

James C Worley  
480 W. Lexington Ave.  
Danville, KY 40422  
May 22, 2017

RECEIVED

MAY 23 2017

Public Service  
Commission

Dr. Talina R. Mathews  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort, KY

Re.: Electric distribution cooperatives submission of reliability data

Dear Dr. Mathews:

The PSC requires electric utilities to submit reliability data that is calculated according to the methodology defined by the Institute of Electrical and Electronic Engineers. Through a Public Records Request I have received the data submitted by the utilities for the 2015 calendar year.

The table on the attached page is a table of the data submitted. My question is this: is anyone at the PSC reviewing the data that is submitted. I say this for four reasons:

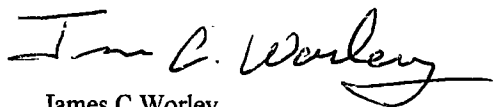
1. It is clear Licking Valley has no idea how to calculate the required values.
2. Taylor County submits the data but, because it is in such a mixed-up format, it is not possible to figure out what all the required values are.
3. Jackson Purchase does not submit the summary page as required. Instead it submits an electronic copy of a print out of a spreadsheet that is 17 inches high and 56 inches wide. This is nearly impossible to read. If I did not know better, I would think that Jackson Purchase was thumbing its nose at the PSC since much of the required summary data is required on its RUS Form 7.
4. Several systems did not use the summary page in the format that the PSC has specified.

The reliability data is not meaningless or trivial. During my 25-year career in the utility industry, I spent a good part of my time dealing with customers' complaints regarding power reliability and power quality and saw how important these were to customers, especially larger commercial customers and all industrial customers.

The reliability data has issues. It cannot be used as a strict quantitative comparison between different systems because of the vagaries of the human involvement in the defining and gathering of the data. However, it is a good metric to give a qualitative comparison of systems. I believe when distribution systems come before the PSC they should be questioned about their right-of-way practices and expenses, particularly if their outage numbers are significantly above the average for all the systems.

Thank you for any consideration the PSC might give my comments.

Yours truly



James C Worley

2015	Current Year						5-year Average					
			Excluding MED		Including MED				Excluding MED		Including MED	
	TMED	MED	SAIDI	SAIFI	SAIDI	SAIFI	SAIDI	SAIFI	SAIDI	SAIFI		
Big Sandy	33.18	2	323	2.40	427	2.80	201	2.56	615	1.53		
Blue Grass	12.56	2	143	1.22	184	1.36	121	1.16	241	1.45		
Clark	11.14	1	198	1.53	358	1.79	145	1.53	305	2.01		
Cumberland Valley	13.26	0	169	1.98	169	1.98	128	1.36	167	1.78		
Farmers	20.90	1	150	1.67	175	2.17	214	1.90	255	2.10		
Fleming-Mason	9.54	1	119	1.01	143	1.12	143	1.11	293	1.55		
Grayson	57.61	2	440	3.23	674	3.66	339	2.95	1,240	3.71		
Inter County	8.49	7	97	1.02	235	1.56	94	1.07	216	1.59		
Jackson Energy	11.02	3	185	1.62	357	1.96	174	1.58	309	1.84		
Licking Valley	8073.43	35	8,032	67.50	16,206	86.94	6,291	57.09	14,346	80.94		
Nolin	9.34	0	111	1.12	111	1.12	84	0.91	119	1.04		
Owen	10.59	1	116	1.56	158	1.56	136	1.37	187	1.52		
Salt River	7.89	1	89	0.96	106	1.08	97	0.94	120	1.22		
Shelby	12.80	1	158	1.51	172	1.57	112	1.03	253	1.50		
South Kentucky	17.68	1	163	1.71	182	1.82	173	2.40	228	2.96		
Taylor	?	?	?	?	153	1.30	?	?	186	1.94		
Jackson Purchase			132									
Kenergy	7.53	5	84	1.15	214	1.73	106	1.61	148	1.82		
Meade	9.75	5	102	1.82	217	2.08	90	1.23	220	32.36		
Avg.	15.83	2.06	163	1.59	237	1.80	147	1.54	300	3.64		
	1. The average excludes Licking Valley, Taylor, and Jackson Purchase.											
	2. Jackson Purchase was calculated based on the data submitted.											