## COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION OF FLEMING-	)	CASE NO.
MASON ENERGY COOPERATIVE, INC. FOR A	)	2023-00223
GENERAL ADJUSTMENT OF RATES	)	

## COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO FLEMING-MASON ENERGY COOPERATIVE, INC.

Fleming-Mason Energy Cooperative, Inc. (Fleming-Mason Energy), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 20, 2023. The Commission directs Fleming-Mason Energy to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

<sup>&</sup>lt;sup>1</sup> 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.

Fleming-Mason Energy shall make timely amendment to any prior response if Fleming-Mason Energy 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 Fleming-Mason Energy fails or refuses to furnish all or part of the requested information, Fleming-Mason Energy 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 filling a paper containing personal information, Fleming-Mason 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 Direct Testimony), pages 18–19, lines 17–10. Considering Fleming-Mason Energy is using the 12 coincident peak (CP) methodology for the cost of service study, explain what efforts or programs Fleming-Mason Energy plans to do to reduce the residential customers' 12 CP demand.
- Refer to the FME-COS-2022-FILED, tab ZeroInt, Account 368 Line
   Transformers.

- Explain, if any, which of the line transformers listed have been fully a. depreciated.
- b. Explain how Fleming-Mason Energy procures the line transformers to meet customers' demands. Include in the response if either Fleming-Mason Energy, East Kentucky Power Cooperative, Inc. (EKPC), or a third-party procures them and distributes them on an as needed basis.
  - Explain how Fleming-Mason Energy finances the line transformers.
- 3. Refer to the Application, Wolfram Direct Testimony, Exhibit JW-2, Schedule 1.09. Provide a breakdown of the total test-year expenses for the board of directors.
- 4. Refer to Fleming-Mason Energy's response to Commission Staff's First Request for Information (Staff's First Request), Item 10.
  - State which notes have variable interest rates. a.
- b. Provide the issuance date and maturity date for all notes included in the Application, Wolfram Direct Testimony, Exhibit JW-2, Schedule 1.03.
- 5. Refer to Fleming-Mason Energy's response to Staff's First Request, Item 11(d). Provide supporting documentation for the pro forma right-of-way maintenance expense.
- 6. Refer to Fleming-Mason Energy's response to Staff's First Request, Item 15. Provide a breakdown of the pro forma test-year wages and salaries in the same format.

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- 7. Refer to Fleming-Mason Energy's response to Staff's First Request, Item

  16. Provide the number of employees that participated in each plan type for 2022 and

  2023.
- 8. Refer to Fleming-Mason Energy's response to Staff's First Request, Item 17.
- a. Confirm that all employees contribute 20 percent of health insurance premiums. If this cannot be confirmed, provide a breakdown of employee contribution rates per plan type.
- b. Provide a breakdown of test-year and pro forma total health insurance expenses and Fleming-Mason Energy's contribution for each plan type.

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

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DATED NOV 08 2023

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