

FARMERS RURAL ELECTRIC COOPERATIVE

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COMMISSION

March 21, 2007

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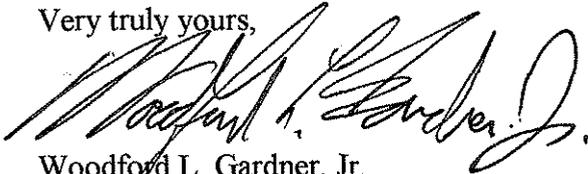
Ms. Elizabeth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40602

Re: PSC Case No. 2006-00478

Dear Ms. O'Donnell:

Please find enclosed for filing with the Public Service Commission in the above-referenced case an original and five (5) copies of the Responses of Farmers Rural Electric Cooperative Corporation, to the Commission Staff's First Data Requests dated March 12, 2007.

Very truly yours,



Woodford L. Gardner, Jr.  
Counsel for Farmers Rural Electric Cooperative Corporation

Enclosures

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>APPLICATION OF FARMERS RURAL ELECTRIC</b>	)	
<b>COOPERATIVE CORPORATION TO</b>	)	
<b>PASS-THROUGH AN INCREASE OF ITS</b>	)	<b>CASE NO.</b>
<b>WHOLESALE POWER SUPPLIER PURSUANT</b>	)	<b>2006-00478</b>
<b>TO KRS 278.455(2)</b>	)	

**RESPONSES TO COMMISSION STAFF'S FIRST DATA REQUEST  
TO FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION  
DATED MARCH 12, 2007**

**FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION**

**PSC CASE NO. 2006-00478**

**COMMISSION STAFF'S FIRST DATA REQUEST DATED 3/12/07**

Farmers Rural Electric Cooperative Corporation ("Farmers") hereby submits responses to the Commission Staff's First Data Request dated March 12, 2007. Each response with its associated supportive reference materials is individually tabbed.



**FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION**

**PSC CASE NO. 2006-00478**

**FIRST DATA REQUEST RESPONSE**

**COMMISSION STAFF'S FIRST DATA REQUEST DATED 3/12/07**

**REQUEST 1**

**RESPONSIBLE PERSON: William A. Bosta**

**COMPANY: Farmers Rural Electric Cooperative Corporation**

**Request 1.** Refer to the Application, Exhibits II and III.

**Request 1a.** Provide all workpapers, calculations, assumptions, and other documentation used to determine the proposed rates and the billing analysis.

**Response 1a.** Attached is information from EKPC's Exhibit I, Pages 3-5, which shows the present and proposed rates and revenues by wholesale customer class for service to Farmers.

As indicated in Mr. Bosta's testimony, the demand charges for retail industrial rates mirror EKPC's proposed rates for Schedules B and C, as applicable.

The increase applicable to all other classes was based on taking the total increase to the member system, subtracting the retail industrial class increase and then dividing that amount by the kWh for all other classes. This resulted in a per unit (cents/kWh) energy cost increase that was applied to all other classes. The only exceptions are Electric Thermal Storage (ETS) Rate Schedules RM and CM, which were designed based on a charge of 60 percent of the energy rate of the related rate class.

See the response to Request 1b for the calculations to determine the proposed rates.

**Request 1b.** Provide in electronic format the Excel spreadsheets used to determine the proposed rates and billing analysis, with all formulas intact.

**Response 1b.** Based on discussion with the Commission Staff on March 19, 2007, attached are two (2) copies of the requested information on CD-ROM.

**Billings Units - Base Rate Revenue**

Rate E	Demand Energy	Rate	Present Revenue	Proposed Revenue	Revenue Adjustment
E-1	1.90	0.00378	39,227,193	41,870,429	2,643,237
E-2	6.52		18,549,828	20,177,960	1,628,132
E-3	0.038464	0.0314	17,897,075	18,437,170	540,095
E-4	0.030898	0.020898	38,623,314	42,012,158	3,388,844
E-5			12,229,216	13,308,262	1,079,046
E-6			19,020,790	20,735,730	1,715,000
E-7			40,704,360	44,354,295	3,649,934
E-8			18,892,822	20,561,234	1,668,412
E-9			24,426,401	26,597,009	2,170,608
E-10			16,757,957	18,791,828	2,033,871
E-11			45,510,426	49,482,591	3,972,165
E-12			11,694,634	12,731,760	1,037,116
E-13			22,133,177	24,105,023	1,971,896
E-14			11,436,176	12,446,242	1,010,067
E-15			314,468	344,503	30,035
E-16			10,655,426	11,813,118	1,157,692
E-17			42,800,799	46,320,652	3,519,853
E-18			332,164,032	428,827,439	95,663,347

Rate E - Interl	Demand Energy	Rate	Present Revenue	Proposed Revenue	Revenue Adjustment
E-19	1.90	0.00378	111,560,148	170,574,064	59,013,916
E-20	6.52		5,191,092	5,621,694	430,602
E-21	0.038464	0.0314	5,171,757	5,621,694	450,000
E-22	0.030898	0.020898	10,885,115	11,711,486	826,371
E-23			3,362,252	3,621,694	259,442
E-24			4,972,594	5,317,910	345,316
E-25			14,268,278	15,711,486	1,443,208
E-26			6,229,469	6,719,610	490,141
E-27			6,613,088	7,193,845	580,757
E-28			5,078,047	5,407,738	329,691
E-29			13,065,059	14,101,529	1,036,470
E-30			3,203,697	3,407,984	204,287
E-31			5,983,714	6,417,070	433,356
E-32			3,171,113	3,419,211	248,098
E-33			71,190	77,127	5,937
E-34			3,008,970	3,242,588	233,618
E-35			12,080,836	12,939,669	858,833
E-36			111,560,148	170,574,064	59,013,916

Rate B	Demand Energy	Rate	Present Revenue	Proposed Revenue	Revenue Adjustment
B-1	7.29	0.027325	344,900	358,625	13,725
B-2	4.14		1,103,543	1,198,659	95,116
B-3	0.027325		8,044,828	9,050,088	1,005,260
B-4			468,018	251,340	-216,678
B-5			2,514,321	132,455	-2,381,866
B-6			8,044,828	9,050,088	1,005,260
B-7			1,103,543	1,198,659	95,116
B-8			26,020,634	28,894,286	2,873,652

Rate B - Interl	Demand Energy	Rate	Present Revenue	Proposed Revenue	Revenue Adjustment
B-9	7.29	0.027325	344,900	358,625	13,725
B-10	4.14		1,103,543	1,198,659	95,116
B-11	0.027325		8,044,828	9,050,088	1,005,260
B-12			468,018	251,340	-216,678
B-13			2,514,321	132,455	-2,381,866
B-14			8,044,828	9,050,088	1,005,260
B-15			1,103,543	1,198,659	95,116
B-16			26,020,634	28,894,286	2,873,652

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E-22	0.030898	0.020898	10,885,115	11,711,486	826,371
E-23			3,362,252	3,621,694	259,442
E-24			4,972,594	5,317,910	345,316
E-25			14,268,278	15,711,486	1,443,208
E-26			6,229,469	6,719,610	490,141
E-27			6,613,088	7,193,845	580,757
E-28			5,078,047	5,407,738	329,691
E-29			13,065,059	14,101,529	1,036,470
E-30			3,203,697	3,407,984	204,287
E-31			5,983,714	6,417,070	433,356
E-32			3,171,113	3,419,211	248,098
E-33			71,190	77,127	5,937
E-34			3,008,970	3,242,588	233,618
E-35			12,080,836	12,939,669	858,833
E-36			111,560,148	170,574,064	59,013,916

Rate B - Interl	Demand Energy	Rate	Present Revenue	Proposed Revenue	Revenue Adjustment
B-9	7.29	0.027325	344,900	358,625	13,725
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B-14			8,044,828	9,050,088	1,005,260
B-15			1,103,543	1,198,659	95,116
B-16			26,020,634	28,894,286	2,873,652



Demand 0.957689  
Efficiency 0.957689  
Heat Rate 9816.9  
Mbu Demand 38014 \$ /Mbu  
Mbu Energy 4994.11 \$ /Mbu  
Mbu Demand 277,080,529  
Mbu Energy 232,661.7

converted

BILL-KAY 508,649  
BILL-KAY 277,080,529

Dem Revs. 2,543,590

Energy Revenue 6,788,794

Total Revenue 9,332,384

8,654,161 778,224

Load Center - Normalized

Meter #	125	944	2373	2855	4505	Revenue
COOP	12	48	228	24	24	886,692
21	41,970,429	3,348,394	232,807	805,316	0	439,596
23	20,177,360	232,807	1,242,292	800,711	1,242,292	447,338
27	19,437,170	1,181,002	1,784,626	0	0	991,688
3	42,012,158	8,629,299	0	2,517,318	0	413,076
30	13,398,669	0	0	0	0	426,336
34	20,735,720	6,953,856	0	117,223	0	855,980
37	44,354,295	1,981,556	0	0	0	613,860
49	20,551,234	2,072,016	0	0	0	889,112
51	25,628,149	0	0	0	0	474,120
52	20,429,813	0	0	0	0	689,112
54	49,462,581	0	0	0	0	1,197,228
56	12,731,750	0	0	0	0	325,248
57	24,105,073	0	0	0	0	517,548
58	12,466,242	0	0	0	0	268,296
59	344,503	0	0	0	0	0
61	11,813,118	0	0	0	0	410,676
64	45,924,652	8,989,679	0	0	0	1,152,952
						10,218,764
						428,000
						7,500
						510,669,030
						43,364,220

Grand Total Revenue by Member System

COOP	E	B	C	Inland Container	Inland Steam	Salish	IGP	ASC	Load Center	Metering	Metering Only	Proposed Total	Present	Rate Adj
21	41,970,429	3,348,394	0	0	0	0	0	0	886,692	39,000	0	46,242,515	42,526,334	3,716,181
23	20,177,360	232,807	805,316	0	0	0	0	0	439,596	19,500	0	25,735,642	24,028,185	1,707,457
27	19,437,170	1,242,292	800,711	1,242,292	0	0	4,081,065	0	447,338	16,000	0	21,945,509	20,221,957	1,723,542
3	42,012,158	1,181,002	1,784,626	0	0	0	0	0	991,688	40,500	0	46,020,253	42,364,688	3,655,565
30	13,398,669	8,629,299	0	0	0	0	0	0	413,076	16,500	1,500	20,459,344	18,871,430	1,587,914
34	20,735,720	6,953,856	0	0	0	0	0	0	426,336	16,000	0	23,697,444	21,777,590	1,919,854
37	44,354,295	1,981,556	0	0	0	33,842,557	0	0	955,980	34,500	0	88,141,167	78,952,634	7,188,493
49	20,551,234	2,072,016	0	0	0	0	0	0	613,860	30,000	3,000	21,325,317	19,645,505	1,679,812
51	25,628,149	0	0	0	0	0	0	5,305,563	889,112	27,000	0	34,611,422	31,936,390	2,675,012
52	20,429,813	0	0	0	0	0	0	0	474,120	16,000	1,500	51,043,371	47,484,260	3,559,111
54	49,462,581	0	0	0	0	0	5,602,652	0	1,197,228	48,500	1,500	56,297,242	51,840,182	4,457,060
56	12,731,750	0	0	0	0	0	0	0	527,548	15,000	0	13,071,868	12,034,882	1,037,116
57	24,105,073	0	0	0	0	0	0	0	517,548	22,500	0	24,645,121	22,673,225	1,971,698
58	12,466,242	0	0	0	0	0	0	0	268,296	12,000	0	12,736,438	11,716,472	1,010,067
59	344,503	0	0	0	0	0	0	0	0	0	0	344,503	314,498	30,005
61	11,813,118	0	0	0	0	0	0	0	410,676	19,500	0	12,902,629	11,890,098	1,012,741
64	45,924,652	8,989,679	0	0	0	0	0	0	1,152,952	46,500	7,500	56,893,033	52,390,640	4,492,394
									10,218,764	428,000	7,500	554,033,251	510,668,030	43,364,220
									428,000	428,000	0	554,033,251	554,033,251	0
									7,500	7,500	0	554,033,251	554,033,251	0
									510,669,030	510,669,030	0	554,033,251	554,033,251	0
									43,364,220	43,364,220	0	554,033,251	554,033,251	0



Farmers Rural Electric Cooperative  
Billing Analysis  
for the 12 months ended September 30, 2006

Schedule R  
Residential Service

	E-Based kWh	Existing			Proposed			\$ Increase	% Increase	Dmd \$	Energy \$
		Billing Determinants	Current Rate	Annualized Revenues	Billing Determinants	Rate	Annualized Revenues				
Total Annual Invoices - Incl Min Bills		257,884			257,884						
Customer Charge / Energy Cha	284,292	31,855	\$6.96	\$221,711	31,855	\$7.17	\$228,319	6,608	2.98%		6,608
Energy charge per kWh		11,301,450	\$0.13929	1,574,179	11,301,450	\$0.14335	1,620,051	45,872	2.91%		45,872
First 50 kWh	11,301,450	11,301,450	\$0.13929	1,574,179	11,301,450	\$0.14335	1,620,051	45,872	2.91%		45,872
all over 50 kWh	284,796,270	284,796,270	\$0.06120	17,429,532	284,796,270	\$0.06526	18,585,514	1,155,982	6.63%		1,155,982
Total from base rates				19,225,421			20,433,084	1,208,463	6.29%		
Fuel adjustment				2,455,296			2,455,296	-	0.00%		
Environmental surcharge				1,607,564			1,607,564	-	0.00%		
Total revenues				\$23,288,281			\$24,498,744	\$1,208,463	5.19%		
Average Bill				\$90.31			\$94.99	\$4.69	5.19%		

Schedule RM  
Residential Off-Peak Marketing

	E-Based kWh	Existing			Proposed			\$ Increase	% Increase	Dmd \$	Energy \$
		Billing Determinants	Current Rate	Annualized Revenues	Billing Determinants	Rate	Annualized Revenues				
Customer Bills		2,013		\$0	2,013	\$0.00	\$0				
Energy charge per kWh	2,312,637	2,312,637	\$0.03672	84,920	2,312,637	\$0.03916	90,552	5,632	6.63%		5,632
Total from base rates				84,920			90,552	5,632	6.63%		
Fuel adjustment				20,756			20,756	0	0.00%		
Environmental surcharge				6,901			6,901	0	0.00%		
Total revenues				\$112,577			\$118,209	5,632	5.00%		
Average Bill				\$55.93			\$58.72	\$2.80	5.00%		

Schedule C Section 1  
Commercial & Industrial Less than 50 kW

	E-Based kWh	Existing			Proposed			\$ Increase	% Increase	Dmd \$	Energy \$
		Billing Determinants	Current Rate	Annualized Revenues	Billing Determinants	Rate	Annualized Revenues				
Total Customer Bills - Incl Min Bill		18,212			18,212						750
Customer Charge / Energy Cha	37,571	3,653	\$6.96	\$25,425	3,653	\$7.17	\$26,183	758			750
Demand Charge					0	\$0.00	\$0.00				
Energy Charge		727,950	\$0.13929	101,396	727,950	\$0.14335	104,351	2,955	2.91%		2,955
First 50 kWh KW	727,950	727,950	\$0.13929	101,396	727,950	\$0.14335	104,351	2,955	2.91%		2,955
All over 50 kWh	26,597,084	26,597,084	\$0.06437	1,712,654	26,597,084	\$0.06843	1,820,011	107,957	6.31%		107,957
Total Baseload Charges				\$1,838,875			\$1,950,545	111,670	6.07%		
Fuel adjustment				222,890			222,890	-	0.00%		
Environmental surcharge				157,084			157,084	-	0.00%		
Total revenues				\$2,218,849			\$2,330,519	111,670	5.03%		
Average Bill				\$ 121.83			\$ 127.97	6.13	5.03%		

Farmers Rural Electric Cooperative  
Billing Analysis  
for the 12 months ended September 30, 2006

Schedule CM  
Small Commercial Off-Peak Marketing  
Rate 8

	E-Based kWh	Existing			Proposed			\$ Increase	% Increase	Dmd \$	Energy \$
		Billing Determinants	Current		Billing Determinants	Annualized					
			Rate	Revenues		Rate	Revenues				
Number of Bills		5		\$0		5		\$0			
Energy Charge	4,352	4,352	\$0.03862	168		4,352	\$0.04106	179	11	6.31%	11
Total BaseLoad Charges				\$168				\$179	11	6.31%	
Fuel adjustment				35				35	-	0.00%	
Environmental surcharge				15				15	-	0.00%	
Total revenues				\$218				\$229	11	4.86%	
Average Bill				\$ 43.63				\$ 45.75	2.12	4.86%	

Schedule C Section 2  
Commercial & Industrial Service 50 kW and Over  
Rate 5

	E-Based kWh	Existing			Proposed			\$ Increase	% Increase	Dmd \$	Energy \$
		Billing Determinants	Current		Billing Determinants	Annualized					
			Rate	Revenues		Rate	Revenues				
Customer Charge		921				921					
Demand Charge		102,088	\$4.93	\$503,294		102,088	\$4.93	\$503,294	-	0.00%	
Energy charge per kWh	29,510,594	29,510,594	\$0.04902	1,446,809		29,510,594	\$0.05309	1,566,602	119,993	8.29%	119,993
Total from base rates				1,949,903				2,069,896	119,993	6.15%	
Fuel adjustment				235,199				235,199	-	0.00%	
Environmental surcharge				163,013				163,013	-	0.00%	
Total revenues				\$2,348,115				\$2,468,108	119,993	5.11%	
Average Bill				\$ 2,849.53				\$ 2,879.81	\$ 130.29	5.11%	

Schedule C Section 2a  
Commercial & Industrial Service 50 kW or Above  
Rate 9

	E-Based kWh	Existing			Proposed			\$ Increase	% Increase	Dmd \$	Energy \$
		Billing Determinants	Current		Billing Determinants	Annualized					
			Rate	Revenues		Rate	Revenues				
Customer Charge		63		\$0		63					
Demand Charge		141,203	\$4.93	696,131		141,203	\$4.93	696,131	-	0.00%	
Energy Charge	57,828,600	57,828,600	\$0.04902	2,834,758		57,828,600	\$0.05309	3,069,895	235,137	8.29%	235,137
10 % Discount (Primary Service Rider)				(353,069)				(376,288)	(23,199)		(23,199)
Total BaseLoad Charges				\$3,177,800				3,389,737	211,938	6.67%	
Fuel adjustment				473,750				473,750	0	0.00%	
Environmental surcharge				283,552				283,552	0	0.00%	
Total Revenues				\$3,915,102				4,127,039	211,938	5.41%	
Average Bill				\$ 62,144.47				\$ 65,508.56	\$ 3,364.09	5.41%	

Farmers Rural Electric Cooperative  
Billing Analysis  
for the 12 months ended September 30, 2006

Schedule D  
Large Commercial / Industrial Service Optional Time-of-Day Rate

	Existing			Proposed			\$ Increase	% Increase	Dmd \$	Energy \$	
	E-Based kWh	Billing Determinants	Current Rate	Annualized Revenues	Billing Determinants	Rate					Annualized Revenues
Customer Charge		84		\$0	84	\$0					
Demand Charge		16,421	\$4.93	80,956	16,421	\$4.93	60,956	0.00%			
Energy Charge Per kWh	5,826,760	5,826,760	\$0.04902	285,628	5,826,760	\$0.05309	309,343	23,715	8.30%	23,715	
Total Baseload Charges				<u>\$366,583</u>			<u>\$360,298</u>	<u>\$23,715</u>	<u>6.47%</u>		
Fuel adjustment				45,770			45,770	-	0.00%		
Environmental surcharge				<u>30,309</u>			<u>30,309</u>	-	0.00%		
Total Revenues				<u>\$442,662</u>			<u>466,377</u>	<u>23,715</u>	<u>5.36%</u>		
Average Bill			\$	5,270			5,552	282.32	5.36%		

Schedule E  
Large Industrial Rate  
Rate 10

	Existing			Proposed			\$ Increase	% Increase	Dmd \$	Energy \$	
	E-Based kWh	Billing Determinants	Current Rate	Annualized Revenues	Billing Determinants	Rate					Annualized Revenues
Customer Charge		36	\$535.00	\$19,260	36	\$535	19,260	-	0.00%		
Demand Charge		109,810	\$5.39	591,876	109,810	\$7.29	800,515	208,639	35.25%	208,639	
Energy Charge Per kWh	63,417,600	63,417,600	\$0.03517	2,230,397	63,417,600	\$0.03517	2,230,397	-	0.00%		
Total Baseload Charges				<u>\$2,841,533</u>			<u>\$3,050,172</u>	<u>\$208,639</u>	<u>7.34%</u>		
Fuel adjustment				509,234			509,234	-	0.00%		
Environmental surcharge				<u>244,973</u>			<u>244,973</u>	-	0.00%		
Total Revenues				<u>\$3,595,740</u>			<u>3,804,379</u>	<u>208,639</u>	<u>5.80%</u>		
Average Bill			\$	99,881.66			105,677	5,795.53	5.80%		

Schedule SL  
Street Lighting Service  
Rate 6

	Existing			Proposed			\$ Increase	% Increase	Dmd \$	Energy \$	
	E-Based kWh	Billing Determinants	Current Rate	Annualized Revenues	Billing Determinants	Rate					Annualized Revenues
Customer Charge		108			108						
Energy Charge Per kWh	435,669	435,669	\$0.03859	16,812	435,669	\$0.04266	18,584	1,771	10.54%	1,771	
Total Baseload Charges				<u>\$16,812</u>			<u>\$18,584</u>	<u>\$1,771</u>	<u>10.54%</u>		
Fuel adjustment				3,506			3,506	-	0.00%		
Environmental surcharge				<u>3,392</u>			<u>3,392</u>	-	0.00%		
Total Revenues				<u>\$23,710</u>			<u>25,482</u>	<u>1,771</u>	<u>7.47%</u>		
Average Bill			\$	219.54			236	16.40	7.47%		

Lighting - Farmers	6,891,950	6,891,950	\$	623,108.16			651,131	28,023.33		\$ 1,919,854 Total Revenue Req
Total Non-Demand kWh	426,555,179									
	489,972,779								185,440	1,734,414
	489,972,779									0.0040661 per kWh
	0									1,919,854
										0

Farmers Rural Electric Cooperative Corporation  
Billing Analysis  
for the 12 months ended September 30, 2006

Schedule OL - Outdoor Lighting Service

	Existing				Proposed				Per kWh	% Increase
	Billing Determinants	kWh	Current Rate	Annualized Revenues	Billing Determinants	Rate	Annualized Revenues			
70	86,872	6,012,253	\$ 6.35	\$51,637	86,872	6.63	576,084	0.09582	24,446.39	4.43%
23	640	14,720	\$ 6.35	4,064	640	6.44	4,124	0.28015	59.85	1.47%
98	1,024	100,352	\$ 7.12	7,291	1,024	7.52	7,699	0.07672	408.04	5.60%
156	2,096	326,976	\$ 10.76	22,553	2,096	11.39	23,882	0.07304	1,329.52	5.90%
378	14	5,292	\$ 18.14	254	14	19.68	275	0.05206	21.52	8.47%
42	298	12,516	\$ 6.85	2,041	298	7.02	2,092	0.16716	50.89	2.49%
63	252	15,876	\$ 7.85	1,978	252	8.11	2,043	0.12867	64.55	3.26%
105	343	36,015	\$ 10.52	3,608	343	10.95	3,755	0.10426	146.44	4.06%
165	2,230	367,950	\$ 13.31	29,681	2,230	13.98	31,177	0.08473	1,496.12	5.04%
385	-	0	\$ 28.60	29,681	0	30.17	-	0.07835	-	-
	93,769	6,891,950		623,108	93,769		651,131		\$28,023	4.50%

Total Base Rates

Average Bill  
\* Includes Adjustment

OL	Mercury Vapor 175 Watt	\$ 6.35	6.63	0.28	4.43%
OL	Mercury Vapor 175 Watt (shared)	\$ 6.35	6.44	0.09	1.47%
OL	Mercury Vapor 250 Watt	\$ 7.12	7.52	0.40	5.60%
OL	Mercury Vapor 400 Watt	\$ 10.76	11.39	0.63	5.90%
OL	Mercury Vapor 1000 Watt	\$ 18.14	19.68	1.54	8.47%
OL	Sodium Vapor 100 Watt	\$ 6.85	7.02	0.17	2.49%
OL	Sodium Vapor 150 Watt	\$ 7.85	8.11	0.26	3.26%
OL	Sodium Vapor 250 Watt	\$ 10.52	10.95	0.43	4.06%
OL	Sodium Vapor 400 Watt	\$ 13.31	13.98	0.67	5.04%
OL	Sodium Vapor 1000 Watt	\$ 28.60	30.17	1.57	5.47%

1

2

3

**FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION**

**PSC CASE NO. 2006-00478**

**FIRST DATA REQUEST RESPONSE**

**COMMISSION STAFF'S FIRST DATA REQUEST DATED 3/12/07**

**REQUEST 2**

**RESPONSIBLE PERSON: William A. Bosta**

**COMPANY: Farmers Rural Electric Cooperative Corporation**

**Request 2.** KRS 278.455(2) provides that a distribution cooperative may change its rates to reflect a change in the rate of its wholesale supplier if the effects of an increase or decrease are allocated to each class and within each tariff on a proportional basis that will result in no change in the rate design currently in effect. 807 KAR 5:007, Section 2(2), provides that the distribution cooperative shall file an analysis demonstrating that the rate change does not change the rate design currently in effect and the revenue change has been allocated to each class and within each tariff on a proportional basis. In the cover letter to its Application, Farmers states:

In each instance, the retail rates for a particular class have been developed in a manner that is consistent with the method proposed by EKPC. The proposed rate design structure at retail does not change the rate design currently in effect and is consistent with the rate design methodology used at wholesale.

**Request 2a.** For each retail Rate Schedule listed in Exhibit II of the Application, identify the corresponding wholesale Rate Schedule of East Kentucky Power Cooperative, Inc.

**Response 2a.** Please see the attached information.

**Request 2b.** Would Farmers agree that KRS 278.455(2) and 807 KAR5:007, Section 2(2), require that increases or decreases in rates from the wholesale supplier must be allocated to each retail class and within each retail tariff on a proportional basis? Explain the response.

Yes. EKPC and each Member System understands these requirements and have developed proposed rates that meet the intent of KRS 278.455(2) and 807 KAR5:007. As explained in Mr. Bosta's testimony, EKPC began the rate design process at wholesale by allocating the proposed rate increase to each rate class on a proportional basis. The proportional increase to each rate class was then applied to the most appropriate rate mechanism for each rate class.

The proposed increase at retail is strictly a pass-through of EKPC's increased wholesale costs and each Member System must recover the dollar increase from new wholesale rates. As a result, EKPC and each Member System recognized that it was important to implement retail rates that mirror the change at wholesale, while meeting the proportionality and rate design requirements.

EKPC and its Member Systems understand that a "pure" proportional increase at retail, as discussed in Item 3 herein, would result in increases at retail to customer, demand and energy charges. However, EKPC and its Member Systems came to the conclusion that, for example, an increase in the customer charge at retail made no sense because the wholesale increase had no relationship to customer cost. EKPC has not proposed an increase in its substation charges or metering point charges in this proceeding. Consequently, EKPC and its Member Systems could not justify increasing the retail customer charge when the wholesale increase has no relationship to that cost.

Therefore, EKPC believes that its proposed wholesale increase using a proportional basis, coupled with the use of the wholesale rate design methodology at retail, is a reasonable approach to meeting the intent of the requirements.

**Request 2c.** Would Farmer's agree that KRS 278.455(2) and 807 KAR 5:007, Section 2(2), require that the retail rate change does not change the retail rate design currently in effect? Explain the response.

**Response 2c.** Yes. EKPC and its Member Systems understand the requirements set forth in KRS 278.455(2) and 807 KAR 5:007 and believe that the proposed rates do not alter the existing rate design structure at retail.

As indicated in the response to Item 2b, the rate design used for the pass-through increase at retail was intended to meet these requirements, while also maintaining the existing wholesale/retail rate design relationship and recognizing cost causation principles.

Industrial customers at retail, for example, will pay the same demand charge as the Member System pays to EKPC. This maintains the rate design relationship from wholesale to retail that has existed for a number of years. Likewise, the proposed increase in the "E" wholesale rate, which is only applied to the energy charge, is being passed through only to the energy charge at retail. This process allows the rate design relationship from wholesale to retail to remain in place.

Fundamentally, for every retail rate class, there has been no change in the rate design structure. The demand, energy, and customer components for industrial rates remains intact and the residential and commercial rate design structure remains as is through a continuation of the customer and energy charge structure. This adherence to the rate

design structure, coupled with a retention of the wholesale to retail rate design relationship, is a reasonable approach and meets the legal requirements.

**Request 2a  
Attachment  
Page 1 of 1**

The present and proposed rates structures of Farmers Rural Electric Cooperative Corporation are listed below:

<u>Rate Class</u>	<u>EKPC Sch</u>	<u>Present</u>	<u>Proposed</u>
Schedule R – Residential Service	E-2		
First 50 kWh		\$0.13929	\$0.14335
All Remaining kWh		\$0.06120	\$0.06526
Schedule C – Commercial & Industrial Service	E-2		
For Consumers With Less Than 50 kW:			
Demand Charge per kW		N/A	N/A
First 50 kWh		\$0.13929	\$0.14335
All Remaining kWh		\$0.06437	\$0.06843
For Consumers With 50 kW or More			
Demand Charge per kW		\$4.93	\$4.93
Energy Charge per kWh		\$0.04902	\$0.05309
Schedule OL – Outdoor Lighting Service	E-2		
Mercury Vapor 175 Watts		\$6.35	\$6.63
Mercury Vapor 250 Watts		\$7.12	\$7.52
Mercury Vapor 400 Watts		\$10.76	\$11.39
Mercury Vapor 1000 Watts		\$18.14	\$19.68
Sodium Vapor 100 Watts		\$6.85	\$7.02
Sodium Vapor 150 Watts		\$7.85	\$8.11
Sodium Vapor 250 Watts		\$10.52	\$10.95
Sodium Vapor 400 Watts		\$13.31	\$13.98
Sodium Vapor 1000 Watts		\$28.60	\$30.17
Schedule SL – Street Lighting Service	E-2		
Energy Charge per Rated kWh		\$0.03859	\$0.04266
Schedule D – Large Commercial/ Industrial Optional Time-of-Day Rate	E-2		
Demand / kW		\$4.93	\$4.93
Energy Charge / kWh		\$0.04902	\$0.05309
Schedule E – Large Industrial Rate	C		
Consumer Charge / Month		\$535.00	\$535.00
Demand Charge / kW		\$5.39	\$7.29
Energy Charge / kWh		\$0.03517	\$0.03517
Schedule RM – Residential Off-Peak Marketing	E-2		
Energy Charge / kWh		\$0.03672	\$0.03916
Schedule CM – Small Commercial Off-Peak Marketing	E-2		
Energy Charge / kWh		\$0.03862	\$0.04106



**FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION**

**PSC CASE NO. 2006-00478**

**FIRST DATA REQUEST RESPONSE**

**COMMISSION STAFF'S FIRST DATA REQUEST DATED 3/12/07**

**REQUEST 3**

**RESPONSIBLE PERSON: William A. Bosta**

**COMPANY: Farmers Rural Electric Cooperative Corporation**

**Request 3.** Refer to Exhibit III of the Application.

**Request 3a.** Prepare the following comparative analyses of Farmers's present and proposed revenues:

(1) Calculate the percentage that each rate schedule or class represents of the total revenues for both the present revenues and proposed revenues. Percentages should be expressed to 2 decimal places.

(2) Calculate the percentage that each component of the base rates within each rate schedule or class represents of the total base rate revenues for both the present revenues and proposed revenues. Do not include fuel adjustment revenues, environmental surcharge revenues, or green power revenues. Percentages should be expressed to 2 decimal places.

**Response 3a.** (1) Please see the attached information.

(2) Please see the attached information.

**Request 3b.** Based upon the results of the analyses prepared in part (a) above, explain in detail how Farmers's proposed pass-through rates are in compliance with the retail rate requirements of KRS 278.455(2) and 807 KAR 5:007, Section 2(2).

Maintaining the existing revenue proportion as shown in part (a) above assumes that the proportionality requirement would follow strict adherence to the existing proportion of revenues at retail, by rate mechanism component (i.e. customer, energy and demand). EKPC and the Member Systems believe that the proportionality requirement is not so narrow and that the pass-through at retail has followed the proposed wholesale rate design process in a proportional manner. At retail, for example, there is no increase in the customer charge because EKPC did not increase the metering point charge or substation charge at wholesale. Moreover, the "B" and "C" type retail industrial classes will have the same demand rate as the proposed demand rate for industrial customers at wholesale. It follows the matching concept upon which these rates were originally created.

See also the response to Item 2(b) and 2(c) herein. KRS 278.455(2) explicitly recognizes "proportional" allocation without recognizing a specific method, whether KWh, revenue, or other means of proportionality. EKPC has chosen the proportional method of applying wholesale to retail, with the intended matching concept of costs vs. revenue. The retail rates reflect this top-down approach to proportionality. Please see the attached analysis which illustrates this approach.

Farmers Rural Electric Cooperative Corporation  
 Billing Analysis  
 for the 12 months ended September 30, 2006

	Existing Total \$	% to Total	Proposed Total \$	% to Total	\$ Increase	% Increase
Schedule R - Residential Service	23,288,281	63.68%	24,496,744	63.65%	1,208,463	5.19%
Schedule RM - Residential Off-Peak Marketing	112,577	0.31%	118,209	0.31%	5,632	5.00%
Schedule C Section 1 - Commercial & Industrial Service Less than 50 kW	2,218,849	6.07%	2,330,519	6.06%	111,670	5.03%
Schedule C Section 2 - Commercial & Industrial Off-Peak Marketing	218	0.00%	229	0.00%	11	4.86%
Schedule C Section 2a - Commercial & Industrial Service 50 kW or Above	2,348,115	6.42%	2,468,108	6.41%	119,993	5.11%
Schedule D - Large Commercial/Industrial Service Optional Time-of-Day Rate	3,915,102	10.71%	4,127,039	10.72%	211,938	5.41%
Schedule E - Large Industrial Rate	442,662	1.21%	466,377	1.21%	23,715	5.36%
Schedule SL - Street Lighting Service	3,595,740	9.83%	3,804,379	9.88%	208,639	5.80%
Schedule OL - Outdoor Lighting Service	23,710	0.06%	25,482	0.07%	1,771	7.47%
	623,108	1.70%	651,131	1.69%	28,023	4.50%
	36,568,364	100.00%	38,488,218	100.00%	1,919,854	5.25%

Farmers Rural Electric Cooperative  
Billing Analysis  
for the 12 months ended September 30, 2006

Schedule R  
Residential Service

	Existing				Proposed				\$ Increase	% Increase
	Billing Determinants	Current Rate	Annualized Revenues	% Total Rate Class	Billing Determinants	Proposed Rate	Annualized Revenues	% Total Rate Class		
Total Annual Invoices - Incl Min I	257,884				257,884					
Customer Charge / Energy Chai	31,855	\$6.96	\$221,711	1.15%	31,855	\$7.17	\$228,319	1.12%	6,608	2.98%
Energy charge per kWh										
First 50 kWh	11,301,450	\$0.13929	1,574,179	8.19%	11,301,450	\$0.14335	1,620,051	7.93%	45,872	2.91%
all over 50 kWh	284,796,270	\$0.06120	17,429,532	90.66%	284,796,270	\$0.06526	18,585,514	90.95%	1,155,982	6.63%
Total from base rates			<u>19,225,421</u>	100.00%			<u>20,433,884</u>	100.00%	<u>1,208,463</u>	<u>6.29%</u>
Fuel adjustment			2,455,296				2,455,296		-	0.00%
Environmental surcharge			<u>1,607,564</u>				<u>1,607,564</u>		-	0.00%
Total revenues			<u>\$23,288,281</u>				<u>\$24,496,744</u>		<u>\$1,208,463</u>	<u>5.19%</u>
Average Bill			\$90.31				\$94.99		\$4.69	5.19%

Schedule RM  
Residential Off-Peak Marketing

	Existing				Proposed				\$ Increase	% Increase
	Billing Determinants	Current Rate	Annualized Revenues	% Total Rate Class	Billing Determinants	Proposed Rate	Annualized Revenues	% Total Rate Class		
Customer Bills	2,013		\$0	0.00%	2,013	\$0.00	\$0	0.00%		
Energy charge per kWh	2,312,637	\$0.03672	84,920	100.00%	2,312,637	\$0.03916	90,552	100.00%	5,632	6.63%
Total from base rates			<u>84,920</u>	100.00%			<u>90,552</u>	100.00%	<u>5,632</u>	<u>6.63%</u>
Fuel adjustment			20,756				20,756		0	0.00%
Environmental surcharge			<u>6,901</u>				<u>6,901</u>		0	0.00%
Total revenues			<u>\$112,577</u>				<u>\$118,209</u>		<u>5,632</u>	<u>5.00%</u>
Average Bill			\$55.93				\$58.72		\$2.80	5.00%

Schedule C Section 1  
Commercial & Industrial Less than 50 kW

	Existing				Proposed				\$ Increase	% Increase
	Billing Determinants	Current Rate	Annualized Revenues	% Total Rate Class	Billing Determinants	Proposed Rate	Annualized Revenues	% Total Rate Class		
Total Customer Bills - Incl Min Bi	18,212				18,212					
Customer Charge / Energy Chai	3,653	\$6.96	\$25,425	1.38%	3,653	\$7.17	\$26,183	1.34%	758	
Demand Charge			-		0	\$0.00	\$0.00		-	
Energy Charge										
First 50 kWh kW	727,950	\$0.13929	101,396	5.51%	727,950	\$0.14335	104,351	5.35%	2,955	2.91%
All over 50 kWh	26,597,084	\$0.06437	1,712,054	93.10%	26,597,084	\$0.06843	1,820,011	93.31%	107,957	6.31%
Total Baseload Charges			<u>\$1,838,975</u>	100.00%			<u>\$1,950,545</u>	100.00%	<u>111,670</u>	<u>6.07%</u>
Fuel adjustment			222,890				222,890		-	0.00%
Environmental surcharge			<u>157,084</u>				<u>157,084</u>		-	0.00%
Total revenues			<u>\$2,218,849</u>				<u>\$2,330,519</u>		<u>111,670</u>	<u>5.03%</u>
Average Bill			\$ 121.83				\$ 127.97		6.13	5.03%

Farmers Rural Electric Cooperative  
Billing Analysis  
for the 12 months ended September 30, 2006

Schedule CM  
Small Commercial Off-Peak Marketing  
Rate 8

	Existing				Proposed				\$ Increase	% Increase
	Billing Determinants	Current Rate	Annualized Revenues	% Total Rate Class	Billing Determinants	Proposed Rate	Annualized Revenues	% Total Rate Class		
Number of Bills	5		\$0	0.00%	5		\$0	0.00%	-	-
Energy Charge	4,352	\$0.03862	168	100.00%	4,352	\$0.04106	179	100.00%	11	6.31%
Total Baseload Charges			<u>\$168</u>	100.00%			<u>\$179</u>	100.00%	<u>11</u>	<u>6.31%</u>
Fuel adjustment			35				35		-	0.00%
Environmental surcharge			15				15		-	0.00%
Total revenues			<u>\$218</u>				<u>\$229</u>		<u>11</u>	<u>4.86%</u>
Average Bill			\$ 43.63				\$ 45.75		2.12	4.86%

Schedule C Section 2  
Commercial & Industrial Service 50 kW and Over  
Rate 5

	Existing				Proposed				\$ Increase	% Increase
	Billing Determinants	Current Rate	Annualized Revenues	% Total Rate Class	Billing Determinants	Proposed Rate	Annualized Revenues	% Total Rate Class		
Customer Charge	921								-	0.00%
Demand Charge	102,088	\$4.93	\$503,294	25.81%	102,088	\$4.93	\$503,294	24.31%	-	0.00%
Energy charge per kWh	29,510,594	\$0.04902	1,446,609	74.19%	29,510,594	\$0.05309	1,566,602	75.69%	119,993	8.29%
Total from base rates			<u>1,949,903</u>	100.00%			<u>2,069,896</u>	100.00%	<u>119,993</u>	<u>6.15%</u>
Fuel adjustment			235,199				235,199		-	0.00%
Environmental surcharge			163,013				163,013		-	0.00%
Total revenues			<u>\$2,348,115</u>				<u>\$2,468,108</u>		<u>119,993</u>	<u>5.11%</u>
Average Bill			\$ 2,549.53				\$ 2,679.81		\$ 130.29	5.11%

Schedule C Section 2a  
Commercial & Industrial Service 50 kW or Above  
Rate 9

	Existing				Proposed				\$ Increase	% Increase
	Billing Determinants	Current Rate	Annualized Revenues	% Total Rate Class	Billing Determinants	Proposed Rate	Annualized Revenues	% Total Rate Class		
Customer Charge	63		\$0		63				-	-
Demand Charge	141,203	\$4.93	696,131	21.91%	141,203	\$4.93	696,131	20.54%	-	0.00%
Energy Charge	57,828,600	\$0.04902	2,834,758	89.21%	57,828,600	\$0.05309	3,069,895	90.56%	235,137	8.29%
10 % Discount (Primary Service Rider)			(353,089)	-11.11%			(376,288)	-11.10%	(23,199)	
Total Baseload Charges			<u>\$3,177,800</u>	100.00%			<u>3,389,737</u>	100.00%	<u>211,938</u>	<u>6.67%</u>
Fuel adjustment			473,750				473,750		0	0.00%
Environmental surcharge			263,552				263,552		0	0.00%
Total Revenues			<u>\$3,915,102</u>				<u>4,127,039</u>		<u>211,938</u>	<u>5.41%</u>
Average Bill			\$ 62,144.47				\$ 65,508.56		\$ 3,364.09	5.41%

Farmers Rural Electric Cooperative  
Billing Analysis  
for the 12 months ended September 30, 2006

Schedule D  
Large Commercial / Industrial Service Optional Time-of-Day Rate

	Existing				Proposed				\$ Increase	% Increase
	Billing Determinants	Current Rate	Annualized Revenues	% Total Rate Class	Billing Determinants	Proposed Rate	Annualized Revenues	% Total Rate Class		
Customer Charge	84		\$0	0.00%	84	\$0	-	0.00%	-	
Demand Charge	16,421	\$4.93	80,956	22.08%	16,421	\$4.93	80,956	20.74%	-	0.00%
Energy Charge Per kWh	5,826,760	\$0.04902	285,628	77.92%	5,826,760	\$0.05309	309,343	79.26%	23,715	8.30%
Total Baseload Charges			<u>\$366,583</u>	100.00%			<u>\$390,298</u>	100.00%	<u>\$23,715</u>	<u>6.47%</u>
Fuel adjustment			45,770				45,770		-	0.00%
Environmental surcharge			30,309				30,309		-	0.00%
Total Revenues			<u>\$442,662</u>				<u>466,377</u>		<u>23,715</u>	<u>5.36%</u>
Average Bill		\$	5,270				5,552		282.32	5.36%

Schedule E  
Large Industrial Rate  
Rate 10

	Existing				Proposed				\$ Increase	% Increase
	Billing Determinants	Current Rate	Annualized Revenues	% Total Rate Class	Billing Determinants	Proposed Rate	Annualized Revenues	% Total Rate Class		
Customer Charge	36	\$535.00	\$19,260	0.68%	36	\$535	19,260	0.63%	-	0.00%
Demand Charge	109,810	\$5.39	591,876	20.83%	109,810	\$7.29	800,515	26.24%	208,639	35.25%
Energy Charge Per kWh	63,417,600	\$0.03517	2,230,397	78.49%	63,417,600	\$0.03517	2,230,397	73.12%	-	0.00%
Total Baseload Charges			<u>\$2,841,533</u>	100.00%			<u>\$3,050,172</u>	100.00%	<u>\$208,639</u>	<u>7.34%</u>
Fuel adjustment			509,234				509,234		-	0.00%
Environmental surcharge			244,973				244,973		-	0.00%
Total Revenues			<u>\$3,595,740</u>				<u>3,804,379</u>		<u>208,639</u>	<u>5.80%</u>
Average Bill		\$	99,881.66				105,677		5,795.53	5.60%

Schedule SL  
Street Lighting Service  
Rate 6

	Existing				Proposed				\$ Increase	% Increase
	Billing Determinants	Current Rate	Annualized Revenues	% Total Rate Class	Billing Determinants	Proposed Rate	Annualized Revenues	% Total Rate Class		
Customer Charge	108				108				-	
Energy Charge Per kWh	435,669	\$0.03859	16,812	100.00%	435,669	\$0.04266	18,584	100.00%	1,771	10.54%
Total Baseload Charges			<u>\$16,812</u>	100.00%			<u>\$18,584</u>	100.00%	<u>\$1,771</u>	<u>10.54%</u>
Fuel adjustment			3,506				3,506		-	0.00%
Environmental surcharge			3,392				3,392		-	0.00%
Total Revenues			<u>\$23,710</u>				<u>25,482</u>		<u>1,771</u>	<u>7.47%</u>
Average Bill		\$	219.54				236		16.40	7.47%

Farmers Rural Electric Cooperative Corporation  
Billing Analysis  
for the 12 months ended September 30, 2006

Schedule OL - Outdoor Lighting Service

	Existing				Proposed				% to Total	% Increase
	Billing Determinants	kWh	Current Rate	Annualized Revenues	Billing Determinants	Rate	Annualized Revenues	% to Total		
OL	86,872	6,012,253	\$ 6.35	\$ 551,637	86,872	6.63	576,084	88.47%	24,446.39	4.43%
OL	640	14,720	\$ 6.35	4,064	640	6.44	4,124	0.63%	59.85	1.47%
OL	1,024	100,352	\$ 7.12	7,291	1,024	7.52	7,699	1.18%	408.04	5.60%
OL	2,096	326,976	\$ 10.76	22,553	2,096	11.39	23,882	3.67%	1,329.52	5.90%
OL	14	5,292	\$ 18.14	254	14	19.68	275	0.04%	21.52	8.47%
OL	298	12,516	\$ 6.85	2,041	298	7.02	2,092	0.32%	50.89	2.49%
OL	252	15,876	\$ 7.85	1,978	252	8.11	2,043	0.31%	64.55	3.26%
OL	343	36,015	\$ 10.52	3,608	343	10.95	3,755	0.58%	146.44	4.06%
OL	2,230	367,950	\$ 13.31	29,681	2,230	13.98	31,177	4.79%	1,496.12	5.04%
OL	-	0	\$ 28.60	-	0	30.17	-	0.00%	-	-
	93,769	6,891,950		623,108	93,769		651,131	100.00%	\$28,023	4.50%
				6.65			6.94		0.30	4.50%

Total Base Rates

Average Bill  
\* Includes Adjustment

OL	Mercury Vapor 175 Watt	\$ 6.35	6.63	0.28	4.43%
OL	Mercury Vapor 175 Watt (shared)	\$ 6.35	6.44	0.09	1.47%
OL	Mercury Vapor 250 Watt	\$ 7.12	7.52	0.40	5.60%
OL	Mercury Vapor 400 Watt	\$ 10.76	11.39	0.63	5.90%
OL	Mercury Vapor 1000 Watt	\$ 18.14	19.68	1.54	8.47%
OL	Sodium Vapor 100 Watt	\$ 6.85	7.02	0.17	2.49%
OL	Sodium Vapor 150 Watt	\$ 7.85	8.11	0.26	3.26%
OL	Sodium Vapor 250 Watt	\$ 10.52	10.95	0.43	4.06%
OL	Sodium Vapor 400 Watt	\$ 13.31	13.98	0.67	5.04%
OL	Sodium Vapor 1000 Watt	\$ 28.60	30.17	1.57	5.47%

## Analysis of Wholesale to Retail Proportionality

	Retail
Wholesale	

### I Customer Charge

	Existing	Proposed	Change	Existing	Proposed	Change
Metering Point Charge	\$125/Mo.	\$125/Mo.	\$ -	\$ -	\$ -	\$ -
Substation at less than 3 MVA	\$944/Mo.	\$944/Mo.	\$ -	\$ -	\$ -	\$ -

### II Demand Charge

B&C Demand Charge (\$/kW)	\$5.39	\$7.29	\$1.90	\$5.39	\$7.29	\$1.90
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### III Energy Charge

The non-industrial wholesale increase was based on the dollar amount remaining to be recovered at wholesale, divided by kWh.

The non-industrial retail increase was based on the dollar amount remaining to be recovered at retail, divided by kWh.



**FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION**

**PSC CASE NO. 2006-00478**

**FIRST DATA REQUEST RESPONSE**

**COMMISSION STAFF'S FIRST DATA REQUEST DATED 3/12/07**

**REQUEST 4**

**RESPONSIBLE PERSON: William A. Bosta**

**COMPANY: Farmers Rural Electric Cooperative Corporation**

**Request 4.** Refer to Exhibit III of the Application. For each type of street light and/or outdoor light included in the billing analysis, provide the following information:

**Request 4a.** The assigned or estimated kWh usage per light for each light that is not separately metered.

**Request 4b.** The number of lights.

**Response 4a-b.**

Light Description	4(a) KWH	4(b) Number of Lights Billed
Mercury Vapor 175 Watt	70	86,872
Mercury Vapor 175 Watt (shared)	23	640
Mercury Vapor 250 Watt	98	1,024
Mercury Vapor 400 Watt	156	2,096
Mercury Vapor 1000 Watt	378	14
Sodium Vapor 100 Watt	42	298
Sodium Vapor 150 Watt	63	252
Sodium Vapor 250 Watt	105	343
Sodium Vapor 400 Watt	165	2,230
Sodium Vapor 1000 Watt	385	-
Total		93,769