



Rural Electric Cooperative Corporation

A Touchstone Energy® Cooperative 

August 29, 2012

Mr. Gerald Wuetcher
Kentucky Public Service Commission
PSC Regulations
P.O. Box 615
Frankfort, KY 40602-0615

Dear Mr. Wuetcher:

Thank you for the opportunity to comment on the proposed PSC administrative regulation changes. Nolin RECC would like to make the following comments:

807 KAR 5:006: General Rules

Section 7: Billings, Meter Readings and Information

(5)(C): Frequency of Meter Reading

Nolin Comments: Since Nolin uses AMI/AMR meter reading technology it would be very expensive if not impossible to accurately verify meter readings. There is no way to compare an AMI reading with field meter reading in real time. We employ no meter readers now because of the AMI/AMR system. The AMI system gives us an actual reading and that reading is used for billing the consumer. This wording should be clarified as to the intent if meters are to be physically read annually or bi-annually.

Section 19: Request Tests

(1): Tested Meter Retention

Nolin Comments: The new regulation requires a request test meter be kept by Nolin for one year after the test request is resolved. Nolin believes 6 months is adequate after the case is completed. Holding meters for a year will take several meters out of service and will increase our burden for record keeping and security of these meters.

Section 20: Access to Property

Nolin Comments: Nolin believes we need 24/7/365 access to our property and equipment. In case of emergency, fire, power outages, etc., Nolin must have access to meters, services and equipment for the protection, safety and security of all concerned.

Section 23: System Maps and Records

(1)(b) Rate Districts

Nolin Comments: Nolin does not have maps broken down by "rate districts." Could the regulations define "rate districts"?

(1)(f) Date of Construction of all items

Nolin Comments: Nolin does not have readily available historical records back to 1938 for dates of construction for "all items" of plant. It would be a monumental and expensive task to retrieve these records and add them to the mapping system. Also, in Section 23, could the regulations define "a commission readable geographic information system (GIS) file"?

807 KAR 5:011

Section 4: Contents of Schedules

(2)(e): Late Payment Charge; State the Amount

Nolin comment: Late charges are not identified on each rate schedule but rather on Nolin's billing sheet in our rules and regulations that addresses all rate schedules.

Section 6: Tariff Addition, Revision or Withdrawal

(2)(b) "...Providing notice to the public"

Nolin Comments: As written this regulation seems to mean that any text change or other minor wording change or revised tariff sheet would require full notification for even those not affecting rates. This regulation should be clarified.

Section 8: Notices

(2)(b): Public Postings; Manner of Notification

Nolin comment: Refer to previous comment in Section 6(2)(b).

Thank you for considering Nolin's comments. If you have any questions or need clarification please contact me at (270) 765-6153.

Sincerely,



Michael L. Miller
President & CEO