## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION OF INTER-	)	
COUNTY ENERGY COOPERATIVE	)	CASE NO.
CORPORATION FOR PASS-THROUGH OF	)	2021-00111
EAST KENTUCKY POWER COOPERATIVE,	)	
INC. WHOLESALE RATE ADJUSTMENT	)	

## COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO INTER-COUNTY ENERGY COOPERATIVE CORPORATION

Inter-County Energy Cooperative Corporation (Inter-County Energy), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on September 17, 2021. The Commission directs Inter-County Energy 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.

Inter-County Energy shall make timely amendment to any prior response if Inter-County Energy 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 Inter-County Energy fails or refuses to furnish all or part of the requested information, Inter-County Energy 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, Inter-County Energy 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 Inter-County Energy's July 30, 2021 filing of Revised Exhibits of the proposed rates for the pass-through of East Kentucky Power Cooperative, Inc.'s (EKPC) wholesale rate adjustment, Staff-1-5-InterCounty-Settle-v2.xlsx, Summary Tab. Also refer to Case No. 2021-00103, EKPC's Responses to Staff's Post-Hearing Requests

dated August 18, 2021, Item 10, PH\_DR Response 10 Settle Rate Design CONFIDENTIAL.xlsx, Summary by Rate by Member Tab.<sup>2</sup>

- a. Reconcile the total increase allocated to Inter-County Energy by EKPC, and the total increase Inter-County Energy applied in the billing analysis.
- b. Provide supporting analysis for this difference in Excel spreadsheet format with all formulas, columns, and rows unprotected and accessible.

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

DATED \_\_\_\_ SEP 10 2021

cc: Parties of Record

<sup>&</sup>lt;sup>2</sup> Case No. 2021-00103, 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 (filed Aug. 18, 2021).

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