

David S. Samford david@gosssamfordlaw.com (859) 368-7740

November 2, 2018

RECEIVED

## VIA HAND DELIVERY

Gwen R. Pinson, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602 NOV 0 2 2018

PUBLIC SERVICE COMMISSION

## Re: IN THE MATTER OF: APPLICATION OF INTER-COUNTY ENERGY COOPERATIVE CORPORATION FOR A GENERAL ADJUSTMENT OF EXISTING RATES - Case No. 2018-00129

Ms. Pinson:

Please find enclosed and accept for filing in the above-styled matter an original and ten (10) copies of Inter-County Energy Cooperative Corporation's Responses to Commission Staff's Informal Conference Request for Information. Please return a file-stamped copy to me.

I appreciate your assistance with this matter, and please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,

David S. Samford

Enclosures

# RECEIVED

## **COMMONWEALTH OF KENTUCKY**

## **BEFORE THE PUBLIC SERVICE COMMISSION**

PUBLIC SERVICE COMMISSION

NOV 0 2 2018

In the Matter of:

APPLICATION OF INTER-COUNTY ENERGY COOPERATIVE CORPORATION FOR A GENERAL ADJUSTMENT OF EXISTING RATES

) Case No. 2018-00129

## INTER-COUNTY ENERGY COOPERATIVE CORPORATION'S RESPONSE TO COMMISSION STAFF'S INFORMAL CONFERENCE REQUEST FOR INFORMATION

Filed: November 2, 2018

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## **COMMONWEALTH OF KENTUCKY**

#### **BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

APPLICATION OF INTER-COUNTY ENERGY COOPERATIVE CORPORATION FOR A GENERAL ADJUSTMENT OF EXISTING RATES

Case No. 2018-00129

#### **VERIFICATION OF SHEREE GILLIAM**

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COMMONWEALTH OF KENTUCKY

COUNTY OF BOYLE

Sheree Gilliam, Senior Vice-President Finance and Administration, Inter-County Energy Cooperative Corporation, being duly sworn, states that she has supervised the preparation of certain of the responses of Inter-County Energy Cooperative Corporation to Commission Staff's Informal Conference Request for Information in the above-referenced case and that the matters and things set forth in her responses are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

Huru Lilliam

The foregoing Verification was signed, acknowledged and sworn to before me this day of November, 2018, by Sheree Gilliam.

NOTARY PUBLIC, Notary # 547-44 Commission expiration:



#### **COMMONWEALTH OF KENTUCKY**

#### **BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

APPLICATION OF INTER-COUNTY ENERGY COOPERATIVE CORPORATION FOR A GENERAL ADJUSTMENT OF EXISTING RATES

Case No. 2018-00129

#### **VERIFICATION OF RICHARD J. MACKE**

STATE OF MINNESOTA

COUNTY OF ANOKA

Richard J. Macke, Vice President, Economics, Rates and Business Planning with Power System Engineering, Inc., being duly sworn, states that he has supervised the preparation of certain of the responses of Inter-County Energy Cooperative Corporation to Commission Staff's Informal Conference Request for Information in the above-referenced case and that the matters and things set forth in his responses are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

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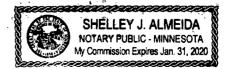
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Richard J. Macke

The foregoing Verification was signed, acknowledged and sworn to before me this 2 day of November, 2018, by Richard J. Macke.

NOTARY PUBLIC, Notary #

Commission expiration: 1/31/2020



Item 1 Page 1 of 1 Witness: Rich Macke

## Inter-County Energy Cooperative Corporation Case No. 2018-00129 Commission Staff's Informal Conference Request for Information

1. Please provide the new proposed changes to Schedule 2 – Small Commercial and Small Power rates.

### **Response:**

In its application, Exhibit 12, Page 1 of 1, Inter-County Energy showed a revenue request for Schedule 2 of \$1,670,807, representing a \$151,070, or 9.9% increase from present rate levels. Exhibit 13, Page 2 of 4 of the application shows the proposed rate design used to produce this revenue request. The request also included a change in how the rate is administered. In administering the <u>present</u> rate members are assessed the Demand Charge only on kW that exceeds 10 kW in each month, if any. Inter-County <u>proposed</u> to change the administration so that all members would be assessed the Demand Charge on all kW each month. However, in preparing its response to Staff Data Request No. 4, question 5, it became apparent that it would be problematic to administer Schedule 2 in this manner in the short-term. Therefore, Inter-County Energy is proposing to maintain the present administration of the rate whereby only kW that exceeds 10 kW is billed the Demand Charge. The overall revenue request would not change, and the rate design shown below in the "Alternative" column would achieve the requested revenue while maintaining the present administration of the rate (there is a \$1 difference due to rounding).

_	Present	As Filed	Alternative
	(> 10 kW)	(all kW)	(>10 kW)
Customer Charge	\$6.28	\$18.00	\$18.00
Demand Charge	\$4.54	\$5.85	\$5.85
Energy Charge	\$0.08688	\$0.07150	\$0.08612
Annual Revenue	\$1,519,737	\$1,670,807	\$1,670,806
Change		9.9%	9.9%

## Schedule 2 - Small Commercial and Small Power

Item 2 Page 1 of 1 Witness: Sheree Gilliam

## Inter-County Energy Cooperative Corporation Case No. 2018-00129 Commission Staff's Informal Conference Request for Information

2. Provide the number of Inter-County Energy employees engaged in storm restoration that have hours included in the 2018 Project 9, March snow storm. Please provide the total number of regular hours worked by these Inter-County Energy employees and the total expense for these regular hours worked.

## **Response:**

Total number of Inter-County Energy employees who billed labor expenses to Project 9: 47

Total regular hours worked for Inter-County Energy employees: 1,408.25 hours

Total expense for regular hours worked for Inter-County Energy employees: \$44,387.18

Item 3 Page 1 of 4 Witness: Sheree Gilliam

## Inter-County Energy Cooperative Corporation Case No. 2018-00129 Commission Staff's Informal Conference Request for Information

3. Please provide the regular hour and the overtime expense incurred by Inter-County Energy, by quarter, for 2013 – 2018, along with regular and overtime expense for March 2013, March 2014, March 2015, March 2016, March 2017 & March 2018 through October 21, 2018.

## **Response:**

Please see attached. The information included is for Inter-County Energy employees only. The "outside" employees are those who work primarily in outdoor conditions. The "inside" employees are those who work primarily in an office setting. On page 2 of this response, Inter-County Energy is providing the general ledger entries related to Inter-County Energy's labor expense for its own employees.

Inter - County Emergy Work
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GRAND TOTAL	\$	100,359.95	<u> </u>

#### Regular/Overtime hours & expense 2013 - 2018 by quarter

2013	1st Quarter				2nd Quarter	-			3rd Quarter				4th Quarter	-		
	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense
Outside employees	15442.00	\$ 459,163.25	705.50	\$ 31,922.92	18144.50	531,309.64	1027.00 \$	45,064.12	15697.50	\$ 459,227.55	1390.50 \$	61,397.23	18695.50	\$ 550,140.98	1394.00 \$	62,282.74
Inside employees	16036.50	\$ 434,928.98	108.00	3,455.30	17181.00	468,545.81	176.50 \$	5,710.51	14428.00	\$ 398,813.53	113.00 \$	3,681.35	16905.00	\$ 479,079.88	127.00 \$	4,036.06
Total	31478.50	\$ 894,092.23	813.50	\$ 35,378.22	35325.50	\$ 999,855.45	1203.50 \$	50,774.63	30125.50	\$ 858,041.08	1503.50 \$	65,078.58	35600.50	\$ 1,029,220.86	1521.00 \$	66,318.80

2014	1st Quarter				2nd Quarter				3rd Quarter				4th Quarter			
	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense
Outside employees	15404.7	\$ 466,327.58	1538.05	68,566.79	16049.00	\$ 464,896.53	1215.50 \$	52,706.55	16837.50	\$ 491,569.56	1345.00 \$	59,376.92	17037.00	\$ 505,555.08	853.00 \$	37,499.14
Inside employees	15420.5	\$ 460,025.98	237.50	\$ 8,627.28	15552.00	\$ 427,145.38	120.50 \$	3,633.96	18174.40	\$ 513,683.27	345.50 \$	11,084.95	18426.00	\$ 518,875.19	192.50 \$	5,857.01
Total	30825.20	\$ 926,353.56	1775.55	\$ 77,194.07	31601.00	\$ 892,041.91	1336.00 \$	56,340.51	35011.90	\$ 1,005,252.83	`1690.50 \$	70,461.87	35463.00	\$ 1,024,430.27	1045.50 \$	43,356.15

2015	1st Quarter				2nd Quarter				3rd Quarter			i i i i i i i i i i i i i i i i i i i	4th Quarter			
	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense
Outside employees	14876.5	\$ 450,026.58	592.25 \$	26,641.99	18130.00	\$ 539,366.86	1443.25 \$	64,519.57	15512.00	\$ 463,480.63	1764.50 \$	78,211.05	18077.50	\$ 549,471.26	537.50 \$	24,227.39
Inside employees	15902.5	\$ 453,628.06	152.25 \$	4,497.85	18600.00	\$ 527,905.19	244.75 \$	7,719.76	16087.00	\$ 459,825.49	139.00 \$	4,451.47	18872.50	548,427.06	101.00 \$	3,149.41
Total	30779.00	\$ 903,654.64	744.50 \$	\$ 31,139.84	36730.00	\$ 1,067,272.05	1688.00 \$	72,239.33	31599.00	\$ 923,306.12	1903.50 \$	82,662.52	36950.00	\$ 1,097,898.32	638.50 \$	27,376.80

2016	1st Quarter				2nd Quarter				3rd Quarter				4th Quarter			
	Reg Hr. Reg E	xpense OT I	Hrs C	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense
Outside employees	17677.00 \$ 545	5,875.17 68	89.00 \$	32,271.68	15680.50 \$	485,315.71	1268.75 \$	58,888.90	18751.50	\$ 577,573.35	1629.75 \$	75,365.31	16027.50 \$	502,968.86	526.75 \$	24,967.82
Inside employees	19338.25 \$ 572	2,384.06 9	94.25 \$	3,075.34	16140.00 \$	484,912.78	147.75 \$	4,960.56	17501.50	\$ 525,041.83	89.25 \$	2,878.90	15544.50 \$	471,963.54	80.75 \$	2,635.05
Total	37015.25 \$1,118	8,259.23 78	83.25 \$	35,347.02	31820.50 \$	970,228.49	1416.50 \$	63,849.46	36253.00	\$ 1,102,615.18	1719.00 \$	78,244.21	31572.00 \$	974,932.40	607.50 \$	27,602.87

2017	1st Quarter				2nd Quarter				3rd Quarter				4th Quarter			
	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense
Outside employees	18722.00 \$	594,926.81	961.75	\$ 44,635.97	16187.00	\$ 522,135.81	1202.00 \$	56,867.91	19165.00	\$ 616,052.74	1208.75 \$	57,796.26	15961.00	\$ 511,368.20	606.50 \$	28,961.43
Inside employees	17946.53 \$	550,296.67	115.00	\$ 3,959.31	16123.10	\$ 502,596.69	151.25 \$	5,181.46	17725.75	\$ 532,282.34	87.00 \$	2,921.83	15705.00	\$ 494,059.31	87.25 \$	2,807.85
Total	36668.53 \$	1,145,223.48	1076.75	\$ 48,595.28	32310.10	\$ 1,024,732.50	1353.25 \$	62,049.37	36890.75	\$ 1,148,335.08	1295.75 \$	60,718.09	31666.00	\$ 1,005,427.51	693.75 \$	31,769.28

**2018	1st Quarter				2nd Quarter				3rd Quarter				**4th Quarter			
	Reg Hr. R	leg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense	Reg Hr.	Reg Expense	OT Hrs	OT Expense
Outside employees	17804.00 \$	578,037.78	1911.75	91,072.83	15389.50	\$ 499,684.15	1279.25 \$	61,002.52	17830.50	\$ 581,849.53	1921.50 \$	92,593.37	5128.00	165,826.41	428.75 \$	20,664.63
Inside employees	18646.50 \$	619,340.99	230.75	8,403.30	15226.25	\$ 462,317.53	131.00 \$	4,668.77	17736.50	\$ 538,942.54	97.75 \$	3,451.09	4973.50	155,574.02	27.50 \$	948.40
Total	36450.50 \$1	1,197,378.77	2142.50	\$ 99,476.13	30615.75	\$ 962,001.68	1410.25 \$	65,671.29	35567.00	\$ 1,120,792.07	2019.25 \$	96,044.46	10101.50	321,400.43	456.25 \$	21,613.03

\*\*2018 Budget OT Hrs & Expense: 4,500 Hrs/\$201,000 \*\* Reg/ OT Hrs & Expense 10/1/18 - 10/21/2018

March, 2013	Reg. Hrs	Reg.	Exp.	OT Hrs.	OT	Exp.
Outside Employees	5208.00	\$	152,973.84	186.00	\$	8,334.74
Inside Employees	5612.50	\$	148,042.01	37.00	\$	1,186.89
Total	10820.50	\$	301,015.85	223.00	\$	9,521.63

March, 2014	Reg. Hrs	Reg.	Exp.	OT Hrs.	OT	Exp.
Outside Employees	9303.50	\$	273,263.82	357.50	\$	15,242.92
Inside Employees	4902.50	\$	144,153.24	49.50	\$	1,694.65
Total	14206.00	\$	417,417.06	407.00	\$	16,937.57

March, 2015	Reg. Hrs	Reg.	Exp.	OT Hrs.	ОТ	Exp.
Outside Employees	5121.00	\$	153,158.61	271.25	\$	12,123.20
Inside Employees	4962.50	\$	143,362.46	48.50	\$	1,473.66
Total	10083.50	\$	296,521.07	319.75	\$	13,596.86

<u>.</u>						
March, 2016	Reg. Hrs	Reg.	Exp.	OT Hrs.	OŤ	Exp.
Outside Employees	7606.00	\$	234,840.28	161.25	\$	7,542.05
Inside Employees	7968.00	\$	233,864.17	36.25	\$	1,182.02
Total	15574.00	\$	468,704.45	197.50	\$	8,724.07

March, 2017	Reg. Hrs	Reg.	Exp.	OT Hrs.	ΟΤ	Exp.
Outside Employees	7995.50	\$	254,729.88	578.00	\$	26,031.76
Inside Employees	7608.00	\$	231,083.40	45.00	\$	1,571.34
Total	15603.50	\$	485,813.28	623.00	\$	27,603.10

March, 2018	Reg. Hrs	Reg.	Exp.	OT Hrs.	ОТ	Exp.
Outside Employees	7627.00	\$	232,878.69	174.75	\$	6,444.06
Inside Employees	7569.00	\$·	246,465.09	1517.25	\$	71,848.22
Total	15196.00	\$	479,343.78	1692.00	\$	78,292.28