

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CLARK ENERGY)	
COOPERATIVE, INC. FOR A CERTIFICATE)	CASE NO.
OF CONVENIENCE AND NECESSITY TO)	2011-00303
CONSTRUCT ACCORDING TO ITS 2010-)	
2014 CONSTRUCTION WORK PLAN)	

COMMISSION STAFF'S SECOND INFORMATION REQUEST TO
CLARK ENERGY COOPERATIVE, INC.

Clark Energy Cooperative, Inc. ("Clark Energy") is to file with the Commission, in the format identified in the Commission's Order entered September 14, 2011 for the use of electronic filing procedures, its responses to the requests herein, with a copy as identified in the Commission's September 14, 2011 Order to all parties of record. The paper original filed with the Commission shall be appropriately bound, tabbed and indexed and shall include the name of the witness responsible for responding to the questions related to the information provided. The information requested herein is due no later than ten days from the issuance of this request.

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.

Clark Energy 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 Clark Energy fails or refuses to furnish all or part of the requested information, it 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.

1. Refer to the response to Item 1 of the Commission Staff's First Information Request ("Staff's First Request"). Provide the annual actual cost of operations (excluding the cost of power) for each year 2009 through 2011, and the annual budgeted cost of operations (excluding the cost of power) for each year 2012 through 2014.

2. Refer to the response to Item 6 of Staff's First Request.

- a. State whether the mechanical meters can be retrofitted to work with the TS2 system or if they would have to be replaced. If the former, provide the cost to retrofit the meter to make it compatible with the TS2 system.

- b. State whether the digital TS1 meters can be retrofitted to work with the TS2 system or if they would have to be replaced. If the former, provide the cost to retrofit the meter to make it compatible with the TS2 system.

3. Page 4 of the 740C Detail Report filed in the application shows that the AMR/AMI project total cost is \$1,559,800. Exhibit 3 shows that the cost for the TS2 project is \$1,381,900.

a. Confirm that these two references are for the same project.

b. Explain the discrepancy of \$177,900.

4. Refer to the response to Staff's First Request, Item 6, in which Clark Energy states it has 7,020 TS1 meters and 810 TS2 meters in its system.

a. When did Clark Energy begin purchasing and installing TS1 and TS2 meters? Provide a breakdown by year of the number and cost of TS1 and TS2 meters.

b. Identify the construction work plans ("CWP") filed with the Commission in which the TS1 and TS2 meter purchases were included.

c. If they were not included in a CWP, did Clark Energy obtain a Certificate of Public Convenience and Necessity prior to purchasing the TS1 and TS2 meters? If yes, identify the case number of the proceeding.

d. Section 2 of the CWP, page 2-4, shows the replacement of 4,000 meters, or 1,000 meters per year. State whether these replacements are expected to be made as meters fail or whether Clark Energy is gradually "replacing" all mechanical meters at a rate of 1,000 meters per year. If the latter, does Clark Energy plan to replace meters at the rate of 1,000 per year beyond the time period of this CWP, or does Clark Energy expect to accelerate the replacements after 2014? Explain your response.

David Greenwell for

Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED APR 20 2012

cc: Parties of Record

Case No. 2011-00303

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