

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

FILING OF OWEN ELECTRIC COOPERATIVE, INC. )	Case No.
TO IMPLEMENT A TIME OF DAY TARIFF FOR ITS )	2012-00154
SMART HOME PILOT PROGRAM )	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO OWEN ELECTRIC COOPERATIVE, INC.

Owen Electric Cooperative, Inc. ("Owen"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due within seven days of the issuance 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 the 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.

Owen 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 Owen 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 shall 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. As a result of Owen's recent revenue neutral rate case, Case No. 2011-00037,<sup>1</sup> the customer charges for both the residential class and the small commercial class were increased, with corresponding decreases to the energy charges. In part, the rate design changes are meant to allow Owen to offer demand-side management and energy efficiency programs, while limiting potential revenue erosion. Explain why Owen does not propose a program similar to the Smart Home Pilot for commercial customers. Include in the explanation whether Owen plans other programs for small commercial customers in the future.

2. Refer to Owen's response to Item 3 of Commission Staff's First Request for Information ("Staff's First Request"). Owen proposes to include 100 low-income members with full HAN including thermostat and water heater control, 100 non-low-income members with full HAN including thermostat and water heater control, and 100 members with HAN but no thermostat and water heater control in its Smart Home Pilot.

a. Explain how Owen decided to group the participants in the three segments as described above. Include in the explanation whether the segment with

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<sup>1</sup> Case No. 2011-00037, Application of Owen Electric Cooperative Corporation for an Order Authorizing a Change in Rate Design for Its Residential and Small Commercial Rate Classes, and the Proffering of Several Optional Rate Designs for the Residential Rate Classes (Ky. PSC Feb. 29, 2012).

100 members with HAN and no thermostat and water heater control includes both low-income and non-low-income members and whether income will be identified in the segment.

b. Explain what criteria Owen will use to determine whether a customer is eligible as low income.

c. Explain whether Owen believes the \$11.76 per month fee for software service described in its response to Item No. 12 of Staff's First Request will be a deterrent for participation by low-income customers.

d. Explain whether Owen believes the high speed internet requirement for participation in the Smart Home Pilot will be a deterrent for participation by low-income customers.

e. Would a high-speed internet connection through a wireless device such as a smart phone be possible for participation?

3. Refer to Owen's response to Item 5 of Staff's First Request. Owen states that those customers with less- or greater-than-average usage would see a change in their monthly bills. Using specific examples and assuming no change in energy consumption patterns on behalf of the consumer, quantify the dollar and percentage increases for a low-usage and a high-usage residential customer. Provide all calculations and workpapers necessary to support the response.

4. Refer to Owen's response to Item 8 of Staff's First Request.

a. Explain why Owen sets out a schedule of hours that identifies weekday hours, but does not include weekend hours in the schedule. If unintentionally

omitted, provide a revised tariff setting out weekend hours, or include a statement concerning the treatment of all weekend hours.

b. Owen requires a two-year minimum commitment for participation in the Smart Home Pilot. Assume that a member does not sign up immediately when the pilot begins. The member's commitment would then exceed the two-year period for which Owen requests the pilot be approved. Explain whether the customer obligation ends if Owen decides not to continue the program past two years. Include in the explanation whether the member reverts to the Farm and Home tariff and, if so, when this occurs.



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DATED JUN 01 2012

cc: Parties of Record

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