

Allen Anderson, President & CEO

925-929 North Main Street Post Office Box 910 Somerset , KY 42502-0910 Telephone 606-6784121 Toll Free 800-264-5112 Fax 606-679-8279 www.skrecc.com

April 3, 2014

RECEIVED

APR 4 2014

PUBLIC SERVICE COMMISSION

Mr. Jeff R. Derouen, Executive Director Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602

Dear Mr. Derouen:

RE: PSC Case No. 2014-00051

Please find enclosed an original and five copies of the response to the Six Month Examination of Environmental Surcharge as requested in Appendix B of the above stated order.

If additional information is needed, please advise.

Very truly yours,

Michelle D. Herman Michelle D. Herman

Vice President of Finance

MDH: jb

Enclosures

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

APR 4 2014

PUBLIC SERVICE

COMMISSION

IN THE MATTER OF:

AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIROMENTAL SURCHARGE MECHANISM OF EAST KENTUCKY POWER COOPERATIVE, INC. FOR THE SIX MONTH BILLING PERIOD ENDING DECEMBER 31, 2013 AND THE PASS THROUGH MECHANISM FOR ITS SIXTEEN MEMBER DISTRIBUTION COOPERATIVES

CASE NO. 2014-00051

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CERTIFICATE

STATE OF KENTUCKY

COUNTY OF PULASKI

Michelle D. Herrman, being duly sworn, states that she has supervised the preparation of the

Responses of South Kentucky RECC to the Public Service Commission Staff's First Data

Request for Information contained in the above-referenced case dated March 6, 2014,

and that the matters and things set forth therein are true and accurate to the best of her

knowledge, information and belief, formed after reasonable inquiry.

Michille D. Henna

Subscribed and sworn before me on the 3 day of April, 2014.

Danie H. Babar

My commission expires 12-2-2017

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIROMENTAL SURCHARGE MECHANISM OF EAST KENTUCKY POWER COOPERATIVE, INC. FOR THE SIX MONTH BILLING PERIOD ENDING DECEMBER 31, 2013 AND THE PASS THROUGH MECHANISM FOR ITS SIXTEEN MEMBER DISTRIBUTION COOPERATIVES

CASE NO. 2014-00051

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CERTIFICATE

STATE OF KENTUCKY

COUNTY OF PULASKI

Jeff Greer, being duly sworn, states that he has supervised the preparation of the Responses of South Kentucky RECC to the Public Service Commission Staff's First Data

Request for Information contained in the above-referenced case dated March 6, 2014,

and that the matters and things set forth therein are true and accurate to the best of his

knowledge, information and belief, formed after reasonable inquiry.

Jeff Sum

Subscribed and sworn before me on the 22 day of March, 2014.

Jamies H. Baker Notary Public

My commission expires 12-2-2017

SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE

PSC CASE NO. 2014-00051

ENVIRONMENTAL SURCHARGE MECHANISM

RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S FIRST DATA REQUEST FOR INFORMATION DATED MARCH 6, 2014

Request 2(b). For each of the 16 member distribution cooperatives, provide an explanation of the factors that contributed to each individual member distribution cooperative's over- and under-recovery amount.

Response2(b): The basic operation of the surcharge pass-through mechanism will produce monthly over and under recoveries due to the fact that the 12-month average retail revenues used to calculate the passthrough factor never match the actual retail revenues to which the pass-through factor is applied. If the 12-month average retail revenues are below the actual retail revenues the pass-through factor is applied to, then there will be over-recoveries. If the 12-month average retail revenues are above the actual retail revenues the factor is applied to, under-recoveries will result. This is a function of the design of the recovery mechanism.

Another major factor contributing to the over or under recoveries calculated for this review period is the amortization of previous surcharge over or under recoveries as determined in the final Orders in Cases 2012-00486 and 2013-00140. Case 2012-00486 covered 18 months of surcharge operations and Case 2013-00140 covered 6 months of operations. While the over or under recoveries reflected 24 months of surcharge operations, in each case the amortization period was 6 months. Because of the timing of the final Orders in these cases, the amortization periods overlapped for 5 months. Specifically, for South Kentucky the net amortization of the previous surcharge review cases during the 6 month period this case covers is an over recovery of \$1,589,362. Thus, this has a direct effect on our current under recovery of \$1,109,224 because the amortization of the over recovery reduced the amount of surcharge revenue collected for the 6 month period.

We believe an additional factor that can be considered for future cases that will assist in mitigating the fluctuations in environmental surcharge revenue recoveries would be to incorporate a historical review of the over or under recovery since inception of the surcharge. Specifically for this case, our historical over recovery since inception of the environmental surcharge beginning July 2005 and ending at the beginning of this 6 month review case was \$227,577. By incorporating this historical figure into our review period figures our under recovery would be reduced to \$881,647. This is illustrated in the table below:

	EKPC	Billed to							
	Invoice	Retail							
	Month	Consumer &							
	recorded	recorded on	Monthly	Cumulative					
	Member's	Member's	(Over) or	((Over) or				
	Books	Books	Under	Under					
Mo/Yr	(1)	(2)	(3)		(4)				
Historical	Carry Over (Ju	e 2013)	\$	(227,577)					
Jul-13	\$ 1,121,811	\$ 1,216,380	\$ (94,569)	\$	(322,146)				
Aug-13	\$ 1,041,807	\$ 1,170,195	\$ (128,388)	\$	(450,534)				
Sep-13	\$ 890,975	\$ 757,959	\$ 133,016	\$	(317,518)				
Oct-13	\$ 842,623	\$ 643,795	\$ 198,828	\$	(118,690)				
Nov-13	\$ 1,199,649	\$ 695,562	\$ 504,087	\$	385,397				
Dec-13	\$ 1,482,101	\$ 985,851	\$ 496,250	\$	881,647				
Jan-14	\$ 1,652,665	\$ 1,261,004	\$ 391,661	\$	1,273,308				
Feb-14	\$ 980,590	\$-	\$ 980,590	\$	2,253,898				
Cumulative	\$	881,647							
Monthly R	ecovery (per	month for six	months)	\$	146,941				

South Kentucky RECC - Calculation of (Over)/Under

We believe this historical accumulated carryover of the over or under recovery will benefit our members in case review periods where previous over or under recoveries have been applied, as well as allow for the overall recovery by the Cooperative that will more closely tie to their recorded financial statement over or under recovery for the environmental surcharge calculation. An historical application of the over or under recovery would assist in mitigating the applied amounts in the amortization of the recovery from one surcharge review period to the next.

Item #7 Page 1 of 4 Witness: Jeff Greer

SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE PSC CASE NO. 2014-00051 ENVIRONMENTAL SURCHARGE MECHANISM RESPONSE TO INFORMATION REQUEST COMMISSION STAFF'S FIRST DATA REQUEST FOR INFORMATION DATED MARCH 6, 2014

Request 7. For your particular distribution cooperative, provide the actual average residential customer's monthly usage for the 12 months ending November 30, 2013. Based on this usage amount, provide the dollar impact any over- or under-recovery will have on the average residential customer's monthly bill for the requested recovery period. Provide all supporting calculations.

Response: See attached Exhibit A

Case No. 2014-00051 Item #7 Exhibit A Page 2 of 4

South Kentucky RECC Impact on Average Residential Consumer's Bill

Average Residential Account:	Actual				
	<u>Rate</u>	Bill Amount			
Consumer Charge	\$12.82	\$12.82			
kWh Charge	\$0.08543				
kWh Average Monthly Usage	1,077	\$92.01			
Fuel Adjustment	-\$0.00390	-\$4.20			
		\$100.63			
*Environmental Monthly Charge	7.82%	\$7.87			
School Tax	3.00%	\$3.25			
Total Monthly Bill		\$111.75			

*Based on page 3 of 5 Rate

Average Residential Account:	6 Month	Recovery
	<u>Rate</u>	Bill Amount
Consumer Charge	\$12.82	\$12.82
kWh Charge	\$0.08543	
kWh Average Monthly Usage	1,077	\$92.01
Fuel Adjustment	-\$0.00390	-\$4.20
		\$100.63
*Environmental Monthly Charge	9.75%	\$9.81
School Tax	3.00%	\$3.31
Total Monthly Bill		\$113.75
	Impact	\$2.00

*Based on Rates on Page 3 & 4.

Additional Monthly Recovery of \$184,871 for six months Over Recovery \$1,109,224/6

East Kentucky Power Cooperative, Inc. - Distribution Cooperatives Pass Through Mechanism Report for South Kentucky RECC

For the Month Ending February 2014

Line.	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
				EKPC	On-peak	EKPC Net	EKPC 12-mon	hs South	Amortization	South	South	On-Peak	South	12-months	South
	[Monthly	Revenue	Monthly	Ended Averag	e Kentucky	of	Kentucky	Kentucky	Retail	Kentucky	ended	Kentucky
Surcharge				Revenues from	Adjustment	Sales	Monthly Reven	ue Revenue	(Over)/Under	Net	Total	Revenue	Net Monthly	Avg. Retail	Pass
Factor				Sales to		to	from Sales to	Requirement	Recovery	Revenue	Monthly Retail	Adjustment	Retail	Revenues,	Through
Expense	EKPC	EKPC	EKPC	South		South	South			Requirement	Revenues		Revenues	Net	Mechanism
Month	CESF %	BESF %	MESF %	Kentucky		Kentucky	Kentucky								Factor
			Col. (1) - Col. (2)			Col. (4) - Col. (5)		Col (3) x Col (7)		Col (8) + Col (9)			Col. (11) - Col. (12)		Col (10) / Col (14)
Sep-11	12.01%	0.00%	12.01%	\$ 5,845,122		\$ 5,845,122	\$ 6,915,6	52 \$ 830,571	\$ 260,165	\$ 1,090,736	\$ 9,536,854		\$ 9,536,854	\$ 9,352,003	11.64%
Oct-11	14.85%	0.00%	14.85%	\$ 5,673,946		\$ 5,673,946	\$ 7,006,1	73 \$ 1,040,417	\$ 260,165	\$ 1,300,582	\$ 7,318,628		\$ 7,318,628	\$ 9,351,070	13.91%
Nov-11	15.11%	0.00%	15.11%			\$ 6,632,354				\$ 1,332,956	\$ 8,039,947		\$ 8,039,947	\$ 9,404,788	14.25%
Dec-11	14.21%	0.00%		\$ 7,829,382		\$7,829,382				\$ 1,245,413	\$ 9,438,041			\$ 9,402,480	13.24%
Jan-12	12.09%	0.00%		\$ 8,445,069		\$ 8,445,069	• • •		•		\$ 11,260,653			\$ 9,288,986	8.73%
Feb-12	10.78%	0.00%		\$ 7,494,679		\$ 7,494,679					\$ 10,885,650			\$ 9,064,730	7.82%
Mar-12	12.92%	0.00%		\$ 5,833,422		\$ 5,833,422		•	•	\$ 863,480	\$ 9,070,418			\$ 8,986,989	9.53%
Apr-12	14.94%	0.00%		\$ 5,039,236		\$ 5,039,236								\$ 8,892,189	11.06%
May-12	16.90%	0.00%		\$ 5,774,776		\$ 5,774,776			-	\$ 1,128,009	\$ 7,695,942			\$ 8,941,421	12.69%
Jun-12	15.55%	0.00%		\$ 6,377,242		\$ 6,377,242									11.57%
Jul-12	14.51%	0.00%		\$ 7,269,717		\$ 7,269,717			-		\$ 9,657,844			\$ 9,091,963	10.76%
Aug-12	14.13%	0.00%		\$ 6,554,562		\$ 6,554,562					\$ 9,929,869				10.20%
Sep-12	16.23%	0.00%		\$ 5,681,667		\$ 5,681,667			•		\$ 8,915,852			\$ 9,011,820	11.73%
Oct-12	17.57%	0.00%		\$ 5,651,327		\$ 5,651,327		19 \$ 1,150,592			\$ 7,396,071			\$ 9,018,274	12.77%
Nov-12	18.23%	0.00%		\$ 7,240,850		\$ 7,240,850		27 \$ 1,203,057			\$ 8,801,431			\$ 9,081,731	13.34%
Dec-12	14.61%	0.00%		\$ 7,914,412		\$ 7,914,412					\$ 9,605,115			\$ 9,095,654	10.63%
Jan-13	13.49%	0.00%		\$ 8,687,605		\$ 8,687,605					\$11,917,064			\$ 9,150,355	9.83%
Feb-13	12.61%	0.00%		\$ 7,993,024			\$ 6,668,1				\$12,507,964		\$ 12,507,964	\$ 9,285,547	9.19%
Mar-13	14.37%	0.00%		\$ 8,229,515			\$ 6,867,8			\$ 986,907	\$10,651,391		\$ 10,651,391		10.63%
Apr-13	14.27%	0.00%		\$ 5,856,204			\$ 6,935,9				\$10,003,319		\$ 10,003,319		10.51%
May-13	17.97%	0.00%		\$ 5,862,754		, _, _, ,	\$ 6,943,2				\$ 7,640,542			\$ 9,604,002	12.99%
Jun-13	17.09%	0.00%		\$ 6,435,598				3 \$ 1,187,431	•		\$ 8,393,400		\$ 8,393,400	\$ 9,618,322	12.36%
Jul-13	15.77%	0.00%		\$ 6,564,126				04 \$ 1,086,443	,		\$ 9,363,789			\$ 9,593,817	8.30%
Aug-13	15.49%	0.00%		\$ 6,606,279			\$ 6,893,6		\$ (260,189)		\$ 9,466,625			\$ 9,555,214	8.42%
5ep-13	14.93%	0.00%		\$ 5,751,961		1 1 1 1		71 \$ 1,030,091						\$ 9,573,044	8.06%
Oct-13	16.69%	0.00%		\$ 5,643,820		+		16 \$ 1,151,417					· · ·	\$ 9,593,921	9.31%
Nov-13	17.43%	0.00%		\$ 7,187,844		\$ 7,187,844		29 \$ 1,201,699					· · ·	\$ 9,579,581	9.81%
Dec-13	14.54%	0.00%		\$ 8,503,162		\$ 8,503,162		91 \$ 1,009,584		\$ 749,395				\$ 9,661,316	7.82%
Jan-14	10.92%	0.00%		\$11,366,310			\$ 7,166,7 [.]				\$12,851,992		\$ 12,851,992	\$ 9,739,227	8.39%
Feb-14	5.44%	0.00%	5.44%	\$ 8,979,796		\$ 8,979,796	\$ 7,248,94	17 \$ 394,343	\$-	\$ 394,343					4.05%m

Notes:

South Kentucky Total Monthly Retail Revenues in Column (11) includes demand and energy charges, customer charges, and FAC revenues. Revenues reported in Columns (4), (6), (7), (11), (13), and (14) are net of Green Power Revenues. Case No. 2014-00051 Item #7 Exhibit A Page 3 of 4

East Kentucky Power Cooperative, Inc. - Distribution Cooperatives Pass Through Mechanism Report for South Kentucky RECC

For the Month Ending February 2014

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
				EKPC	On-peak	EKPC Net	EKPC 12-months	South	Amortization	South	South	On-Peak	South	12-months	South
				Monthly	Revenue	Monthly	Ended Average	Kentucky	of	Kentucky	Kentucky	Retail	Kentucky	ended	Kentucky
Surcharge				Revenues from	Adjustment	Sales	Monthly Revenue	Revenue	(Over)/Under	Net	Total	Revenue	Net Monthly	Avg. Retail	Pass
Factor				Sales to		to	from Sales to	Requirement	Recovery	Revenue	Monthly Retail	Adjustment	Retail	Revenues,	Through
Expense	EKPC	EKPC	EKPC	South		South	South			Requirement	Revenues		Revenues	Net	Mechanism
Month	CESF %	BESF %	MESF %	Kentucky		Kentuck y	Kentucky								Factor
			Col. (1) - Col. (2)			Col. (4) - Col. (5)		Col (3) x Col (7)		Col (8) + Col (9)			Col. (11) - Col. (12)		Col(10)/Col(14)
Sep-11	12.01%	0.00%	12.01%	• • •		\$ 5,845,122		\$ 830,571	\$ 260,165	\$ 1,090,736	\$ 9,536,854		\$ 9,536,854	\$ 9,352,003	11.64%
Oct-11	14.85%	0.00%	14.85%			\$ 5,673,946		\$ 1,040,417	· ·	\$ 1,300,582	\$ 7,318,628		\$ 7,318,628	\$ 9,351,070	13.91%
Nov-11	15.11%	0.00%	15.11%			\$ 6,632,354		\$ 1,072,791	· •	\$ 1,332,956	\$ 8,039,947		\$ 8,039,947	\$ 9,404,788	14.25%
Dec-11	14.21%	0.00%	14.21%			\$ 7,829,382			\$ 260,165	\$ 1,245,413	\$ 9,438,041		\$ 9,438,041	\$ 9,402,480	13.24%
Jan-12	12.09%	0.00%	12.09%	· · ·		\$ 8,445,069		· ·			\$ 11,260,653		\$ 11,260,653	\$ 9,288,986	8.73%
Feb-12	10.78%	0.00%	10.78%			\$ 7,494,679			•		\$ 10,885,650			\$ 9,064,730	7.82%
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Apr-12	14.94%	0.00%	14.94%			\$ 5,039,236	, , , , , , , , ,	• •	•	\$ 994,174			\$ 7,707,437	\$ 8,892,189	11.06%
May-12	16.90%	0.00%	16.90%			\$ 5,774,776		\$ 1,128,009		\$ 1,128,009	\$ 7,695,942			\$ 8,941,421	12.69%
Jun-12	15.55%	0.00%	15.55%			\$ 6,377,242	· · ·	\$ 1,034,357	•		\$ 8,221,562			\$ 8,943,727	11.57%
Jul-12	14.51%	0.00%		\$ 7,269,717		\$ 7,269,717		•			\$ 9,657,844			\$ 9,091,963	10.76%
Aug-12	14.13%	0.00%		\$ 6,554,562		\$ 6,554,562		•			\$ 9,929,869			\$ 9,063,570	10.20%
Sep-12	16.23%	0.00%		\$ 5,681,667		\$ 5,681,667	\$ 6,550,504		-		\$ 8,915,852			\$ 9,011,820	11.73%
Oct-12	17.57%	0.00%		\$ 5,651,327		\$ 5,651,327			-		\$ 7,396,071			\$ 9,018,274	12.77%
Nov-12	18.23%	0.00%		\$ 7,240,850		\$ 7,240,850	\$ 6,599,327		-		\$ 8,801,431			\$ 9,081,731	13.34%
Dec-12	14.61%	0.00%		\$ 7,914,412		\$ 7,914,412			•		\$ 9,605,115		\$ 9,605,115	\$ 9,095,654	10.63%
Jan-13	13.49%	0.00%		\$ 8,687,605		\$ 8,687,605		\$ 893,932			\$11,917,064		\$ 11,917,064	\$ 9,150,355	9.83%
Feb-13	12.61%	0.00%		\$ 7,993,024		\$ 7,993,024	\$ 6,668,153			\$ 840,854	\$12,507,964		\$ 12,507,964	\$ 9,285,547	9.19%
Mar-13	14.37%	0.00%		\$ 8,229,515		\$ 8,229,515	\$ 6,867,828	\$ 986,907		\$ 986,907	\$10,651,391		\$ 10,651,391	\$ 9,417,295	10.63%
Apr-13	14.27%	0.00%		\$ 5,856,204		\$ 5,856,204	\$ 6,935,908	\$ 989,754		\$ 989,754	\$10,003,319		\$ 10,003,319	\$ 9,608,619	10.51%
May-13	17.97%	0.00%		\$ 5,862,754		\$ 5,862,754	\$ 6,943,240	\$ 1,247,700	•		\$ 7,640,542		\$ 7,640,542	\$ 9,604,002	12.99%
Jun-13	17.09%	0.00%		\$ 6,435,598		\$ 6,435,598	\$ 6,948,103	\$ 1,187,431			\$ 8,393,400		\$ 8,393,400	\$ 9,618,322	12.36%
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Sep-13	14.93%	0.00%		\$ 5,751,961		\$ 5,751,961		\$ 1,030,091			\$ 9,129,819			\$ 9,573,044	8.06%
Oct-13	16.69%	0.00%		\$ 5,643,820		\$ 5,643,820				\$ 891,228				\$ 9,593,921	9.31%
Nov-13	17.43%	0.00%		\$ 7,187,844		\$ 7,187,844		\$ 1,201,699			\$ 8,629,346		• • •	\$ 9,579,581	9.81%
Dec-13	14.54%	0.00%		\$ 8,503,162		\$ 8,503,162		\$ 1,009,584			\$10,585,938			\$ 9,661,316	9.75%
Jan-14	10.92%	0.00%		\$11,366,310		\$ 11,366,310					\$12,851,992		\$ 12,851,992	\$ 9,739,227	8.39%
Feb-14	5.44%	0.00%	5.44%	\$ 8,979,796		\$ 8,979,796	\$ 7,248,947	\$ 394,343	\$-	\$ 394,343					4.05%

Notes:

South Kentucky Total Monthly Retail Revenues in Column (11) includes demand and energy charges, customer charges, and FAC revenues.

Revenues reported in Columns (4), (6), (7), (11), (13), and (14) are net of Green Power Revenues.

Monthly Amortization
(\$288,417)
\$28,228
\$184,871
(\$75,318)

Item #7 Exhibit A Page 4 of

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