SHEEHAN, BARNETT, HAYS, DEAN & PENNINGTON, P.S.C.

ATTORNEYS AT LAW 114 SOUTH FOURTH STREET P.O. BOX 1517 DANVILLE, KENTUCKY 40423-1517 TELEPHONE (859) 236-2641 FAX NUMBER (859) 236-1483

JAMES WILLIAM BARNETT EDWARD D. HAYS JAMES HADDEN DEAN HENRY VINCENT PENNINGTON, III RECEIVED MAR 21 2007

PUBLIC SERVICE GOMMESSION JAMES G. SHEEHAN, JR. ELIZABETH G. NICKELS

HAND DELIVERED

March 21, 2007

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

Re: PSC Case No. 2006-00481

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 Inter-County Energy Cooperative Corporation to the Commission Staff's First Data Requests dated March 12, 2007.

Very truly yours,

SHEEHAN, BARNETT, HAYS, DÉAN& PENNINGTON, P.S.C ÍAMES WILLIAM BARN

JWB/nd Enclosures

х. И cc: Mr. James L. Jacobus, President/CEO Inter County Energy Cooperative Corporation

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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF INTER-COUNTY ENERGY)COOPERATIVE CORPORATION TO)PASS-THROUGH AN INCREASE OF ITS)CASWHOLESALE POWER SUPPLIER PURSUANT)2006TO KRS 278.455(2))

CASE NO. 2006-00481

RESPONSES TO COMMISSION STAFF'S FIRST DATA REQUEST TO INTER-COUNTY ENERGY COOPERATIVE CORPORATION DATED MARCH 12, 2007

INTER-COUNTY ENERGY COOPERATIVE CORPORATION

PSC CASE NO. 2006-00481

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

Inter-County Energy Cooperative Corporation ("Inter-County") 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.

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PSC Request 1 Page 1 of 2

INTER-COUNTY ENERGY COOPERATIVE CORPORATION PSC CASE NO. 2006-00481 FIRST DATA REQUEST RESPONSE

COMMISSION STAFF'S FIRST DATA REQUEST DATED 3/12/07REQUEST 1RESPONSIBLE PERSON:William A. BostaCOMPANY:Inter-County Energy Cooperative Corporation

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

Request 1a.Provide all workpapers, calculations, assumptions, and otherdocumentation 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 Inter-County.

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 exception is Electric Thermal Storage (ETS) Rate Schedule 1-A, Rate E18, which was 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.

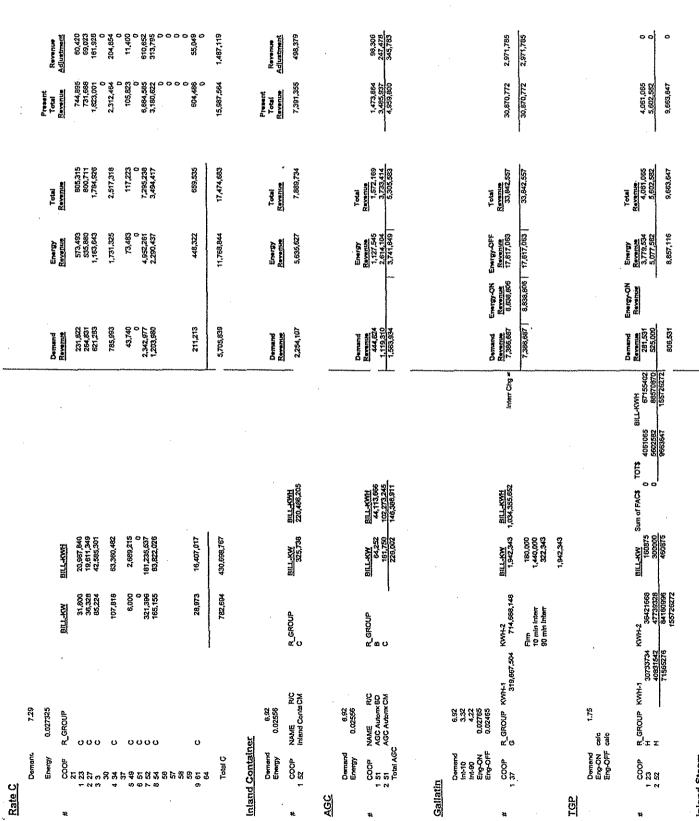
Request 1a Attachment Page 1 of 3

EXHIBIT I Page 3 of 7

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	Revenue	Allertrart 3,443,537 1,825,532 1,850,085 1,971,550 3,633,534 1,971,950 3,633,534 1,971,950 1,971,950 1,971,950 1,971,950 1,971,950 1,971,955 1,070,067 3,972,553 3,976,953 3,719,852 3,719,852 3,719,852 3,719,852	34,663,347	8,693 3,201 31,344	13,237	Revertue	141,759 141,759 104,745 104,795 500,175 0	395,265	00111111	0 0 0 198 (81,198	2,273,652	131,186 171,509	302,695
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Request 1a Attachment Page 2 of 3

EXHIBIT I Page 4 of 7



Inland Steam equiv Domend 5,00073823 equiv Energy 0.02450058

Request 1a Attachment Page 3 of 3

EXHIBIT I Page 5 of 7

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Rate Adj

Present

Request 1b Attachment Page 1 of 6

Inter-County Billing Analysis for the 12 months ended September 30, 2006

	Total	Total	\$ Increase	% Increase
Farm and Home Service	29,122,772	30,514,041	1,391,269	4.78%
Farm and Home Marketing Rate (ETS)	36,721	38,490	1,769	4.82%
Small commercial & Small Power	702,482	730,015	27,533	3.92%
Large Power Rate	1,930,149	2,016,742	86,593	4.49%
All Electric Schools	229,648	243,132	13,485	5.87%
Large Industrial Rate B1 (500 kW to 4,999 kW)	1,811,590	1,919,415	107,825	5.95%
Large Industrial Rate C1 (500 kW to 4,999 kW)	1,129,626	1,195,507	65,881	5.83%
Street/Security Lighting Outdoor Lighting	647,125	676,312	29,187	4.51%

35,610,113	37,333,655	1,723,542	4.84%

Inter-County Energy Cooperative Billing Analysis for the 12 months ended September 30, 2006

Schedule 1 Farm and Home Service

Rate	Class	A10-A19	

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	•			Rate Class						Increase	Increase	Increase
		[Existing			Proposed]	\$ Increase	% Increase	Demand	Energy	Cust
		Billing Determinants	Current Rate	Annualized Revenues	Billing Determinants	Rate	Annualized Revenues					
Customer Charg	ge	283,418	\$5.55	\$1,572,970	283,418	\$5.55	\$1,572,970	-	0.00%			\$
Energy charge ¢ First 500 kWh All Over 500 k	per Month	138,093,191 209,056,703	\$0.06900 \$0.06366	9,528,430 13,308,550	138,093,191 209,056,703	\$0.07301 \$0.06767	10,081,865 14,146,384	553,435 837,835	5.81% 6.30%	· .	553,435 837,835	
Total from base				24,409,950			25,801,219	1,391,269	5.70%			·
Fuel adjustment Environmental s				2,934,000 1,778,822			2,934,000 1,778,822	-	0.00% 0,00%			
Total revenues				\$29,122,772			\$30,514,041	1,391,269	4.78%			
Average Bill				\$ 102.76			\$ 107.66	\$ 4,91	4.78%			
			Farr	Schedu n and Home Ma Rate	rketing Rate (ETS)							
		Billing Determinants	Existing Current Rate	Annualized Revenues	Billing Determinants	Proposed Rate	Annualized Revenues	\$ Increase	% Increase			
Customer Charg	ge	1,373	\$5.55	\$7,621	1,373	\$5.55	\$7,621	\$0 \$0	0.00% #DIV/01			\$
y charge p	per kWh	736,818	\$0.03820	28,146	736,818	\$0.04060	29,915	\$1,769 \$0	6.28% #DIV/0		\$1.76	3
Total from base	rates		•	35,767			37,536	\$1,769 \$0	4.95% #DIV/0!			
Fuel adjustment Environmental s				6,490 2,085			6,490 2,085	\$0 \$0	0.00%			
Total revenues				\$44,342			\$46,111	\$1,769	3.99%			
Average Bill				\$32.29			\$33.58	\$1.29	3.99%			

Request 1b Attachment Page 2 of 6

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Demand= Load Cntr=

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Inter-County Energy Cooperative Billing Analysis for the 12 months ended September 30, 2006

Schedule 2 Small commercial & Small Power Rate B20; B25; B26; B28

			 e 620; 620						
		Existing	 		Proposed		\$ li	ncrease	% Increase
	Billing Determinants	Current Rate	iualized venues	Billing Determinants	Rate	nualized evenues			
Customer Charge	2,594	\$5,55	\$ 14,397	2,594	\$5.55	\$ 14,397		\$0 \$0	0.00% #DIV/0]
Demand Charge	16,623	\$4.02	66,824	16,623	\$4.02	66,824		\$0 \$0 \$0	0.00% #DIV/0! #DIV/0!
Energy charge per kWh First 1,000 kWh per Month All Over 1000 kWh per Month	1,771,719 5,104,131	\$0.07825 \$0.06576	138,637 335,648	1,771,719 5,104,131	\$0.08225 \$0.06976	145,731 356,086		\$7,094 \$20,438	\$.12% 6.09%
Total from base rates			 555,506			 583,039		\$27,533	4.96%
Fuel adjustment Environmental surcharge			56,650 90,326			 56,650 90,326		\$0 \$0	0.00%
Total revenues	·		 702,482			 730,015		\$27,533	3.92%
Average Bill			\$ 270.81			\$ 281.42	\$	10.61	3.92%
			Schedi Large Pov Rate C40; (ver Rate					
	[Existing	 		Proposed	 	\$	ncrease	% Increase
	Billing Determinants	Current Rate	nualized wenues	Billing Determinants	Rate	nnualized Revenues			

Customer Charge	1,245	\$11.10	\$ 13,820	1,245	\$11,10	\$ 13,820	\$0 \$0	0.00% #DIV/0I
nd Charge	90,635	\$4.02	364,352	90,635	\$4,02	364,352	\$0 \$0	0.00%
Energy charge per kWh All KWh	21,625,142	\$0.05655	1,222,902	21,625,142	\$0.06055	1,309,495	\$0 \$86,593	#DIV/0I 7.08%

Total from base rates	1,601,074	1,687,667 \$86,593	5,41%
Fuel adjustment Environmental surcharge	183,781 145,294		0.00% 0.00%
Total revenues	1,930,149	2,016,742 \$86,593	4.49%
Average Bill	\$ 1,550.32	\$ 1,619.87 \$ 69.55	4,49%

\$0

\$86,593

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Inter-County Energy Cooperative Billing Analysis for the 12 months ended September 30, 2006

Schedule AES All Electric Schools Rate D50

	,	Existing]	J,	Proposed		\$ Increase	% Increase
	Billing Determinants	Current Rate	Annualized Revenues	Billing Determinants	Rate	Annualized Revenues		
Customer Charge	60		\$0	60	\$0.00	\$0	\$0 \$0	#DIV/0! #DIV/01
Energy charge per kWh	3,367,553	\$0.05884	198,147	3,367,553	\$0.06284	211,631	\$13,485 \$0	6.81% #DIV/0!
. Total from base rates			198,147		-	211,631	\$13,485 \$0	6.81% #DIV/0!
Fuel adjustment Environmental surcharge			28,304 <u>3,197</u>			28,304 3,197	\$0 \$0	0.00% 0.00%
Total revenues		:	\$229,648		:	\$243,132	\$13,485	5.87%
Average Bill			\$3,827.46			\$4,052.21	\$224.74	5.87%

Schedule B1 Large Industrial Rate (500 kW to 4,999 kW) Rate B10

		Existing			Proposed		\$ Increase	% Increase
	Billing Determinants	Current Rate	Annualized Revenues	Billing Determinants	Rate	Annualized Revenues		
Customer Charge Demand charge	84	\$535.00	\$44,940	84	\$535	\$44,940	\$0 \$0 \$0	0.00% #DIV/0! #DIV/0!
Contract Excess Demand	47,679 9,071	\$5.39 \$7.82	\$256,991 \$70,935	47,679 9,071	\$7,29 \$9.72	347,582 88,170	\$90,591 \$17,235 \$0	35.25% 24.30% #DIV/0!
Energy Charge	30,643,892	\$0.03532	1,082,342	30,643,892	\$0.03532	1,082,342	\$0	0.00%
ⁱ Baseload Charges			\$1,455,209			\$1,563,034	\$107,825	7.41%
adjustment Environmental surcharge			247,831 108,550			247,831 108,550	\$0 \$0	0.00% 0.00%
Total Revenues			\$1,811,590			\$1,919,415	\$107,825	5.95%
Average Bill			\$ 21,566.54			\$ 22,850.18	1,283.64	5.95%

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Inter-County Energy Cooperative Billing Analysis for the 12 months ended September 30, 2006

Schedule C1 Large Industrial Rate (500 kW to 4,999 kW) Rate C10

		Existing		[Proposed]	\$ Increase	% Increase	
	Billing Determinants	Current Rale	Annualized Revenues	Billing Determinants	Rate	Annualized Revenues			
Customer Charge	12	\$535.00	\$6,420	12	\$535	\$6,420	\$0 \$0	0.00% #DIV/0!	
Demand Charge	34,674	\$5.39	\$186,893	34,674	\$7.29	252,773	\$65,881 \$0	35.25% #DIV/0!	\$65,881
Energy Charge	19,611,349	\$0.03565	699,145	19,611,349	\$0.03565	699,145	\$0	0.00%	
Total Baseload Charges		-	\$892,457			\$958,338	\$65,881	7.38%	
Fuel adjustment Environmental surcharge			159,554 77,615	-		159,654 77,615	\$0 \$0	0.00% 0.00%	
Total Revenues			\$1,129,626			\$1,195,507	\$65,881	5.83%	
Average Bill			\$ 94,136			\$ 99,626	5,490.05	5.83%	

	173,706	1,520,649	-
K	Wh		
N	on-Dem		
	387,044,168		
		Parts	Diff
Total Incr	1,723,542	1,723,542	(0,12)
Dem Incr	173,706		
Cust Incr			
Energy Inc	1,549,836		
Ener Rate	0.004004287		

\$35,617,734

\$37,341,275 \$1,723,542

Request 1b Atlachment Page 6 of 6 2

Inter-County Energy Cooperative Billing Analysis for the 12 months ended September 30, 2006

Street Lighting and Security Lights Outdoor Lighting

	I		Exis	ling			Propos		\$ Increase % Increase		
	<u>kWh</u>	Bi⊯ing Determinants	Total kWh	Current Rate	Annualized Revenues	Billing Determinants	Total kWh	Rate	Annualized Revenues		
107,800 Lumen Directional Floodlight	360	381	137,160	\$22.95	\$8,743.95	. 381	137,160	\$24.39	9,293	549	6,28%
50,000 Lumen Directional Floodlight	159	1,640	260,760	\$12,48	\$20,467.20	1,640	260,760	\$13.12	21,511	1,044	5,10%
27,500 Lumen Directional Floodlight	87	2,268	197,316	\$8.92	\$20,230.56	2,268	197,316	\$9.27	21,021	790	3,91%
27,500 Lumen Cobra Head	87	1,338	116,406	\$8.31	\$11,118.78	1,338	116,406	\$8.66	11,585	466	4.19%
9,500 Lumen Security Light	39.3	0	0	\$6.68	\$0.00	0	0	\$6,84	0	-	
7,000 Lumen Security Light	77	84,737	6,524,749	\$6.66	\$564,348.42	84,737	6,524,749	\$6.97	590,475	26,127	4.63%
4,000 Lumen Decorative Colonial Post	20	2,626	52,520	\$8,46	\$22,215.96	2,626	52,520	\$8.54	22,426	210	0.95%
9,550 Lumen Decorative Colonial Post	38.3	0	. 0	\$10.89	\$0.00	0	0	\$11.04	0	-	
		92,990	7,288,911		\$647,124.87	92,990	7,288,911		676,312	29,186.89	4.51%

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INTER-COUNTY ENERGY COOPERATIVE CORPORATION PSC CASE NO. 2006-00481 FIRST DATA REQUEST RESPONSE

COMMISSION STAFF'S FIRST DATA REQUEST DATED 3/12/07REQUEST 2RESPONSIBLE PERSON:William A. BostaCOMPANY:Inter-County Energy 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, Inter-County 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 theApplication, identify the corresponding wholesale Rate Schedule of East KentuckyPower Cooperative, Inc.

Response 2a. Please see the attached information.

Request 2b. Would Inter-County agree that KRS 278.455(2) and 807 KAR 5:007, 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.

Response 2b. 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 Inter-County 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 2 ;.-

The present and proposed rates structures of Inter-County Energy Cooperative Corporation are listed below:

		EKPC		
<u>Schedule</u>	Rate Class	Rate Schedule	Present	Proposed
1	Farm and Home Service	E-2	11050111	rioposed
*	Customer Charge per month	, <u>1</u>	\$5.55	\$5.55
	First 500 kWh/Mo per kWh		\$0.06900	\$0.07301
	Over 500 kWh/Mo per kWh		\$0.06366	\$0.06767
1-A	Firm and Home Marketing Rate (ETS)	E-2	\$0.00000	40.00707
1-11	Energy Charge per kWh	3 5 <i>4</i> 7	\$0.03820	\$0.04060
2	Small Commercial and Small Power	E-2	0.00020	Φ0.0 4 000
2	Customer Charge per month	Junt Kar	\$5.55	\$5.55
	Demand Charge (over 10 kW/Mo) per KW		\$4.02	\$4.02
	Energy Charge per kWh for First 1,000		\$0.07825	\$0.08225
	kWh/Mo		0.07625	φ 0.0622 5
	Energy Charge per kWh for All Over 1,000		\$0.06576	\$0.06976
	kWh/Mo		\$0.000 ,0	401002770
4	Large Power Rate	E-2		
	Customer Charge per month		\$11.10	\$11.10
	Demand Charge per KW		\$4.02	\$4.02
	Energy Charge per kWh		\$0.05655	\$0.06055
5	All Electric Schools	E-2		
	Energy Charge per kWh		\$0.05884	\$0.06284
6	Outdoor Lighting Service – Security Lights	E-2		
	107,800 Lumen Directional Floodlight per		\$22.95	\$24.39
	month			
	50,000 Lumen Directional Floodlight per		\$12.48	\$13.12
	month			
	27,500 Lumen Directional Floodlight per		\$8.92	\$9.27
	month			
	27,500 Lumen Cobra Head per month		\$8.31	\$8.66
	9,500 Lumen Security Light per month		\$6.68	6.84
	7,000 Lumen Security Light per month		\$6.66	\$6.97
	4,000 Lumen Decorative Colonial Post per		\$8.46	\$8.54
	month			
	9,550 Lumen Decorative Colonial Post per		\$10.89	11.04
	month			
B1	Large Industrial Rate	В		
	Customer Charge per month		\$535.00	\$535.00
	Contract Demand Charge		\$5.39	\$7.29
	Demand Charge Excess of Contract		\$7.82	\$9.72
	Energy Charge per month		\$0.03532	\$0.03532
B2	Large Industrial Rate	В		
•	Customer Charge per month		\$1,069.00	\$1,069.00
	Contract Demand Charge per KW		\$5.39	\$7.29
	Demand Charge Excess of Contract per KW		\$7.82	\$9.72
	Energy Charge per kWh		\$0.03032	\$0.03032
B3	Large Industrial Rate	В		
	Customer Charge per month		\$1,069.00	\$1,069.00
	Contract Demand Charge per KW		\$5.39	\$7.29

Request 2a Attachment Page 2 of 2

Demand Charge Excess of Contract per KW		\$7.82	\$9.72
Energy Charge per kWh		\$0.02932	\$0.02932
Large Industrial Rate	С		
Customer Charge per month		\$535.00	\$535.00
Demand Rate per KW		\$5.39	\$7.29
Energy Rate per kWh		\$0.03565	\$0.03565
Large Industrial Rate	С	·	
Customer Charge per month		\$1,069.00	\$1,069.00
Demand Rate per KW		\$5.39	\$7.29
Energy Rate per kWh		\$0.03065	\$0.03065
Large Industrial Rate	С		
Customer Charge per month		\$1,069.00	\$1,069.00
Demand Rate per KW		\$5.39	\$7.29
Energy Rate per kWh		\$0.02965	\$0.02965
Interruptible Service Rider			

C3

C2

C1

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INTER-COUNTY ENERGY COOPERATIVE CORPORATION PSC CASE NO. 2006-00481 FIRST DATA REQUEST RESPONSE

COMMISSION STAFF'S FIRST DATA REQUEST DATED 3/12/07REQUEST 3RESPONSIBLE PERSON:William A. BostaCOMPANY:Inter-County Energy Cooperative Corporation

Request 3. Refer to Exhibit III of the Application.

<u>Request 3a.</u> Prepare the following comparative analyses of Inter-County'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 Inter-County'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).

<u>Response 3b.</u> 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.

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Inter-County Billing Analysis for the 12 months ended September 30, 2006

					Prresent	Proposed
	Existing	Proposed			Revenue	Revenue
	Total	Total	<u>\$ Increase</u>	<u>% Increase</u>	<u>% Total</u>	<u>Percent</u>
Farm and Home Service	29,122,772	30,514,041	1,391,269	4.78%	81.78%	81.73%
Farm and Home Marketing Rate (ETS)	36,721	38,490	1,769	4.82%	0.10%	0.10%
Small commercial & Small Power	702,482	730,015	27,533	3.92%	1.97%	1.96%
Large Power Rate	1,930,149	2,016,742	86,593	4.49%	5.42%	5.40%
All Electric Schools	229,648	243,132	13,485	5.87%	0.64%	0.65%
Large Industrial Rate B1 (500 kW to 4,999 kW)	1,811,590	1,919,415	107,825	5.95%	5.09%	5.14%
Large Industrial Rate C1 (500 kW to 4,999 kW)	1,129,626	1,195,507	65,881	5.83%	3.17%	3.20%
Street/Security Lighting Outdoor Lighting	647,125	676,312	29,187	4.51%	1.82%	1.81%

35,610,113

37,333,655

1,723,542

4.84%

100.00% 100.00%

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	Determinants	Rate	Revenues		Determinants	Rate	Revenues			······································		
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Customer Charge	283,418	\$5,55	\$1,572,970		283,418	\$5.55	\$1,572,970		\$0	0.00%	6.44%	6.10%
Sustemet energe	200,410					<i>Q</i> 0 .00	\$1,072,070		\$0	#DIV/0!	0.4470	0.1070
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Energy charge per kWh First 500 kWh per Month	138,093,191	\$0.06900	9,528,430		138,093,191	\$0.07304	10,081,865		\$0 \$553,435	#DIV/01 5.81%	39,04%	39.08%
All Over 500 kWh per Month	209,056,703	\$0.06366	13,308,550		209,056,703		14,146,384	 }	\$837,835	6.30%	54.52%	54.83%
						, `.						
Total from base rates	a animal 4400 (analy)		24,409,950				25,801,219	olla belon	\$1,391,269	5.70%	100.00%	100.00%
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Fuel adjustment			2,934,000		·····		2,934,000		\$0	0.00%		
Environmental surcharge	14 (************************************		1,778,822				1,778,822		\$0	0.00%	····	*********************************
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Average Bill			\$ 102.76				\$ 107.66		\$ 4.91	4.78%		
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Customer Charge	0	\$5,55	\$0	ļ	0	\$5.55	\$0	-	\$0	and the second descent of the second s	0.00%	0,00%
Energy charge per kWh	736,818	\$0.03820	28,146		736,818	\$0:04060	29,915	┢	\$0		100.00%	100.00%
Lindigy Gladge per KVVD	130,018		20,140		100,018	φυ,04000	29,915		\$1,769		100.00%	100.00%
Total from base rates			28,146			·	29,915	1	\$1,769	6.28%	100.00%	100.00%
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Total revenues			\$36,721		**************************************		\$38,490		\$1,769	4.82%		
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	Determinants	Rate	Revenues		Determinants	Rate	Revenues					
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Customer Charge	2,594	\$5.55	\$ 14,397		2,594	\$5.55	\$ 14,397	·	\$0	0.00%	2.59%	2.47%
Customer Charge	2,004	\$3.00	ψ 14,001		2,004		φ 14,037		<u>\$0</u> \$0	#DIV/01	2.3375	2.4170
Demand Charge	16,623	\$4.02	66,824	-v	16,623	\$4.02	66,824		\$0	0.00%	12.03%	11.46%
									\$0	#DIV/01		nabriad Vasilishan andalaman nambaran sa
Energy charge per kWh	1	#0.0700F	(00.007	<u> </u>		#0.0000-			\$0	#DiV/0!		
First 1,000 kWh per Month All Over 1000 kWh per Month	1,771,719 5,104,131	\$0.07825 \$0.06576	138,637 335,648		1,771,719 5,104,131		145,731 356,086	<u>-</u>	\$7,094 \$20,438	5.12% 6.09%	24.96% 60.42%	25.00% 61.07%
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Total from base rates			555,506		ļ		583,039		\$27,533	4.96%	100,00%	100,00%
Fuel adjustment			56,650				56,650	1	\$0	0,00%		
Environmental surcharge			90,326				90,326	1	\$0	0.00%		
]				
Total revenues			702,482			******	730,015		\$27,533	3.92%		
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Customer Charge	1,245	\$11.10	\$ 13,820	<u> </u>	1,245	\$11.10	\$ 13,820		\$0		0.86%	0.82%
Demand Charge	90,635	\$4.02	364,352		90,635	\$4.02	364,352		\$0 \$0		22.76%	21.59%
	00,000	<u><u><u></u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u></u>		1			004,002		\$0 \$0		22.1070	21.0070
Energy charge per kWh				<u> </u>					\$0	#DIV/0!		·····
All KWh	21,625,142	\$0.05655	1,222,902		21,625,142	\$0.06055	1,309,495		\$86,593	7.08%	76.38%	77.59%
		e ter madod a visa istra frodosoverska dasho										
	***			-		1					·	
		·				uurhaan ferfaade Earlanar ee Die Earanaan daareel	Notentian tan on a care	1-		<u> </u>	********	
				_		administrative production of the factor	· · · · · · · · · · · · · · · · · · ·	1				
Total from base rates			1,601,074				1,687,667		\$86,593	5.41%	100.00%	100.00%
Euol adjustment			100 704	<u> </u>			400 704			0.000	 	
Fuel adjustment Environmental surcharge			183,781 145,294	ł			183,781 145,294		\$0 \$0	0.00%		
	****		140,204				170,234			0.00%		
Total revenues	dana damara matananina (middifa midaata/da'a). talada		1,930,149	L			2,016,742		\$86,593	4.49%		
]								
Average Bill			\$ 1,550.32				\$ 1,619.87	-	\$ 69.55	4.49%	ļ	
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		ior the	12 monuts enueu	36	sternoer 30, 2000	,	<u> </u>			1		
	-I		Schedul	e Až	is is it is the second s	······································	· · · · · · · · · · · · · · · · · · ·	l				
			All Electric		iools							
			Rate 1	D50			·					
	-	Existing	······	w2 vv 3vvvm*		Proposed			\$ Increase	% Increase		4 ₉₉ - 14 ₉₉ - 4 ₉₉
				/!*/*uun!				armint	-//			
	Billing	Current	Annualized		Billing		Annualized				1991 1992 - 1992 - 1993 - 1994 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1	······································
	Determinants	Rate	Revenues		Determinants	Rate	Revenues					
				[1				
Customer Charge	60		\$0	[60	\$0.00	\$0		\$0	#DIV/0!	0,00%	0.00%
		#0 0700 L	100 4/7		<u> </u>	00.0000 A	<u></u>		\$0	#DIV/01		400.000/
Energy charge per kWh	3,367,553	\$0.05884	198,147	3	3,367,553	\$0.06284	211,631		\$13,485 \$0	6,81% #DIV/0!	100.00%	100.00%
Total from base rates	·····		196,147				211,631	1	\$13,485	6.81%	100.00%	100.00%
									\$0	#DIV/0!		
Fuel adjustment			28,304				28,304		\$0	0.00%	1	
Environmental surcharge			3,197	-			3,197		\$0	0.00%	<u> </u>	1005-10-10-10-10-10-10-10-10-10-10-10-10-10-
Total revenues			\$229,648				\$243,132		\$13,485	5.87%		niana()
				1				T.			······································	
Average Bill			\$3,827,46				\$4,052.21		\$224.74	5.87%		
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					(and the second s			 				s. 3most/former/in-same and a statistical
		······································	Inter-County Ene	l rav {	Cooperative		L	Varmar				
	1 - 12 - 10 - 10 - 10 - 10 - 10 - 10 - 1		Billing A	nalv	sis							
		for th	e 12 months ende	d Se	ptember 30, 2006			·				
			Schedu	ile E	l			.I		Lauranter and a second se	l	naalidadi (Aladado), wakika na kuta kuta kuta kuta kuta kuta kuta kut
		Large	Industrial Rate (1					· .	
			Rate				1					
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5.00° at		Existing				Proposed		<u> </u>	\$ Increase	76 11018858	 	
	Billing	Current	Annualized		Billing		Annualized					
anticipation for an international statements and a statement of the statement of the statement of the statement	Determinants	Rate	Revenues		Determinants	Rate	Revenues		J	-	ļ	
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Customer Charge		\$535.00	\$44,940	444000	84	\$535	\$44,940	+	· \$0	0.00%	3.09%	2,88%
								1	\$0	#DIV/01		1 (anno 17 an Andrea An
Demand charge								1	\$0			
Contract	47,679	\$5.39 \$7.82	\$256,991	 	47,679	\$7.29	347,582		\$90,591	35.25%		22.24%
Excess Demand	9,071	\$1.02	\$70,935		9,071	\$9.72	88,170	+	\$17,235 \$0		4.87%	5.64%
	30,643,892	\$0.03532	1,082,342	1	30,643,892	\$0.03532	1,082,342	1	\$0		74.38%	69.25%
Energy Charge	00,040,002	F F F F F F F F F F F F F F F F F F F	[
	00,040,002	·				4	\$1,563,034	1	\$107,825	7.41%	100.00%	100.00%
Energy Charge Total Baseload Charges		s	\$1,455,209	-	addutta's distance and the second		· · · · · · · · · · · · · · · · · · ·					1
Total Baseload Charges		 Andrew Andrew Andre				,,,,,,,,		-				
Total Baseload Charges Fuel adjustment		۰ ـ ـ	247,831		a balantida da fala diserta en consultar en presente de la consultar en presente de la consultar de la consulta La consulta de la consulta de la constata de la constata de la consultar de la consultar de la consultar de la constata		247,831		\$0	0.00%		
Total Baseload Charges Fuel adjustment Environmental surcharge			247,831 108,550	1			247,831 108,550		\$0 \$0	0.00%		
Total Baseload Charges Fuel adjustment			247,831	1			247,831		\$0	0.00%		
Total Baseload Charges Fuel adjustment Environmental surcharge			247,831 108,550	1			247,831 108,550		\$0 \$0	0.00%		

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			Inter-County Ener								
· · · · · · · · · · · · · · · · · · ·			Billing Ar								
		for th	e 12 months ender	<u>d Se</u>	ptember 30, 2006) 					
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,		Large	Industrial Rate (6								
deventioned descended of the method of the first section of the first section of the first section of the first		r	Rate	<u>C10</u>	• • • • • • • • • • •				·/		
		L	L	<u> </u>		L					
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	Billing	Current	Annualized	*****	Billing		Annualized				an a
	Determinants	Rate	Revenues		Determinants	Rate	Revenues				and an analytic structure of the second s
			vere the strengtuin termination termination to when to the							10. X 117 al-ci	
0	12	1505 00	PC 400		40	\$535	\$6,420	\$0	0.00%	0.72%	0.67%
Customer Charge	<u>12</u>	\$535.00	\$6,420		12	a000.	\$0,42U	\$0		0.7276	0.0776
		05.00	\$400.000		104.074	\$7.29	252,773	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	35.25%	20.94%	26.38%
Demand Charge	34,674	\$5.39	\$186,893	ļ	`34,674	\$7.29 I	202,173	\$65,881	#DIV/0!	20.94%	20.3076
			000 447		10.044.040		000 445	\$0		78.34%	72.95%
Energy Charge	19,611,349	\$0.03565	699,145		19,611,349	\$0.03565	699,145	\$0	0.00%	18.34%	72.95%
Total Decelored Charges		na analis na inanaka kabula ka dinaka s	\$892,457				\$958,338	\$65,881	7.38%	100.00%	100.00%
Total Baseload Charges			\$092,407		a da da da da da da matama emerilem de se al secon emerile		\$900,000	\$00,001	1.30%	100.00%	100,0072
Fuel adjustment	*****		159.554				159,554	\$0	0.00%		
Environmental surcharge			77,615			-"o" ("sillion da minina pilohanan la ana	77,615	<u>\$0</u>			an a
- Trending and Strong ge	**************************************	ļ					,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		0.00 /0		a nana an tan tan tan tan tan tan tan ta
Total Revenues		j	\$1,129,626				\$1,195,507	\$65,881	5.83%		
The second state of the second s	de la serve et a set atérice administration de la des serves										
Average Bill		and a start of the fact that it constants at the base	\$ 94,136			\	\$ 99,626	5,490.05	5.83%	n a na manana da na ini dan manan di dan d	e barradourolladada analdarere renderde barr
Average Dia			<u>ψ 34,130</u>	1			w 35,020	0,430.00	0.0070		1

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Inter-County Energy Cooperative Billing Analysis for the 12 months ended September 30, 2006

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Street Lighting and Security Lights Outdoor Lighting

% Increase				6.28%	5.10%	3.91%	4.19%	#DIV/0	4.63%	0.95%	#DIV/0	4.51%
\$ Increase % Increase				549	1,044	790	466	0	26,127	210	0	29,187
		% of	Total	1.37%	3.18%	3.11%	1.71%	0.00%	87.31%	3.32%	0.00%	100.00%
		Annualized	Revenues	9,293	21,511	21,021	11,585	0	590,475	22,426	0	676,312
sed			Rate	\$24 39	\$13.12	\$9.27	\$8.66	\$6,84	\$6.97	\$8.54	\$11.04	
Proposed		Total kWh		137,160	260,760	197,316	116,406	0	6,524,749	52,520	0	7,288,911
		Billing	Determinants	381	1,640	2,268	1,338	0	84,737	2,626	0	92,990
		% of	Total	1.35%	3.16%	3.13%	1.72%	0.00%	87.21%	3.43%	0.00%	100.00%
		Annualized	Revenues	\$8,743.95	\$20,467.20	\$20,230.56	\$11,118.78	\$0.00	\$564,348.42	\$22,215.96	\$0.00	\$647,124.87
jug		Current	Rate						\$6.66			
Existing		Total kWh		137,160	260,760	197,316	116,406	0	6,524,749	52,520	0	7,288,911
		Billing	Determinants	381	1,640	2.268	1.338	0	84,737	2,626	0	92,990
L	I		kWh	360	159	87	87	39.3	77	20	38.3	

107,800 Lurnen Directional Floodlight 50,000 Lurnen Directional Floodlight 27,500 Lurnen Directional Floodlight 27,500 Lurnen Cobra Head 9,500 Lurnen Security Light 7,000 Lurnen Security Light 4,000 Lurnen Decorative Colonial Post 9,550 Lurnen Decorative Colonial Post

Request 3a 2 Attachment Page 5 of 5

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Analysis of Wholesale to Retail Proportionality

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M	Wholesale			R	Retail		
Ċ	Existing	Proposed	Change		Existing	Existing Proposed	Change
I Customer Charge Metering Point Charge	\$125/Mo.	\$125/Mo.	، ج	Customer Charge 1 Residential	\$5.55/Mo	\$5.55/Mo	۱ 6 9
Substation at less than 3 MVA	\$944/Mo.	\$944/Mo.	، ج	Customer Charge 1 Residential	\$5.55/Mo	\$5.55/Mo	، ج
II Demand Charge B&C Demand Charge (\$/kW)	\$5.39	\$7.29	\$1.90	Industrial Rate (\$/kW)	\$5.39	\$7.29	\$1.90
III Energy Charge The non-industrial wholesale increase was based on the dollar amount remaining to be recovered at wholesale, divided by kWh.	crease was borced at wholes	ased on the do ale, divided by	llar / kWh.	The non-industrial retail increase was based on the dollar amount remaining to be recovered at retail, divided by kWh.	based on the d retail, divided b	ollar y kWh.	

Request 3b Attachment i

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