

SULLIVAN, MOUNTJOY, STAINBACK & MILLER PSC
ATTORNEYS AT LAW

Sullivan
Mountjoy
Frank Stainback
James M. Miller
Michael A. Fiorella
Allen W. Holbrook
R. Michael Sullivan
Bryan R. Reynolds*
Tyson A. Kamuf
Mark W. Starnes
C. Ellsworth Mountjoy

*Also Licensed in Indiana

March 20, 2013

Mr. Jeff Derouen
Executive Director
Public Service Commission of Kentucky
211 Sower Boulevard
Frankfort, KY 40601

RECEIVED

MAR 20 2013

PUBLIC SERVICE
COMMISSION

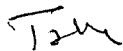
**RE: *In the Matter of: Consideration of the Implementation of
Smart Grid and Smart Meter Technologies,
Case No. 2012-00428***

Dear Mr. Derouen:

Enclosed find an original and fourteen (14) copies of the responses of Big River Electric Corporation ("Big Rivers"), Jackson Purchase Energy Corporation, Kenergy Corp., and Meade County Rural Electric Cooperative Corporation to the Commission Staff's and the Office of the Attorney General's Requests for Information, dated February 27, 2013, in the abovementioned matter. A copy of these responses is being sent by first class, U.S. Mail to the parties listed on the attached service list.

Please confirm the Commission's receipt of these responses by placing the Commission's date stamp on the additional, enclosed copy and returning it to Big Rivers in the postage paid, self-addressed envelope provided. Should you have any questions about this filing you may contact either me or Roger Hickman at roger.hickman@bigrivers.com.

Sincerely yours,



Tyson Kamuf

cc: Billie J. Richert
Service List

Telephone (270) 926-4000
Telecopier (270) 683-6694

100 St. Ann Building
PO Box 727
Frankfort, Kentucky
42302-0727

www.westkylaw.com

Service List
Administrative Case No. 2012-00428

Allen Anderson
President & CEO
South Kentucky R.E.C.C.
925-929 N. Main Street
P. O. Box 910
Somerset, KY 42502-0910

Lonnie E Bellar
VP - State Regulation
Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

John B Brown
Chief Financial Officer
Delta Natural Gas Company, Inc.
3617 Lexington Road
Winchester, KY 40391

Anthony S Campbell
President & CEO
East Ky. Power Cooperative, Inc.
4775 Lexington Road
P. O. Box 707
Winchester, KY 40392-0707

Judy Cooper
Manager, Regulatory Services
Columbia Gas of Kentucky, Inc.
2001 Mercer Road
P. O. Box 14241
Lexington, KY 40512-4241

Rocco D'Ascenzo
Senior Counsel
Duke Energy Kentucky, Inc.
139 East 4th Street, R. 25 At II
P. O. Box 960
Cincinnati, OH 45201

Paul G Embs
President & CEO
Clark Energy Cooperative, Inc.
2640 Ironworks Road
P. O. Box 748
Winchester, KY 40392-0748

David Estep
President & General Manager
Big Sandy R.E.C.C.
504 11th Street
Paintsville, KY 41240-1422

Carol Ann Fraley
President & CEO
Grayson R.E.C.C.
109 Bagby Park
Grayson, KY 41143

Mark David Goss
Goss Samford, PLLC
2365 Harrodsburg Road
Suite B130
Lexington, KY 40504

Ted Hampton
Manager
Cumberland Valley Electric, Inc.
Highway 25E
P. O. Box 440
Gray, KY 40734

Jennifer B Hans
Assistant Attorney General's Office
1024 Capital Center Drive, Ste 200
Frankfort, KY 40601-8204

Larry Hicks
President & CEO
Salt River Electric Cooperative Corp.
111 West Brashear Avenue

P. O. Box 609
Bardstown, KY 40004

Kerry K Howard
CEO
Licking Valley R.E.C.C.
P. O. Box 605
271 Main Street
West Liberty, KY 41472

James L Jacobus
President & CEO
Inter-County Energy Cooperative
Corporation
1009 Hustonville Road
P. O. Box 87
Danville, KY 40423-0087

Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

Mark Martin
VP Rates & Regulatory Affairs
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, KY 42303

Debbie J Martin
President & CEO
Shelby Energy Cooperative, Inc.
620 Old Finchville Road
Shelbyville, KY 40065

Donald T. Prather
Mathis, Riggs & Prather, P.S.C.
500 Main Street, Suite 5
Shelbyville, KY 40065

Burns E Mercer
President & CEO
Meade County R.E.C.C.
P. O. Box 489
Brandenburg, KY 40108-0489

Michael L Miller
President & CEO
Nolin R.E.C.C.
411 Ring Road
Elizabethtown, KY 42701-6767

Barry L Myers
Manager
Taylor County R.E.C.C.
625 West Main Street
P. O. Box 100
Campbellsville, KY 42719

G. Kelly Nuckols
President & CEO
Jackson Purchase Energy Corp.
2900 Irvin Cobb Drive
P. O. Box 4030
Paducah, KY 42002-4030

Christopher S Perry
President & CEO
Fleming-Mason Energy
Cooperative, Inc.
1449 Elizaville Road
P. O. Box 328
Flemingsburg, KY 41041

Bill Prather
President & CEO
Farmers R.E.C.C.
504 South Broadway
P. O. Box 1298
Glasgow, KY 42141-1298

David S Samford
Goss Samford, PLLC
2365 Harrodsburg Road
Suite B130
Lexington, KY 40504

Honorable Iris G Skidmore
415 W. Main Street
Suite 2
Frankfort, KY 40601

Mark Stallons
President & CEO
Owen Electric Cooperative, Inc.
8205 Highway 127 North
P. O. Box 400
Owenton, KY 40359

Gregory Starheim
President & CEO
Kenergy Corp.
6402 Old Corydon Road
P. O. Box 18
Henderson, KY 42419

Ed Staton
VP - State Regulation and Rates
Louisville Gas and Electric Co.
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

Mike Williams
President & CEO
Blue Grass Energy
Cooperative Corp.
1201 Lexington Road
P. O. Box 990
Nicholasville, KY 40340-0990

Ranie Wohnhas
Managing Director, Reg & Finance
Kentucky Power Company
101 A Enterprise Drive
P. O. Box 5190
Frankfort, KY 40602

Carol Wright
President & CEO
Jackson Energy Cooperative Corp.
115 Jackson Energy Lane
McKee, KY 40447

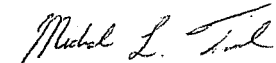
Clayton O. Oswald
Taylor Keller & Oswald, PLLC
P.O. Box 3440
1306 W. 5th St., Suite 100
London, KY 40743-3440

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

VERIFICATION

I, Michael L. French, verify, state, and affirm that I prepared or supervised the preparation of my responses to data requests filed with this Verification, and that those responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Michael L. French

COMMONWEALTH OF KENTUCKY)
COUNTY OF MEADE)

SUBSCRIBED AND SWORN TO before me by Michael L. French on this
the 18 day of March, 2013.



Notary Public, Ky. State at Large

My Commission Expires 12-21-2016

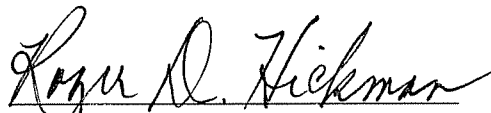
480341

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

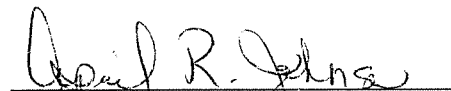
VERIFICATION

I, Roger D. Hickman, verify, state, and affirm that I prepared or supervised the preparation of my responses to data requests filed with this Verification, and that those responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Roger D. Hickman

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Roger D. Hickman on
this the 15th day of March, 2013.

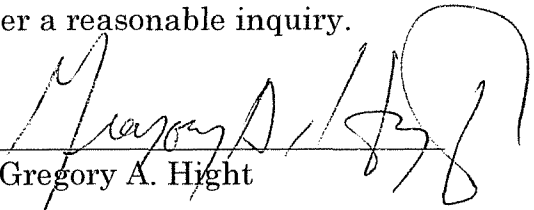

Notary Public, Ky. State at Large
My Commission Expires 8-9-2014

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

VERIFICATION


I, Gregory A. Hight, verify, state, and affirm that I prepared or supervised the preparation of my responses to data requests filed with this Verification, and that those responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Gregory A. Hight

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Gregory A. Hight on this
the 15th day of March, 2013.



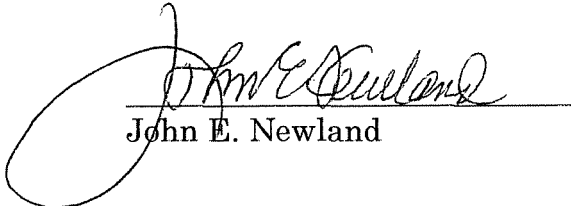
Notary Public, Ky State at Large
My Commission Expires 8-9-2014

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

VERIFICATION

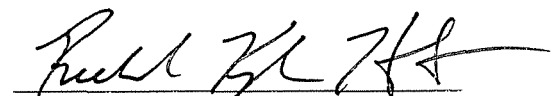
I, John E. Newland, verify, state, and affirm that I prepared or supervised the preparation of my responses to data requests filed with this Verification, and that those responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



John E. Newland

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by John E. Newland on this
the 19 day of March, 2013.



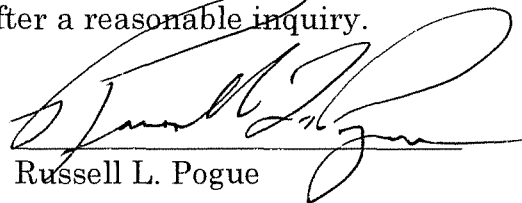
Notary Public, Ky. State at Large
My Commission Expires 11/13/2016
Notary ID # 478427

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

VERIFICATION


I, Russell L. Pogue, verify, state, and affirm that I prepared or supervised the preparation of my responses to data requests filed with this Verification, and that those responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Russell L. Pogue

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Russell L. Pogue on this
the 15th day of March, 2013.



Notary Public, Ky State at Large
My Commission Expires 8-9-2014

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

VERIFICATION

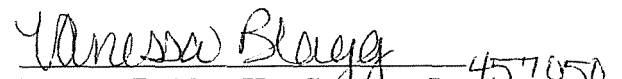
I, Scott W. Ribble, verify, state, and affirm that I prepared or supervised the preparation of my responses to data requests filed with this Verification, and that those responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Scott W. Ribble

COMMONWEALTH OF KENTUCKY)
COUNTY OF McCRACKEN)

SUBSCRIBED AND SWORN TO before me by Scott W. Ribble on this
the 12th day of March, 2013.



457050
Notary Public, Ky. State at Large
My Commission Expires 12-22-15

ORIGINAL



Your Touchstone Energy® Cooperative 

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

CONSIDERATION OF THE IMPLEMENTATION)
OF SMART GRID AND SMART METER) Case No.
TECHNOLOGIES) 2012-00428

Responses to the Office of the Attorney General's
Request for Information
dated February 27, 2013

FILED: March 20, 2013

ORIGINAL

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 1)** *Since the Commission initiated Consideration of the New*
2 *Federal Standards of the Energy Independence and Security Act of 2007,*
3 *Administrative Case No. 2008-00408, has the company changed its position*
4 *regarding Smart Grid? If so, how?*

5

6 **Response)** No.

7

8 **Witnesses)** Roger D. Hickman (*Big Rivers*¹), Scott W. Ribble (*JPEC*²),
9 John E. Newland (*Kenergy*³), and Michael L. French (*MCRECC*⁴)

10

¹ Big Rivers = Big Rivers Electric Corporation.

² JPEC = Jackson Purchase Energy Corporation.

³ Kenergy = Kenergy Corp.

⁴ MCRECC = Meade County Rural Electric Cooperative Corporation.

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 2)** *Are the technologies pertaining to the implementation of*
2 *Smart Grid definitely known and proven?*

3

4 *a. If yes, explain in detail every aspect from the use of each*
5 *technology from the company to the end-user.*

6 *b. If not, explain in detail what technologies are already*
7 *advancing/improving as well as those that are envisioned*
8 *on the immediate time horizon.*

9

10 **Response)** Big Rivers and its Members believe not all technologies pertaining to
11 the general implementation of Smart Grid are definitely known and/or proven.
12 Please see the Direct Testimony of Roger D. Hickman ("Hickman Testimony") at
13 page 12, line 22 through page 23, line 16, and pages 23-25.

14

15

16 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
17 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

18

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 Item 3) *In light of resent (sic) catastrophic storms over the past ten*
2 *years (for example, the various ice storms, tornadoes, and strong winds),*
3 *which electric companies have experienced, and for which the company*
4 *may ultimately have sought regulatory assets, can the company*
5 *affirmatively state that its basic infrastructure, including all of its*
6 *generation, transmission and distribution facilities, have proven to be*
7 *reliable 24 hours a day, seven days a week, 365 days a week (sic)? If not,*
8 *for each and every storm that it affected the utility in excess of two days,*
9 *please provide the following:*

10

- 11 *a. The number of days before the company's last ratepayer's*
12 *electricity was restored for each storm.*
13 *b. The average number of days, or hours if applicable, that the*
14 *average ratepayer's outage lasted for each storm.*
15 *c. The average financial loss for the average ratepayer for*
16 *each storm, if known.*

17

18 **Response)**

19 a. and b.

20 Neither Big Rivers nor its Members keep the requested
21 information by storm.

22 c. Unknown.

Case No. 2012-00428
Response to AG 1-3

Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)

Page 1 of 2

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1
2
3
4

**Witnesses) Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)**

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 4)** *Does the company agree with the Attorney General that*
2 *electricity is not considered a luxury service but a necessary commodity of*
3 *modern life? If not, why not?*

4
5 **Response)** Big Rivers and its Members recognize the importance of electricity in
6 the lives of their customers. Big Rivers and its Members always strive to fulfill
7 their obligations as outlined in the Kentucky Revised Statutes and the Kentucky
8 Administrative Regulations. As such, Big Rivers and its Members strive to
9 provide "adequate, efficient and reasonable service." KRS 278.030(2).

10

11

12 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
13 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

14

Case No. 2012-00428

Response to AG 1-4

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 5)** *Does the company agree that the fundamental reliability of its*
2 *electric grid - i.e., the delivery of electricity to the end-user 24/7/365 - is*
3 *paramount to the end-user's ability to monitor and/ or conserve his/her*
4 *demand or electricity consumption? If not, why not?*

5

6 **Response)** Neither Big Rivers nor its Members can speak to what is paramount
7 for an end user; however, an end user does have the ability to monitor and
8 conserve his or her electricity demand and consumption without the delivery of
9 electricity being uninterrupted.

10

11

12 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
13 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

14

Case No. 2012-00428

Response to AG 1-5

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 6)** *Please state whether the company is aware of any*
2 *cybersecurity breaches effecting the electric and gas industries that have*
3 *either occurred in the United States or internationally. If the answer is in*
4 *the affirmative, please explain the details of the breaches without*
5 *exposing information that is not already in the public domain.*

6

7 **Response)** Please see Big Rivers' and its Members' response to Item 104 of the
8 Commission Staff's Initial Request for Information.

9

10

11 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
12 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

13

14

Case No. 2012-00428

Response to AG 1-6

Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 *Item 7) Please confirm that the company is aware that the prior*
2 *United States Secretary of Defense Leon Panetta, in speaking on the*
3 *vulnerability of the nation's electric grid with the consequential safety*
4 *and security concerns that ensue, warned the Senate Appropriations*
5 *Committee on Defense that the risk to the United States could even be*
6 *considered the equivalent of a "digital Pearl Harbor."⁵*

7

8 *a. Is this concern of the vulnerability of the nation's electric*
9 *grid shared by the company? If not, why not?*

10

11 **Response)** Yes. Big Rivers and its Members are aware of Secretary Panetta's
12 comment.

13

14 a. Yes.

15

16

17 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
18 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

⁵ Comments by Secretary of Defense, Leon Panetta, U.S. Senate Appropriations Subcommittee on Defense, Hearing on FY 13 DoD Budget, June 13, 2012.
<http://www.appropriations.senate.gov/webcasts.cfm?method=webcasts.view&id~10d86ec5-4a324fa4-b09cZa006fa63c976>

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 8)** *With regard to cybersecurity in general, can the company*
2 *unequivocally confirm that its system reliability is not vulnerable to a*
3 *cybersecurity attack? If not, what could be the consequences? Please*
4 *explain in detail as much as possible for the following:*

5

6 *a. the company, and*

7 *b. the company's ratepayers.*

8

9 **Response)** No. Due to the rapidly changing nature of technology itself as well as
10 the capabilities of those wishing to cause harm, it is a fundamental fallacy to
11 assume anything is unequivocally immune from a cyber-breach. Big Rivers and
12 its Members strive to protect their respective systems from any cybersecurity
13 attack. Due to the sensitivity of the information regarding consequences of a
14 breach, we are unable to state specifics regarding the impact of a breach.

15 Please see Big Rivers' and its Members' response to Item 104 of the
16 Commission Staff's Initial Request for Information.

17

18

19 **Witnesses)** Gregory A. Hight (*Big Rivers*), Scott W. Ribble (*JPEC*),
20 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

21

**Case No. 2012-00428
Response to AG 1-8**

**Witnesses: Gregory A. Hight (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 9)** *Please provide the names of the standards, protocols or*
2 *policies which the company observes and/ or implements in its*
3 *maintaining its system reliability from cybersecurity threats.*

4
5 **Response)** Please see Big Rivers' and its Members' response to Item 104 of the
6 Commission Staff's Initial Request for Information.

7
8
9 **Witnesses)** Gregory A. Hight (*Big Rivers*), Scott W. Ribble (*JPEC*),
10 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

11

Case No. 2012-00428

Response to AG 1-9

Witnesses: Gregory A. Hight (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 10)** *Please provide copies of the standards, protocols or policies*
2 *which the company observes and/ or implements in its maintaining its*
3 *system reliability from cybersecurity threats.*

4

5 **Response)** Please see Big Rivers' and its Members' response to Item 104 of the
6 Commission Staff's Initial Request for Information.

7

8

9 **Witnesses)** Gregory A. Hight (*Big Rivers*), Scott W. Ribble (*JPEC*),
10 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

11

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 Item 11) *With regard to cybersecurity in general, can the company*
2 *unequivocally confirm that its ratepayers' privacy of data cannot be*
3 *compromised or otherwise divulged to any individual or entity not*
4 *associated with the company, or a qualified third-party which has issues a*
5 *non-disclosure statement or the ratepayers? If not, what could be the*
6 *consequences? Please explain in detail as much as possible for the*
7 *following:*

8

9

a. the company, and

10

b. the company's ratepayers.

11

12 **Response)** Please see Big Rivers' and its Members' response to Item 8 above.

13

14

15 **Witnesses)** Gregory A. Hight (*Big Rivers*), Scott W. Ribble (*JPEC*),

16

John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

17

Case No. 2012-00428

Response to AG 1-11

Witnesses: Gregory A. Hight (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 12)** *If a qualified third-party that has agreed to a non-disclosure*
2 *statement and obtains ratepayers' private information, what guarantees*
3 *exist that the information will not be disclosed, whether intentionally or*
4 *unintentionally?*

5

6 **Response)** Big Rivers and its Members cannot answer this question because the
7 circumstances around which the question presumes a third party would have
8 access to a ratepayer's private information are unclear.

9

10

11 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
12 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

13

Case No. 2012-00428

Response to AG 1-12

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 13)** *Please provide the names of the standards, protocols or*
2 *policies which the company observes and/ or implements in its*
3 *maintaining its ratepayers' privacy data from cybersecurity threats.*

4

5 **Response)** Please see Big Rivers' and its Members' response to Item 104 of the
6 Commission Staff's Initial Request for Information.

7

8

9 **Witnesses)** Gregory A. Hight (*Big Rivers*), Scott W. Ribble (*JPEC*),
10 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

11

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 14)** *Please provide copies of the standards, protocols or policies*
2 *which the company observes and/ or implements in its maintaining its*
3 *ratepayers' privacy data from cybersecurity threats.*

4
5 **Response)** Please see Big Rivers' and its Members' response to Item 104 of the
6 Commission Staff's Initial Request for Information.

7
8
9 **Witnesses)** Gregory A. Hight (*Big Rivers*), Scott W. Ribble (*JPEC*),
10 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

11

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 Item 15) *Given the vulnerability of the electric grid to cyber-attacks,*
2 *describe what analog (non-digital) means the company will have in place*
3 *to insure reliability, including but not limited to the maintenance of*
4 *legacy systems.*

5

6 **Response)** Big River's maintains and uses analog type devices for the majority of
7 the transmission grid visibility inputs. Because of the reliability demands of the
8 transmission grid all flow type indications, whether analog or digital, have backup
9 indications that may be used for comparison by the human operators.

10 Some of the fall back systems for Big Rivers and its Members are
11 manual systems, *e.g.*, manual opening and closing of switches when remote
12 capability is lost, walking of downed lines when systems cannot isolate the exact
13 location of problems.

14

15

16 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
17 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

18

**Case No. 2012-00428
Response to AG 1-15**

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428

Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013

March 20, 2013

1 Item 16) *What are the company's estimated costs to invest in order to*
2 *fully implement Smart Grid?*

3

4 a. *Do any cost estimates include results of any modeling that*
5 *may show the degree of exposure to the following risks:*

6

7 (a) *hacking;*

8 (b) *electronic magnetic pulses (EMPs, whether related to*
9 *solar flares or otherwise); and/or*

10 (c) *weather events?*

11

12 *If so, provide a list of the modeling software used to*
13 *produce any estimates, the scenarios and sensitivities*
14 *examined, and any and all such results.*

15

16 **Response)** These costs are currently unknown.

17

18

19 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
20 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

21

BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428

Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013

March 20, 2013

1 Item 17) *Please explain in detail what benefits, if any, the company*
2 *expects its ratepayers to realize because of Smart Grid?*

3

4 a. *Does the company believe that societal benefits are to be*
5 *considered in evaluating benefits? If so, detail those*
6 *societal benefits and how they may be used in evaluations?*
7 *If not, why not?*

8

9 **Response)** Big Rivers and its Members have not analyzed the benefits its
10 ratepayers might realize from any general implementation of Smart Grid. Any
11 such analysis will include all known, quantifiable costs and benefits. Big Rivers
12 and its Members note that societal benefits are not currently included among the
13 California Tests which are applied to Demand-Side Management programs.

14

15

16 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
17 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

18

Case No. 2012-00428
Response to AG 1-17

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 18)** *Would the company agree to strict limits and/or caps on*
2 *ratepayer costs? If not, why not?*

3

4 **Response)** No. Big Rivers and its Members believe that all prudent Smart Grid-
5 related costs which are incurred in good faith should be recovered through fair,
6 just, and reasonable rates approved by the Commission.

7

8

9 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
10 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

11

Case No. 2012-00428

Response to AG 1-18

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 19)** *Would the company agree to allow ratepayers to opt-out of*
2 *smart meter deployment? If not, why not?*

3

4 **Response)** Please see Big Rivers' and its Members' response to Item 23 of the
5 Commission Staff's Initial Request for Information.

6

7

8 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
9 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

10

Case No. 2012-00428
Response to AG 1-19

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 20)** *Can the company quantify measureable and significant*
2 *benefits that the ratepayers will realize, including a monetary*
3 *quantification of net savings (if any) to ratepayers?*

4

5 **Response)** Big Rivers and its Members are currently unable to quantify
6 measurable and significant benefits which ratepayers might realize from any
7 general implementation of Smart Grid.

8

9

10 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
11 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

12

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 21)** *Please explain in detail what detriments, if any, the company*
2 *expects its ratepayers to realize because of Smart Grid? Include in the*
3 *explanation both new costs as well as stranded costs.*

4
5 **Response)** Big Rivers and its Members have not done any analysis of Smart
6 Grid which would permit them to detail any detriments, or benefits, to the general
7 implementation of Smart. Please see the Hickman Testimony and Big Rivers' and
8 its Members' comments in Case No. 2008-00408 for additional observations about
9 Smart Grid.

10

11

12 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
13 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

14

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 22)** *What are the company's estimated costs which the company*
2 *expects the ratepayers to realize?*

3

4 **Response)** Big Rivers and its Members have not performed any analysis on the
5 general implementation of Smart Grid. Therefore, costs which ratepayers might
6 realize are unknown at this time.

7

8

9 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
10 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

11

**Case No. 2012-00428
Response to AG 1-22**

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 23)** *What are the company's estimated costs which the company*
2 *expects its shareholders, if any, to realize? Include in the explanation*
3 *both new costs as well as stranded costs.*

4

5 **Response)** Big Rivers and its Members are member-owned electric cooperatives.
6 Therefore, they do not have shareholders.

7

8

9 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
10 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

11

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 24)** *Does the company agree that its costs to invest and implement*
2 *Smart Grid will be different than other utility companies? If not, why not?*

3

4 **Response)** Yes. Big Rivers and its Members believe the cost and benefits from
5 any general implementation of Smart Grid will vary from utility to utility. Please
6 see the Hickman Testimony page 12, line 22 through page 23, line 16, and pages
7 23-25.

8

9

10 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
11 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

12

Case No. 2012-00428

Response to AG 1-24

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 25)** *Does the company agree that its ratepayers' benefits, whether*
2 *financial or otherwise, may differ from one utility to another upon*
3 *implementation of any Smart Grid technology? If not, why not?*

4
5 **Response)** Please see Big Rivers' and its Members' response to Item 24 above.

6
7
8 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
9 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)
10

Case No. 2012-00428
Response to AG 1-25

Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 26)** *Can the company guarantee that the deployment of Smart*
2 *Grid will not interfere with the regulatory compact whereby the*
3 *ratepayers will receive safe, adequate and reliable service at fair, just and*
4 *reasonable costs? If not, why not? Explain in detail.*

5

6 **Response)** Big Rivers and its Members are all member-owned organizations.
7 Our customers are our owners. Therefore, Big Rivers and its Members make every
8 effort to provide low-cost, reliable power at fair, just, and reasonable rates
9 approved by the Commission.

10

11

12 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
13 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

14

**Case No. 2012-00428
Response to AG 1-26**

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428

Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013

March 20, 2013

1 Item 27) *Answer the above question with the definition of "fair, just and*
2 *reasonable costs" as being economically feasible for the end-user.*

3

4 *a. Provide any cost-benefit analysis that the company has run*
5 *or will run to make the determination of economically*
6 *feasible to the end-user.*

7

8 **Response)** Please see Big Rivers' and its Members' response to Item 26 above.
9 Big Rivers and its Members have done no cost-benefit analysis on the general
10 implementation of Smart Grid.

11

12

13 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
14 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

15

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 28)** *Regarding time of use (TOU) rates, can the company confirm*
2 *that low-income ratepayers will not be disproportionately affected more*
3 *than non-low-income customers? If not, why not? (Provide in the answers*
4 *in any studies, reports, analyses and relevant data.)*

5

6 **Response)** Big Rivers and its Members believe TOU rates would be equally
7 available to all of its members. However, the ability and motivation of any one
8 member to participate, *i.e.*, sign up for TOU rates, will vary from member to
9 member.

10

11

12 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
13 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

14

**Case No. 2012-00428
Response to AG 1-28**

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 29)** *With regard to TOU rates, does the company have any history*
2 *with any such program? If so, explain in detail with particular facts as*
3 *to:*

4

5

a. the number of customers who participated;

6

b. whether they remained on the program;

7

c. whether they saved money on their bills; and

8

d. whether the customers ultimately reduced their usage.

9

10 **Response)** Please see Big Rivers' and its Members' response to Item 103 of the
11 Commission Staff's Initial Request for Information.

12

13

14

Witnesses) Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),

15

John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

16

Case No. 2012-00428

Response to AG 1-29

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 30)** *What proposals will the company present to deal with*
2 *technological impediments to the broad use of Smart Grid, including but*
3 *not limited to the following:*

4

5 *a. low and fixed-income individuals who do not have Internet*
6 *resources at their home;*

7 *b. multiple forms of telecommunications technology used to*
8 *access information (i.e., analog, cellular, VOIP); and*

9 *c. multiple and proprietary technology and software options*
10 *in the market that may lead to issues of compatibility?*

11

12 **Response)** Big Rivers and its Members will consider these concerns when
13 making any Smart Grid implementation decisions.

14

15

16 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
17 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

18

Case No. 2012-00428

Response to AG 1-30

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 31)** *Assume: Full deployment of Smart Grid at the residential*
2 *ratepayer level consisting of a household with only Energy Star*
3 *appliances, an HVAC system with at least a 15 SEERS rating, etc. and any*
4 *smart grid apparatuses/equipment for interconnectivity with the*
5 *electricity provider (including generation, transmission and distribution).*

6

7 *a. Does the company agree that if full deployment of the*
8 *magnitude described in the above question occurs, the*
9 *average residential ratepayer could experience a*
10 *significant capital outlay?*

11 *b. If so, what are the projected costs?*

12 *c. If no costs are anticipated by the electric provider, why not?*

13

14 **Response)**

15 a. Big Rivers and its Members agree that the full deployment
16 described above may lead to the average residential customer
17 experiencing significant capital outlays.

18 b. Big Rivers and its Members have not done any analysis on the
19 general implementation of Smart Grid, and the costs and benefits
20 thereof. Therefore, Big Rivers and its Members are unable to
21 offer any projections.

22 c. Not applicable.

Case No. 2012-00428

Response to AG 1-31

Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)

Page 1 of 2

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1
2
3
4
5

**Witnesses) Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)**

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 32)** *In regard to appliances, such as refrigerators or lighting, does*
2 *the company agree that in the long run, it is cheaper for the end-user*
3 *himself/herself to make that capital outlay for the purchase of the*
4 *appliance or lighting than have the company provide the appliance(s)*
5 *and build the costs into the company's rate base which would then include*
6 *a profit component for the company on an-going basis?*

7

8 **Response)** Big Rivers and its Members do not provide appliances to their
9 member-owners, except in the case of Compact Fluorescent Lamps ("CFLs") which
10 are a component of their Demand-Side Management programs. Therefore, any
11 rate base costs would not include any amount for the cost of 'non-CFL' appliances,
12 but may include incentives to replace energy inefficient appliances, *e.g.*,
13 refrigerators and clothes washers.

14

15

16 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
17 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

18

Case No. 2012-00428
Response to AG 1-32

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 33)** *Confirm that the Smart Grid depends, at least in part, if not*
2 *exclusively, on telephony (whether landline, fiber optic, wireless or VOIP)*
3 *at the end-user level for the end-user to participate in his/ her altering*
4 *his/her electricity usage patterns or behavior.*

5

6 **Response)** Big Rivers and its Members believe that end-users are able to
7 currently alter their electricity usage patterns and/or behavior without the use of
8 the technologies listed.

9

10

11 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
12 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

13

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 34)** *If the answer to the above question is in the affirmative,*
2 *confirm that limited access or even complete absence of access to*
3 *telephony will interfere with, if not prevent, the deployment of the Smart*
4 *Grid at the end-user level.*

5

6 **Response)** Not Applicable. Please see Big Rivers and its Members response to
7 Item 33 above.

8

9

10 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
11 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

12

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 35)** *If the company intends to install infrastructure / software*
2 *allowing for the transmission of Smart Grid / Smart Meter data over its*
3 *distribution / transmission conductors and networks, provide estimates, or*
4 *actual numbers, for the costs of doing so.*

5

6 **Response)** Big Rivers and its Members have no current plans for additional
7 future installations of infrastructure/software allowing for the transmission of
8 Smart Grid/Smart Meter data over their transmission/distribution networks,
9 except for those projects mentioned in their response to Item 99 of the Commission
10 Staff's Initial Request for Information.

11

12

13 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
14 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

15

BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428

Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013

March 20, 2013

1 Item 36) *Is there a standard communications' protocol that the*
2 *company will deploy in its Smart Grid that will be interoperable*
3 *regardless of the communications provider?*

4

5 *a. If not, explain how the company plans on addressing any*
6 *problems that might arise.*

7

8 **Response)** Big Rivers and its Members have no plans for the general
9 deployment of Smart Grid.

10

11

12 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
13 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

14

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 37)** *If improved reliability is the goal of Smart Grid / Smart Meter,*
2 *would it not be more cost-effective to invest in infrastructure hardening*
3 *(for example, utilizing protocols and standards developed and*
4 *implemented by many utilities in hurricane prone regions)?*

5

6 **Response)** Big Rivers and its Members believe that system reliability is one of
7 several goals associated with the general deployment of Smart Grid / Smart
8 Meter. However, Big Rivers and its Members cannot state if infrastructure
9 hardening would be more cost effective since they have not done any direct
10 comparison.

11

12

13 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
14 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

15

**Case No. 2012-00428
Response to AG 1-37**

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428

Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013

March 20, 2013

1 Item 38) *Describe the company's plans to avoid obsolescence of Smart*
2 *Grid / Smart Meter infrastructure (both hardware and software) and any*
3 *resulting stranded costs. (This question and the subparts should be*
4 *construed to relate to both the Smart Grid Investment Standard as well as*
5 *the Smart Grid Information Standard.)*

6

7 a. *Describe who would pay for stranded costs resulting from*
8 *obsolescence.*

9 b. *With regard to the recovery of any obsolete investment,*
10 *explain the financial accounting that should be used (as in*
11 *account entry, consideration of depreciation, time period*
12 *involved, etc.)*

13

14 **Response)** Big Rivers and its Members believe that all Smart Grid / Smart
15 Meter implementation costs which are prudent, and incurred in good faith, should
16 be recoverable through fair, just, and reasonable rates as approved by the
17 Commission.

18

19

20 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
21 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

22

Case No. 2012-00428

Response to AG 1-38

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 39)** *With regard to interoperability standards, does the company*
2 *agree that Smart Grid equipment and technologies as they currently exist,*
3 *and are certain to evolve in the future, are not a one size fits all approach*
4 *to the Commonwealth?*

5

6 **Response)** Yes. Please see Hickman Testimony page 12, line 22 through page
7 23, line 16, and pages 23-25.

8

9

10 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
11 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

12

Case No. 2012-00428

Response to AG 1-39

Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 40)** *Is dynamic pricing strictly defined as TOU?*

2

3

a. If not, explain why not.

4

*b. Is the company requesting that dynamic pricing be
voluntary or involuntary, if at all?*

5

6

7 **Response)** No.

8

9

10

a. Dynamic pricing may include, but not be limited to, Critical Peak Pricing, Real-Time Pricing, and Customer Credits for customers with agreements with their utility providers to reduce consumption during contracted periods.

11

12

13

b. Big Rivers and its Members are not making any request regarding dynamic pricing at this time.

14

15

16

17

Witnesses) Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),

18

John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

19

Case No. 2012-00428

Response to AG 1-40

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428

Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013

March 20, 2013

1 Item 41) *Please explain in detail whether the company has any*
2 *dynamic programs in place in Kentucky.*

3

4 *a. For each program, provide the number of participants.*

5 *b. For each program, state whether those participants on*
6 *aggregate have saved costs on their bills.*

7 *c. For each program, state whether those participants on*
8 *aggregate have saved costs on their bills.*

9 *d. For each program, state whether each participant has*
10 *saved costs on his/her/its bills. (The question is not intended*
11 *to request any private identifier information.)*

12

13 **Response)** Please see Big Rivers' and its Members' response to Item 103 of the
14 Commission Staff's Initial Request for Information.

15

16

17 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
18 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

19

Case No. 2012-00428

Response to AG 1-41

Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 42)** *Does the company recommend the Commission to formally*
2 *adopt the EISA 2007 Smart Grid Investment Standard? If not, why not?*

3

4 **Response)** See Hickman Testimony at page 11, line 13 through page 14, line 14.

5

6

7 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
8 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

9

Case No. 2012-00428

Response to AG 1-42

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 43)** *Does the company recommend the Commission to formally*
2 *adopt the EISA 2007 Smart Grid Information Standard? If not, why not?*

3

4 **Response)** See Hickman Testimony at page 14, line 16, through page 15, line 15.

5

6

7 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
8 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

9

Case No. 2012-00428

Response to AG 1-43

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 44)** *Does the company recommend issuing an IRP Standard?*

2

3 *a. If so, what concerns does the company have with a*
4 *standard, including "priority resource," especially as it*
5 *relates to cost-effectiveness?*

6 *b. What concerns would the company have with a standard as*
7 *it affects CPCN and rate applications?*

8

9 **Response)** Big Rivers and its Members believe that the existing Integrated
10 Resource Plan ("IRP") statutes and regulations, along with the Kentucky IRP
11 Standard which the Commission established in Case No. 2008-00408,⁶ are
12 sufficient. No additional IRP standard is necessary.

13

14

15 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
16 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

17

⁶ See the Commission's Order, dated July 24, 2012, *In the Matter of: Consideration of the New Federal Standards in the Energy Independence and Security Act of 2007*, pages 9-10.

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 45)** *Does the company agree that any investment in grid*
2 *modernization infrastructure should be done before deploying TOU rates*
3 *or dynamic pricing? If not, why not?*

4

5 **Response)** No. Big Rivers and its Members do not believe there is an
6 inseparable link between modernization of grid infrastructure and TOU rates or
7 dynamic pricing.

8

9

10 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
11 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

12

Case No. 2012-00428

Response to AG 1-45

Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 46)** *Regarding the Kentucky Smart Grid Roadmap Initiative*
2 *(KSGRI), does the company believe that it provides the fundamental basis*
3 *for the Commonwealth as a whole to proceed with Smart Grid given its*
4 *lack of incorporating all electric utilities such as municipalities and the*
5 *TVA, along with its distribution companies? If yes, please explain why. If*
6 *not, please explain why not.*

7
8 **Response)** Please see Hickman Testimony at page 19, line 5 through page 23,
9 line 5.

10

11

12 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
13 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

14

Case No. 2012-00428

Response to AG 1-46

Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 47)** *Does the company believe that the Commonwealth's electric*
2 *industry is, or will become, so interconnected that all electric entities in*
3 *any way involved or associated with the generation, transmission and / or*
4 *distribution of electricity should be included and participate to some*
5 *degree with Smart Grid if it is to come to fruition? If yes, please explain*
6 *why. If not, please explain why not.*

7

8 **Response)** Please see Hickman testimony at page 19, line 10 through page 20,
9 line 6.

10

11

12 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
13 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

14

Case No. 2012-00428

Response to AG 1-47

Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 48)** *Does the company believe that any Smart Grid Investment will*
2 *trigger a CPCN case? If not, why not?*

3

4 **Response)** Please see the response of Big Rivers and its Members to Item 17 of
5 the Commission Staff's First Request for Information.

6

7

8 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
9 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

10

11

**Case No. 2012-00428
Response to AG 1-48**

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 49)** *Does the company believe that Dynamic Pricing should be*
2 *economically feasible for the end-user and be supported by a cost-benefit*
3 *analysis?*

4

5 **Response)** Big Rivers and its Members believe any dynamic pricing scheme
6 should be voluntary. Consequently, under such any voluntary scheme, the end-
7 user's decision to participate will rest solely with him/her.

8

9

10 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
11 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

12

**Case No. 2012-00428
Response to AG 1-49**

**Witnesses: Roger D. Hickman (Big Rivers), Scott W. Ribble (JPEC),
John E. Newland (Kenergy), and Michael L. French (MCRECC)**

Page 1 of 1

**BIG RIVERS ELECTRIC CORPORATION
JACKSON PURCHASE ENERGY CORPORATION
KENERGY CORP.
MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**

**CONSIDERATION OF THE IMPLEMENTATION
OF SMART GRID AND SMART METER TECHNOLOGIES
CASE NO. 2012-00428**

**Response to the Office of the Attorney General's
Request for Information
dated February 27, 2013**

March 20, 2013

1 **Item 50)** *If additional education is contemplated with the deployment*
2 *of the Smart Grid, please explain in detail if known or contemplated.*

3

4 **Response)** Big Rivers and its Members believe there may be an educational
5 component to any general implementation of Smart Grid implementation.

6

7

8 **Witnesses)** Roger D. Hickman (*Big Rivers*), Scott W. Ribble (*JPEC*),
9 John E. Newland (*Kenergy*), and Michael L. French (*MCRECC*)

10