

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENERGY CORP. FOR) CASE NO.
APPROVAL OF SAMPLE METER TESTING PLAN) 2010-00034

FIRST DATA REQUEST OF
COMMISSION STAFF TO KENERGY CORP.

Pursuant to 807 KAR 5:001, Kenergy Corp. ("Kenergy") is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due ten days from the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kenergy shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kenergy fails or refuses to furnish all or part of the requested information, Kenergy shall

provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to page 2 of 8 of the amended application. Kenergy states that it will comply with 807 KAR 5:041, Section 16, when implementing its sample meter testing program. Section 16 pertains to a different sample plan than the one being proposed by Kenergy. What portion of Section 16 would Kenergy comply with when implementing its sample meter testing program?

2. Refer to page 4 of 8 of the amended application. Kenergy states that watt-hour meters shall be adjusted when the error in registration exceeds 2 percent at 50 percent power factor. However, 807 KAR 5:041, Section 17, requires a watt-hour meter to be adjusted when registration exceeds 1 percent at 50-percent power factor. Would Kenergy be agreeable to revise the 2 percent to 1 percent? If not, provide a detailed explanation as to why Kenergy would not be so agreeable.

3. Refer to page 4 of 8. It appears that Kenergy will use only the full-load test results in the calculation to determine if a particular lot of meters passes or fails. In Case No. 2009-00103,¹ the Commission noted that "it is very possible that a meter

¹ Case No. 2009-00103, Application of Grayson Rural Electric Cooperative Corporation for a Deviation From 807 KAR 5:041, Section 15(3), Sample Master Meter Testing Program (Ky. PSC Sep. 25, 2009) at 2.

might test accurately under a full-load test, but fail under a light-load test, in which case the subject meter would not be accurate.” Would Kenergy be agreeable to revise its amended application to reflect that lot performances for new and existing meters shall be deemed acceptable if the full-load and light-load performances of the meters within the lot meet the acceptability criteria of the ANSI/ASQCZ1.9-2003?

4. With respect to new meters, utilities with approved sample meter plans similar to Kenergy's amended proposal are required to sample test new meters. Would Kenergy agree to sample test the new meters using an Inspection Level I and an AQL 1.0? If no, explain why this is not reasonable and provide the estimated cost to sample test the new meters.



Jeff Derouen
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Public Service Commission
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DATED: APR 23 2010

cc: Parties of Record

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