COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF JACKSON PURCHASE) ^
ENERGY CORPORATION FOR APPROVAL OF) CASE NO.
FLOW THROUGH RATES PURSUANT TO KRS) 2013-00384
278.455	j

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO JACKSON PURCHASE ENERGY CORPORATION

Jackson Purchase Energy Corporation ("Jackson Purchase"), pursuant to 807 KAR 5:001, is to file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due no later than February 3, 2014. 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 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.

Jackson Purchase 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 Jackson Purchase 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 should 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, Jackson Energy's proposed tariff.
- a. Refer to page 5 of 158. The proposed energy charge for the Schedule R Residential class is shown as \$.114366 per kWh. The proposed Schedule R Residential energy rate shown on page 1 of Exhibit C of the application, the public notice, is shown as \$.114365 per kWh. Identify which is the correct proposed rate.
- b. Refer to page 132 of 158. Confirm that Jackson Purchase intended to delete the renewable resource energy service rate for Rate Schedule L-E Large Industrial Member Expansion from this page.
- 2. Provide all spreadsheets contained in Exhibit B of the application (which encompasses all Exhibits to the Testimony of Jim Adkins) in Excel spreadsheet format with the formulas intact and unprotected and all rows and columns accessible.
- 3. Refer to Exhibit D to the Testimony of Jim Adkins, page 3 of 8. Confirm that the proposed energy charge on this page should have been shown as \$.110096 as presented in Exhibit A, the proposed tariff, and Exhibit C, the public notice, instead of \$.110095.

- 4. Refer to Exhibit D to the Testimony of Jim Adkins, page 5 of 8.
- a. Confirm that Jackson Energy's direct-served customer is served under this schedule, Schedule I-E Large Commercial and Industrial Existing.
- b. Provide the test-year billing determinants related to the directserved customer.
- c. If this customer is served under a special contract, provide a copy of the special contract.
- d. Explain why the direct-served customer is charged rates that differ from Big Rivers Electric Corporation's ("Big Rivers") Large Industrial Customer rate.
- e. State whether Jackson Purchase is proposing that the direct-served customer receive a rate increase equal to the \$201,414 Industrial wholesale rate increase Jackson Purchase is receiving from Big Rivers related to this customer as shown in Exhibit B to the Testimony of Jim Adkins. If yes, provide the calculation confirming the equal increase. If no, explain why an equal pass-through is not being proposed.
 - 5. Provide a copy of an actual bill with customer information redacted.
- 6. Provide a copy of the same customer bill prepared with the assumption that Big Rivers is granted its full requested increase in Case No. 2013-00199¹ and receives approval of its proposal to mitigate the increase using the Economic and Rural Economic Reserve funds. The proposed sample bill should reflect the tariff changes proposed by Jackson Purchase in this case.
 - 7. Refer to Exhibit A of the application, pages 57 and 58 of 158.

¹ Case No. 2013-00199, Application of Big Rivers Electric Corporation for a General Adjustment in Rates Supported by Fully Forecasted Test Period (Ky. PSC, filed June 28, 2013)

a. Explain how the rates listed in Jackson Purchase's Schedule SPC A – Small Power Production or Generation Less Than 100 kW and Schedule SPC-B –
 Small Power Production or Generation Greater Than 100 kW were calculated.

b. Explain why a change in Big Rivers' Schedule QFS – Cogeneration/Small Power Production Sales - Over 100 kW, as proposed in Case No. 2013-00199, would not require a change in Jackson Purchase's Schedules SPC-A and SPC-B.

Jeff Derouen

Executive Director

Public Service Commission

P.O. Bax 615

Frankfort, KY 40602

DATED JAN 2 7 2014

cc: Parties of Record

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