


Rural Electric Cooperative Corporation

A Touchstone Energy® Cooperative 

August 20, 2014

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**PUBLIC SERVICE
COMMISSION**

MR JEFF DEROUEN
EXECUTIVE DIRECTOR
PUBLIC SERVICE COMMISSION
PO BOX 615
FRANKFORT KY 40602

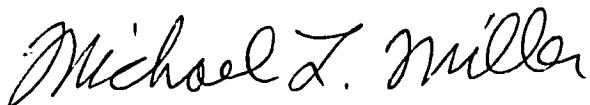
RE: PSC CASE NO. 2014-00051

Dear Mr. Derouen:

Please find enclosed an original and five (5) copies of our responses of Nolin RECC to Staff Commission's Third Data Request as requested in the above referenced case.

If you have any questions, please let me know.

Sincerely,



Michael L. Miller
President & CEO

afc

Enclosures

Commonwealth of Kentucky
Before the Public Service Commission
Case No. 2014-00051

VERIFICATION

I verify, state and affirm that the testimony filed with this verification and for which I am listed as a witness is true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.




O.V. Sparks, Vice President Administration & Finance

State of Kentucky

County of Hardin

The foregoing was signed, acknowledged and sworn to before me by O.V. Sparks, this 20th day of August, 2014.


Notary Public

My Commission Expires:

August 27, 2016

Nolin Rural Electric Cooperative Corporation
Case No. 2014-00051
Witness: O. V. Sparks

6. This question is addressed to all member cooperatives. Refer to each member cooperative's July 31, 2013 monthly pass-through filing.

a. Provide the numerator used in the calculation of the respective member cooperative's pass-through mechanism factor, along with the expense month with which the numerator is associated.

Response The numerator is \$710,937, and the month used is June 2013.

b. Provide the denominator used in the calculation of the respective member cooperative's pass-through mechanism factor, along with the calculations and the months supporting the calculations of the denominator.

Response The denominator is \$5,357,324 and the month used is May 2013

c. Provide the month's revenue (amount and month of the year) each member cooperative's pass-through mechanism factor for July 2013 is applied to in arriving at the monthly environmental surcharge revenues recovered.

Response The month's revenue of May 2013 of \$5,357,324 times 13.27%

7. This question is addressed to all member cooperatives. For the month of July 2005, provide the following:

a. Identify the month in which the member cooperative's revenue requirement was used, along with the months in which the member cooperative's 12-months-ended average retail revenue was used in calculating the pass-through mechanism factor.

Response July 2005 was used for the revenue and July 2005 for the 12 months-ended average retail revenue

b. Identify the member cooperative's month revenues (amount and month of the year) the pass-through mechanism factor was applied to arrive at the member cooperative's monthly environmental surcharge revenues.

Response The month's revenue of May 2005 of \$3,589,617 times 4.27%

c. Identify the member cooperative's month revenues (amount and month of the year) used in calculating any over/under recovery, along with the month the over/under recovery is reflected, in the member cooperative's response to the Information Request of Commission Staff following the June 18, 2014 informal Conference ("Staff's IC Information Request"), item 2.

Response As shown in Nolin's response to the Information Request of Commission Staff following the June 18, 2014 informal conference, Nolin had no revenues involved in the over/under recovery calculated for July 2005. Concerning the request for the month over/under recovery is reflected, Nolin respectfully submits it does not understand what is being requested concerning the over/under recovery for that period.

8. This question is addressed to all member cooperatives. For the month of December 2013, provide the following:

a. Identify the month in which the member cooperative's revenue requirement was used, along with the months in which the member cooperative's 12-months-ended average retail revenue was used, in calculating the pass-through mechanism factor.

Response November 2013 was used for December 2013 and November 2013 for the 12 months-ended average retail revenue

b. Provide the member cooperative's month revenues the pass-through mechanism factor was applied to arrive at the member cooperative's monthly environmental surcharge revenues.

Response The month's revenue of November 2013 of \$5,375,139 times 12.64%

c. Provide the member cooperative's month revenue and the member cooperative's month expense used in calculating any over/under recovery, along with the month the over/under recovery is reflected in the member cooperative's response to Staff's IC Information Request, item 2.

Response As shown in Nolin's response to the Information Request of Commission Staff following the June 18, 2014 informal conference, Nolin's December 2013 revenues of \$978,487 and December 2013 expense of \$837,054 were used to calculate the over/under recovery of \$18,487. Concerning the request for the month the over/under recovery is reflected, Nolin respectfully submits it does not understand what is being requested concerning the over/under recovery for that period.

- d. If there was a change in the calculations between Item No. 8(c) and Item No. 7(c), fully explain the reason for the change and provide any Commission supporting authorization for the change.

Response There have been no changes.

9. This question is addressed to all member cooperatives. In a month when there is an amortization of an over-or under-recovery amount applied in the calculation of the pass-through mechanism factor, do the member cooperatives agree that the pass-through factor is a net factor, and the net factor is combination of the pass-through factor that is attributed to the member cooperative's revenue requirement divided by the 12-months-ended average retail revenues and the member cooperative's amortization of any over- or under-recovery amount also divided by the 12-months-ended average retail revenues? If not, explain.

Response Nolin agrees that in a month when there is an amortization of an over- or under-recovery amount applied in the calculation of the pass-through mechanism factor the pass-through factor is a net factor. However Nolin does not agree with the description of the calculation of the pass-through factor as stated in the request. As clearly shown on the monthly "Pass Through Mechanism Report" filed for Nolin, the monthly revenue requirement shown in column 8 is combined with the amortization of over- or under-recovery shown in column 9. The net amount is shown in column 10. The net amount in column 10 is divided by the 12-months ended average net retail revenues shown in column 14, producing the pass-through factor shown in column 15. While the approach described in the request essentially produces the same result mathematically, separate pass-through factor components are not calculated for the monthly revenue requirement and the amortization of the over- or under-recovery.

10. This question is addressed to all member cooperatives.

- a. Does each member cooperative have a monthly Fuel Adjustment Clause ("FAC") that contains a prior month over- or under-recovery mechanism in the calculations?

Response Yes

- b. If the answer to 10(a) above is yes, does each member cooperative remove the prior month over- or under-recovery amount in calculating the current month's over- or under-recovery amount?

Response No

- c. If the answer to 10(b) above is no, explain why it is appropriate to remove any over- or under-recovery amount in the environmental surcharge, but it is not required to remove any over/under recovery in the FAC.

Response It should be noted that the environmental surcharge is established by KRS 278.183 while the FAC is established by 807 KAR 5:056 and neither explicitly address how over- and under-recoveries are to be handled. Under the FAC for the Member Cooperatives, the over- or under-recovery from the second previous month is incorporated into the calculations of the current FAC. The current FAC is applied to retail customer bills rendered two months later. Thus, there is a four month lag from the inception of an over- or under-recovery until it is refunded or collected on the retail customers' bill. Each month the retail customers' bill will include a single month's FAC over- or under-recovery amount. There is no adjustment to remove any previous month's over- or under-recovery amount in calculating the current month's over-or under-recovery. Under the environmental surcharge, the over- or under-recovery is determined during the periodic six-month and two-year surcharge review cases. Under normal circumstances, the over- or under-recovery determined during a surcharge review case will cover six months of surcharge operation and the amortization period on the over- or under-recovery has been six months. While the amortization results in an equal dollar amount being included in the retail customers' bills during the amortization period, rather than an amount that reflects month to month changes in sales volumes, it is essentially the same approach as the FAC. Each month during the amortization period will reflect a single month's surcharge over- or under- recovery amount. There have been no adjustments to remove any previous month's over- or under-recovery amount when calculating the current month's over- or under-recovery. However, the processing of Case nos. 2012-00486 and 2013-00140 were not normal circumstances. Case No. 2012-00486 reviewed the last six months of a two-year review period and two subsequent six-month review periods, for a total of 18 months of surcharge operations. The case was opened on November 16, 2012 and the Commission's final Order was dated August 2, 2013. Although the review period covered 18 months of surcharge operations, the over- or under-recoveries determined for the Member Cooperatives were amortized over six months. The first month of the amortization of the over- and under-recoveries was reflected in the Member Cooperatives' surcharge pass-through was reflected in the Member Cooperatives' surcharge pass-through factors filed with the Commission on August 20, 2013. Case No. 2013-00140 covered a single six-month review period. This case was opened on May 14, 2013 and the Commission's final Order was dated September 17, 2013. The over- and under-recoveries

determined for the Member Cooperatives were amortized over six months. The first month of the amortization of the over- and under-recoveries was reflected in the Member Cooperatives' surcharge pass-through factors filed with the Commission on September 20, 2013. Because of the number of review periods included in the two cases and the overlapping of the amortization periods for these two cases, over- and under-recoveries resulting from 24 months of surcharge operations were amortized over a total of seven months. Thus, the normal situation where six months of surcharge operations are reflected in six months of over- or under-recovery amortization no longer was in force. Without some adjustment to remove the effects of amortizing over- or under-recoveries resulting from 24 months of surcharge operations over seven months, subsequent surcharge review over- and under-recovery calculations will be skewed.

11. This question is addressed to all member cooperatives.

- a. Provide the schedules which support the amount of both the environmental surcharge revenues and the environmental surcharge expenses removed from their cost-of-service on Schedule S for each of their rate filings which cover the period July 2005 through December 2013.

Response Attached are Exhibit S, Exhibit 14 and Exhibit 15 from Case No. 2006-00466 concerning the environmental surcharge.

- b. Provide an analyses comparing the monthly amounts in 11(a) above with the same monthly amounts the member cooperatives provided in their response to Staff's IC Information Request, Item No. 2.

Response Attached is Exhibit 11b

- c. If there is a difference in the monthly revenue and/or expense amounts in the response to 11(b) above, provide a complete explanation of the reason(s) for the difference.

Response Errors were made in the early stages of implementing the surcharge. Due to the amount of time that has passed since the differences and errors occurred Nolin does not know how to answer this question.

12. This question is addressed to all member cooperatives. For each of the member cooperatives, provide the following:

- a. The cumulative over/under recovery for the 24-month period ending December 31, 2013.

Response See attached Exhibit 12a

- b. If the amount provided in 12(a) above is amortized over a six-month period, provide the bill impact on the average residential customer.

Response See attached Exhibit 12b

13. This question is addressed to all member cooperatives.

- a. Provide the billing cycles and billing dates for each cycle in the month of July 2013.

Response Cycle 1 - July 2, 2013 Cycle 2 - July 8, 2013 Cycle 3 - July 18, 2013
Cycle 4 - July 23, 2013 Cycle 7 - July 31, 2013

- b. For each billing cycle in July 2013, provide the environmental surcharge factor that was billed to customers.

Response Cycle 1 - 13.59% Cycle 2 - 13.59% Cycle 3 - 13.59%
Cycle 4 - 13.59% Cycle 7 - 13.59%

Nolin Rural Electric
Case No. 2006-00466
Balance Sheet, Adjusted
August 31, 2006

Exhibit S
page 1 of 4
Witness: Jim Adkins

	Actual Test Year	Adjustments to Test Year	Adjusted Test Year
ASSETS			
Electric Plant:			
In service	77,992,969		77,992,969
Under construction	3,178,140	86,229	3,264,369
	81,171,109	86,229	81,257,338
Less accumulated depreciation	24,483,181	111,336	24,594,517
	56,687,928	(25,107)	56,662,821
Investments	12,609,462		12,609,462
Current Assets:			
Cash and temporary investments	2,390,127		2,390,127
Accounts receivable, net	7,954,112		7,954,112
Other receivables	43,740,544		43,740,544
Material and supplies	539,532		539,532
Prepayments and current assets	147,532		147,532
	54,771,847		54,771,847
Deferred charges	53,074		53,074
Net Change in Assets		3,091,223	3,091,223
Total	124,122,311	3,066,116	127,188,427
MEMBERS' EQUITIES AND LIABILITIES			
Margins:			
Memberships	314,525		314,525
Patronage capital	33,880,501	2,934,263	36,814,764
	34,195,026	2,934,263	37,129,289
Long Term Debt	72,036,029		72,036,029
Accumulated Operating Provisions	1,281,866	131,853	1,413,719
Current Liabilities:			
Notes payable	6,500,000		6,500,000
Accounts payable	6,498,914		6,498,914
Consumer deposits	1,179,541		1,179,541
Accrued expenses	2,215,875		2,215,875
	16,394,330		16,394,330
Consumer Advances for Construction	215,060		215,060
Total	124,122,311	3,066,116	127,188,427

Nolin Rural Electric
Case No. 2006-00466
Statement of Operations, Adjusted

Exhibit S
page 2 of 4
Witness: Jim Adkins

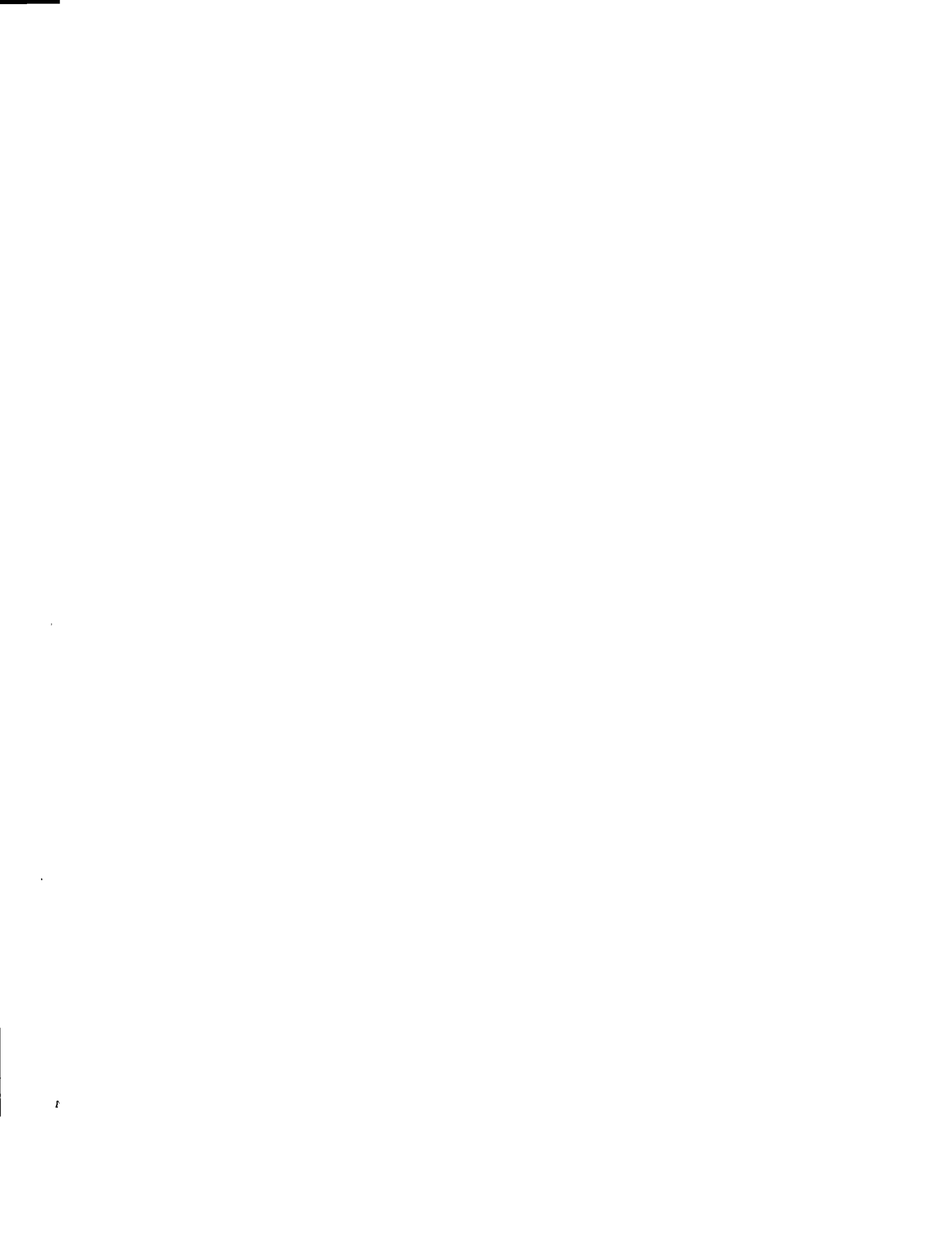
	Actual Test Year	Normalized Adjustments	Normalized Test Year	Proposed Increase	Proposed Test Year
Operating Revenues:					
Base rates	\$44,435,831	(\$285,763)	\$44,150,068	\$2,934,263	\$47,084,331
Fuel and surcharge	9,049,908	(9,049,908)	0		0
Other electric revenue	<u>2,589,412</u>	<u>222,626</u>	<u>2,812,038</u>		<u>2,812,038</u>
	<u>56,075,151</u>	<u>(9,113,045)</u>	<u>46,962,106</u>	<u>2,934,263</u>	<u>49,896,369</u>
Operating Expenses:					
Cost of power:					
Base rates	32,287,948	32,981	32,320,929		32,320,929
Fuel and surcharge	9,693,238	(9,693,238)	0		0
Distribution - operations	2,297,036	130,429	2,427,465		2,427,465
Distribution - maintenance	2,703,999	87,515	2,791,514		2,791,514
Consumer accounts	1,794,310	77,958	1,872,268		1,872,268
Customer service	713,998	24,482	738,480		738,480
Sales	0	0	0		0
Administrative and general	<u>2,247,957</u>	<u>(11,436)</u>	<u>2,236,521</u>		<u>2,236,521</u>
Total operating expenses	<u>51,738,486</u>	<u>(9,351,309)</u>	<u>42,387,177</u>	<u>0</u>	<u>42,387,177</u>
Depreciation	2,852,427	116,004	2,968,431		2,968,431
Taxes - other	0	0	0		0
Interest on long-term debt	3,967,170	225,395	4,192,565		4,192,565
Interest expense - other	342,283	(138,870)	203,413		203,413
Other deductions	<u>37,407</u>	<u>(37,407)</u>	<u>0</u>		<u>0</u>
Total cost of electric service	<u>58,937,773</u>	<u>(9,186,187)</u>	<u>49,751,586</u>	<u>0</u>	<u>49,751,586</u>
Utility operating margins	<u>(2,862,622)</u>	<u>73,142</u>	<u>(2,789,480)</u>	<u>2,934,263</u>	<u>144,783</u>
Nonoperating margins, interest	2,911,146	0	2,911,146		2,911,146
Nonoperating margins, other	995,971	106,724	1,102,695		1,102,695
Patronage Capital Credits:					
G & T		0	0		0
Other	<u>33,941</u>	<u>0</u>	<u>33,941</u>		<u>33,941</u>
Net Margins	<u>\$1,078,436</u>	<u>\$179,866</u>	<u>\$1,258,302</u>	<u>\$2,934,263</u>	<u>\$4,192,565</u>
TIER	1.27		1.30		2.00

Witness: Jim Adkins

Nolin Rural Electric
Case No. 2006-00466
Proposed Revenues
August 31, 2006

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Interest on long term debt	4,192,565
Normalized margins	<u>1,258,302</u>
Proposed increase in revenues over normalized revenues to attain a TIER of 2.0x	<u><u>\$2,934,263</u></u>



Nolin Rural Electric Cooperative
Case No. 2006-00466
Purchase Power
Test Year Billing Determinants
August 31, 2006

Exhibit 14
page / of 3
Witness: Jim Adkins

	← Billing Demand →			Total kwh billing					→				
	Sch B/C	Excess Contract	Schedule E2	Schedule B all Kwh	Schedule C all Kwh	← Schedule E → On-Peak	Off-Peak	Green Power	Total kwh	Metering Point	← Substation Charge → 2,373 2,855 4,605		
September	22,700		99,834	15,593,004	0	27,827,240	17,366,378	16,400	60,803,022	18	2	12	4
October	23,000		83,502	15,946,401	0	18,172,338	21,293,689	18,000	55,430,428	18	2	12	4
November	23,000		110,884	15,118,606	0	20,527,289	23,773,038	25,200	59,444,133	18	2	12	4
December	23,000		139,235	14,266,156	0	29,624,285	35,985,313	26,800	79,902,554	18	2	12	4
January	23,000	252	117,532	15,513,266	0	24,188,316	28,652,080	23,000	68,376,662	18	2	12	4
February	26,700		135,446	3,909,716	10,885,445	24,301,429	29,486,202	23,200	68,605,992	18	2	12	4
March	26,700		117,555	4,236,034	12,745,934	21,828,232	26,216,580	22,400	65,049,180	18	2	12	4
April	26,700		73,349	4,127,718	12,314,556	16,875,741	19,571,250	22,400	52,911,665	18	2	12	4
May	27,050		89,749	4,425,878	12,986,274	22,599,088	16,801,743	22,400	56,835,383	18	2	12	4
June	27,050		81,862	3,358,898	13,171,799	27,967,860	17,628,132	22,300	62,148,989	18	2	12	4
July	27,050		117,477	4,408,911	12,352,918	34,115,994	21,289,288	22,300	72,189,411	18	2	12	4
August	27,050		124,751	4,528,248	13,918,198	34,256,610	21,939,753	28,200	74,671,009	18	2	12	4
Total	303,000	252	1,291,176	105,432,836	88,375,124	302,284,422	280,003,446	272,600	776,368,428	216	24	144	48

Nolin Rural Electric Cooperative
Case No. 2006-00466
Purchase Power
August 31, 2006

Sept - May

Billing Rates:	
KW-Sch B/C	5.39
Excess Contract	2.24
KW-Sch E2	5.22
KWH-Sch B	0.027325
KWH-Sch C	0.025560
KWH-Sch E2 On-Peak	0.034684
KWH-Sch E2 Off-Peak	0.027118
Green power	0.023769
KVA 3000 - 7499	2,373.00
KVA 7500 - 14999	2,855.00
KVA 15000 - 99999	4,605.00
Meting Point	125.00

	← Billing Demand →			Demand Charge	Schedule B all Kwh	Schedule C all Kwh	Total kwh billing		Green Power	Energy Charge	Metering Point	Substation Charge			Total	Adjustments	Total from Base Rates	Fuel Adjustment	Environmental Surcharge	Total
	Sch B/C	Excess Contract	Schedule E2				← Schedule E2 →	On-Peak				Off-Peak	3,000	7,500						
September	122,353	0	521,133	643,486	426,079	0	965,160	470,941	390	1,862,570	2,250	4,746	34,260	18,420	57,426	(24,381)	2,541,352	674,124	362,318	3,577,794
October	123,970	0	435,880	559,850	435,735	0	630,289	577,442	428	1,643,895	2,250	4,746	34,260	18,420	57,426	(159)	2,263,262	491,510	280,119	3,034,891
November	123,970	0	578,814	702,784	413,116	0	711,968	644,677	599	1,770,361	2,250	4,746	34,260	18,420	57,426	(498)	2,532,323	480,700	287,688	3,300,711
December	123,970	0	726,807	850,777	389,823	0	1,027,489	975,850	637	2,393,798	2,250	4,746	34,260	18,420	57,426	758	3,305,009	536,767	413,166	4,254,942
January	123,970	564	613,517	738,052	423,900	0	838,948	776,987	547	2,040,381	2,250	4,746	34,260	18,420	57,426	143	2,838,252	894,750	210,511	3,943,513
February	143,913	0	707,028	850,941	106,833	278,232	842,871	799,607	551	2,028,094	2,250	4,746	34,260	18,420	57,426	(464)	2,938,247	518,484	274,075	3,730,806
March	143,913	0	613,637	757,550	115,750	325,786	757,090	710,941	532	1,910,100	2,250	4,746	34,260	18,420	57,426	(503)	2,726,823	447,386	277,698	3,451,907
April	143,913	0	382,882	526,795	112,790	314,760	585,318	530,733	532	1,544,134	2,250	4,746	34,260	18,420	57,426	(479)	2,130,126	324,212	222,807	2,677,145
May	145,800	0	468,490	614,289	120,937	331,929	783,827	455,630	532	1,692,855	2,250	4,746	34,260	18,420	57,426	(125)	2,366,695	404,509	246,591	3,017,795
June	145,800	0	427,320	573,119	91,782	336,671	970,037	478,040	530	1,877,060	2,250	4,746	34,260	18,420	57,426	2	2,509,857	475,889	289,266	3,275,012
July	145,800	0	613,230	759,029	120,473	315,741	1,183,279	577,323	530	2,197,346	2,250	4,746	34,260	18,420	57,426	(1)	3,016,051	339,906	344,937	3,700,894
August	145,800	0	651,200	797,000	123,734	355,749	1,188,156	594,962	670	2,263,272	2,250	4,746	34,260	18,420	57,426	3	3,119,951	435,167	460,658	4,015,776
Total	1,633,170	564	6,739,939	8,373,673	2,880,952	2,258,868	10,484,433	7,593,133	6,480	23,223,866	27,000	56,952	411,120	221,040	689,112	(25,704)	32,287,948	6,023,404	3,669,834	41,981,186

Normalized using rates effective

1,633,170	564	6,739,939	8,373,673	2,880,952	2,258,868	10,484,433	7,593,133	6,479	23,223,866	27,000	56,952	411,120	221,040	689,112	25	32,313,676	0	0	32,313,676
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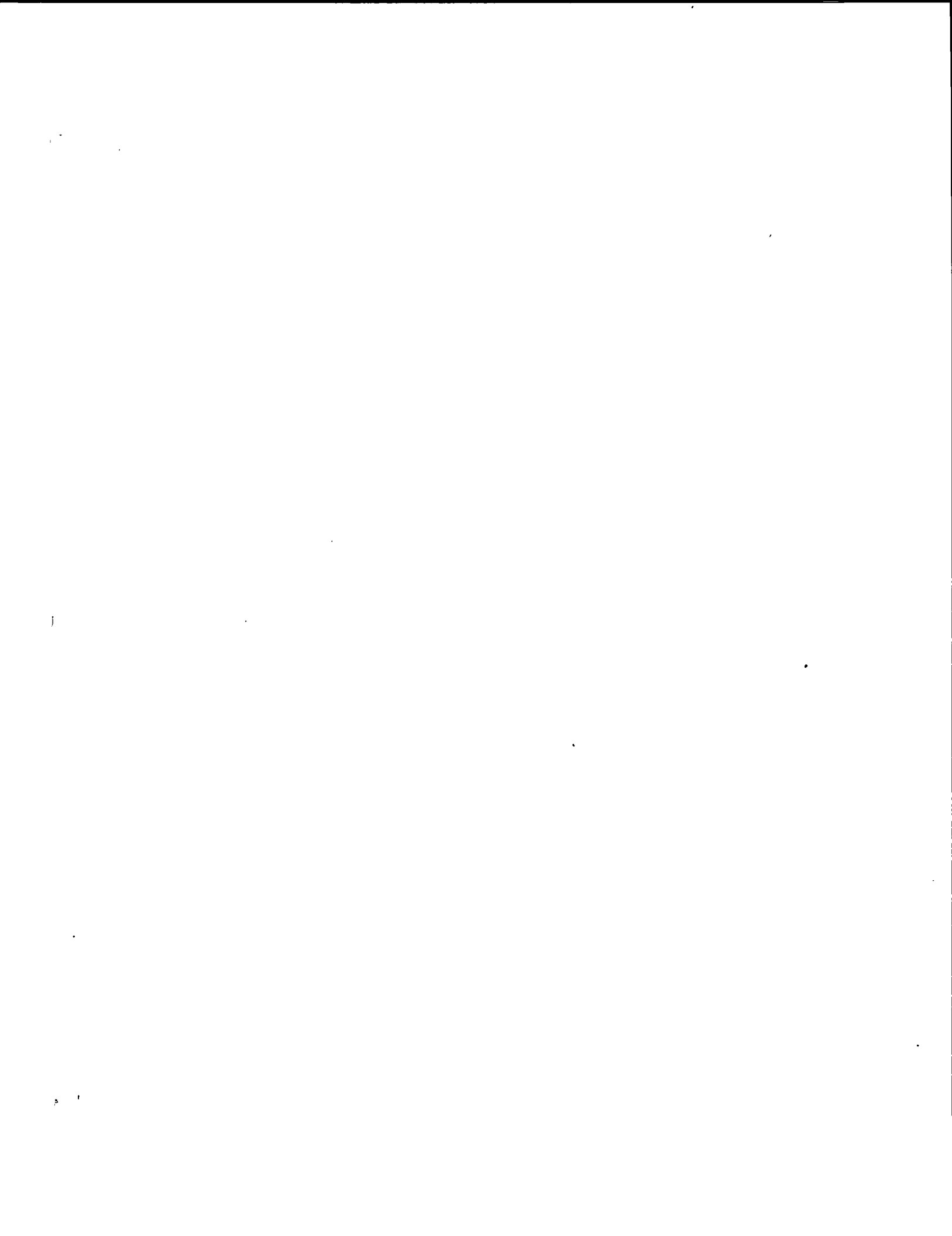
Normalized adjustment 25,729

Nolin Rural Electric Cooperative
Case No. 2006-00466
Analysis of Fuel Adjustment and Environmental Surcharge
August 31, 2006

An analysis of fuel adjustment and environmental surcharge as purchased and passed on to consumers is as follows:

Month	Sales		Purchased	
	Fuel Adjustment	Environmental Surcharge	Fuel Adjustment	Environmental Surcharge
September, 2005	537,375	339,758	674,124	362,318
October	810,570	314,185	491,510	280,119
November	713,262	339,244	480,700	287,688
December	746,051	434,262	536,767	413,166
January, 2006	443,494	202,080	894,750	210,511
February	(23,659)	235,125	518,484	274,075
March	501,966	275,438	447,386	277,698
April	(69,175)	208,855	324,212	222,807
May	414,858	253,263	404,509	246,591
June	423,271	319,521	475,889	289,266
July	520,984	384,883	339,906	344,937
August	288,193	436,104	435,167	460,658
Total	<u>5,307,190</u>	<u>3,742,718</u>	<u>6,023,404</u>	<u>3,669,834</u>

The fuel purchased and environmental surcharge from East Kentucky Power Cooperative is passed on to the consumers using the Fuel Adjustment Procedures established by this Commission.



Nolin Rural Electric Cooperative
Case No. 2006-00466
Normalized Revenue Adjustments
August 31, 2006

Total revenues per general ledger	53,485,739
Less:	
Fuel charge	5,307,190
Environmental charge	<u>3,742,718</u> (9,049,908)
Base rates for the test year	44,435,831
Normalized revenues using rates effective in Case No. 2004-00482	<u>44,097,114</u>
Normalized revenue adjustment	<u><u>(338,717)</u></u>

Nolin Rural Electric Coop Corp
Case No. 2014-00051
Analyses

a	Case No. 2006-00466 Exhibit 14 Page 3 of 3		Case No. 2014-00051 Item 2 Page 1 of 2		Differences		Nolin Sales Report	
	b EKPC	c NOLIN	d EKPC	e NOLIN	f* EKPC	g NOLIN	h	i** col. C -col. H
Sept '05	362,318	339,758	360,933	173,973	1,385	165,785	333,896	5,862
Oct	280,119	314,185	280,119	333,896	-	(19,711)	304,892	9,293
Nov	287,688	339,244	287,688	304,560	-	34,684	328,647	10,597
Dec	413,166	434,262	413,279	328,647	(113)	105,615	423,673	10,589
Jan '06	210,511	202,080	210,511	423,673	-	(221,593)	191,696	10,384
Feb	274,075	235,125	274,075	191,696	-	43,429	224,963	10,162
Mar	277,698	275,438	277,698	265,211	-	10,227	265,211	10,227
Apr	222,807	208,855	222,807	198,807	-	10,048	198,807	10,048
May	246,591	253,263	246,591	242,886	-	10,377	242,886	10,377
Jun	289,266	319,521	289,266	309,032	-	10,489	309,032	10,489
Jul	344,937	384,883	344,937	374,368	-	10,515	374,368	10,515
Aug	460,658	436,104	460,658	425,805	-	10,299	425,805	10,299
Total	3,669,834	3,742,718	3,668,562	3,572,554	1,272	170,164	3,623,876	118,842

f* The two amounts are related to adjustments to the power bill that were not picked up in the rate case.

i** These differences are attributed to an under billing error on a large power customer that was added to their bill in order to recover the under billing.

NOLIN ENVIRONMENTAL SURCHARGE

Accounting Period	Power Bill Date	EKPC (power bills)	Nolin (billed to mems)	monthly	(over)/under cumulative
January-12	January-12	673,839.00	589,376.72	84,462.28	84,462.28
February-12	February-12	500,689.00	483,535.84	17,153.16	101,615.44
March-12	March-12	365,939.00	353,343.40	12,595.60	114,211.04
April-12	April-12	373,546.00	404,543.31	(30,997.31)	83,213.73
May-12	May-12	538,221.00	515,417.99	22,803.01	106,016.74
June-12	June-12	659,613.00	690,237.44	(30,624.44)	75,392.30
July-12	July-12	707,927.00	697,256.40	10,670.60	86,062.90
August-12	August-12	589,886.00	577,828.73	12,057.27	98,120.17
September-12	September-12	497,172.00	460,449.21	36,722.79	134,842.96
October-12	October-12	536,165.00	545,219.93	(9,054.93)	125,788.03
November-12	November-12	702,967.00	670,634.33	32,332.67	158,120.70
December-12	December-12	809,074.00	825,543.44	(16,469.44)	141,651.26
January-13	January-13	704,094.00	743,318.81	(39,224.81)	102,426.45
February-13	February-13	601,885.00	594,290.46	7,594.54	110,020.99
March-13	March-13	569,781.00	541,782.29	27,998.71	138,019.70
April-13	April-13	491,579.00	497,128.74	(5,549.74)	132,469.96
May-13	May-13	516,052.00	510,210.25	5,841.75	138,311.71
June-13	June-13	712,587.00	723,822.72	(11,235.72)	127,075.99
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September-13	September-13	561,666.00	623,478.89	(61,812.89)	(28,673.88)
October-13	October-13	498,116.00	590,920.43	(92,804.43)	(121,478.31)
November-13	November-13	667,728.00	774,399.05	(106,671.05)	(228,149.36)
December-13	December-13	837,054.00	978,879.47	(141,825.47)	(369,974.83)

East Kentucky Power Cooperative, Inc. - Distribution Cooperatives
Pass Through Mechanism Report for Nolin RECC

For the Month Ending June 2014

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
Surcharge Factor Expense Month	EKPC CESF %	EKPC BESF %	EKPC MESF %	EKPC Monthly Revenues from Sales to Nolin	On-peak Revenue Adjustment	EKPC Net Monthly Sales to Nolin	EKPC 12-months Ended Average Monthly Revenue from Sales to Nolin	Nolin Revenue Requirement	Amortization of (Over)/Under Recovery	Nolin Net Revenue Requirement	Nolin Total Monthly Retail Revenues	On-Peak Retail Revenue Adjustment	Nolin Net Monthly Retail Revenues	12-months ended Avg. Retail Revenues, Net	Nolin Pass Through Mechanism Factor
	Col (1) - Col (2)			Col (4) - Col (5)			Col (3) x Col (7)			Col (8) + Col (9)			Col (11) - Col (12)		Col (10) / Col (14)
Jul-12	14.51%	0.00%	14.51%	\$ 4,552,578		\$ 4,552,578	\$ 3,830,863	\$ 555,858	\$ -	\$ 555,858	\$ 5,964,487		\$ 5,964,487	\$ 5,125,320	10.80%
Aug-12	14.13%	0.00%	14.13%	\$ 4,065,388		\$ 4,065,388	\$ 3,803,533	\$ 537,439	\$ -	\$ 537,439	\$ 5,350,232		\$ 5,350,232	\$ 5,108,115	10.49%
Sep-12	16.23%	0.00%	16.23%	\$ 3,518,558		\$ 3,518,558	\$ 3,804,600	\$ 617,487	\$ -	\$ 617,487	\$ 4,389,409		\$ 4,389,409	\$ 5,110,719	12.09%
Oct-12	17.57%	0.00%	17.57%	\$ 3,303,548		\$ 3,303,548	\$ 3,806,854	\$ 668,864	\$ -	\$ 668,864	\$ 4,508,955		\$ 4,508,955	\$ 5,117,131	13.09%
Nov-12	18.23%	0.00%	18.23%	\$ 4,000,950		\$ 4,000,950	\$ 3,833,995	\$ 698,937	\$ -	\$ 698,937	\$ 5,123,511		\$ 5,123,511	\$ 5,131,545	13.66%
Dec-12	14.81%	0.00%	14.61%	\$ 4,438,149		\$ 4,438,149	\$ 3,847,828	\$ 562,168	\$ -	\$ 562,168	\$ 6,043,964		\$ 6,043,964	\$ 5,145,829	10.96%
Jan-13	13.49%	0.00%	13.49%	\$ 4,819,274		\$ 4,819,274	\$ 3,854,267	\$ 519,941	\$ -	\$ 519,941	\$ 6,782,065		\$ 6,782,065	\$ 5,188,172	10.10%
Feb-13	12.61%	0.00%	12.61%	\$ 4,461,726		\$ 4,461,726	\$ 3,912,632	\$ 493,383	\$ -	\$ 493,383	\$ 5,884,073		\$ 5,884,073	\$ 5,225,601	9.51%
Mar-13	14.37%	0.00%	14.37%	\$ 4,518,482		\$ 4,518,482	\$ 4,006,289	\$ 575,704	\$ -	\$ 575,704	\$ 5,697,051		\$ 5,697,051	\$ 5,333,318	11.02%
Apr-13	14.27%	0.00%	14.27%	\$ 3,420,858		\$ 3,420,858	\$ 4,050,425	\$ 577,996	\$ -	\$ 577,996	\$ 4,511,112		\$ 4,511,112	\$ 5,356,210	10.84%
May-13	17.97%	0.00%	17.97%	\$ 3,616,335		\$ 3,616,335	\$ 4,051,573	\$ 728,068	\$ -	\$ 728,068	\$ 4,706,767		\$ 4,706,767	\$ 5,364,602	13.59%
Jun-13	17.09%	0.00%	17.09%	\$ 3,965,445		\$ 3,965,445	\$ 4,056,774	\$ 693,303	\$ -	\$ 693,303	\$ 5,326,255		\$ 5,326,255	\$ 5,357,324	12.92%
Jul-13	15.77%	0.00%	15.77%	\$ 4,004,530		\$ 4,004,530	\$ 4,011,103	\$ 632,551	\$ 78,386	\$ 710,937	\$ 5,547,665		\$ 5,547,665	\$ 5,322,588	13.27%
Aug-13	15.49%	0.00%	15.49%	\$ 4,104,434		\$ 4,104,434	\$ 4,014,357	\$ 621,824	\$ 89,429	\$ 711,253	\$ 5,341,696		\$ 5,341,696	\$ 5,321,877	13.36%
Sep-13	14.93%	0.00%	14.93%	\$ 3,625,994		\$ 3,625,994	\$ 4,023,310	\$ 600,680	\$ 89,429	\$ 690,109	\$ 4,666,789		\$ 4,666,789	\$ 5,344,992	12.97%
Oct-13	16.69%	0.00%	16.69%	\$ 3,336,337		\$ 3,336,337	\$ 4,028,043	\$ 671,947	\$ 89,429	\$ 761,376	\$ 4,556,035		\$ 4,556,035	\$ 5,348,915	14.24%
Nov-13	17.43%	0.00%	17.43%	\$ 4,000,771		\$ 4,000,771	\$ 4,026,028	\$ 701,737	\$ 89,429	\$ 791,166	\$ 5,438,191		\$ 5,438,191	\$ 5,375,139	14.79%
Dec-13	14.54%	0.00%	14.54%	\$ 4,802,382		\$ 4,802,382	\$ 4,056,381	\$ 589,798	\$ 89,429	\$ 679,227	\$ 6,618,531		\$ 6,618,531	\$ 5,423,019	12.64%
Jan-14	10.92%	0.00%	10.92%	\$ 6,138,305		\$ 6,138,305	\$ 4,166,300	\$ 454,960	\$ 11,043	\$ 466,003	\$ 8,159,082		\$ 8,159,082	\$ 5,537,771	8.59%
Feb-14	5.44%	0.00%	5.44%	\$ 5,179,183		\$ 5,179,183	\$ 4,226,088	\$ 229,899	\$ -	\$ 229,899	\$ 6,540,568		\$ 6,540,568	\$ 5,592,479	4.15%
Mar-14	11.62%	0.00%	11.62%	\$ 4,569,156		\$ 4,569,156	\$ 4,230,311	\$ 491,562	\$ (2,429)	\$ 489,133	\$ 5,523,895		\$ 5,523,895	\$ 5,578,049	8.75%
Apr-14	13.47%	0.00%	13.47%	\$ 3,449,261		\$ 3,449,261	\$ 4,232,678	\$ 570,142	\$ (2,429)	\$ 567,713	\$ 4,478,167		\$ 4,478,167	\$ 5,575,303	10.18%
May-14	15.84%	0.00%	15.84%	\$ 3,680,230		\$ 3,680,230	\$ 4,238,002	\$ 671,300	\$ (2,429)	\$ 668,871	\$ 4,867,134		\$ 4,867,134	\$ 5,588,667	12.00%
Jun-14	15.67%	0.00%	15.67%	\$ 4,152,773		\$ 4,152,773	\$ 4,253,613	\$ 666,541	\$ (2,429)	\$ 664,112					11.88%

Notes:

Nolin Total Monthly Retail Revenues in Column (11) includes demand and energy charges, customer charges, and FAC revenues.

East Kentucky Power Cooperative, Inc. - Distribution Cooperatives
Pass Through Mechanism Report for Nolin RECC

Exhibit 12a
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For the Month Ending June 2014

Surcharge Factor Expense Month	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
	EKPC CESF %	EKPC BESF %	EKPC MESF %	EKPC Monthly Revenues from Sales to Nolin	On-peak Revenue Adjustment	EKPC Net Monthly Sales to Nolin	EKPC 12-months Ended Average Monthly Revenue from Sales to Nolin	Nolin Revenue Requirement	Amortization of (Over)/Under Recovery	Nolin Net Revenue Requirement	Nolin Total Monthly Retail Revenues	On-Peak Retail Revenue Adjustment	Nolin Net Monthly Retail Revenues	12-months ended Avg. Retail Revenues, Net	Nolin Pass Through Mechanism Factor
			Col. (1) - Col. (2)			Col. (4) - Col. (5)		Col. (3) x Col. (7)		Col. (8) + Col. (9)			Col. (11) - Col. (12)		Col. (10) / Col. (14)
Jul-12	14.51%	0.00%	14.51%	\$ 4,552,578		\$ 4,552,578	\$ 3,830,863	\$ 555,858	\$ -	\$ 555,858	\$ 5,964,487		\$ 5,964,487	\$ 5,125,320	10.80%
Aug-12	14.13%	0.00%	14.13%	\$ 4,065,386		\$ 4,065,386	\$ 3,803,533	\$ 537,439	\$ -	\$ 537,439	\$ 5,350,232		\$ 5,350,232	\$ 5,108,115	10.49%
Sep-12	16.23%	0.00%	16.23%	\$ 3,518,558		\$ 3,518,558	\$ 3,804,600	\$ 617,487	\$ -	\$ 617,487	\$ 4,389,409		\$ 4,389,409	\$ 5,110,719	12.09%
Oct-12	17.57%	0.00%	17.57%	\$ 3,303,546		\$ 3,303,546	\$ 3,806,854	\$ 668,864	\$ -	\$ 668,864	\$ 4,508,955		\$ 4,508,955	\$ 5,117,131	13.09%
Nov-12	18.23%	0.00%	18.23%	\$ 4,000,950		\$ 4,000,950	\$ 3,833,995	\$ 698,937	\$ -	\$ 698,937	\$ 5,123,511		\$ 5,123,511	\$ 5,131,545	13.66%
Dec-12	14.61%	0.00%	14.61%	\$ 4,438,149		\$ 4,438,149	\$ 3,847,828	\$ 562,168	\$ -	\$ 562,168	\$ 6,043,964		\$ 6,043,964	\$ 5,145,629	10.96%
Jan-13	13.49%	0.00%	13.49%	\$ 4,819,274		\$ 4,819,274	\$ 3,854,267	\$ 519,941	\$ -	\$ 519,941	\$ 6,782,065		\$ 6,782,065	\$ 5,188,172	10.10%
Feb-13	12.61%	0.00%	12.61%	\$ 4,461,726		\$ 4,461,726	\$ 3,912,632	\$ 493,383	\$ -	\$ 493,383	\$ 5,884,073		\$ 5,884,073	\$ 5,225,601	9.51%
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Apr-13	14.27%	0.00%	14.27%	\$ 3,420,858		\$ 3,420,858	\$ 4,050,425	\$ 577,996	\$ -	\$ 577,996	\$ 4,511,112		\$ 4,511,112	\$ 5,356,210	10.84%
May-13	17.97%	0.00%	17.97%	\$ 3,616,335		\$ 3,616,335	\$ 4,051,573	\$ 728,068	\$ -	\$ 728,068	\$ 4,706,767		\$ 4,706,767	\$ 5,364,602	13.59%
Jun-13	17.09%	0.00%	17.09%	\$ 3,965,445		\$ 3,965,445	\$ 4,056,774	\$ 693,303	\$ -	\$ 693,303	\$ 5,326,255		\$ 5,326,255	\$ 5,357,324	12.92%
Jul-13	15.77%	0.00%	15.77%	\$ 4,004,530		\$ 4,004,530	\$ 4,011,103	\$ 632,551	\$ 78,386	\$ 710,937	\$ 5,547,665		\$ 5,547,665	\$ 5,322,588	13.27%
Aug-13	15.49%	0.00%	15.49%	\$ 4,104,434		\$ 4,104,434	\$ 4,014,357	\$ 621,824	\$ 89,429	\$ 711,253	\$ 5,341,696		\$ 5,341,696	\$ 5,321,877	13.36%
Sep-13	14.93%	0.00%	14.93%	\$ 3,625,994		\$ 3,625,994	\$ 4,023,310	\$ 600,680	\$ 89,429	\$ 690,109	\$ 4,666,789		\$ 4,666,789	\$ 5,344,992	12.97%
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Jan-14	10.92%	0.00%	10.92%	\$ 6,138,305		\$ 6,138,305	\$ 4,166,300	\$ 454,960	\$ 11,043	\$ 466,003	\$ 6,159,082		\$ 8,159,082	\$ 5,537,771	8.59%
Feb-14	5.44%	0.00%	5.44%	\$ 5,179,183		\$ 5,179,183	\$ 4,226,088	\$ 229,899	\$ -	\$ 229,699	\$ 6,540,566		\$ 6,540,566	\$ 5,592,479	4.15%
Mar-14	11.62%	0.00%	11.62%	\$ 4,569,156		\$ 4,569,156	\$ 4,230,311	\$ 491,562	\$ (2,429)	\$ 489,133	\$ 5,523,695		\$ 5,523,695	\$ 5,578,049	6.75%
Apr-14	13.47%	0.00%	13.47%	\$ 3,449,261		\$ 3,449,261	\$ 4,232,678	\$ 570,142	\$ (2,429)	\$ 567,713	\$ 4,476,167		\$ 4,476,167	\$ 5,575,303	10.18%
May-14	15.64%	0.00%	15.64%	\$ 3,680,230		\$ 3,680,230	\$ 4,238,002	\$ 671,300	\$ (2,429)	\$ 668,871	\$ 4,867,134		\$ 4,867,134	\$ 5,588,667	12.00%
Jun-14	15.67%	0.00%	15.67%	\$ 4,152,773		\$ 4,152,773	\$ 4,253,613	\$ 666,541	\$ (2,429)	\$ 664,112					11.88%

Notes:
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NOLIN ENVIRONMENTAL SURCHARGE

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December-13	December-13	837,054.00	978,879.47	(141,825.47)	(369,974.83)
				Recovery adjustment*	487,224.00
					117,249.17

* This represents a recovery adjustment from a underbilled account prior to 2012. An additional \$20,301 was included each month to recover the underbilling on a large power account. This adjustment was for sixty months starting in May 2009 and concluded in April 2014.

East Kentucky Power Cooperative, Inc. - Distribution Cooperatives
Pass Through Mechanism Report for Nolin RECC

Exhibit 12a
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For the Month Ending June 2014

Surcharge Factor Expense Month	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
	EKPC CESF %	EKPC BESF %	EKPC MESF %	EKPC Monthly Revenues from Sales to Nolin	On-peak Revenue Adjustment	EKPC Net Monthly Sales to Nolin	EKPC 12-months Ended Average Monthly Revenue from Sales to Nolin	Nolin Revenue Requirement	Amortization of (Over)/Under Recovery	Nolin Net Revenue Requirement	Nolin Total Monthly Retail Revenues	On-Peak Retail Revenue Adjustment	Nolin Net Monthly Retail Revenues	12-months ended Avg. Retail Revenues, Net	Nolin Pass Through Mechanism Factor
	Col (1) - Col (2)			Col (4) - Col (5)			Col (3) x Col (7)		Col (8) + Col (9)		Col (11) - Col (12)		Col (10) / Col (14)		
Jul-12	14.51%	0.00%	14.51%	\$ 4,552,578		\$ 4,552,578	\$ 3,630,863	\$ 555,858	\$ -	\$ 555,858	\$ 5,964,467		\$ 5,964,467	\$ 5,125,320	10.80%
Aug-12	14.13%	0.00%	14.13%	\$ 4,065,388		\$ 4,065,388	\$ 3,803,533	\$ 537,439	\$ -	\$ 537,439	\$ 5,350,232		\$ 5,350,232	\$ 5,108,115	10.49%
Sep-12	16.23%	0.00%	16.23%	\$ 3,518,558		\$ 3,518,558	\$ 3,804,600	\$ 617,467	\$ -	\$ 617,467	\$ 4,389,409		\$ 4,389,409	\$ 5,110,719	12.09%
Oct-12	17.57%	0.00%	17.57%	\$ 3,303,548		\$ 3,303,548	\$ 3,806,854	\$ 668,664	\$ -	\$ 668,664	\$ 4,508,955		\$ 4,508,955	\$ 5,117,131	13.09%
Nov-12	16.23%	0.00%	16.23%	\$ 4,000,950		\$ 4,000,950	\$ 3,833,995	\$ 698,937	\$ -	\$ 698,937	\$ 5,123,511		\$ 5,123,511	\$ 5,131,545	13.66%
Dec-12	14.81%	0.00%	14.81%	\$ 4,438,149		\$ 4,438,149	\$ 3,847,828	\$ 562,168	\$ -	\$ 562,168	\$ 6,043,964		\$ 6,043,964	\$ 5,145,829	10.96%
Jan-13	13.49%	0.00%	13.49%	\$ 4,819,274		\$ 4,819,274	\$ 3,854,267	\$ 519,941	\$ -	\$ 519,941	\$ 6,782,085		\$ 6,782,085	\$ 5,188,172	10.10%
Feb-13	12.61%	0.00%	12.61%	\$ 4,461,726		\$ 4,461,726	\$ 3,912,632	\$ 493,383	\$ -	\$ 493,383	\$ 5,884,073		\$ 5,884,073	\$ 5,225,601	9.51%
Mar-13	14.37%	0.00%	14.37%	\$ 4,518,482		\$ 4,518,482	\$ 4,006,289	\$ 575,704	\$ -	\$ 575,704	\$ 5,697,051		\$ 5,697,051	\$ 5,333,316	11.02%
Apr-13	14.27%	0.00%	14.27%	\$ 3,420,858		\$ 3,420,858	\$ 4,050,425	\$ 577,998	\$ -	\$ 577,998	\$ 4,511,112		\$ 4,511,112	\$ 5,356,210	10.84%
May-13	17.97%	0.00%	17.97%	\$ 3,618,335		\$ 3,618,335	\$ 4,051,573	\$ 728,068	\$ -	\$ 728,068	\$ 4,706,767		\$ 4,706,767	\$ 5,364,602	13.59%
Jun-13	17.09%	0.00%	17.09%	\$ 3,965,445		\$ 3,965,445	\$ 4,056,774	\$ 693,303	\$ -	\$ 693,303	\$ 5,328,255		\$ 5,328,255	\$ 5,357,324	12.92%
Jul-13	15.77%	0.00%	15.77%	\$ 4,004,530		\$ 4,004,530	\$ 4,011,103	\$ 632,551	\$ 78,386	\$ 710,937	\$ 5,547,665		\$ 5,547,665	\$ 5,322,568	13.27%
Aug-13	15.49%	0.00%	15.49%	\$ 4,104,434		\$ 4,104,434	\$ 4,014,357	\$ 621,824	\$ 89,429	\$ 711,253	\$ 5,341,698		\$ 5,341,698	\$ 5,321,877	13.38%
Sep-13	14.93%	0.00%	14.93%	\$ 3,825,994		\$ 3,825,994	\$ 4,023,310	\$ 600,680	\$ 89,429	\$ 690,109	\$ 4,666,789		\$ 4,666,789	\$ 5,344,992	12.97%
Oct-13	16.69%	0.00%	16.69%	\$ 3,338,337		\$ 3,338,337	\$ 4,026,043	\$ 671,947	\$ 89,429	\$ 761,378	\$ 4,558,035		\$ 4,558,035	\$ 5,348,915	14.24%
Nov-13	17.43%	0.00%	17.43%	\$ 4,000,771		\$ 4,000,771	\$ 4,028,028	\$ 701,737	\$ 89,429	\$ 791,166	\$ 5,438,191		\$ 5,438,191	\$ 5,375,139	14.79%
Dec-13	14.54%	0.00%	14.54%	\$ 4,802,382		\$ 4,802,382	\$ 4,056,361	\$ 589,798	\$ 108,971	\$ 698,769	\$ 6,618,531		\$ 6,618,531	\$ 5,423,019	13.00%
Jan-14	10.92%	0.00%	10.92%	\$ 6,138,305		\$ 6,138,305	\$ 4,168,300	\$ 454,960	\$ 11,043	\$ 466,003	\$ 8,159,082		\$ 8,159,082	\$ 5,537,771	6.59%
Feb-14	5.44%	0.00%	5.44%	\$ 5,179,183		\$ 5,179,183	\$ 4,226,088	\$ 229,899	\$ -	\$ 229,899	\$ 6,540,568		\$ 6,540,568	\$ 5,592,479	4.15%
Mar-14	11.62%	0.00%	11.62%	\$ 4,569,156		\$ 4,569,156	\$ 4,230,311	\$ 491,562	\$ (2,429)	\$ 489,133	\$ 5,523,895		\$ 5,523,895	\$ 5,578,049	8.75%
Apr-14	13.47%	0.00%	13.47%	\$ 3,449,261		\$ 3,449,261	\$ 4,232,678	\$ 570,142	\$ (2,429)	\$ 567,713	\$ 4,478,167		\$ 4,478,167	\$ 5,575,303	10.18%
May-14	15.84%	0.00%	15.84%	\$ 3,680,230		\$ 3,680,230	\$ 4,238,002	\$ 671,300	\$ (2,429)	\$ 668,871	\$ 4,887,134		\$ 4,887,134	\$ 5,588,667	12.00%
Jun-14	15.67%	0.00%	15.67%	\$ 4,152,773		\$ 4,152,773	\$ 4,253,613	\$ 666,541	\$ (2,429)	\$ 664,112					11.88%

Notes:

Nolin Total Monthly Retail Revenues in Column (11) includes demand and energy charges, customer charges, and FAC revenues.

	Actual		Spread	
			6 Months	
12 month Average Residential kWh		1,361		1,361
Residential Rate:				
Customer Charge	\$ 9.04	\$ 9.04	\$ 9.04	\$ 9.04
kWh Charge	0.08598	117.02	0.08598	117.02
FAC	-0.002224	-3.03	-0.002224	-3.03
Sub Total		\$ 123.03		\$ 123.03
* Surcharge Dec. 2013	12.64%	15.55	11.49%	14.14
Total		\$ 138.58		\$ 137.17
Impact				\$ (1.41)

* See attached EKP Pass Through Mechanism Reports. Exhibit 12a Page 2 & 5

Spreading \$61,646 ($\$369,975 \div 6$)

	Actual		Spread	
			6 Months	
12 month Average Residential kWh		1,361		1,361
Residential Rate:				
Customer Charge	\$ 9.04	\$ 9.04	\$ 9.04	\$ 9.04
kWh Charge	0.08598	117.02	0.08598	117.02
FAC	-0.002224	-3.03	-0.002224	-3.03
Sub Total		\$ 123.03		\$ 123.03
* Surcharge Dec. 2013	12.64%	15.55	13.00%	15.99
Total		\$ 138.58		\$ 139.03
Impact				\$ 0.44

* See attached EKP Pass Through Mechanism Reports. Exhibit 12 a Page 3 & 5

Spreading \$117,249 (\$19,542 ÷ 6)