## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST ) KENTUCKY POWER COOPERATIVE, INC. FOR A ) GENERAL ADJUSTMENT OF RATES, APPROVAL ) OF DEPRECIATION STUDY, AMORTIZATION OF ) CERTAIN REGULATORY ASSETS, AND OTHER ) GENERAL RELIEF )

CASE NO. 2021-00103

## <u>COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION</u> <u>TO EAST KENTUCKY POWER COOPERATIVE, INC.</u>

East Kentucky Power Cooperative, Inc. (EKPC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than August 18, 2021. The Commission directs EKPC to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. 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

<sup>&</sup>lt;sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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

EKPC shall make timely amendment to any prior response if EKPC 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 EKPC fails or refuses to furnish all or part of the requested information, EKPC 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, EKPC 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 EKPC's Hearing Exhibit 1, the Stipulation and Settlement Agreement (Settlement Agreement), Exhibit C. Provide Settlement Agreement Exhibit C in an Excel version containing supporting calculations with all formulas, columns, and rows unprotected and accessible.

2. Provide a schedule with EKPC's salary and wage data broken out by month from September 2020 until present, with the number of full-time equivalent and part-time equivalent employees by employee group, hours worked by regular and overtime, and

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total salaries by employee group. Provide the schedule in Excel spreadsheet format with supporting calculations with all formulas, columns, and rows unprotected and accessible.

3. Provide a schedule with other post-retirement benefit (OPEB) expense for the last five calendar years, broken out by year. Provide the schedule in Excel spreadsheet format with supporting calculations with all formulas, columns, and rows unprotected and accessible.

Refer to the Application, Exhibit ISS-1, Schedule 1.20. Provide Schedule
1.20 calculated based upon 84 months of amortization beginning in January 2020 through
December 2026

5. Provide a schedule with the balance of the Smith 1 Regulatory Asset for each month for the remainder of 2021.

6. Refer to the August 3, 2021 Hearing Testimony of Isaac S. Scott regarding the Smith 1 Regulatory Asset, generally. Provide a schedule of PJM Interconnection, LLC revenues recognized by EKPC between January 1, 2017, and December 31, 2019, stating the amount of each revenue item and what each amount represents, and the amortization expense between January 1, 2017, and December 31, 2019.

7. Refer to the Application, Exhibit ISS-1, Schedule 1.26. Provide a schedule that breaks out the \$7,244,148 balance of 2019 Spurlock Maintenance expenses set forth in Schedule 1.26. Provide the schedule in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

8. Refer to Staff Hearing Exhibit 6. Provide a copy of the letter from Michael A. McNalley to the United States Department of Agriculture Rural Utility Service (RUS),

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dated January 22, 2020, that was referenced by RUS in its January 30, 2020 response letter.

9. Refer to Richard J. Macke's Rebuttal Testimony, Exhibits RJM-4 and RJM-5.

a. Provide Exhibit RJM-4 in a schedule containing supporting calculations in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

b. Provide Exhibit RJM-5 in a schedule containing supporting calculations in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

10. Provide a billing analysis of the allocation of the proposed Stipulation and Settlement Agreement revenue increase, including the allocation of revenue to each rate class and to each of EKPC's Owner-Members, by rate component (i.e., kWh, customer, demand).

11. Provide the projected budgeted generation maintenance expense for the next five calendar years.

for

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

DATED <u>AUG 05 2021</u>

cc: Parties of Record

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