Leonard K. Peters
Secretary
Energy and Environment Cabinet

# Public Service Commission 211 Sower Blvd. <br> P.O. Box 615 

onweath of Kentucky

Linda Breathitt Commissioner

November 3, 2014

## PARTIES OF RECORD

Re: Case No. 2014-00159

Attached is a copy of a memorandum which is being filed in the record of the above-referenced case. If you have any comments you would like to make regarding the contents of the memorandum please do so within five days of receipt of this letter. If you have any questions, please contact Jonathan Beyer, Commission Counsel, at 502/782-2581.

# KENTUCKY PUBLIC SERVICE COMMISSION 

TO: $\quad$ Case File - Case No. 2014-00159
FROM: Jonathan Beyer, Staff Attorney
DATE: November 3, 2014
RE: Informal Conference of October 29, 2014
Pursuant to the Commission's October 29, 2014 Order, an informal conference was held in this matter on October 29, 2014. A list of attendees is attached.

Beginning the conference, Cumberland Valley Electric, Inc. ("Cumberland Valley") personnel discussed and explained the rationale for its proposed interest expense adjustment. Cumberland Valley indicated that a significant portion of its debt, approximately $85 \%$, is currently comprised of variable short-term debt so as to take advantage of the historically low rates. It, however, believes that rates will soon begin to increase and it will be compelled to lock in longer term rates, which it can do on any calendar quarter. It stated that due to the use of short-term borrowing, it has saved on interest expense and the ratepayers have thereby been benefited. Cumberland Valley noted that it has the lowest blended interest rate in the Commonwealth and one of the lowest nationwide rates. Several handouts, which are attached, were distributed to aid in the discussion.

Commission Staff indicated that the Commission has never previously permitted recovery for interest expense which remains hypothetical. Cumberland Valley stated that if it is not granted the full amount requested, particularly in regard to the interest expense, it will most likely continue to lose money, fail to meet its TIER requirements and will likely request another rate increase next year.

The Attorney General followed with questions concerning Cumberland Valley's consistent practice of granting raises to all employees. Cumberland Valley stated that the raises for union employees are negotiated and the non-union employees are granted the same increase. It opined that its salaries are in line with other electric cooperatives. The Attorney General further inquired into Cumberland Valley's proposed increase being placed exclusively on the customer charge.

Finally, the parties discussed the potential for resolving the issues in this case. Thereafter, finding that no party had any further questions, the conference was adjourned.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CUMBERLAND VALLEY ELECTRIC, INC. FOR AN ADJUSTMENT OF RATES

$$
\begin{aligned}
& \text { ) CASE NO. } \\
& \text { ) } 2014-00159
\end{aligned}
$$

October 29, 2014
Please sign in:

NAME


Barbara relics
$\qquad$


JENWIER Bench HMO \& A

$\qquad$


5anthen Buyer

REPRESENTING


INTEREST EXPENSE ON LONG-TERM DEBT


## LONG-TERM DEBT



|  |  |  | 10/13/2014 |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Type of Debt Issued | Date of Issue | Date of Maturity | Oustanding <br> Amount | Cost Rate to Maturity | Annualized Cost Col (d) $\mathrm{x}(\mathrm{g})$ | Test Year <br> Interest Cost |
| RUS loans |  |  |  |  |  |  |
| 1 B 290 | Dec-97 | Jun-32 | 1,214,461.83 | 5.375\% | 65,277 | 68,128 |
| 1 B 295 | Nov-98 | Jun-32 | 1,190,673.59 | 5.000\% | 59,534 | 62,103 |
| 1 B 300 | Aug-00 | Mar-35 | 950,138.40 | 0.125\% | 1,188 | 2,517 |
| Advance Payment |  |  | $(1,362,682.41)$ |  |  |  |
|  |  |  | 1,992,591.41 |  | 125,999 | 132,748 |
| FFB loans |  |  |  |  |  |  |
| H0010 | Mar-01 | Dec-14 | 2,818,608.30 | 0.020\% | 564 | 5,038 |
| H0015 | Jul-03 | Dec-14 | 3,385,144.57 | 0.020\% | 677 | 6,051 |
| H0020 | Jul-04 | Dec-14 | 1,666,896.56 | 0.020\% | 333 | 2,957 |
| H0025 | Feb-05 | Dec-14 | 1,515,360.47 | 0.020\% | 303 | 2,688 |
| H0030 | Oct-05 | Dec-14 | 2,267,341.93 | 0.020\% | 453 | 4,022 |
| H0035 | Sep-06 | Dec-14 | 1,542,707.21 | 0.020\% | 309 | 2,737 |
| H0040 | May-07 | Dec-14 | 859,185.68 | 0.020\% | 172 | 1,534 |
| H0045 | Aug-08 | Dec-14 | 3,456,083.68 | 0.020\% | 691 | 6,676 |
| H0050 | Nov-08 | Dec-14 | 2,160,052.29 | 0.020\% | 432 | 3,798 |
| H0055 | Jan-10 | Dec-14 | 2,592,034.29 | 0.020\% | 518 | 4,557 |
| H0060 | Jul-11 | Dec-14 | 3,619,034.35 | 0.020\% | 724 | 6,363 |
| H0065 | Jul-12 | Dec-14 | 2,186,447.12 | 0.020\% | 437 | 3,844 |
| F0070 | Jan-13 | Dec-14 | 3,000,000.00 | 0.020\% | 600 | 2,526 |
| F0075 | Jun-13 | Dec-14 | 1,900,000.00 | 0.020\% | 380 | 1,600 |
| F0080 | Dec-13 | Dec-14 | 2,000,000.00 | 0.020\% | 400 | 1,074 |
| F0085* | Jul-14 | Dec-14 | 3,000,000.00 | 0.053\% | 1,590 | 0 |
|  |  |  | 37,968,896.45 |  | 8,584 | 55,465 |

*FFB Loan for \$3,000,000 on July 22, 2014
NCSC loans

| 2003 | Oct-10 | Aug-13 | 0.00 | $2.300 \%$ | 0 | 4,662 |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
| 2004 | Nov-10 | Aug-14 | 0.00 | $2.700 \%$ | 0 | 9,027 |
| 2005 | Nov-10 | Aug-15 | $301,948.87$ | $3.050 \%$ | 9,209 | 10,635 |
| 2006 | Nov-10 | Aug-16 | $320,665.49$ | $3.350 \%$ | 10,742 | 12,405 |
| 2007 | Nov-10 | Aug-17 | $202,674.75$ | $3.600 \%$ | 7,296 | 8,425 |
| 2008 | Nov-10 | Aug-18 | $253,479.96$ | $3.800 \%$ | 9,632 | 11,123 |
| 2009 | Nov-10 | Aug-19 | $248,981.06$ | $4.000 \%$ | 9,959 | 11,500 |
| 2010 | Nov-10 | Aug-20 | $264,048.38$ | $4.150 \%$ | 10,958 | 12,654 |
| 2011 | Nov-10 | Aug-21 | $211,859.16$ | $4.200 \%$ | 8,898 | 10,275 |
| 2012 | Nov-10 | Aug-22 | $164,699.46$ | $4.300 \%$ | 7,082 | 8,178 |
|  |  |  | $1,968,357.13$ |  |  | 73,778 |
|  |  |  |  |  | 98,884 |  |

CoBank loans

| 628 T01 | Feb-13 | May-31 | 1,531,087.15 | 3.680\% | 56,344 | 45,236 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 628 T 02 | Feb-13 | Feb-22 | 603,227.19 | 2.590\% | 15,624 | 13,344 |
| 628 T 03 | Feb-13 | Nov-20 | 234,684.92 | 2.410\% | 5,656 | 4,935 |
| 628 T04 | Feb-13 | May-16 | 81,539.84 | 1.860\% | 1,517 | 1,780 |
| 628 T 05 | Feb-13 | Nov-13 | 0.00 | 1.960\% | 0 | 1,950 |
|  |  |  | 2,450,539.10 |  | 79,140 | 67,245 |
| Total Long Term Debt |  |  | 44,380,384.09 |  | 287,501 | 354,342 |

Annualized cost rate [Total Annualized Cost Col./Total Outstanding Amount] Actual test year cost rate [Total Test Year Interst Cost/Total Outstanding Amount]

| 06/24/2014 |  |  |  |  | 2013 Key Ratio Trend Analysis (KRTA) Cumberland Valley Electric, Inc. (KY057) |  |  |  |  |  |  |  |  | Page 4 |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | US Total |  |  | State Grouping |  |  | Consumer Size |  |  | Major Current Power Supplier |  |  | Plant Growth (2008-2013) |  |  |
| Year | System Value | Median | NBR | Rank | Median | NBR | Rank | Median | NBR | Rank | Median | NBR | Rank | Median | NBR | Rank |
| RATIO 19 --- LONG TERM DEBT AS A \% OF TOTAL ASSETS |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2009 | 45.26 | 45.69 | 808 | 415 | 51.56 | 23 | 17 | 44.60 | 67 | 31 | 53.09 | 16 | 13 | 44.15 | 160 | 77 |
| 2010 | 43.50 | 44.72 | 807 | 430 | 50.32 | 23 | 17 | 44.33 | 69 | 38 | 52.77 | 16 | 13 | 43.76 | 169 | 88 |
| 2011 | 43.44 | 44.30 | 805 | 424 | 49.56 | 23 | 17 | 43.31 | 70 | 34 | 50.79 | 16 | 13 | 45.62 | 210 | 117 |
| 2012 | 41.96 | 44.22 | 807 | 455 | 48.20 | 23 | 17 | 43.77 | 69 | 41 | 49.79 | 16 | 13 | 44.37 | 187 | 111 |
| 2013 | 43.90 | 44.29 | 809 | 414 | 48.80 | 23 | 14 | 40.98 | 67 | 26 | 49.44 | 16 | 11 | 44.73 | 200 | 105 |
| RATIO 20 --. LONG TERM DEBT PER KWH SOLD (MILLS) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2009 | 65.31 | 103.19 | 808 | 603 | 82.16 | 23 | 15 | 95.34 | 67 | 50 | 87.16 | 16 | 12 | 93.02 | 160 | 118 |
| 2010 | 61.69 | 103.16 | 807 | 605 | 77.57 | 23 | 14 | 94.72 | 69 | 52 | 85.54 | 16 | 12 | 92.56 | 169 | 134 |
| 2011 | 70.25 | 104.60 | 805 | 571 | 81.72 | 23 | 14 | 88.24 | 70 | 50 | 87.31 | 16 | 12 | 101.37 | 210 | 153 |
| 2012 | 76.02 | 109.12 | 807 | 566 | 87.27 | 23 | 14 | 94.65 | 69 | 45 | 94.77 | 16 | 12 | 108.74 | 187 | 131 |
| 2013 | 87.96 | 112.60 | 809 | 529 | 88.10 | 23 | 13 | 100.00 | 67 | 40 | 93.58 | 16 | 11 | 118.73 | 200 | 133 |
| RATIO 21 --- LONG TERM DEBT PER CONSUMER (\$) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2009 | 1,385.30 | 2,043.37 | 808 | 622 | 1,732.15 | 23 | 17 | 1,788.10 | 67 | 50 | 1,905.12 | 16 | 13 | 1,903.59 | 160 | 124 |
| 2010 | 1,416.17 | 2,063.99 | 807 | 620 | 1,778,10 | 23 | 17 | 1,874.96 | 69 | 53 | 1,972.56 | 16 | 13 | 2,014.22 | 169 | 135 |
| 1 | 1,504.63 | 2,089.05 | 805 | 605 | 1,867,88 | 23 | 16 | 1,902.65 | 70 | 51 | 1,944.93 | 16 | 12 | 1,965.73 | 210 | 153 |
|  | 1.523.40 | 2,142.33 | 807 | 610 | 1,868.06 | 23 | 17 | 1,892,94 | 69 | 52 | 1,964.78 | 16 | 13 | 2,034.05 | 187 | 142 |
| - 43 | 1.729 .63 | 2,276.62 | 809 | 573 | 1,877.36 | 23 | 15 | 1,896.43 | 67 | 45 | 1,927.44 | 16 | 12 | 2.217 .31 | 200 | 143 |
| RATIO 22 --- NON-GOVERNMENT DEBT AS A \% OF TOTAL LONG TERM DEBT |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2009 | 10.57 | 25.26 | 792 | 626 | 14.26 | 23 | 15 | 28.26 | 65 | 53 | 12.41 | 16 | 9 | 23.00 | 159 | 124 |
| 2010 | 18.53 | 32.80 | 794 | 595 | 18.69 | 23 | 13 | 34.31 | 68 | 52 | 17.38 | 16 | 8 | 31.83 | 169 | 128 |
| 2011 | 15.48 | 32.20 | 795 | 640 | 18.32 | 23 | 15 | 3309 | 69 | 57 | 17.33 | 16 | 10 | 28.09 | 207 | 169 |
| 2012 | 13.44 | 38.85 | 793 | 685 | 15.72 | 23 | 17 | 33.97 | 67 | 58 | 14.88 | 16 | 12 | 37.91 | 183 | 159 |
| 2013 | 10.32 | 39.92 | 800 | 744 | 14.23 | 23 | 20 | 31.91 | 66 | 59 | 13.41 | 16 | 15 | 41.03 | 197 | 184 |
| RATIO 23 - BLENDED INTEREST RATE (\%) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2009 | 2.03 | 507 | 809 | 806 | 453 | 23 | 23 | 5.21 | 67 | 67 | 4.58 | 16 | 16 | 5.08 | 162 | 161 |
| 2010 | 1.62 | 4.96 | 807 | 803 | 4.26 | 23 | 23 | 5.08 | 69 | 69 | 4.22 | 16 | 16 | 4.99 | 169 | 169 |
| 2011 | 1.23 | 4.81 | 805 | 802 | 4.11 | 23 | $23$ | 4.86 | 70 | 70 | 3.91 | 16 | 16 | 4.84 | 211 | 210 |
| $2012$ | 1.13 | 4.61 | 806 | 805 | 3.92 | 23 | 23 | 4.67 | 69 | 69 | 3.58 | 16 | 16 | 4.59 | 187 | 187 |
| $2013$ | 0.88 | 4.47 | 808 | 807 | 3.72 | 23 | 23 | 4.54 | 67 | 67 | 3.38 | 16 | 16 | 4.42 | 200 | 200 |
| RATIO 24 --- ANNUAL CAPITAL CREDITS RETIRED PER TOTAL EQUITY (\%) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2009 | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 2010 | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 2011 | 1.21 | 2.18 | 675 | 518 | 0.84 | 18 | 8 | 2.12 | 56 | 40 | 0.78 | 14 | 6 | 2.34 | 183 | 148 |
| $2012$ | 0.49 | 2.11 | 672 | 601 | 1.09 | 18 | 12 | 2.00 | 56 | 49 | 1.02 | 15 | 9 | 2.24 | 156 | 145 |
| $2013$ | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |

Residential Rates
as of $8 / 2 / 2014$

| Ranked Based on Monthly Bill Amount |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  | Power Provider | Monthly <br> Consumer <br> Charge | Residential Rate per Kwh | $\begin{gathered} \text { Monthly } \\ \text { Bill Based on } \\ 1,000 \mathrm{Kwh} \\ \hline \hline \end{gathered}$ |
| Hickman-Fulton RECC | TVA | \$21.50 | \$0.113760 | \$135.26 |
| Jackson Purchase Energy | Big Rivers | \$14.13 | \$0.114370 | \$128.50 |
| West Kentucky | TVA | \$23.40 | \$0.102730 | \$126.13 |
| Grayson RECC | East Ky | \$15.00 | \$0.109100 | \$124.10 |
| Pennyrile Electric | TVA | \$18.40 | \$0.099400 | \$117.80 |
| Kenergy | Big Rivers | \$15.60 | \$0.101300 | \$116.90 |
| Meade County RECC | Big Rivers | \$17.16 | \$0.097670 | \$114.83 |
| Tri-County | TVA | \$18.00 | \$0.095220 | \$113.22 |
| Jackson Energy Coop. Corp. | East Ky | \$12.44 | \$0.098490 | \$110.93 |
| *Warren RECC | TVA | \$18.80 | \$0.091800 | \$110.60 |
| Clark Energy Cooperative, Inc. | East Ky | \$12.43 | \$0.092425 | \$104.86 |
| Owen Electric Cooperative, Inc. | East Ky | \$17.10 | \$0.087560 | \$104.66 |
| Big Sandy RECC | East Ky | \$15.00 | \$0.089000 | \$104.00 |
| Inter-County RECC | East Ky | \$8.97 | \$0.094210 | \$103.18 |
| Licking Valley RECC | East Ky | \$9.32 | \$0.093550 | \$102.87 |
| Fleming-Mason RECC | East Ky | \$15.00 | \$0.084310 | \$99.31 |
| Blue Grass Energy Cooperative | East Ky | \$9.73 | \$0.089510 | \$99.24 |
| Shelby Energy Cooperative, Inc. | East Ky | \$10.14 | \$0.088610 | \$98.75 |
| Farmers RECC | East Ky | \$9.35 | \$0.088953 | \$98.30 |
| South Kentucky RECC | East Ky | \$12.82 | \$0.085430 | \$98.25 |
| Nolin RECC | East Ky | \$9.04 | \$0.085980 | - \$95.02 |
| AEP (Kentucky Power) |  | \$8.00 | \$0.085900 | - $\$ 93.90$ |
| Taylor County RECC | East Ky | \$9.82 | \$0.082200 | - \$92.02 |
| Louisville Gas \& Electric |  | \$10.75 | \$0.080760 | - \$91.51 |
| **Cumberland Valley Electric, Inc. | East Ky | \$5.74 | \$0.085630 | - \$91.37 |
| Salt River Electric Coop. Corp. | East Ky | \$8.84 | \$0.079520 | - \$88.36 |
| Kentucky Utilities |  | \$10.75 | \$0.077440 | - \$88.19 |
| Duke Energy |  | \$4.50 | \$0.079090 | $0 \quad \$ 83.59$ |

$\left.\begin{array}{|ccc|}\hline \hline \text { Rate Options Available to Residential Consumers } \\ \text { TOD } & \text { ETS } & \begin{array}{c}\text { Inclining } \\ \text { Block }\end{array} \\ \hline \hline & \text { Low Emission } \\ \text { Vehicle }\end{array}\right]$

## CUMBERLAND VALLEY ELECTRIC

DECREASE IN ANNUAL INTEREST EXPENSE

|  |  |  |  |
| :---: | :---: | :---: | :---: |
|  |  |  |  |
|  |  | Base Year |  |
|  | Interest | Minus | Cumulative |
| Year | Expense | Current Year | Decrease |
| 2007-Base | \$ 1,628,935 |  |  |
| 2008 | 1,097,400 | \$ 531,535 | \$ 531,535 |
| 2009 | 715,609 | 913,326 | 1,444,861 |
| 2010 | 567,377 | 1,061,558 | 2,506,419 |
| 2011 | 449,190 | 1,179,745 | 3,686,164 |
| 2012 | 427,212 | 1,201,723 | 4,887,887 |
| 2013 | 354,342 | 1,274,593 | 6,162,480 |

