COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

INI	THE	MATTER C)F.
IIN	THE	MALIERU)F:

ELECTRONIC APPLICATION OF JACKSON PURCHASE)	
ENERGY CORPORATION FOR A DEVIATION FROM)	CASE NO.
THE REQUIREMENT TO MANUALLY READ)	2021-00351
CUSTOMER METERS)	

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

Filed: November 2, 2021

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:		
ELECTRONIC APPLICATION OF JACKSON PURCHASE ENERGY CORPORATION FOR A DEVIATION FROM THE REQUIREMENT TO MANUALLY READ CUSTOMER METERS)))	CASE NO. 2021-00351
VERIFICATION OF JEFFREY R. WILLIAN	4 S	
COMMONWEALTH OF KENTUCKY)) COUNTY OF McCRACKEN)		
Jeffrey R. Williams, CFO-VP, Accounting, Finance and Mem-Purchase Energy Corporation, being duly sworn, states that he has superertain responses to Commission Staff's First Request for Information case and that the matters and things set forth therein are true and acconsoledge, information and belief, formed after reasonable inquiry.	ervised in the	the preparation of above-referenced
Jeffrey R. Williams		
The foregoing Verification was signed, acknowledged and sworn lay of November, 2021, by Jeffrey R. Williams.	to befo	fore me this 1st
Comprission expiration:	8/	192/9095



Witness: Jeff Williams

Jackson Purchase Energy Corporation Case No. 2021-00351 Commission Staff's First Request for Information

1. Identify the total number of customer meters in Jackson Purchase Energy's system and identify the total number of those meters that are Advanced Metering Infrastructure (AMI) meters by brand and model.

Response:

As of the end of August 2021, Jackson Purchase had 30,407 active meters. All meters are AMI. Please see the Excel attachment that shows information on the meters by brand and model. Please specifically review the pivot table in the spreadsheet attachment.

ATTACHMENTS ARE EXCEL SPREADSHEETS AND UPLOADED SEPARATELY

Item 2
Page 1 of 1
Witness: Jeff Williams

Jackson Purchase Energy Corporation Case No. 2021-00351 Commission Staff's First Request for Information

2. Explain whether Jackson Purchase Energy is requesting a deviation from 807 KAR 5:006, Section (5)(b), for all customer meters on its system, for all AMI meters, or for some subset of AMI meters. If it is a subset of AMI meters, identify those meters for which it is requesting a deviation.

Response:

Jackson Purchase is requesting deviation from 807 KAR 5:006, Section (5)(b) for all meters, which are all AMI meters.

Item 3
Page 1 of 1
Witness: Jeff Williams

Jackson Purchase Energy Corporation Case No. 2021-00351 Commission Staff's First Request for Information

3. Explain how the meters for which Jackson Purchase Energy is requesting deviation are read manually.

Response:

Meters that do not send a read through Jackson Purchase's software are read manually monthly.

Item 4
Page 1 of 1
Witness: Jeff Williams

Jackson Purchase Energy Corporation Case No. 2021-00351 Commission Staff's First Request for Information

4. State whether there has ever been a discrepancy between an AMI meter or Jackson Purchase Energy's system being read remotely versus when it was read manually, and if so, identify and describe each such instance and the cause of the discrepancy.

Response:

There has been no discrepancy noted by Jackson Purchase.

Item 5
Page 1 of 1
Witness: Jeff Williams

Jackson Purchase Energy Corporation Case No. 2021-00351 Commission Staff's First Request for Information

5. If the Commission granted Jackson Purchase Energy's requested deviation, explain when, under what circumstances, and how often, if ever, employees or contractors of Jackson Purchase Energy would check AMI meters manually.

Response:

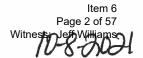
In accordance with the Commission's guidelines, Jackson Purchase would still check meters once every two years.

Jackson Purchase Energy Corporation Case No. 2021-00351 Commission Staff's First Request for Information

6. Provide documentation supporting Jackson Purchase Energy's "Current Meter Reading Monthly Cost by Outside Contractor" of \$10,000 in its Application and its estimated "Cost per meter" of \$3.33, including any contracts or invoices that support those numbers.

Response:

The \$10,000 that was used in the Application was a very conservative estimate provided by Jackson Purchase's technology department which manages the meter-reading contractor. Jackson Purchase estimated it has about 3,000 meters to manually read each month. The estimate provided is simply the \$10,000 divided by the 3,000 meters, which equals \$3.33 per meter/per month. Please see attached invoices from the meter-reading contractor for the past 12 months. Additionally, please see the Excel attachment for the actual field reads for the last 13 months.



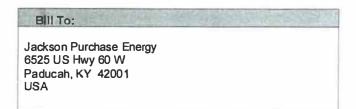
QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996

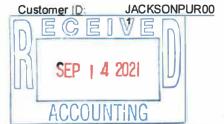


Invoice Number:

21-417

Invoice Date:

Sep 14, 2021



Customer PO	Payment Terms	Due Date	Company Job II
	Net 30 Days	10/14/21	

Quantity	Description	Unit Price	Amount
	Cycle One		
80.00	Meter Reader Blended Hourly Rate	45.60	3,648.00
	Cycle Two		
98.00	Meter Reader Blended Hourly Rate	45.60	4,468.80
	Cycle Three		
45.00	Meter Reader Blended Hourly Rate	45.60	2,052.00
	Cycle Four		
72.00	Meter Reader Blended Hourly Rate	45.60	3,283.20
	Month of August	1	
	RE:Jackson Purchase Energy		
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INVOICE TOTAL

13,452.00

Item 6 Page 3 of 57 Witness: Jeff Williams



		Location				
Jack	son Purchase	Paducah Ky		August		
		Meter Readin	g Timeshe	ets by Cycle		
#	Inspector	Date	Reg. Hours	Cycle	Total Hours	
1	Jim Chapman	8/10/2021	5	3	5	
2	Jim Chapman	8/15/2021	9	3	9	
3	Jim Chapman	8/16/2021	10	3	10	
4	Jim Chapman	8/17/2021	11	3	11	
5	Jim Chapman	8/18/2021	10	3	10	
6	Jim Chapman	8/22/2021	9	4	9	
7	Jim Chapman	8/23/2021	11	4	11	
8	Josh Champion	8/23/2021	10	4	10	
9	Curtis Franklin	8/23/2021	10	4	10	
10	Jim Chapman	8/24/2021	11	4	11	
11	Curtis Franklin	8/24/2021	10	4	10	
12	Jim Chapman	8/25/2021	9	4	9	
13	Curtis Franklin	8/25/2021	12	4	12	
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Item 6 Page 5 of 57 Witness: Jeff Williams



		Location			
Jackson Purchase		Paducah Ky		August	
		Meter Reading Timesheets by Cycle			
#	Inspector	Date	Reg. Hours	Cycle	Total Hours
1	Jim Chapman	7/28/2021	10	1	10
2	Curtis Franklin	7/28/2021	10	1	10
3	Curtis Franklin	7/29/2021	10	1	10
4	Jim Chapman	8/1/2021	11	1	11
5	Jim Chapman	8/2/2021	9	1	9
6	Josh Champion	8/2/2021	5	1	5
7	Jim Chapman	8/3/2021	10	1	10
8	Josh Champion	8/3/2021	5	1	5
9	Jim Chapman	8/4/2021	10	1	10
10	Jim Chapman	8/5/2021	5.5	2	5.5
11	Jim Chapman	8/6/2021	4.5	2	4.5
12	Curtis Franklin	8/6/2021	13	2	13
13	Jim Chapman	8/8/2021	10	2	10
14	Curtis Franklin	8/8/2021	10	2	10
15	Curtis Franklin	8/9/2021	10	2	10
16	Billy Joe Parker	8/9/2021	10	2	10

17	Josh Champion	8/9/2021	10	2	10
18	Jim Chapman	8/9/2021	10	2	10
19	Curtis Franklin	8/10/2021	5	2	5
20	Jim Chapman	8/10/2021	10	2	10
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Item 6
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Witness: Jeff Williams

QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996

Jackson Purchase Energy 6525 US Hwy 60 W Paducah, KY 42001 USA

Invoice Number: 21-416

Invoice Date: Aug 31, 2021

Customer ID: JACKSONPUR00



Customer PO	Payment Terms	Due Date	Company Job ID
	Net 30 Days	9/30/21	

Description	Unit Price	Amount
Cycle One Meter Reader Blended Hourly Rate	45.60	3,237.60
Cycle Two Meter Reader Blended Hourly Rate	45.60	3,169.20
Cycle Three	45.00	0.044.00
Meter Reader Blended Hourly Rate Cycle Four	45.60	2,211.60
Meter Reader Blended Hourly Rate	45.60	3,192.00
RE:Jackson Purchase Energy		
	Cycle One Meter Reader Blended Hourly Rate Cycle Two Meter Reader Blended Hourly Rate Cycle Three Meter Reader Blended Hourly Rate Cycle Four Meter Reader Blended Hourly Rate Month of July	Cycle One Meter Reader Blended Hourly Rate Cycle Two Meter Reader Blended Hourly Rate Cycle Three Meter Reader Blended Hourly Rate Meter Reader Blended Hourly Rate Cycle Four Meter Reader Blended Hourly Rate Month of July

INVOICE TOTAL

11,810.40

Item 6 Page 9 of 57 Witness: Jeff Williams



		Location			
Jack	son Purchase	Paducah Ky		July	
		Meter Reading Timesheets by Cycle			
#	Inspector	Date	Reg. Hours	Cycle	Total
1	Jim Chapman	6/27/2021	10	1	10
2	Jim Chapman	6/28/2021	10	1	10
3	Jim Chapman	6/28/2021	10	1	10
4	Jim Chapman	6/29/2021	10	1	10
5	Josh Champion	6/29/2021	11	1	11
6	Josh Champion	6/30/2021	10	1	10
7	Jim Chapman	6/30/2021	10	1	10
8	Jim Chapman	7/5/2021	10	2	10
9	Jim Chapman	7/6/2021	11	2	11
10	Jim Chapman	7/7/2021	11	2	11
11	Josh Champion	7/7/2021	11	2	11
12	Jim Chapman	7/8/2021	5	2	5
13	Josh Champion	7/8/2021	10	2	10
14	Jim Chapman	7/11/2021	11.5	2	11.5
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Item 6 Page 12 of 57 Witness: Jeff Williams



		Location			
Jack	son Purchase	Paducah Ky	Paducah Ky July		
		Meter Readin	g Timeshe	ets b <u>y Cy</u> cle	
#	Inspector	Date	Reg. Hours	Cycle	Total
1	Jim Chapman	7/13/2021	10	3	10
2	Jim Chapman	7/14/2021	10	3	10
3	Jim Chapman	7/15/2021	8.5	3	8.5
4	Jim Chapman	7/18/2021	10	3	10
5	Jim Chapman	7/19/2021	10	3	10
6	Josh Champion	7/19/2021	10	4	10
7	Jim Chapman	7/20/2021	10	4	10
8	Jim Chapman	7/21/2021	10	4	10
9	Jim Chapman	7/25/2021	11	4	11
10	Jim Chapman	7/26/2021	9	4	9
11	Josh Champion	7/26/2021	10	4	10
12	Jim Chapman	7/27/2021	10	4	10
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Witness: Jeff Williams

QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996

Bill To:

Jackson Purchase Energy 6525 US Hwy 60 W Paducah, KY 42001 USA Invoice Number:

21-362

Invoice Date:

Aug 6, 2021

Customer ID:

JACKSONPUR00



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Customer PO	Payment Terms	Due Date	Company Job ID
	Net 30 Days	9/5/21	

Quantity	Description	Unit Price	Amount
	Cycle One		
87.00	Meter Reader Blended Hourly Rate	45.60	3,967.20
	Cycle Two		
74.00	Meter Reader Blended Hourly Rate	45.60	3,374.40
	Cycle Three		
50.00	Meter Reader Blended Hourly Rate	45.60	2,280.00
	Cycle Four		
50.00	Meter Reader Blended Hourly Rate	45.60	2,280.00
	Month of June		
	RE:Jackson Purchase Energy		

INVOICE TOTAL

11,901.60

Item 6 Page 15 of 57 Witness: Jeff Williams



		Location				
Jackson Purchase		Paducah Ky	Paducah Ky June			
		Meter Reading Timesheets by Cycle				
#	Inspector	Date	Reg. Hours	Cycle	Total Hours	
1	Jim Chapman	6/1/2021	10	1	10	
2	Josh Champion	6/1/2021	10	1	10	
3	Jim Chapman	6/2/2021	11	1	11	
4	Josh Champion	6/2/2021	10	1	10	
5	Jim Chapman	6/3/2021	11	1	11	
6	Josh Champion	6/3/2021	10	1	10	
7	Curtis Franklin	6/3/2021	8	1	8	
8	Shawn Farmer	6/3/2021	10	1	10	
9	Jim Chapman	6/7/2021	7	1	7	
10	Jim Chapman	6/7/2021	4	2	4	
11	Jim Chapman	6/8/2021	10	2	10	
12	Josh Champion	6/8/2021	10	2	10	
13	Shawn Farmer	6/8/2021	10	2	10	
14	Jim Chapman	6/9/2021	10	2	10	
15	Jim Chapman	6/10/2021	10	2	10	
16	Josh Champion	6/10/2021	10	2	10	

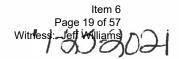
17	Shawn Farmer	6/10/2021	10	2	10
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Item 6 Page 17 of 57 Witness: Jeff Williams



		Location			
Jack	son Purchase	Paducah Ky		June	
		Meter Readir	ng Timeshee	ets by Cycle	
#	Inspector	Date	Reg.	Cycle	Total
			Hours	Texas a	Hours
1	Jim Chapman	6/14/2021	10	3	10
2	Jim Chapman	6/15/2021	10	3	10
3	Jim Chapman	6/16/2021	10	3	10
4	Jim Chapman	6/17/2021	10	3	10
5	Josh Champion	6/17/2021	10	3	10
6	Jim Chapman	6/20/2021	10	4	10
7	Josh Champion	6/20/2021	10	4	10
8	Jim Chapman	6/21/2021	10	4	10
9	Jim Chapman	6/22/2021	10	4	10
10	Jim Chapman	6/23/2021	10	4	10
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QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996

Bill To:

Jackson Purchase Energy 6525 US Hwy 60 W Paducah, KY 42001 USA Invoice Number:

21-308

Invoice Date:

Jun 30, 2021

Customer ID:

JACKSONPUR00



Customer PO	Payment Terms	Due Date	Company Job II
	Net 30 Days	7/30/21	

Quantity	Description	Unit Price	Amount
	Cycle One		
96.50	Meter Reader Blended Hourly Rate	45.60	4,400.40
	Cycle Two		
50.00	Meter Reader Blended Hourly Rate	45.60	2,280.00
	Cycle Three		
40.00	Meter Reader Blended Hourly Rate	45.60	1,824.00
	Cycle Four		
45.00	Meter Reader Blended Hourly Rate	45.60	2,052.00
	Month of May		
	RE:Jackson Purchase Energy		

INVOICE TOTAL

10,556.40

Item 6 Page 20 of 57 Witness: Jeff Williams



		Location			
Jack	son Purchase	Paducah Ky		May	
		Meter Readin	g Timeshe	ets by Cycle	
#	Inspector	Date	Reg. Hours	Cycle	Total Hours
1	Jeannie Mitchell	4/30/2021	10	1	10
2	Curtis Franklin	5/3/2021	10	1	10
3	Josh Champion	5/3/2021	8	1	8
4	Jeannie Mitchell	5/3/2021	10	1	10
5	Josh Champion	5/4/2021	10	1	10
6	Curtis Franklin	5/4/2021	10	1	10
7	Jeannie Mitchell	5/4/2021	9	1	9
8	Jeannie Mitchell	5/5/2021	9.5	1	9.5
9	Jeannie Mitchell	5/6/2021	10	1	10
10	Josh Champion	5/6/2021	10	1	10
11	Curtis Franklin	5/7/2021	10	2	10
12	Josh Champion	5/10/2021	10	2	10
13	Billy Joe Parker	5/10/2021	10	2	10
14	Josh Champion	5/11/2021	10	2	10
15	Josh Champion	5/12/2021	10	2	10
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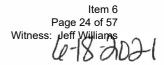
Item 6 Page 22 of 57 Witness: Jeff Williams



		Location				
Jack	son Purchase	Paducah Ky May				
		Meter Readin	g Timeshe	ets by Cycle		
#	Inspector	Date	Reg. Hours	Cycle	Total Hours	
1	Josh Champion	5/14/2021	10	3	10	
2	Josh Champion	5/17/2021	10	3	10	
3	Josh Champion	5/18/2021	10	3	10	
4	Josh Champion	5/19/2021	10	3	10	
5	Josh Champion	5/24/2021	10	4	10	
6	Jim Chapman	5/25/2021	10	4	10	
7	Josh Champion	5/25/2021	5	4	5	
8	Josh Champion	5/26/2021	10	4	10	
9	Jim Chapman	5/26/2021	10	4	10	
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QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996

Bill To:

Jackson Purchase Energy 6525 US Hwy 60 W Paducah, KY 42001 USA Invoice Number:

21-241

Invoice Date:

May 26, 2021

Customer ID:

JACKSONPUR00

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Customer PO	Payment Terms	Due Date	Company Job ID
	Net 30 Days	6/25/21	

Quantity	Description	Unit Price	Amount
	Cycle One		
100.00	Meter Reader Blended Hourly Rate	45.60	4,560.00
	Cycle Two		
61.00	Meter Reader Blended Hourly Rate	45.60	2,781.60
	Cycle Three		
34.00	Meter Reader Blended Hourly Rate	45.60	1,550.40
	Cycle Four		
54.00	Meter Reader Blended Hourly Rate	45.60	2,462.40
	Month of April		
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Item 6 Page 25 of 57 Witness: Jeff Williams



Josh Champion

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Jack	sson Purchase	Paducah Ky April			
		Meter Readin	g Timeshe	ets by Cycle	
#	Inspector	Date	Reg. Hours	Cycle	Total Hours
1	Jeannie Mitchell	3/30/2021	1.5	1	1.5

3/30/2021

3/31/2021

4/1/2021

4/1/2021

4/1/2021

4/2/2021

4/2/2021

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4/6/2021

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Item 6 Page 27 of 57 Witness Jeff Williams

QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996

BIII To: Jackson Purchase Energy 2900 Irvin Cobb Dr. Paducah, KY 42003 USA

Invoice Number:

21-196

Invoice Date:

Apr 29, 2021

Customer ID:

JACKSONPUR00



Customer PO	Payment Terms	Oue Date	Company Job ID
	Net 30 Days	5/29/21	

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INVOICE TOTAL

13,497.60

Item 6 Page 28 of 57 Witness: Jeff Williams



		Location					
Jack	cson Purchase	Paducah Ky					
		Meter Reading Timesheets by Cycle					
#	Inspector	Date	Reg. Hours	Cycle	Total Hours		
1	Jeannie Mitchell	3/1/2021	10	1	10		
	Jason Phelps	3/1/2021	10	1	10		
2	Jeannie Mitchell	3/2/2021	10	1	10		
	Jason Phelps	3/2/2021	10	1	10		
3	Jeannie Mitchell	3/3/2021	10.5	1	10.5		
	Jason Phelps	3/3/2021	5.5	1	5.5		
4	Jeannie Mitchell	3/4/2021	10.5	1	10.5		
	Josh Champion	3/4/2021	4	1	4		
5	Jeannie Mitchell	3/5/2021	5.5	1	5.5		
6	Jeannie Mitchell	3/8/2021	9.5	2	9.5		
	Jason Phelps	3/8/2021	10	2	10		
7	Jeannie Mitchell	3/9/2021	10.5	2	10.5		
	Jason Phelps	3/9/2021	10	2	10		
	Josh Champion	3/9/2021	10	2	10		
8	Jeannie Mitchell	3/10/2021	10	2	10		
	Jason Phelps	3/10/2021	10	2	10		

	Josh Champion	3/10/2021	10	2	10
9	Jeannie Mitchell	3/11/2021	10.5	2	10.5
	Jason Phelps	3/11/2021	10	2	10
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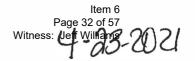
Item 6 Page 30 of 57 Witness: Jeff Williams



	Location	_ = = =
Jackson Purchase	Paducah Ky	March
	Meter Reading Timeshee	ets by Cycle

#	Inspector	Date	Reg. Hours	Cycle	Total Hours
1	Jeannie Mitchell	3/15/2021	9	3	9
2	Jeannie Mitchell	3/16/2021	9	3	9
3	Jeannie Mitchell	3/17/2021	8	3	8
4	Jeannie Mitchell	3/18/2021	9	3	9
5	Josh Champion	3/18/2021	10	3	10
6	Jeannie Mitchell	3/22/2021	9	4	9
7	Jeannie Mitchell	3/23/2021	10	4	10
8	Jeannie Mitchell	3/24/2021	8	4	8
9	Jeannie Mitchell	3/25/2021	9.5	4	9.5
10	Jeannie Mitchell	3/26/2021	4.5	4	4.5
11	Curtis Franklin	3/26/2021	10	4	10
12	Jeannie Mitchell	3/29/2021	8.5	4	8.5
13	Josh Champion	3/29/2021	10	4	10
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QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996

Bill To:

Jackson Purchase Energy 2900 Irvin Cobb Dr. Paducah, KY 42003 USA Invoice Number:

21-145

Invoice Date:

Mar 29, 2021

Customer ID:

JACKSONPUROO

APR - 1 2021

Customer PO	Payment Terms	Due Date	Company Job ID
	Net 30 Days	4/28/21	

Quantity	Description	Unit Price	Amount
91.50	Cycle One Meter Reader Blended Hourly Rate	45.60	4,172.40
90.50	Cycle Two Meter Reader Blended Hourly Rate Cycle Three	45.60	4,126.80
62.00	Meter Reader Blended Hourly Rate Cycle Four	45.60	2,827.20
37.50	Meter Reader Blended Hourly Rate Month of February RE:Jackson Purchase Energy	45.60	1,710.00

INVOICE TOTAL

12,836.40

Item 6 Page 33 of 57 Witness: Jeff Williams



		Location			
Jack	son Purchase	Paducah Ky		February	
		Meter Readin	g Timeshe	ets by Cycle	
#	Inspector	Date	Reg. Hours	Cycle	Total Hours
1	Shawn Farmer	2/15/2021	3	3	3
2	Jason Phelps	2/16/2021	10	3	10
3	Jordan Phelps	2/16/2021	10	3	10
4	Billy Joe Parker	2/16/2021	10	3	10
5	Jason Phelps	2/17/2021	9.5	3	9.5
6	Jordan Phelps	2/17/2021	9.5	3	9.5
7	Billy Joe Parker	2/17/2021	10	3	10
8	Jeannie Mitchell	2/22/2021	9	4	9
9	Jeannie Mitchell	2/23/2021	10	4	10
10	Jeannie Mitchell	2/24/2021	10.5	4	10.5
11	Jeannie Mitchell	2/25/2021	8	4	8
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Item 6 Page 35 of 57 Witness: Jeff Williams



		Location			
Jack	son Purchase	Paducah Ky		February	
		Meter Readin	g Timeshe	ets by Cycle	
#	Inspector	Date	Reg. Hours	Cycle	Total Hours
1	Jeannie Mitchell	1/29/2021	4	1	4
2	Jeannie Mitchell	2/1/2021	10	1	10
3	Billy Joe Parker	2/1/2021	10	1	10
4	Jeannie Mitchell	2/2/2021	10	1	10
5	Billy Joe Parker	2/2/2021	10	1	10
6	Jeannie Mitchell	2/3/2021	10	1	10
7	Billy Joe Parker	2/3/2021	10	1	10
8	Jeannie Mitchell	2/4/2021	10	1	10
9	Billy Joe Parker	2/4/2021	10.5	1	10.5
10	Shawn Farmer	2/4/2021	3	1	3
11	Jordan Phelps	2/4/2021	3	1	3
12	Jeannie Mitchell	2/8/2021	10	2	10
13	Jordan Phelps	2/8/2021	10	2	10
14	Shawn Farmer	2/8/2021	10	2	10
15	Jeannie Mitchell	2/9/2021	9.5	2	9.5
16	Jordan Phelps	2/9/2021	11	2	11

17	Shawn Farmer	2/9/2021	10	2	10
18	Jeannie Mitchell	2/10/2021	2	2	2
19	Jordan Phelps	2/10/2021	9	2	9
20	Shawn Farmer	2/10/2021	10	2	10
21	Josh Champion	2/10/2021	9	2	9
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Item 6 Page 37 of 57 Witness: Jeff Williams

QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996

Bill To: Jackson Purchase Energy 2900 Irvin Cobb Dr. Paducah, KY 42003 USA

Invoice Number:

21-072

Invoice Date:

Feb 26, 2021

Customer ID:

JACKSONPUR00



Customer PO	Payment Terms	Due Date	Company Job ID
	Net 30 Days	3/28/21	

Quantity	Description	Unit Price	Amount
	Cycle One		
87.00	Meter Reader Blended Hourly Rate	45.60	3,967.20
	Cycle Two		
96.50	Meter Reader Blended Hourly Rate	45.60	4,400.40
	Cycle Three		
61.50	Meter Reader Blended Hourly Rate	45.60	2,804.40
4	Cycle Four	r e	
51.00	Meter Reader Blended Hourly Rate	45.60	2,325.60
	Month of January		
	RE:Jackson Purchase Energy		
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Item 6 Page 38 of 57 Witness: Jeff Williams



		Location					
Jackson Purchase		Paducah Ky	January				
		Meter Reading Timesheets by Cycle					
#	Inspector	Date	Reg. Hours	Cycle	Total		
1	Jeannie Mitchell	12/31/2021	8	1	8		
2	Josh Champion	1/4/2021	10	1	10		
3	Jason Phelps	1/4/2021	10	1	10		
4	Jeannie Mitchell	1/4/2021	9.5	1	9.5		
5	Josh Champion	1/5/2021	10	1	10		
6	Jeannie Mitchell	1/5/2021	10	1	10		
7	Jason Phelps	1/5/2021	10	1	10		
8	Jeannie Mitchell	1/6/2021	9.5	1	9.5		
9	Jason Phelps	1/6/2021	10	1	10		
10	Jeannie Mitchell	1/7/2021	8.5	2	8.5		
11	Jason Phelps	1/7/2021	10	2	10		
12	Josh Champion	1/7/2021	10	2	10		
13	Shawn Farmer	1/8/2021	10	2	10		
14	Jeannie Mitchell	1/8/2021	5	2	5		
15	Josh Champion	1/11/2021	10	2	10		

16	Jason Phelps	1/11/2021	11	2	11
17	Jeannie Mitchell	1/11/2021	6.5	2	6.5
18	Jeannie Mitchell	1/12/2021	9.5	2	9.5
19	Jeannie Mitchell	1/13/2021	8	2	8
20	Josh Champion	1/13/2021	8	2	8
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Item 6 Page 40 of 57 Witness: Jeff Williams

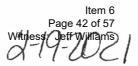


	Location		
Jackson Purchase	Paducah Ky	January	
	Meter Reading Tir	nesheets by Cycle	

#	Inspector	Date	Reg. Hours	Cycle	Total Hours
1	Jeannie Mitchell	1/14/2021	4	3	4
2	Jeannie Mitchell	1/15/2021	10.5	3	10.5
3	Josh Champion	1/18/2021	10	3	10
4	Jeannie Mitchell	1/19/2021	10	3	10
5	Jeannie Mitchell	1/20/2021	10	3	10
6	Jeannie Mitchell	1/21/2021	9	3	9
7	Josh Champion	1/21/2021	8	3	8
8	Jeannie Mitchell	1/21/2021	1	4	1
9	Jeannie Mitchell	1/25/2021	9	4	9
10	Josh Champion	1/26/2021	10	4	10
11	Jeannie Mitchell	1/26/2021	10	4	10
12	Jeannie Mitchell	1/27/2021	10	4	10
13	Jeannie Mitchell	1/28/2021	11	4	11
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QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996

Jackson Purchase Energy 2900 Irvin Cobb Dr. Paducah, KY 42003 USA

Invoice Number:

21-025

Invoice Date:

Jan 25, 2021

Customer ID:

JACKSONPUR00

JAN 2 6 2021

Customer PO	Payment Terms	Due Date	Company Job ID
	Net 30 Days	2/24/21	

Quantity	Description	Unit Price	Amount
	Cycle One		
78.50	Meter Reader Blended Hourly Rate	45.60	3,579.60
	Cycle Two		
109.00	Meter Reader Blended Hourly Rate	45.60	4,970.40
	Cycle Three		
46.50	Meter Reader Blended Hourly Rate	45.60	2,120.40
	Cycle Four		
45.50	Meter Reader Blended Hourly Rate	45.60	2,074.80
	Month of December		
	RE:Jackson Purchase Energy		

INVOICE TOTAL

12,745.20

Item 6 Page 43 of 57 Witness: Jeff Williams



		Location				
Jackson Purchase		Paducah Ky		December		
		Meter Reading Timesheets by Cycle				
#	Inspector	Date	Reg. Hours	Cycle	Total Hours	
1	Jeannie Mitchell	11/30/2020	10	1	10	
2	Josh Champion	11/30/2020	10	1	10	
3	Jason Phelps	11/30/2020	10.5	1	10.5	
4	Jeannie Mitchell	12/1/2020	10	1	10	
5	Josh Champion	12/1/2020	10	1	10	
6	Jeannie Mitchell	12/2/2020	9	1	9	
7	Jeannie Mitchell	12/3/2020	9	1	9	
8	Jeannie Mitchell	12/4/2020	5	1	5	
9	Shawn Farmer	12/4/2020	5	1	5	
10	Jeannie Mitchell	12/7/2020	10	2	10	
11	Shawn Farmer	12/7/2020	10	2	10	
12	Billy Parker	12/7/2020	10	2	10	
13	Billy Parker	12/8/2020	10	2	10	
14	Jeannie Mitchell	12/8/2020	10	2	10	
15	Josh Champion	12/8/2020	10	2	10	
16	Shawn Farmer	12/8/2020	10	2	10	

17	Jeannie Mitchell	12/9/2020	9	2	9
18	Josh Champion	12/9/2020	10	2	10
19	Billy Parker	12/9/2020	10	2	10
20	Shawn Farmer	12/9/2020	10	2	10
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Item 6 Page 45 of 57 Witness: Jeff Williams



		Location		1			
Jackson Purchase		Paducah Ky		December			
		Meter Reading Timesheets by Cycle					
#	Inspector	Date	Reg. Hours	Cycle	Total Hours		
1	Jeannie Mitchell	12/14/2020	7.5	3	7.5		
2	Jeannie Mitchell	12/15/2020	9.5	3	9.5		
3	Josh Champion	12/16/2020	4	3	4		
4	Jeannie Mitchell	12/16/2020	10	3	10		
5	Jeannie Mitchell	12/17/2020	10	3	10		
6	Jeannie Mitchell	12/18/2020	5.5	3	5.5		
7	Jeannie Mitchell	12/21/2020	7	4	7		
8	Jeannie Mitchell	12/22/2020	8.5	4	8.5		
9	Jeannie Mitchell	12/23/2020	8.5	4	8.5		
10	Josh Champion	12/28/2020	5	4	5		
11	Jeannie Mitchell	12/28/2020	9	4	9		
12	Jeannie Mitchell	12/29/2020	7.5	4	7.5		
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Item 6
Page 47 of 57
Witness: Jeff Williams

QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996

BIII To:

Jackson Purchase Energy 2900 Irvin Cobb Dr. Paducah, KY 42003 USA Invoice Number:

20-604

Invoice Date:

Dec 30, 2020

Customer ID:

JACKSONPUR00

1



Customer PO	Payment Terms	Due Date	Company Job ID
	Net 30 Days	1/29/21	

Quantity	Description	Unit Price	Amount
	Cycle One		
94.00	Meter Reader Blended Hourly Rate	45.60	4,286.40
	Cycle Two		
93.00	Meter Reader Blended Hourly Rate	45.60	4,240.80
	Cycle Three		
98.00	Meter Reader Blended Hourly Rate	45.60	4,468.80
	Cycle Four		
49.00	Meter Reader Blended Hourly Rate	45.60	2,234.40
	Month of November		
	RE:Jackson Purchase Energy		

Item 6 Page 48 of 57 Witness: Jeff Williams



		Location			
Jack	son Purchase	Paducah Ky		November	r
		Meter Reading	g Timeshe	ets by Cycle	!
#	Inspector	Date	Reg. Hours	Cycle	Total
1	Jeannie Mitchell	11/16/2020	7.5	3	7.5
2	Shawn Farmer	11/16/2020	10.5	3	10.5
3	Billy Joe Parker	11/16/2020	10	3	10
4	Jeannie Mitchell	11/17/2020	8.5	3	8.5
5	Shawn Farmer	11/17/2020	11	3	11
6	Josh Champion	11/17/2020	11	3	11
7	Billy Joe Parker	11/17/2020	10	3	10
8	Jeannie Mitchell	11/18/2020	9	3	9
9	Shawn Farmer	11/18/2020	10.5	3	10.5
10	Billy Joe Parker	11/18/2020	10	3	10
11	Jeannie Mitchell	11/23/2020	8	4	8
12	Shawn Farmer	11/23/2020	11	4	11
13	Jeannie Mitchell	11/24/2020	8.5	4	8.5
14	Shawn Farmer	11/24/2020	11	4	11
15	Jeannie Mitchell	11/25/2020	6.5	4	6.5
16	Shawn Farmer	11/25/2020	4	4	4

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Item 6 Page 50 of 57 Witness: Jeff Williams



		Location			
Jack	son Purchase	Paducah Ky		Novembe	r
		Meter Reading	g Timeshe	ets by Cycle	Œ
#	Inspector	Date	Reg. Hours	Cycle	Total Hours
1	Jeannie Mitchell	10/30/2020	5	1	5
2	Jeannie Mitchell	11/2/2020	8.5	1	8.5
3	Jason Phelps	11/2/2020	6	1	6
4	Jeannie Mitchell	11/3/2020	8.5	1	8.5
5	Jeannie Mitchell	11/4/2020	4	1	4
6	Jason Phelps	11/4/2020	11	1	11
7	Jason Phelps	11/5/2020	10.5	1	10.5
8	Josh Champion	11/5/2020	5	1	5
9	Billy Parker	11/5/2020	10	1	10
10	Jason Phelps	11/6/2020	10.5	1	10.5
11	Josh Champion	11/6/2020	8	1	8
12	Billy Parker	11/6/2020	8	2	8
13	Jason Phelps	11/7/2020	7	1	7
14	Jeannie Mitchell	11/9/2020	7	2	7
15	Josh Champion	11/9/2020	10	2	7
16	Jason Phelps	11/9/2020	10.5	2	10.5

17	Jeannie Mitchell	11/10/2020	8.5	2	8.5
18	Josh Champion	11/10/2020	10	2	10
19	Jason Phelps	11/10/2020	10.5	2	10.5
20	Jeannie Mitchell	11/11/2020	8.5	2	8.5
21	Josh Champion	11/11/2020	10	2	10
22	Jason Phelps	11/11/2020	10	2	10
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Page 52 of 57
Witness: Jeff Williams

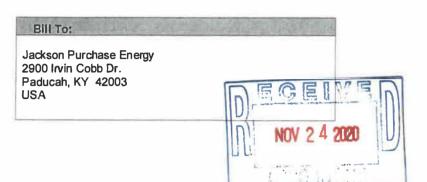
QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996



Invoice Number: 20-545

Invoice Date: Nov 23, 2020

Customer ID: JACKSONPUR00

1

Customer PO	Payment Terms	Due Date	Company Job ID
	Net 30 Days	12/23/20	

Quantity	Description	Unit Price	Amount
	Cycle One		
89.50	Meter Reader Blended Hourly Rate	45.60	4,081.20
	Cycle Two		
65.00	Meter Reader Blended Hourly Rate	45.60	2,964.00
	Cycle Three		
61.00	Meter Reader Blended Hourly Rate	45.60	2,781.60
	Cycle Four		
65.50	Meter Reader Blended Hourly Rate	45.60	2,986.80
	Month of October		
	RE:Jackson Purchase Energy		

INVOICE TOTAL

12,813.60

Item 6 Page 53 of 57 Witness: Jeff Williams



Jeanie Mitchell

16

CYCLE Timesheet

		Location			
Jack	son Purchase	Paducah Ky		October	
		Meter Reading Timesheets by Cycle			
#	Inspector	Date	Reg. Hours	Cycle	Total Hours
1	Josh Champion	9/29/2020	10	1	10
2	Jeanie Mitchell	9/29/2020	5	1	5
3	Josh Champion	9/30/2020	10	1	10
4	Jeanie Mitchell	9/30/2020	10	1	10
5	Josh Champion	10/1/2020	10	1	10
6	Jeanie Mitchell	10/1/2020	9.5	1	9.5
7	Jeanie Mitchell	10/2/2020	4	1	4
8	Billy Parker	10/5/2020	12	1	12
9	Jeanie Mitchell	10/6/2020	11	1	11
10	Billy Parker	10/6/2020	8	1	8
11	Jeanie Mitchell	10/7/2020	9.5	2	9.5
12	Jeanie Mitchell	10/8/2020	9.5	2	9.5
13	Jeanie Mitchell	10/9/2020	9	2	9
14	Jeanie Mitchell	10/12/2020	9	2	9
15	Jeanie Mitchell	10/13/2020	10	2	10
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10/14/2020

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17	Jason Phelps	10/14/2020	9.5	2	9.5
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Item 6 Page 55 of 57 Witness: Jeff Williams



		Location			
Jack	son Purchase	Paducah Ky		October	
		Meter Readin	g Timeshe	ets by Cycle	
#	Inspector	Date	Reg.	Cycle	Total Hours
1	Jeannie Mitchell	10/15/2020	9	3	9
2	Jeannie Mitchell	10/16/2020	2	3	2
3	Jeannie Mitchell	10/19/2020	8	3	8
4	Jason Phelps	10/19/2020	10	3	10
5	Jason Phelps	10/20/2020	11	3	11
6	Jeannie Mitchell	10/20/2020	9	3	9
7	Jeannie Mitchell	10/21/2020	6	3	6
8	Jason Phelps	10/21/2020	6	3	6
9	Jeannie Mitchell	10/22/2020	4	4	4
10	Jeannie Mitchell	10/23/2020	5.5	4	5.5
11	Jeannie Mitchell	10/26/2020	9.5	4	9.5
12	Jeannie Mitchell	10/27/2020	9.5	4	9.5
13	Shawn Farmer	10/27/2020	10	4	10
14	Jeannie Mitchell	10/28/2020	9.5	4	9.5
15	Shawn Farmer	10/28/2020	10	4	10
16	Jeannie Mitchell	10/29/2020	4.5	4	4.5

17	Shawn Farmer	10/29/2020	3	4	3
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Item 6 Page 57 of 57 Witness: Jeff Williams

QUALITY RESOURCES, LLC

PO Box 9 Slaughters, KY 42456



INVOICE

270-339-5996

Bill To:

Jackson Purchase Energy 2900 Irvin Cobb Dr. Paducah, KY 42003 USA Invoice Number: 2

20-524

Invoice Date:

Oct 30, 2020

Customer ID:

JACKSONPUR00

Customer PO	Payment Terms	Due Date	Company Job ID
	Net 30 Days	11/29/20	

Quantity	Description	Unit Price	Amount
	Cycle One		
108.00	Meter Reader Blended Hourly Rate	45.60	4,924.80
	Cycle Two		
70.50	Meter Reader Blended Hourly Rate	45.60	3,214.80
	Cycle Three		
54.00	Meter Reader Blended Hourly Rate	45.60	2,462.40
	Cycle Four		
56.00	Meter Reader Blended Hourly Rate	45.60	2,553.60
	Month of September		
	RE:Jackson Purchase Energy		

ATTACHMENTS ARE EXCEL SPREADSHEETS AND UPLOADED SEPARATELY

Item 7
Page 1 of 1
Witness: Jeff Williams

Jackson Purchase Energy Corporation Case No. 2021-00351 Commission Staff's First Request for Information

7. Provide any invoices from a meter reading contractor for the last 12 months for meter reading.

Response:

Please see the response to Item 6 above.

Witness: Jeff Williams

Jackson Purchase Energy Corporation Case No. 2021-00351 Commission Staff's First Request for Information

8. Assuming the accuracy of Jackson Purchase Energy's cost per meter estimate of \$3.33, confirm that the total annual cost to read 30,339 meters annually would be \$101,028.87 (30,339 x \$3.33) and would not be the \$1.1 million estimated by Jackson Purchase Energy. If Jackson Purchase Energy is not able to confirm, provide each and every basis for why Jackson Purchase Energy is not able to confirm.

Response:

That is confirmed. In Exhibit 1 to Jackson Purchase's Application, Jackson Purchase provided the savings for meter reading costs by installing the AMI system, which is \$1.1 million. The savings to annually deviate should have been listed as the estimate above, which is slightly over \$100,000.

Jackson Purchase Energy Corporation Case No. 2021-00351 Commission Staff's First Request for Information

9. Explain each and every basis why Jackson Purchase Energy contends that the deviation is still justified despite the fact that the deviation will [not] result in significantly lower saving than Jackson Purchase Energy indicated in its Application.

Response:

Jackson Purchase intends to avoid unneeded costs to its membership as it has installed an AMI system that is capable of producing accurate meter readings. If Jackson Purchase had initially brought the request for approval of the AMI system to the Commission, it would have shown the \$1.1 million in savings as a result of the new AMI meters. Furthermore, Jackson Purchase's annual margins for the past several years have been approximately \$1 million. For Jackson Purchase to realize over \$100,000 in savings annually amounts to approximately ten percent of annual margins and would greatly assist in helping to maintain loan covenants and improve financial stability.