

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)	
PROPOSED POLE ATTACHMENT TARIFFS)	CASE NO.
OF RURAL ELECTRIC COOPERATIVE)	2022-00106
CORPORATIONS)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO RURAL ELECTRIC COOPERATIVE CORPORATIONS

Big Rivers Electric Corporation (BREC); Big Sandy RECC; Blue Grass Energy Cooperative Corp. (Blue Grass Energy); Clark Energy Cooperative, Inc. (Clark Energy); Cumberland Valley Electric, Inc.; East Kentucky Power Cooperative, Inc. (EKPC); Farmers RECC; Fleming-Mason Energy Cooperative, Inc. (Fleming-Mason Energy); Grayson RECC; Inter-County Energy Cooperative Corporation (Inter-County Energy); Jackson Energy Cooperative Corporation (Jackson Energy); Jackson Purchase Energy Corporation (Jackson Purchase Energy); Kenergy Corp.; Licking Valley RECC; Meade County RECC; Nolin RECC; Owen Electric Cooperative, Inc. (Owen Electric); Salt River Electric Cooperative Corp. (Salt River Electric); Shelby Energy Cooperative (Shelby Energy); South Kentucky RECC; and Taylor County RECC (collectively, the RECCs), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on July 7, 2022. The Commission directs the RECCs to the Commission's July 22, 2021 Order in Case No. 2020-00085¹

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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.

The RECCs shall make timely amendment to any prior response if the RECCs obtain information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the RECCs fail or refuse to furnish all or part of the requested information, the RECCs 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, the RECCs shall, in accordance with 807

KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. For all cooperatives that require prepayment of survey fees, explain whether the cooperative would refund the difference if the actual cost of the survey were less than the Attachment Customer's prepayment. If so, identify the section of the tariff stating that. If not, explain why not.

2. For Big Sandy RECC only: Refer to Big Sandy RECC's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 10, Exhibit 2–10. Provide a detailed narrative description for how the 156 percent overhead rate was calculated.

3. For Blue Grass Energy only: Refer to Blue Grass Energy's response to Staff's Second Request, Item 13. Explain how the \$71.50 per hour billing rate was determined, including any supporting calculations and a breakdown of overhead expense.

4. For Clark Energy only: Refer to Clark Energy's response to Staff's Second Request, Item 17. Confirm that the administrative review fee is not also recovered through the estimated per pole survey costs. If not confirmed, explain.

5. For Farmers RECC only: Refer to Farmers RECC's response to Commission Staff's First Request for Information (Staff's First Request), Item 16, Exhibit 16. Explain why the travel time amount of \$39.22 was not divided by 10 to calculate the travel time cost per pole to account for the 10 poles included in a typical application.

6. For Farmers RECC only: Refer to Farmers RECC's response to Staff's Second Request, Item 23.

a. Provide the underlying calculation supporting the \$10.26 vehicle cost.

7. For Grayson RECC only: Refer to Grayson RECC's response to Staff's Second Request, Item 30(b), Exhibit 30(b).

a. Explain the distinction between construction labor and payroll.

b. Explain what is included in Accounts Payable.

c. Provide the list of benefits included in Journal Entries.

8. For Inter-County Energy only: Refer to Inter-County Energy's response to Staff's First Request, Item 16, Exhibit 16. Explain why the \$19.87 vehicle cost was not divided by the number of poles in application or number of poles inspected per hour, whichever is applicable.

9. For Jackson Energy only: Refer to Jackson Energy's response to Staff's Second Request, Item 37, Exhibit 37. Provide detailed support for the overhead rate of 197 percent.

10. For Licking Valley RECC only: Refer to Licking Valley RECC's response to Staff's Second Request, Item 44 (c) through (e). Explain whether Licking Valley has had discussions with other distribution cooperatives to help it estimate the number of poles in a typical application and poles reviewed/surveyed per hour.

11. For Meade County RECC only: Refer to Meade County RECC's response to Staff's Second Request, Item 46(a). Provide a breakdown of the labor and overhead head cost for each staking technician, including support for the overhead cost.

12. For Nolin RECC only: Refer to Nolin RECC's response to Staff's Second Request, Item 48. Provide a breakdown of the \$128.59 by hourly rate, overhead, and

transportation costs and include how the overhead and transportation costs were calculated.

13. For Owen Electric only: Refer to Owen Electric's response to Staff's Second Request, Item 51, Exhibit 51(a). Provide a breakdown of the \$67.28 by hourly rate and overheads and include how the overhead was calculated.

14. For Salt River Electric only: Refer to Salt River's response to Staff's Second Request, Item 54.

a. Provide the cost support in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

b. Provide support for the 167 percent overhead rate.

15. For South Kentucky RECC only: Refer to South Kentucky RECC's response to Staff's Second Request, Item 57(b), Exhibit 57(b). Provide detailed descriptions of what is included in the "Indirect labor, related fringe benefits and related transportation costs" and "Miscellaneous expenses and supplies used in construction of work orders" line items.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JUN 23 2022

cc: Parties of Record

*Allison Coffey
Nolin R.E.C.C.
411 Ring Road
Elizabethtown, KY 42701-6767

*Bill T Prather
Farmers R.E.C.C.
504 South Broadway
P. O. Box 1298
Glasgow, KY 42141-1298

*David S Samford
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*L Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*Bradley Cherry
Grayson R.E.C.C.
109 Bagby Park
Grayson, KY 41143

*David T Royse
Attorney At Law
Ransdell Roach & Royse PLLC
176 Pasadena Drive, Building I
Lexington, KENTUCKY 40503

*April Renner
Jackson Energy Cooperative Corporation
115 Jackson Energy Lane
McKee, KY 40447

*R. Brooks Herrick
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KENTUCKY 40202

*Diana Edwards
Salt River Electric Cooperative Corp.
111 West Brashear Avenue
P. O. Box 609
Bardstown, KY 40004

*Anna Swanson
Accounting Supervisor
Meade County R.E.C.C.
P. O. Box 489
Brandenburg, KY 40108-0489

*Carol Wright
President & CEO
Jackson Energy Cooperative Corporation
115 Jackson Energy Lane
McKee, KY 40447

*Hon. Derrick Willis
Attorney at Law
Willis Law Office
P.O. Box 1500
Grayson, KENTUCKY 41143

*Big Sandy R.E.C.C.
Big Sandy R.E.C.C.
504 11th Street
Paintsville, KY 41240

*J. Christopher Hopgood
Dorsey, Gray, Norment & Hopgood
318 Second Street
Henderson, KENTUCKY 42420

*Attorney Earl Rogers III
Campbell Rogers & Hill, PLLC
Campbell & Rogers
154 Flemingsburg Road
Morehead, KENTUCKY 40351

*Billy Frasure
Big Sandy R.E.C.C.
504 11th Street
Paintsville, KY 41240

*Chuck Williamson
Blue Grass Energy Cooperative Corp.
1201 Lexington Road
P. O. Box 990
Nicholasville, KY 40340-0990

*M. Evan Buckley
Dinsmore & Shohl, LLP
City Center, 100 W. Main Street
Suite 900
Lexington, KENTUCKY 40507

*Taylor County R.E.C.C.
Taylor County R.E.C.C.
625 West Main Street
P. O. Box 100
Campbellsville, KY 42719

*Clayton O Oswald
Taylor, Keller & Oswald, PLLC
1306 West Fifth Street, Suite 100
Post Office Box 3440
London, KENTUCKY 40743-3440

*Farmers R.E.C.C.
Farmers R.E.C.C.
504 South Broadway
P. O. Box 1298
Glasgow, KY 42141-1298

*Farrah Coleman
Inter-County Energy Cooperative Corporation
1009 Hustonville Road
P. O. Box 87
Danville, KY 40423-0087

*John Tyler
BellSouth Telecommunications, LLC dba AT&T
405 N Broadway
Oklahoma City, OK 73102

*Nolin R.E.C.C.
Nolin R.E.C.C.
411 Ring Road
Elizabethtown, KY 42701-6767

*Gregory R. Lee
Nolin R.E.C.C.
411 Ring Road
Elizabethtown, KY 42701-6767

*Jennie G Phelps
Farmers R.E.C.C.
504 South Broadway
P. O. Box 1298
Glasgow, KY 42141-1298

*South Kentucky R.E.C.C.
South Kentucky R.E.C.C.
200 Electric Avenue
Somerset, KY 42501

*Jackson Purchase Energy Corporation
Jackson Purchase Energy Corporation
6525 US Highway 60 W
Paducah, KY 42001

*Ken Simmons
South Kentucky R.E.C.C.
200 Electric Avenue
Somerset, KY 42501

*Mark David Goss
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*Hannah Wigger
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*Kerry K Howard
President & CEO
Licking Valley R.E.C.C.
P. O. Box 605
271 Main Street
West Liberty, KY 41472

*Melanie Crossfield
Shelby Energy Cooperative, Inc.
620 Old Finchville Road
Shelbyville, KY 40065

*Honorable James M Crawford
Crawford & Baxter, P.S.C. Attorneys at Law
523 Highland Avenue
P. O. Box 353
Carrollton, KENTUCKY 41008

*Kevin Newton
System Planning Engineer
South Kentucky R.E.C.C.
200 Electric Avenue
Somerset, KY 42501

*Meade County R.E.C.C.
Meade County R.E.C.C.
P. O. Box 489
Brandenburg, KY 40108-0489

*Jerry Carter
Inter-County Energy Cooperative Corporation
1009 Hustonville Road
P. O. Box 87
Danville, KY 40423-0087

*Kenergy Corp.
Kenergy Corp.
6402 Old Corydon Road
P. O. Box 18
Henderson, KY 42419

*Blue Grass Energy Cooperative Corp.
Blue Grass Energy Cooperative Corp.
1201 Lexington Road
P. O. Box 990
Nicholasville, KY 40340-0990

*Jennifer L McRoberts
Fleming-Mason Energy Cooperative, Inc.
1449 Elizaville Road
P. O. Box 328
Flemingsburg, KY 41041

*Fleming-Mason Energy Cooperative, In
Fleming-Mason Energy Cooperative, Inc.
1449 Elizaville Road
P. O. Box 328
Flemingsburg, KY 41041

*Clark Energy Cooperative, Inc.
Clark Energy Cooperative, Inc.
2640 Ironworks Road
P. O. Box 748
Winchester, KY 40392-0748

*Cumberland Valley Electric, Inc.
Cumberland Valley Electric, Inc.
Highway 25E
P. O. Box 440
Gray, KY 40734

*Salt River Electric Cooperative Corp
Salt River Electric Cooperative Corp.
111 West Brashear Avenue
P. O. Box 609
Bardstown, KY 40004

*Vice President of Operations Tim Sharp
P.E.
Salt River Electric Cooperative Corp.
111 West Brashear Avenue
P. O. Box 609
Bardstown, KY 40004

*East Kentucky Power Cooperative, Inc
East Kentucky Power Cooperative, Inc.
4775 Lexington Road
P. O. Box 707
Winchester, KY 40392-0707

*Grayson R.E.C.C.
Grayson R.E.C.C.
109 Bagby Park
Grayson, KY 41143

*Travis Stacy
Licking Valley R.E.C.C.
P. O. Box 605
271 Main Street
West Liberty, KY 41472

*Inter-County Energy Cooperative Corp
Inter-County Energy Cooperative Corporation
1009 Hustonville Road
P. O. Box 87
Danville, KY 40423-0087

*Patsy Walters
Taylor County R.E.C.C.
625 West Main Street
P. O. Box 100
Campbellsville, KY 42719

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

*Jackson Energy Cooperative Corporati
Jackson Energy Cooperative Corporation
115 Jackson Energy Lane
McKee, KY 40447

*Paul Werner
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*Licking Valley R.E.C.C.
Licking Valley R.E.C.C.
P. O. Box 605
271 Main Street
West Liberty, KY 41472

*Big Rivers Electric Corporation
Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420

*Owen Electric Cooperative, Inc.
Owen Electric Cooperative, Inc.
8205 Highway 127 North
P. O. Box 400
Owenton, KY 40359

*Robin Slone
Big Sandy R.E.C.C.
504 11th Street
Paintsville, KY 41240

*Shelby Energy Cooperative, Inc.
Shelby Energy Cooperative, Inc.
620 Old Finchville Road
Shelbyville, KY 40065

*Edward T Depp
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KENTUCKY 40202