

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF INTER-)	
COUNTY ENERGY COOPERATIVE)	CASE NO.
CORPORATION TO IMPLEMENT AN ADVANCED)	2025-00112
METERING SYSTEM OPT-OUT TARIFF FOR)	
RESIDENTIAL CUSTOMERS)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO INTER-COUNTY ENERGY COOPERATIVE CORPORATION

Inter-County Energy Cooperative Corporation (Inter-County Energy), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on June 2, 2025. The Commission directs Inter-County Energy to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Inter-County Energy shall make timely amendment to any prior response if Inter-County Energy obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Inter-County Energy fails or refuses to furnish all or part of the requested information, Inter-County Energy shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Inter-County Energy shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Explain why Inter-County Energy did not propose the Advanced Metering System Opt-out Tariff (Rider AMI) when it submitted its request in Case No. 2022-00350² for authorization of the installation of the Advanced Metering System (AMS).

² Case No. 2022-00350, *Electronic Application of Inter-County Energy Cooperative Corporation for a Certificate of Public Convenience and Necessity Authorizing the Installation of a New Advanced Metering Infrastructure (AMI) System*.

2. State whether Inter-County Energy has received any requests from members to opt-out of the AMS. If so, state how many such requests Inter-County Energy has received and when those requests were received.

3. State what efforts have been made by Inter-County Energy, if any, to encourage those members who do not wish to be metered using AMS to acquiesce. If none, explain.

4. Confirm that the AMS is fully deployed in Inter-County Energy's service territory. If this cannot be confirmed, provide the estimated date when Inter-County Energy expects full deployment.

5. Explain why Inter-County Energy decided to include an AMS opt-out for residential customers.

a. Explain whether and in what ways the AMS opt-out could negatively impact Inter-County Energy.

b. Explain whether and in what ways the AMS opt-out could positively impact Inter-County Energy.

6. Provide an explanation for the \$45 initial fee.

7. Provide an explanation for the \$40 recurring monthly fee.

8. Confirm that Inter-County Energy will read the meters of Rider AMI customers monthly.

9. Explain whether it is possible that Inter-County Energy may estimate Rider AMI customer meter readings on occasion instead of making a trip to read the meter. If so, explain whether the recurring monthly fee would be charged for those months where the meter reading is estimated, and a trip is not made to read the meter.

10. State whether meter reads are performed by contractual labor or whether they are completed by employees of Inter-County Energy.

11. Explain whether Inter-County Energy has estimated the number of opt-outs and how these opt-outs will impact the robustness of the system. Provide supporting work papers which quantify any effect.

12. Explain the time estimates for labor on the Nonrecurring Charge Cost Justification sheets.

13. Provide the reasoning for not including transportation costs on the Nonrecurring Charge Cost Justification calculations.



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DATED MAY 15 2025

cc: Parties of Record

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