

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF TAYLOR)	
COUNTY RURAL ELECTRIC COOPERATIVE)	CASE NO.
CORPORATION FOR A GENERAL)	2023-00147
ADJUSTMENT OF RATES)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO TAYLOR COUNTY RURAL ELECTRIC COOPERATIVE

Taylor County Rural Electric Cooperative Corporation (Taylor RECC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on September 1, 2023. The Commission directs Taylor RECC to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

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).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Taylor RECC shall make timely amendment to any prior response if Taylor RECC obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Taylor RECC fails or refuses to furnish all or part of the requested information, Taylor RECC shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Taylor RECC 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 Taylor RECC's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 2 and the Application, the Direct Testimony of John Wolfram (Wolfram Direct Testimony), Exhibit JW-2, Schedule 1.06. Confirm that column 1, "Year" incorrectly states 2022. If this cannot be confirmed, provide the same adjustment using 2021 data.

2. Refer to Taylor RECC's response to Commission Staff's First Request for Information, Item 8. The response does not address whether the amount 90.71 percent customer related classification for underground conductors and devices is considered average. Explain whether the percent is average when conducting a similar COSS.

3. Refer to Taylor RECC's response to Staff's Third Request, Item 10 and the Attachment, Application, Exhibit 20 and Taylor RECC's response to the Attorney General's First Request for Information (Attorney General's First Request), Item 53. The rates in the chart do not vary from year to year. Reconcile the information and clarify which rates were applied and provide an accurate updated depreciation chart including specific explanations for variances.

4. Refer to Taylor RECC's response to Attorney General's Second Request for Information (Attorney General's Second Request), Item 26. Provide the engineering feasibility studies provided by CBS and MSE engineering firms on the new headquarters. Include any invoices or expenditures that Taylor RECC has paid in accordance with the up to \$90,000 approved for the studies.

5. Refer to Taylor RECC's response to Attorney General's Second Request, Item 37(a). Confirm that Taylor RECC has waived all late fees since the Order referenced in the response. If not, explain why not.

6. Provide Taylor RECC's written policy and procedure for uncollectible accounts. Including when an account is deemed uncollectible and when the loss is written off.

7. Refer to Taylor RECC's response to Attorney General's Second Request, Item 69. Provide the Case Number and Commission approval Order for the GPS system. If not available, explain why.

8. Refer to Taylor RECC's response to Attorney General's First Request, Board Minutes, June 2023. Provide the Case Number and Commission approval Order for the increase in indebtedness. If not available, explain why.

9. Provide the total amount(s) of each severance package approved by the Taylor RECC Board in March 2023.

10. Explain the monthly payments of capital credits in the context of Taylor RECC not meeting its debt covenant requirements.

11. State whether any Board members currently serve on other Boards for other business entities. If the member does serve on another Board, provide the name of the business, position of the member and length of service time.

12. Refer to Taylor RECC's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 7(a)-(c). The response provided is not responsive. For each hypothetical, provide the resulting energy charge that would appear on each bill.

13. Refer to Taylor RECC's response to Staff's Second Request, Item 7(a)-(c). The line items were handwritten on the bill in the upper left-hand corner. Explain why the line items are not documented on the bill, including the customer charge.

A handwritten signature in blue ink, appearing to read 'Linda C. Bridwell', followed by the initials 'FWR'.

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

DATED AUG 22 2023

cc: Parties of Record

Case No. 2023-00147

*L. Allyson Honaker
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 6202
Lexington, KENTUCKY 40509

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

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

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

*Brittany H. Koenig
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 6202
Lexington, KENTUCKY 40509

*John Horne
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

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

*Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204