

## RECEIVED

July 27, 2011
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VIA FAX: (502) 564-3460
ORIGINAL VIA: FEDEARL EXPRESS
PUBLIC SERVICE
COMMISSION

## MR JEFF DEROUEN

## EXECUTIVE DIRECTOR

KENTUCKY PUBLIC SERVICE COMMISSION
211 SOWER BLVD.
FRANKFORT KY 40602
Re: In the Matter of: The Application of Jackson Purchase Energy Corporation for Approval of Flow Through Rates Case Number 2011-00057

Dear Mr. DeRouen:
Please find the following to be a copy of Jackson Purchase Energy Corporation's Answers to the Commission Staff's Second Information Requests in the above referenced matter. The original and ten (10) copies are being sent via Federal Express today.

Sincerely,

## Velma, D. Geo <br> Melissa D. Yates <br> myates@dklaw.com

Attachments

138805

## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

| In the Matter of: |  |
| :--- | :--- |
| The Application of Jackson Purchase | ) |
| Energy Corporation for Approval of |  |
| Flow Through Rates Pursuant to | ) |
| KRS 278.455 |  |

)
KRS 278.455
CASE NO. 2011-00057
)
)

CASE NO. 2011-00057

## JACKSON PURCHASE ENERGY CORPORATION'S ANSWERS TO COMMISSION STAFF'S SECOND INFORMATION REQUESTS

1. Refer to the response to Item 1 of Commission Staff's First Information Request ("Staff's First Request").
a. Staff requested a revised Exhibit B to the application which included the revised current rates resulting from Case No. 2010-00512.' Jackson Purchase provided a revised Exhibit B as Exhibit 2 to its response. However, the current tariff provided in Exhibit 2 does not contain Jackson Purchase's revised current rates. Provide a revised Exhibit B to the application which includes a current tariff reflecting the revised current rates.

RESPONSE: The second revised Exhibit $B$ to the application, which consists of The revised current rates resulting from Case No. 2010-00512 compared to the proposed new rates in PSC No. 8, Case No. 2011-00057, is attached hereto and incorporated hereim by reference as Exhibit 1.

Witness: G. Kelly Nuckols, President and CEO.
b. Explain why the revised Exhibit B does not include Tariff Sheet No. 113, Schedule, G-1 - Renewable Resource Energy Service. Include Sheet No. 113 when providing revised Exhibit $B$ requested in a. above.

[^0]RESPONSE: The second revised Exhibit B to the application, which consists of the revised current rates resulting from Case No. 2010-00512 compared to the proposed new rates in PSC No. 8, Case No. 2011 -00057 and includes Tariff Sheet No. 113, Schedule, G-1 Renewable Resource Energy Service, is attached hereto and incorporated herein by references as Exhibit 1. Tariff Sheet No. 113 was inadvertently omitted in Jacksom Purchase Energy Corporation's Answers to Commission Staff's First Information Requests, Exhibit 2.

Additionally, please see Exhibit 2, which consists of Tariff Sheet No. 113, Schedule, G-1 - Renewable Resource Energy Service as proposed in PSC No. 8, Case No. 2011-00057 and a comparison of the revised current rates resulting from Case No. 2010-00512, Sheet No. 111 compared to the proposed new rates in PSC No. 8, Case No. 2011-00057, Sheet No. 113, attached hereto and incorporated herein.

Whitmess: G. Kelly Nuckols, President and CEO.
2. Refer to the response to Item 3.b. of Staff's First Request. Exhibit 3 of the response contains the notice that was mailed to customers receiving service under Schedule, G-1 - Renewable Resource Energy Service. Confirm that the column labeled "Present Rates" contains the proposed rates and the column labeled "Proposed Rates" contains the present rates. If so, state whether Jackson Purchase plans to renotice the affected customers.

RESPONSE: Jacksom Purchase Energy Corporation confirms the information in "Present Rates" mad "Proposed Rates" was inadvertently transposed. Please see JPEC's Revised Response to 3b of the Commission Staff's First Information Requests filed on July 13, 2011. As stated in its Revised Response to 3.b. individual notices were resent to the
three (3) members who are currently utilizing this tariff. A copy of the revised letter to the affected members is attached hereto and incorporated herein by reference as Exhibit 3 .

Witness: G. Kelly Nuckols, President and CEO.
3. Refer to the response to Item 4.a. of Staff's First Request. The response states that the explanation of the Non-Fuel Adjustment clause Purchase Power Adjustment is contained in Attachments A through D of the Pre-filed testimony of James R. Adkins. Provide the location of the explanation in Attachments A through D of Mr. Adkins' testimony.

RESPONSE: The explanation of the Non-Fuel Adjustment Clause Purchase Power Adjustment is not contained in Attachments A through D of Mr. Adkins testimony. Attachments $A$ through $D$ is an explanation of the impact of Big Rivers Electric Corporation ("BREC") adjustment of rates is on the rates of JPEC. The proposed NonSmelter Non-FAC PPA rider is only applicable to non-smelter power sales and will flow through any charges or credits from Big Rivers made under this proposed rider. The rider has two sections. One section is applicable to energy sales made under JPEC's tariffs for non-direct served members. The present month's credit or charge will be based on BREC's amount for two months preceding the present month plus or minus any over or under adjustments. The second section of this proposed rider is applicable only to members served under BREC's Large Industrial Tariff or Large Industrial Expansion Tariff via direct delivery point. This section will provide for retail charges and credits that are the same as $B R E C$ 's charges or credits since no lag or losses exist.

## Witness: James R. Adkins

4. Refer to the response to Item 4.c. of Staff's First Request, Revised Aitachment C.
a. Refer to page 2 of 8 , Schedule C-1, Small Commercial Single Phase. The proposed customer charge is shown as $\$ 10.67$. Revised Exhibit A of the application (filed in response to Item \| of Staff's First Request, Exhibit 1) shows the proposed customer charge for this class to be $\$ 10.68$. Provide the proposed customer charge for this class.

RESPONSE: The proposed customer charge is $\$ 10.68$. The amount listed in

## Attachment $C$ of $\$ 10.67$ is a typographical error.

Witness: James R. Adkins
b. Refer to page 4 of 8, Schedule D, Commercial and Industrial Demand Less than $3,000 \mathrm{~kW}$. Confirm that the billing adjustment of (\$442) is not reflected in the Total from Base Rates for the Proposed Revenue column, and that its inclusion would not affect the percentage increase to this class.

RESPONSE: The billing adjustment is not reflected and its inclusion would not effect the percentage increase to these rates.

Witness: James R. Adkins
Respectfully submitted,

DENTON \& KEULER, LLP
P. O. BOX 929

PADUCAH KY 42002-0929
Telephone: (270) 443-8253
Facsimile: (270) 442-6000


ATTORNEYS FOR JACKSON PURCHASE ENERGY CORPORATION

I hereby certify that the foregoing has been served via faxing and Federal
Express, a true and correct copy
of the foregoing 10 :

## MR JEFF DEROUEN

EXECUTIVE DIRECTOR
KENTUCKY PUBLIC SERVICE COMMISSION
211 SOWER BLVD.
FRANKFORT KY 40602
And via U.S. Mail to:
OFFICE OF THE ATTORNEY GENERAL OFFICE OF RATE INTERVENTION
1024 CAPITAL CENTER DRIVE
SUITE 200
FRANKFORT KY 40601-8204
on this $27^{\text {th }}$ day of July, 2011.




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IN CASETH. 2011-00057 DATED


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Rate Schedule "SPC. B" $^{\prime}$
 ISSIFD BY /S! G. Kelly Nuntets

BY AUTHORITY OF ORDER OF THE PUELIC SERVICE COXIUISION IH CASE NO. 2011-0AOST DATED

## EXHIBIT 2

| FOR Ja | ackson Purchase Energy Corp. Entire Teritory Served |  |
| :---: | :---: | :---: |
| Community, Town or City |  |  |
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| SHEET NO. |  | 113 |
| CANCELLING P.S.C. KY NO. |  | 7 |
| SHEET NO. |  | 111 |

## RATES AND CHARGES

SCHEDULE G-1 - RENEWABLE RESOURCE ENERGY SERVICE

## Monthly Rate

(1) The rate for Renewable Resource Energy is the rate schedule applicable to service to a Mernber, plus a premlum per kilowatt hour of Renewable Resource Energy contracted for as follows, subject to any adjustment, surcharge or surcredit that is or may become applicable under the Member's rate schedule:

## A Per Kilowatt Hour Premium Of

Rate Schedule "R" - Residential
Rate Schedule "C-1" - Small Commercial Single Phase
Rate Schedule "C-3" - Small Commercial Three Phase
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## EXHIBIT 3

## JACKSON PURCHASE ENERGY CORPORATION notice <br> CASE NO. 2011-00057

## THE APPLICATION OF JACKSON PURCHASE ENERGY CORPORATION FOR AN ADJUSTMENT IN EXISTING RATES

Jackson Purchase Energy Corporation, 2900 Irvin Cobb Drive, P.O. Box 4030, Paducah, KY 42002-4030, will file an application with the Kentucky Public Service Commission in Case No. 2011-0057 pursuant to KRS 278.455(2) to flow through the proposed change in its renewable resource energy rates which are being requested by its wholesale power supplier, Big Rivers Electric Corporation in Case No. 201100036 . The rates contained in this notice, which are the rates contained in the application, are rates proposed by Jackson Purchase Energy Corporation; however, the Kentucky Public Service Commission may order rates to be charged that differ from the rates contained therein.

## Schedule G-1-RENEWABLE RESOURCE ENERGY SERVICE

|  | Present <br> Rates | Percent <br> Decreaso | Proposed <br> Rates |
| :--- | :--- | :--- | :--- | :--- |
| Rate Schedule "R" - Restdential | $\$ 0.036500$ | $27.42 \%$ | $\$ 0.026491$ |
| Rate Schedule "C-1" - Small Commercial Single <br> Phase | $\$ 0.036500$ | $27.42 \%$ | $\$ 0.026491$ |
| Rate Schedule "C-3" - Small Commercial Three <br> Phase | $\$ 0.036500$ | $27.42 \%$ | $\$ 0.026491$ |
| Rate Schedule "OL" - Outdioor Lighting | $\$ 0.036500$ | $27.42 \%$ | $\$ 0.026491$ |


[^0]:    ${ }^{1}$ Case No. 2010-00512, An Examination of the Application of the Fuel Adjusement Clause of Jackson purchase Energy Corporation from July 17, 2009 through October 31, 2010 (Ky. PSC May 31, 2011)

[^1]:    
    

