COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CUMBERLAND VALLEY)ELECTRIC, INC. FOR A CERTIFICATE OF)PUBLIC CONVENIENCE AND NECESSITY TO)REPLACE ITS TWO-WAY RADIO SYSTEM AND)DEVELOP A GIS ACCORDING TO THE)APPLICANTS 01/01/2012-12/31/2015)CONSTRUCTION WORK PLAN)

CASE NO. 2012-00250

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO CUMBERLAND VALLEY ELECTRIC, INC.

Cumberland Valley Electric, Inc. ("Cumberland Valley") is to file with the Commission, in the format identified in the Commission's Order entered July 2, 2012 for the use of electronic filing procedures, the following information, with a copy to all parties of record. The information requested herein is due no later than 14 days from the date of this request. The original and paper copy filed with the Commission 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.

Cumberland Valley 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 Cumberland Valley 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 Item 4 of the Application which states, "[t]his application is for a Certificate of Public Convenience and Necessity ("CPCN") to install a new two-way communication infrastructure ("radio system") and a Graphical [*sic*] Information System ("GIS") as set out in Case No. 2011-00442" Provide the location in either, or both, Case No. 2011-00442¹ or this case where the radio system to be obtained is indicated, "set out," or otherwise noted with its specific options chosen and completely identified.

2. Refer to Item 9 of the Application which states that a "Communication Assessment Report" (behind the tab entitled Appendix A of Data Request No. 1, but with pages noted as Appendix B) and a "GIS Overview" (behind the tab entitled Appendix B of Data Request No. 1, but with pages noted as Appendix A) were included in Case No. 2011-00442. These appended documents provide information, options, details and recommendations, but do not identify the chosen Cumberland Valley course of action. Provide specifics of what systems and equipment are desired. Include items

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¹ Case No. 2011-00442, Application of Cumberland Valley Electric, Inc. for a Certificate of Public Convenience and Necessity to Construct Distribution Facilities in Accordance with Its 2012-2015 Construction Work Plan (Ky. PSC Mar. 29, 2012).

Cumberland Valley desired, needed, or recommended in the new radio system and how they are addressed in the final decision, such as:

a. The mobile radio technology chosen as the best fit;

b. The radio frequency chosen;

c. The specific types of mobile data capabilities and software included, as AVL, Mobile GIS Viewing, Field Orders, Field Inspections, Staking, etc.;

d. Whether additional equipment shelters or cabinets will be required and where;

e. Any provision for and status of a system maintenance or service level agreement;

f. The possible need for a full bandwidth versus path reliability study;

g. The capability for communicating across both Cumberland Valley territories without dispatcher intervention;

h. Any capability of East Kentucky Power Cooperative, Inc. ("EKPC") dispatcher communication with Cumberland Valley personnel or the converse;

i. What percentage will be obtained in communication coverage of the area and the reliability expected with the new radio system chosen;

j. The signal strength and the power of the new equipment;

k. The predicted coverage noted in "i" when taking into account actual equipment and frequency, if different;

I. The number and location of current and of new towers with their status of availability, usability, and any arrangements pursued;

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m. Provisions for emergency power at tower facilities, as well as at base units;

n. Any EKPC involvement, agreements, investment, or funding; and

o. Any additional complimentary devices needed such as, cellular equipment, etc.

3. Refer to Items 10.i. and 10.k. of the Application which identify the original item costs as indicated in Case No. 2011-00442. Are these amounts correct for this case? Explain any variations or additions.

4. Refer to the "GIS Overview" in Case No. 2011-00442 which provides support for the GIS program desired. Provide details of any additions, deletions, or substantive variations to the information provided in that overview.

5. Refer to the "GIS Overview" in Case No. 2011-00442, page 3 of 6, listing two potential contractors to perform field inventory functions, a cost estimate, and a time estimate. Will the field inventory be competitively bid? If the answer is no, what is the justification for single sourcing? How was the cost estimate determined? Provide details of the time estimate.

6. Refer to the "GIS Overview" in Case No. 2011-00442, page 5 of 6. The statement is made, "CVE does not currently own or operate software driven outage management system, nor does it plan to in the near future." Provide any changes in this philosophy or direction given the recommendations of the Commission's Ike and Ice Report of 2009. Discuss how Cumberland Valley plans to design and develop the GIS database so that outage management system functionality could be readily implemented at a later date.

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7. Refer to the "GIS Overview" in Case No. 2011-00442, page 6 of 6. It states that Rural Utilities Service financing will provide some of the funding for the field investory estimate. Identify any funding that will be required by a different source and whether it is anticipated that any additional debt will need to be incurred.

Jeff Øerouen Executive Director Public Service Commission 211 Sower Boulevard Frankfort, KY 40601

AUG 2 2 2012

DATED_____

cc: Parties of Record

Mark D Abner, P.E. Cumberland Valley Electric, Inc. Highway 25E P. O. Box 440 Gray, KY 40734

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