

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CITIPOWER,)	CASE NO.
LLC FOR A RATE ADJUSTMENT FOR SMALL)	2020-00342
UTILITIES PURSUANT TO 807 KAR 5:076)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CITIPOWER, LLC

Citipower, LLC (Citipower), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on January 11, 2021. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Citipower SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Citipower shall make timely amendment to any prior response if Citipower obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Citipower fails or refuses to furnish all or part of the requested information, Citipower shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Citipower shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, Schedule of Adjusted Operations, Attachment SAO-G, Sheet 1. Describe the source of the \$8,530 Other Gas Revenues, i.e., whether it is revenue from approved Special Charges or something else.

2. Refer to the Application, Exhibit titled "Supplemental Information". Citipower states the proposed rates were developed by increasing the monthly and volumetric rates to all customers by approximately the same percentage of 29.6 percent.

- a. Provide a list of the alternative methods Citipower considered to increase its rates.
 - b. Provide an explanation for why Citipower chose to increase its rates by a percentage amount.
3. Refer to the Application, Attachment SAO-G, Exhibit titled Schedule of Adjusted Operations - Revenue Requirement.
 - a. Explain how the interest expense amount of \$86,951 is calculated.
 - b. Provide any payments to the promissory note for the complete 2025 year.
4. Refer to the Application, Billing Analysis. Provide all supporting workpapers in Excel spreadsheet format with all columns and rows unprotected and accessible and all formulas intact.
5. Provide the number of occurrences for each of Citipower's nonrecurring charges during the test year.
6. Provide the total amount collected for late fees and the number of instances for which late fees were charged during the test year.
7. Provide the number of disconnections and reconnections for 2018, 2019, and 2020.
8. Provide cost support calculations for each nonrecurring charge listed in Citipower's tariff.
9. Provide a copy of CitiEnergy, LLC's (CitiEnergy) current organizational chart, showing the relationship between Citipower and any affiliated companies. Include the relative positions of all entities and affiliates with which Citipower routinely has business transactions.

10. List all joint or shared costs that CitiEnergy incurred during the calendar years 2017, 2018, and 2019 that are allocated to Citipower and the other affiliates. For each allocated cost, list the vendor, the total expense amount, amounts allocated per affiliate, and the basis for the allocation(s).

11. List all joint or shared costs that are incurred by an affiliate of Citipower during the calendar years 2017, 2018, and 2019 that are allocated to Citipower. For each allocated cost, list the vendor, the total expense amount, amounts allocated per affiliate, and the basis for the allocation(s).

12. Describe the procedures CitiEnergy used to allocate joint and shared costs among its affiliates for the calendar years 2017, 2018, and 2019.

13. Provide all internal memorandums, policy statements, correspondence, and documents related to the allocation of joint and shared costs.

14. Provide Citipower's general ledger and trial balance for the calendar years 2018 and 2019 in paper medium and electronic Excel spreadsheet format with all columns and rows unprotected and accessible.

15. Provide copies of Citipower's cash receipts and cash disbursement journals for the calendar years 2018 and 2019.

16. Provide Citipower's aged schedule of accounts receivable at December 31, 2017, December 31, 2018, and December 31, 2019.

17. Provide Citipower's schedule of accounts payable by vendor at December 31, 2017, December 31, 2018, and December 31, 2019.

18. Provide copies of Citipower's audited financial statements for calendar years 2017, 2018, and 2019. Include a copy of the auditor's workpapers and all audit adjustments made to the 2019 financial statements.

19. Provide a schedule listing Citipower's 2017, 2018, and 2019 insurance coverages, including type of coverage (i.e., vehicle insurance, general liability insurance, and workers' compensation), annual premiums, and effective dates. Also include copies of the invoices Citipower received to support the annual premiums for each year.

20. Provide Citipower's payroll and related tax information for the calendar year 2019, and supporting time records.

21. Provide job titles, job descriptions, and pay rates for each employee on December 31 for calendar years 2016 through 2020.

22. a. Using a table format, provide the following actual full-year salary information for each employee, identified by employee number and job title, for the years 2017 through 2020 (in gross dollars- not hourly or monthly rates). The employee salary information for each year shall be provided in a separate table.

- (1) Regular salary or pay.
- (2) Overtime pay.
- (3) Vacation payout.
- (4) Standby/Dispatch pay.
- (5) Bonus pay.
- (6) Other amounts paid and reported on the employees' W-2 (specify).

b. Using a table format, provide the regular hours and overtime hours for each employee identified in Citipower's response to Item 22a. for the years 2012 through 2016, providing the employee salary information for each year in a separate table.

23. Using a table format, provide the following actual full-year benefit information for each employee, identified by employee number and job title, for the years 2012 through 2016. Provide the employee benefit information for each year in a separate table.

24. Provide a listing of all health care plan categories available to Citipower's employees, i.e., single, married no dependents, single parent with dependents, family, etc. For each employee listed in Citipower's response to Item 23, identify the type of health insurance coverage that they are provided.

- a. Healthcare benefit cost for each employee.
 - (1) Amount paid by Citipower.
 - (2) Amount paid by each employee.
- b. Dental benefits cost for each employee.
 - (1) Amount paid by Citipower.
 - (2) Amount paid by each employee.
- c. Vision benefits cost for each employee.
 - (1) Amount paid by Citipower.
 - (2) Amount paid by each employee.
- d. Life insurance cost for each employee.
 - (1) Amount paid by Citipower.
 - (2) Amount paid by each employee.
- e. Accidental death and disability benefits for each employee.
 - (1) Amount paid by Citipower.
 - (2) Amount paid by each employee.

- f. Defined Contribution - 401(k) or similar plan cost for each employee.

Provide the amount paid by Citipower.

- g. Defined Benefit Retirement cost for each employee.

- (1) Amount paid by Citipower.

- (2) Amount paid by each employee.

- h. Cost of any other benefit available to an employee (specify).

- (1) Amount paid by Citipower.

- (2) Amount paid by each employee.

25. Provide the minutes from the board of director meetings for the calendar years 2018, 2019, and 2020.

26. Refer to the Annual Report of Citipower, LLC. to the Public Service Commission for the Calendar Year Ended December 31, 2019 (2019 Annual Report), page 29.

- a. In calendar year 2019, Citipower reports meter reading labor of \$110,638. Describe the manner in which Citipower performs meter reading, including the number of meter readers and whether they are Citipower employees or outside contractors. If they are Citipower employees, provide their annual or hourly compensation rates, or both, and identify and describe the job duties they perform other than meter reading.

- b. In calendar year 2019, Citipower reports customer records and collection expenses of \$42,766. Describe in detail the manner in which Citipower performs the customer billing and collections and how it maintains the customer records. Explain whether customer billing and collections is performed by Citipower employees, by outside contractors, or by CitiEnergy employees with the costs allocated to Citipower.

c. In calendar year 2019, Citipower reports administrative and general salaries of \$147,513. Provide an itemized schedule listing each item that is recorded in this expense account, and include a detailed description for each item listed.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED DEC 17 2020

cc: Parties of Record

*CitiPower, L.L.C.
37 Court Street
P. O. Box 1309
Whitley City, KY 42653

*Adam Forsberg
Controller
Citipower L.L.C.
2122 Enterprise Road
Greensboro, NORTH CAROLINA 27408

*L Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504