

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

In the Matter of:

Electronic Application of Jackson Purchase )	
Energy Corporation for a Certificate of )	
Public Convenience and Necessity )	Case No. 2024-00013
Authorizing the Installation of a New )	
Advanced Metering Infrastructure (AMI) )	
System )	

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**Motion for Leave to Deviate**

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Comes now, Jackson Purchase Energy Corporation (“Jackson Purchase” or the “Company”), pursuant to 807 KAR 5:001, Section 22 and 807 KAR 5:0041, Section 22, and moves the Public Service Commission of Kentucky (Commission) for leave to deviate from the requirements of 807 KAR 5:001, Section 15(2)(c), 807 KAR 5:001, Section 15(2)(d)(1), and KAR 5:0041, Section 16. In support of this request, Jackson Purchase respectfully states as follows:

1. Jackson Purchase is a not-for-profit, member-owned, rural electric distribution cooperative organized under KRS Chapter 279. Jackson Purchase is engaged in the business of distributing retail electric power to approximately 23,000 members in the Kentucky counties of Ballard, Carlisle, Graves, Livingston, Marshall, and McCracken. It owns approximately 3,000 circuit miles of distribution line in its service territory, and purchases its power requirements from Big Rivers Electric Corporation pursuant to a Wholesale Power Contract dated October 14, 1977, and subsequent amendments. Jackson Purchase is a “utility” as that term is defined in KRS 278.010(3)(a), and subject to the rates

and service jurisdiction of the Commission.

2. On January 26, 2024, Jackson Purchase filed an application for a Certificate of Public Convenience and Necessity (CPCN) to purchase and install a new AMI meter system.

3. 807 KAR 5:001, Section 15(2)(c) requires that an application for a CPCN contain a full description of the proposed location, route, and a description of the manner in which the facilities will be constructed.

4. 807 KAR 5:001, Section 15(2)(d)(1) requires that an application for a CPCN contain maps to a suitable scale showing the location or route as well as the location to like facilities owned by other utilities.

5. Jackson Purchase's Application is a request for a CPCN for the purchase and installation of new AMI meters, Jackson Purchase requests a deviation pursuant to 807 KAR 5:001, Section 22 of these filing requirements.

6. 807 KAR 5:041, Section 16 requires the periodic and statistical testing of single phase meters. 807 KAR 5:041, Section 22 allows the Commission to grant deviation from 807 KAR 5:041, Section 16 with good cause.

7. To facilitate the installation of the AMI meters, Jackson Purchase is requesting the Commission grant a deviation from 807 KAR 5:041, Section 16 because all meters, with the exception of the pilot meter, will be changed and tested during the AMI deployment. The Commission has previously approved of a deviation of 807 KAR 5:041, Section 16 while AMI meters were installed.<sup>1</sup>


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<sup>1</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.

8. Jackson Purchase anticipates the installation of the new meter will begin late 2024 and will end by December 2025 and Jackson Purchase would resume meter testing in January 2026.

WHEREFORE, Jackson Purchase respectfully requests that the Commission, pursuant to 807 KAR 5:001, Section 22 and 807 KAR 5:041, Section 22 grant a deviation from the filing requirements in 807 KAR 5:001, Section 15(2)(c) and 807 KAR 5:001, Section 15(2)(d)(1) and from the periodic and statistical testing of meters required by 807 KAR 5:041, Section 16 for the duration of the full deployment of the AMI meters.

Respectfully submitted,



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