

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 SECOND REQUEST FOR INFORMATION
TO JACKSON PURCHASE ENERGY CORPORATION

Jackson Purchase Energy Corporation (Jackson Purchase Energy), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on April 22, 2024. The Commission directs Jackson Purchase Energy 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 Energy shall make timely amendment to any prior response if Jackson Purchase Energy 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 Energy fails or refuses to furnish all or part of the requested information, 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 Energy 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 Jackson Purchase Energy's response to Commission Staff's First Request for Information (Staff's First Request), Item 4(c), Exhibit C. State what percentage of total meter reads were performed manually for 2023.

2. Refer to Jackson Purchase Energy's response to Staff's First Request, Item 6, regarding obtaining retired infrastructure from other utilities and buying more expensive replacement parts.

a. State whether retired infrastructure from other utilities is still available or in inventory.

b. State the length of time that replacing infrastructure via other utilities or buying more expensive replacement parts would be possible.

c. State the estimated annual cost of continuing to replace infrastructure via other utilities or buying more expensive replacement parts.

d. State whether obsolete replacement parts or meters are available from other vendors or utilities.

3. Refer to Jackson Purchase Energy's response to Staff's First Request, Item 3(a). State how Jackson Purchase Energy advertised or solicited its Request for Proposals (RFP).

4. Refer to Jackson Purchase Energy's response to Staff's First Request, Item 10(b).

a. State, both in a numeric and a percentage of the total project cost, the funding Jackson Purchase Energy plans to use from its general fund and from the pending USDA United Rural Utilities (RUS) loan.

b. Provide an estimated net change in annual revenue requirement based on the cost of the proposed project depreciated over 15 years, change in O&M expense, debt service on the pending RUS loan, and any other costs or savings.

c. Provide the estimated effect on the average customer's bill based on the estimated change in annual revenue requirement.



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DATED APR 04 2024

cc: Parties of Record

Case No. 2024-00013

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