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April 28, 2010

RECEIVED

APR 28 2010

PUBLIC SERVICE
COMMISSION

FEDEX

Mr. Jeff DeRouen
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

Re: Application of Kenergy Corp. for Approval
Of Sample Meter Testing Plan
Case No. 2010-00034

Dear Mr. DeRouen:

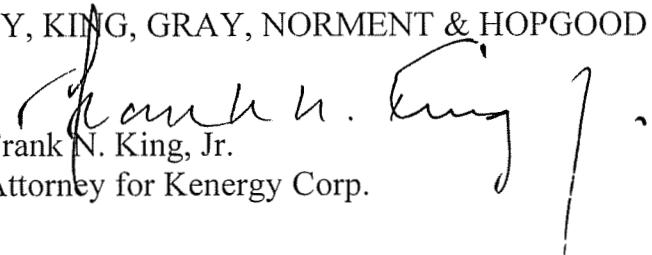
Enclosed for filing please find the original and five (5) copies of
Kenergy Corp.'s Response to First Data Request of Commission Staff in the above
matter.

Your assistance in this matter is appreciated.

Very truly yours,

DORSEY, KING, GRAY, NORMENT & HOPGOOD

By


Frank N. King, Jr.
Attorney for Kenergy Corp.

FNKJr/cds

Encls.

COPY/w/Encls.: Mr. Robert Hayden, Kenergy Corp.

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:)
)
The Application of Kenergy Corp.) CASE NO. 2010-00034
For Approval of Sample Meter)
Testing Plan)

RESPONSE OF KENERGY CORP. TO FIRST DATA REQUEST
OF COMMISSION STAFF

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?

RESPONSE: Kenergy’s statement on page 2 of 8 was overly broad. It was Kenergy’s intent to state that its approved sample meter testing plan would be followed in lieu of the periodic test prescribed in 807 KAR 5:041, Section 15(3). Nevertheless, the plan Kenergy will follow is the amended plan set forth in “Exhibit 1A” of the Amended Application, as that plan may be modified to obtain the Commission’s approval.

WITNESS: Robert Hayden

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.

RESPONSE: Yes, Kenergy is agreeable to revise the 2 percent to 1 percent.

WITNESS: Robert Hayden

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, the Commission noted that "it is very possible that a meter 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.

RESPONSE: Yes, Kenergy is agreeable to revising its Amended Application to reflect that 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.

WITNESS: Robert Hayden

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 1.07 If no, explain why this is not reasonable and provide the estimated cost to sample test the new meters.

RESPONSE: Yes, Kenergy agrees to sample test new meters using an Inspection Level I and an AQL 1.0.

WITNESS: Robert Hayden

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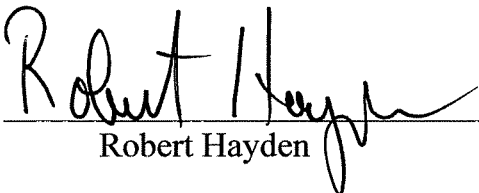
By _____


FRANK N. KING, JR.

CASE NO. 2010-00034

VERIFICATION

The undersigned, **ROBERT HAYDEN**, hereby verifies that the information set forth in Response of Kenergy Corp. to First Data Request of Commission Staff in the above case is true and correct to the best of his information and belief.

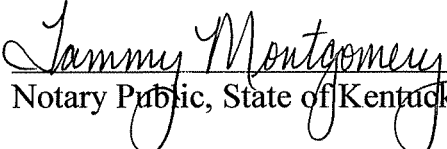

Robert Hayden

STATE OF KENTUCKY

COUNTY OF Daviess

The foregoing was signed, acknowledged and sworn to before me by **ROBERT HAYDEN**, this 27 day of April, 2010.

My commission expires April 24, 2014


I.D.# 416488
Notary Public, State of Kentucky at Large

(seal)