

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF JACKSON PURCHASE )  
ENERGY CORPORATION FOR APPROVAL TO ) CASE NO.  
ADOPT A SAMPLE METER-TESTING PLAN ) 2003-00217

FIRST DATA REQUEST OF COMMISSION STAFF TO  
JACKSON PURCHASE ENERGY CORPORATION

Jackson Purchase Energy Corporation ( Jackson Purchase ), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 10 days from the date of this request. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

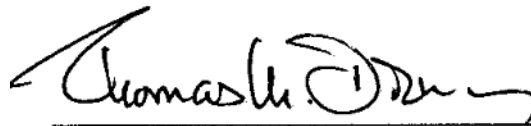
1. Refer to Test Group Table (Figure 1) on page 1 of your application.
  - a. Jackson Purchase states that JPEC will standardize on the Siemens CIS. The CIS meter will become the tenth test group starting in 2004. Does Jackson Purchase have a limit on the maximum number that should be in a group?
    - (1) If no, explain the disadvantages and why a limit of 3000 meters per group is not reasonable, especially when sample testing 2 percent of each group.
    - (2) If yes, provide the maximum number of meters per group and explain how it was derived.
  - b. The number of meters in groups 3, 8, and 9 exceeds 3000. Would Jackson Purchase be agreeable to subdivide these groups into additional groups with no more than 3000 meters per group? If no, explain the disadvantage.
2. Jackson Purchase indicates that the cost to test one meter is \$25.89, which seems very high.
  - a. Has Jackson Purchase surveyed other cooperatives in the state to determine their cost per meter?
    - (1) If yes, provide the survey results, the cost, and name of the company.
    - (2) If no, has Jackson Purchase investigated contracting the meter testing?
  - b. Would Jackson Purchase consider sending a request for proposal to determine how the cost would compare to its cost? Explain.

3. The estimated time to test one meter and record data is 0.5 hour. Explain how it was derived and provide all supporting calculations.

4. Jackson Purchase indicates that 537 meters, which is 2 percent of the total meters, will be tested per year under the sample meter test plan; however, the plan states that no meters will be permitted to operate untested past the 25-year testing cycle. Explain why the annual cost savings was calculated based on 2 percent sample testing instead of 4 percent, which would be required in order to test all meters within 25 years.

a. Explain how Jackson Purchase can comply with the 25-year testing cycle if it tests only 2 percent of the total meters each year.

b. Explain why.



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Thomas M. Dorman  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, Kentucky 40602

DATED August 19, 2003

cc: All Parties