

**COMMONWEALTH OF KENTUCKY  
BEFORE THE  
KENTUCKY PUBLIC SERVICE COMMISSION**

In the Matter of:

Electronic Application of Inter-County )  
Energy Cooperative Corporation for a )  
Certificate of Public Convenience and )  
Necessity Authorizing the Installation of a )  
New Advanced Metering Infrastructure )  
(AMI) System

Case No. 2022-00350

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**Motion for Leave to Deviate**

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Comes now, Inter-County Energy Cooperative Corporation (“Inter-County Energy” or the “Company”), pursuant to 807 KAR 5:041, Section 22 and moves the Public Service Commission of Kentucky (Commission) for leave to deviate from the requirements of 807 KAR 5:041, Section 16. In support of this Application, Inter-County Energy respectfully states as follows:

1. Inter-County Energy is a not-for-profit, member-owned, rural electric distribution cooperative organized under KRS Chapter 279. Inter-County Energy is engaged in the business of distributing retail electric power to approximately 27,000 members in the Kentucky counties of Boyle, Casey, Garrard, Larue, Lincoln, Madison, Marion, Mercer, Nelson, Rockcastle, Taylor and Washington Counties. It maintains 3,985 miles of distribution lines and has a member density of approximately 6.7 members per mile.

2. On October 24, 2022, Inter-County Energy filed an application for a Certificate of Public Convenience and Necessity (CPCN) to purchase and install a new AMI meter system.

3. Subsequently, the Commission granted Inter-County Energy's request for a CPCN to purchase and install the AMI meters finding the project was needed and it would not result in wasteful duplication.<sup>1</sup>

4. Since the CPCN was granted, Inter-County Energy has continued to prepare and plan for the deployment of the AMI meters. Inter-County Energy anticipates the installation to begin in early 2024.

5. To facilitate the installation of the AMI meters, Inter-County Energy is requesting the Commission grant a deviation from 807 KAR 5:041, Section 16, which requires the periodic and statistical testing of meters, for the duration of the full deployment of the AMI meters as all meters, with the exception of the pilot meter, will be changed and tested. The Commission has previously approved of a deviation of 807 KAR 5:041, Section 16 while AMI meters were installed.<sup>2</sup>

6. Inter-County Energy anticipates the installation of new meters will be completed by the end of 2026 and would resume meter testing in January 2027.

WHEREFORE, Inter-County Energy respectfully requests that the Commission, pursuant to 807 KAR 5:041, Section 22 grant a deviation from the periodic and statistical testing of meters required by 807 KAR 5:041, Section 16 for the duration of the full

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<sup>1</sup> Case No. 2022-00350, February 24, 2023 Order.

<sup>2</sup> Case No. 2022-00336, *Electronic Application of Meade County Rural Electric Cooperative Cooperation for a Certificate of Public Convenience and Necessity to Continue with the Full Deployment Installation of its Automated Metering and Infrastructure System*, April 19, 2021 Order at 7.

deployment of the AMI meters.

This the 19<sup>th</sup> day of January, 2024.

Respectfully submitted,

*Heather Temple*

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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing was transmitted to the Commission on January 19, 2024 and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of this filing will be filed.

*Heather Temple*

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*Counsel for Inter-County Energy Cooperative Corporation*