

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF JACKSON)	
ENERGY COOPERATIVE CORPORATION)	CASE NO.
FOR A GENERAL ADJUSTMENT IN)	2019-00066
EXISTING RATES)	

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

Jackson Energy Cooperative Corporation (Jackson Energy), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on May 13, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked. 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.

Jackson Energy shall make timely amendment to any prior response if they obtain 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 Energy fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for their 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Jackson Energy shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of John Wolfram (Wolfram Testimony), page 16, Table 4. Table 4 indicates that the Cost of Service Study (COSS) results indicates that only Rate 10 – Residential Service is being subsidized. Explain why Jackson Energy did not propose an increase in revenue to meet the 1.85 Streamline TIER requirements and additionally propose a revenue allocation between the rate classes so to lower subsidization from the other rate classes.

2. Provide a cross-tab of the usage and income from Jackson Energy's last Residential End-Use Survey.

3. Provide the average monthly use for customers receiving assistance.

4. Provide Jackson Energy's TIER, OTIER, and TIER excluding G&T capital credits for each year since Jackson Energy's last rate case.

5. Provide all exhibits from the application in Excel spreadsheet format with all formulas intact and unprotected, and with all columns and rows accessible.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED APR 26 2019

cc: Parties of Record

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