide the total number of AMI meters that will be installed if the proposed

project is approved by the Commission.

Gwen R. Pinson

Executive Director
Public Service Commission

P.O. Box 615

Frankfort KY 40602

DATED MAY 2 1 2018

cc: Parties of Record

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