

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF FARMERS RURAL ELECTRIC) Case No.
COOPERATIVE CORPORATION FOR A NEW) 2012-00108
COMMERCIAL TIME-OF-DAY TARIFF)

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION

Farmers Rural Electric Cooperative Corporation ("Farmers"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. 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 that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Farmers shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Farmers fails or refuses to furnish all or part of the requested information, it 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.

1. Refer to Exhibit A of the Application.

a. Farmers' proposed Schedule C – Time-of-Day – Commercial Service ("Commercial TOD") tariff limits availability to consumers with a total demand not exceeding 500 kW. Farmers' current Schedule D – Large Commercial/Industrial Service Optional Time-of-Day rate has no demand limit for consumers whose kilowatt demand exceeds 50 kW. Explain why Farmers proposes the 500 kW limit for the Commercial TOD tariff. Include in the explanation whether Farmers has consumers currently served under its Schedule D – Large Commercial/Industrial Service Optional Time-of-Day whose demand exceeds 500 kW and who would be eligible to receive service under the Commercial TOD rate if not for the 500 kW limit.

b. Explain whether the proposed Commercial TOD rate is intended to be available on a voluntary basis only, and whether it is meant to replace any existing tariff.

c. Farmers' current Schedule D – Large Commercial/Industrial Service Optional Time-of-Day rate includes a demand charge, while Farmers' proposed

Commercial TOD rate does not. Explain. Include in the explanation whether the Time-of-Day component of the existing Schedule D – Large Commercial/Industrial Service Optional Time-of-Day rate is through the demand charge and, if so, why the change to an on-peak/off-peak energy charge for the proposed Commercial TOD rate is preferable.

2. Refer to Exhibit B, page 3, A8, of the Prepared Testimony of James R. Adkins. Explain how the off-peak energy rate of \$0.06 per kWh was determined.

3. Refer to Exhibit D of the Application. Provide the year in which the January through December cost support data provided on pages 1 and 2 occurred.

4. Is Farmers' proposed Commercial TOD rate designed to be bill-neutral to a consumer switching from either Schedule C – Commercial & Industrial Service, or from Schedule D – Large Commercial/Industrial Service Optional Time-of-Day rate? If not, provide a comparison of the monthly bill for an average customer currently served under each of the current Schedule C and Schedule D rates and for an average customer served under the proposed Commercial TOD rate. Provide all calculations and workpapers necessary to support the response.

5. Refer to Farmers' application, Exhibit E, page 2. The customer charge adder shows an additional meter cost of \$500.00.

a. Provide a breakdown of the \$500.00 cost.

b. Provide the estimated life expectancy for this type of meter.

6. The rates under Farmers' current Schedule C – Commercial & Industrial Service for consumers of 50 kW or above and current Schedule D – Large Commercial Service Optional Time-of-Day, appear to be identical. Explain whether both rates are

currently available and, if so, whether Farmers intends to eliminate either or both rates if its Commercial TOD rate is approved by the Commission.

7. How does Farmers intend to inform its customers of this new proposed tariff and the proposed rate schedules?



Jeff Derguen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED APR 03 2012

cc: Parties of Record

Case No. 2012-00108

Woodford L Gardner, Jr.
Richardson Gardner & Alexander
117 East Washington Street
Glasgow, KENTUCKY 42141-269