

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF JACKSON)	
PURCHASE ENERGY CORPORATION FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE AND)	CASE NO.
NECESSITY AUTHORIZING THE INSTALLATION)	2024-00013
OF A NEW ADVANCED METERING)	
INFRASTRUCTURE (AMI) SYSTEM)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO JACKSON PURCHASE ENERGY CORPORATION

Jackson Purchase Energy Corporation (Jackson Purchase), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on March 25, 2024. The Commission directs Jackson Purchase to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Jackson Purchase shall make timely amendment to any prior response if Jackson Purchase obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Jackson Purchase fails or refuses to furnish all or part of the requested information, Jackson Purchase shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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. When filing a paper containing personal information, Jackson Purchase shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, page 5. Provide all the documents provided to Jackson Purchase's Board of Directors discussing the need to replace the current AMI system and the documents discussing the recommended and selected AMI system over all other vendor bids received.

2. Refer to the Application, Exhibit 8. Explain whether each of the benefits to the end user will be available with every meter upon installation. If not, explain why not and which attributes will be available.

3. Refer to the Direct Testimony of Travis Spiceland (Spiceland Direct Testimony), page 3.

a. Provide the vendor and meter evaluation documents received in response to Jackson Purchase's request for proposal.

b. Provide a full comparison of the pros and cons between the PLC AMI system and the proposed RF AMI system. Include in the response whether there are attributes of the Aclara RF AMI system that make it better suited with respect to DSM and energy efficiency programs.

4. Refer to the Spiceland Direct Testimony, page 3.

a. State the number of PLC AMI meters in the field currently.

b. For the current PLC AMI system, provide and explain the causes of the increasing failure to receive monthly billing reads over time.

c. For the current PLC AMI system, explain the continued deterioration of read rates over time.

5. Refer to the Spiceland Direct Testimony, page 3.

a. Describe the troubleshooting attempts made by Jackson Purchase, the PLC AMI vendor, or manufacturer.

b. Provide any documents related to these troubleshooting attempts, including, but not limited to, correspondence and reports.

c. Provide any explanations given by the PLC AMI vendor or manufacturer for the degradation of the system.

6. Refer to the Spiceland Direct Testimony, page 3. Explain the current sources of replacement parts for the PLC AMI system and why procuring replacement parts is becoming more difficult.

7. Refer to the Spiceland Direct Testimony, pages 3-4. Explain the need for enhanced “interval data in the capacity needed for ongoing and upcoming energy demands.” Explain whether there is any market for or salvage value of the current PLC AMI meters.

8. Refer to the Spiceland Direct Testimony, page 4.

a. State the useful life of the Aclara Technologies AMI meters as advertised by the vendor and as experienced in the field by other utilities.

b. State the useful life upon which Jackson Purchase will base its proposed depreciation rate for the Aclara RF AMI meter.

9. Refer to the Spiceland Direct Testimony, page 4.

a. Describe the bid process for selecting a meter replacement contractor.

b. Provide all bid documents received from meter replacement contractors and all bid evaluation documents generated by Jackson Purchase.

10. Refer to the Spiceland Direct Testimony, page 5.

a. Confirm that Jackson Purchase will be replacing all of its PLC AMI meters with the Aclara RF AMI meters over the 2024-2025 period. Include in the response after the Aclara RF AMI meters are installed, whether there will be any residential customers or small commercial class customers without the RF AMI meters.

b. Provided the estimated bill impacts for the average residential customer.

c. Explain the approximate timeline for when Jackson Purchase intends to file an application for financing with the Commission.



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Executive Director
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DATED MAR 08 2024

cc: Parties of Record

Case No. 2024-00013

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