

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF NOLIN RURAL)	
ELECTRIC COOPERATIVE CORPORATION FOR)	CASE NO.
PASS-THROUGH OF EAST KENTUCKY POWER)	2025-00211
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION

Nolin Rural Electric Cooperative Corporation (Nolin 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 10, 2025. The Commission directs Nolin 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.

Nolin RECC shall make timely amendment to any prior response if Nolin 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 Nolin RECC fails or refuses to furnish all or part of the requested information, Nolin 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, Nolin 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 Exhibit 4 of the Application.
 - a. Provide the billing analysis in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.
 - b. Reconcile Nolin RECC's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC to Nolin RECC and explain any variance shown in Exhibit 4.

2. Refer to the Direct Testimony of John Wolfram, Exhibit 7.
 - a. Confirm that Nolin RECC's proposed rates reflect a strict proportional pass-through of EKPC's wholesale increase in accordance with KRS 278.455. If not confirmed, explain the response.
 - b. If Nolin RECC considered any deviation from strict proportional pass-through of EKPC's wholesale increase, explain why no such deviation was proposed.
 - c. Provide the class billing determinants used to support the proportional pass-through.
3. Refer to Exhibit 4 of the Application, which shows revenues associated with the AGC Automotive special contract.
 - a. Identify the Commission case number and Order approving this special contract.
 - b. Explain how EKPC's wholesale increase is treated for this load (allocated or excluded) and confirm that the treatment is consistent with the terms of the contract and the statutory provisions governing pass-through adjustments for special contracts. If not confirmed as consistent, explain the response.
4. Refer to Case No. 2023-00014,² which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery. Refer also to Nolin RECC's FAC Form A filings.
 - a. Provide a reconciliation between the \$0.01180/kWh FAC roll-in incorporated in Exhibit 4 and Nolin RECC's FAC Form A filings filed after the August 30, 2024 Order in Case No. 2023-00014.

² Case No. 2023-00014, *An Electronic Examination of the Application of the Fuel Adjustment Clause of East Kentucky Power Cooperative, Inc. Cooperatives from November 1, 2020 through October 31, 2022* (Ky. PSC Aug. 30, 2024), Order.

b. Identify any differences between the billing analysis in Exhibit 4 and the FAC recovery amounts reported in Nolin RECC's semi-annual filings.

c. Confirm that Nolin RECC will continue to apply monthly FAC adjustments filed under 807 KAR 5:056 on customer bills following implementation of the proposed pass-through rates.

5. Refer to Nolin RECC's FAC and Exhibit 4 of the Application.

a. Confirm that the line-loss methodology used to derive the roll-in base fuel amount in this pass-through filing is the same methodology used in Nolin RECC's tariff and ongoing filings under 807 KAR 5:056.

b. Provide the current 12-month line-loss percentage (identify the period) and show the calculation connecting that percentage to the \$/kWh roll-in embedded in the proposed rates.

6. Refer to Nolin RECC's current tariff, including Section 23 (Billing Cycles) and Section 25 (Billing Adjusted to Standard Periods).³

a. Describe how Nolin RECC will implement the new rates for bills with service periods that straddle the effective date.

b. Provide a worked example with specific dates and usage that identifies which components are prorated and which are not (e.g., customer charge, security lighting, energy, and demand).

7. Refer to Schedule 5-Security Lights in Nolin RECC's current tariff and Exhibit 4 of the Application.

³ Nolin Rural Electric Cooperative Corporation Tariff (last changed June 27, 2025), Sections 23 and 25.

a. Confirm that Security Lighting service is unmetered under the current and proposed tariff. If not confirmed, explain the response.

b. Provide the assumed monthly kWh per fixture by type used in Exhibit 4 and show how those assumptions translate into the proposed monthly charges for each item.

c. Explain how the FAC roll-in is reflected for Security Lighting in the proposed rates.

8. Refer to Exhibit 4, Billing Analysis, page 3. Refer also to Exhibit 2, Proposed Tariffs, Schedule 4. The billing analysis states that the Schedule 4 energy charge is \$0.079371 net per kWh, while the Tariff states \$0.07937 net per kWh. Confirm, explain and reconcile the discrepancy.

9. Refer to Exhibit 4, Billing Analysis, page 4, line item 68. Refer also to Exhibit 2, Proposed Tariffs, Schedule 5. The billing analysis states that the “1B – SL 55W LED” has a proposed rate of \$10.56 per month per unit. However, the Tariff states that the “Directional floodlight 100 Watt HPS to be mounted on existing pole” has the proposed rate of \$10.56 per month per unit. Explain and reconcile the discrepancy.

10. Refer to Exhibit 4, Billing Analysis, page 4, line items 69-77, 79-86, 91, 94, 96-97, and 101-102. Refer also to Exhibit 2, Proposed Tariff, Schedule 5. The rates specified in the billing analysis are not included on the proposed or strike through Tariff sheets. Provide an explanation as to why those rates are not included in the proposed Tariff.

11. Refer to Exhibit 4, Billing Analysis, page 4, line item 81. Explain why this rate does not include a proposed rate.

12. Refer to Exhibit 4, Billing Analysis, page 4, line item 83. Explain why this rate does not include a proposed rate.

13. Refer to Exhibit 4, Billing Analysis, page 4, line items 82 and 83. Explain the differences between both rates.

14. Refer to Exhibit 4, Billing Analysis, page 4, line item 86. Explain why this rate does not include a proposed rate.

15. Refer to Exhibit 4, Billing Analysis, page 4, line item 87. Refer also to Exhibit 2, Proposed Tariffs, Schedule 5. The billing analysis states that the “12 – DFL 100 W HPS EP” proposed rate is \$10.09 per month per unit. However, the Tariff states that the “Directional floodlight 100 Watt HPS to be mounted on existing pole” has the proposed rate of \$10.56 per month per unit. Confirm, explain and reconcile the discrepancy.

16. Refer to Exhibit 4, Billing Analysis, page 4, line item 98. Refer also to Exhibit 2, Proposed Tariffs, Schedule 5. The billing analysis states that “22 - SL ORN UG 400W 20' FLUTED POLE” has a proposed rate of \$39.00 per month per unit. The Tariff states that “Acorn Contemporary Type 400 Watt HPS – for underground service only; to be used with the thirty (30') foot fiberglass pole – (Charge does not include pole.)” also has a proposed \$39.00 per month per unit charge. Explain whether those rates are the same rate.

17. Refer to Exhibit 4, Billing Analysis, page 4, line item 99. Refer also to Exhibit 2, Proposed Tariffs, Schedule 5. The billing analysis states that “23 - 20 FT FP COLONIAL” has a proposed rate of \$37.33 per month per unit. The Tariff states that “Santa Rosa Contemporary Type 150 Watt HPS – for underground service only; to be

used with twenty (20') foot fluted pole" also has a proposed \$37.33 per month per unit charge. Explain whether those rates are the same rate.

18. Refer to Exhibit 4, Billing Analysis, page 4, line item 100. Refer also to Exhibit 2, Proposed Tariffs, Schedule 5. Line item 100 appears to be the rate described as "Santa Rosa Contemporary Type 150 Watt HPS – for underground service only; to be used with twenty (20') foot fluted pole" in the Tariff. However, the rates are not the same.

- a. Explain whether those rates are the same rate.
- b. Explain why this rate does not include a proposed rate in the billing analysis.

19. Refer to Exhibit 4, Billing Analysis, page 4, line item 102. Explain why this rate does not include a proposed rate.

20. Refer to Exhibit 2, Proposed Tariffs, Schedule 5. Refer also to Exhibit 4, Billing Analysis, page 4, generally. The billing analysis did not include rates outlined in the Strike Through with no changes.

- a. Provide an explanation as to why these rates were not included in the billing analysis.
- b. Confirm whether those rates have any impact on Schedule 5's revenue and explain how. If confirmed, provide an update

21. Refer to Exhibit 4, Billing Analysis, page 3. Refer also to Exhibit 2, Proposed Tariffs, Schedule 9. The billing analysis lists an energy charge for Schedule 9 of \$0.072455 per kWh. However, the Tariff shows an energy charge of \$0.07246 per kWh. Confirm, explain and reconcile the discrepancy.

22. Refer to Exhibit 4, Billing Analysis, page 5, Schedule 8 and Schedule 10. Refer also to Exhibit 2, generally. The changes made to Schedule 8 and Schedule 10 do not appear in the Proposed or Strike Through Tariffs. Explain why these schedules were excluded from the filing. Additionally, provide the appropriate update to Exhibit 2.



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DATED **AUG 26 2025**

cc: Parties of Record

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