COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION OF SHELBY)	
ENERGY COOPERATIVE INC. FOR PASS-)	CASE NO.
THROUGH OF EAST KENTUCKY POWER)	2025-00212
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO SHELBY ENERGY COOPERATIVE, INC.

Shelby Energy Cooperative, Inc. (Shelby 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 September 10, 2025. The Commission directs Shelby Energy 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.

Shelby Energy shall make a timely amendment to any prior response if Shelby 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 Shelby Energy fails or refuses to furnish all or part of the requested information, Shelby 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 filing a paper containing personal information, Shelby 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 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 Shelby Energy's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC to Shelby Energy, and explain any variance shown in Exhibit 4.

- c. Identify any rate rounding variance reflected in Exhibit 4 and reconcile it to the target revenues by class, showing the arithmetic that produces the rounding amount(s).
 - 2. Refer to the Direct Testimony of John Wolfram, Exhibit 7.
- a. Confirm that Shelby Energy'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 Shelby Energy considered any deviation from strict proportional pass-through of EKPC's wholesale increase, identify said deviation and explain why no such deviation was proposed.
- c. Provide the class billing determinants used to support the proportional pass-through.
- 3. Refer to Case No. 2023-00014,² which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery. Refer also to Shelby Energy's FAC Form A filings.
- a. Provide a reconciliation between the \$0.01160/kWh FAC roll-in incorporated in Exhibit 4 and Shelby Energy's FAC Form A filings filed after the August 30, 2024 Order in Case No. 2023-00014 and identify any differences between the billing analysis and the FAC recovery amounts reported in Shelby Energy's semi-annual filings.

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. Confirm that Shelby Energy will continue to apply monthly FAC adjustments filed under 807 KAR 5:056 on customer bills following implementation of the proposed pass-through rates. If not confirmed, explain the response.
- 4. Refer to Shelby Energy's current tariff, Rules & Regulations-Section 14 (Billing).³
- a. Describe how Shelby Energy will implement the new rates for bills with service periods that straddle the effective date, consistent with Section 14.
- b. Provide a worked example (with specific dates and usage) identifying which components are prorated and which are not (e.g., customer charge, lighting charge, energy, and demand).
- 5. Refer to Exhibit 6 (Customer Notice) and Exhibit 4 (Billing Analysis) of the Application. Exhibit 6 includes a footnote referencing that the rates in the notice reflect approved rates at the time of the notice and do not include the rates approved in Case No. 2024-00351.⁴ Reconcile the rates reflected in the notice for Residential Service (Rate 12), Off Peak Retail Marketing (ETS) (Rate 9), Prepay Service (Rate 15), Large Power Service > 50kW (Rate 2), and General Service < 50kW (Rate 11) with the figures reflected in Exhibit 4 of the Billing Analysis.
- 6. Refer to Exhibit 4, Billing Analysis, page 5, line item 110. Refer also to Exhibit 2, Proposed Tariffs, Special Outdoor Lighting Service Rate 33. The billing analysis gives a proposed energy charge of \$0.073681 per kWh, while the Tariff states \$0.07368 per kWh. Explain why the "1" was not included in the Tariff.

³ Shelby Energy Cooperative, Inc. Tariff (last changed June 27, 2025), at 14.

⁴ Case No. 2024-00351, *Electronic Application of Shelby Energy Cooperative, Inc. for a General Adjustment of Rates* (Ky. PSC July 23, 2025) Order.

7. Refer to Exhibit 4, Billing Analysis, page 5, line item 119. Refer also to

Exhibit 2, Proposed Tariffs, Large Industrial Rate – Schedule C1. The billing analysis

gives a proposed energy charge of \$0.07 per kWh, while the Tariff states \$0.06692 per

kWh. Explain why the entire energy charge was not included in the billing analysis.

8. Refer to Exhibit 4, Billing Analysis, page 5, line item 123. Refer also to

Exhibit 2, Proposed Tariffs, Large Industrial Rate - Schedule C2. The billing analysis

gives a proposed energy charge of \$0.06 per kWh, while the Tariff states \$0.05983 per

kWh. Explain why the entire energy charge was not included in the billing analysis.

9. Refer to Exhibit 4, Billing Analysis, generally. Refer also to Exhibit 6,

Customer Notice, page 26H. The table in the customer notice showing the class revenue

increase in dollars and percent does not match the revenue and percentages outlined in

the billing analysis. Explain the discrepancy and confirm which revenues are correct.

10. Refer to Exhibit 4, Billing Analysis, generally. Refer also to Exhibit 6,

Customer Notice, page 26H. The table in the customer notice showing the class bill

increase in dollars and percent does not match the bill impacts outlined in the billing

analysis. Explain the discrepancy and confirm which bill impacts are correct.

Linda C. Bridwell, PE

Executive Director

Public Service Commission

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DATED **AUG 26 2025**

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