

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| ELECTRONIC APPLICATION OF |) | |
| CUMBERLAND VALLEY ELECTRIC, INC. FOR |) | CASE NO. |
| APPROVAL OF CHANGES TO ITS METER |) | 2020-00393 |
| TESTING PLAN |) | |

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

Cumberland Valley Electric, Inc. (Cumberland Valley), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due within ten days of the date of this request. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Cumberland Valley SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

Cumberland Valley shall make timely amendment to any prior response if Cumberland Valley obtains information that indicates 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, Cumberland Valley 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Cumberland Valley shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Cumberland Valley's Application, Exhibit 3, unnumbered page 3, which states: "No meter shall remain in service without periodic test for a period longer than twenty-five (25) years."

- a. Provide details about what method Cumberland Valley will use to determine which meters have not been selected for random sample testing so they do not remain in service more than 25 years without a test.

b. Given that a meter only has a 15-year useful life, explain whether a different level of testing be used.

2. Refer to Cumberland Valley's Application, Exhibit 3, unnumbered page 3, which states the following: "An annual report (showing each lots performance) and a copy of the manufacturer's new meter test data will be provided to the PSC." Provide details on the type/example of annual report (showing each lot's performance) that will be submitted to the PSC.

3. Refer to Cumberland Valley's Application, Exhibit 3, unnumbered page 3, which states the following: "If Cumberland Valley should suffer an operational hardship due to this requirement, a request for deviation may be filed." Provide an explanation of this statement.

4. Provide the number of jurisdictions in the United States that require meter testing and of those, which allow for the use of sampling techniques similar to those proposed by Cumberland Valley.

5. Confirm the date on which Cumberland Valley completed installation of its Advanced Metering Infrastructure system.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED JAN 28 2021

cc: Parties of Record

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