COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF SALT RIVER ELECTRIC)
COOPERATIVE CORPORATION TO ADJUST) CASE NO. 92-560
ELECTRIC RATES)

ORDER

IT IS ORDERED that Salt River Electric Cooperative Corporation ("Salt River") shall file an original and 12 copies of the following information with the Commission, with a copy to all parties of record. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information requested herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request. The information requested herein is due no later than May 14, 1993.

1. In the response to Items 1(b) and 1(c) of the March 24, 1993 Order, Salt River has stated that the Electric Thermal Storage ("ETS") and Geo-Thermal loans are renewable annually. However, the East Kentucky Power Cooperative, Inc. ("East Kentucky") policy statement on page 2 of 4 makes no reference to annual renewals.

Explain in detail the basis for the statement that the loan from East Kentucky is renewable annually and provide copies of documents which support this position.

- 2. In the response to Item 1 of the March 24, 1993 Order, Salt River has indicated that it borrowed \$90,000 from East Kentucky in July 1990. On page 4 of 4 of that response, it is indicated that loans totalling \$129,053 have been made under this program. Provide complete details of the sources of \$129,053 in loans to members including the amount of Salt River's own funds that have been invested in this program since the program's inception and during the test year.
- 3. The response to Item 2 of the March 24, 1993 Order contains the union contracts for outside employees at Salt River. Provide the following information concerning standby duty:
- a. Explain in detail the purpose of standby duty including the reason(s) such work duty is required by Salt River.
- b. Explain in detail what alternatives are available to Salt River which would accomplish the same purpose as the standby duty.
- c. Indicate whether there have been any cost/benefit analyses performed evaluating the cost effectiveness of standby duty. Include the results of such analyses.
- 4. Exhibit 3 of the Application, pages 3 and 4 of 48, contains Salt River's proposed wage and salary adjustment. Provide the following information concerning the standby wages:

- a. The schedules show 19 employees were paid \$36,600 in standby wages during the test year. The outside employees labor contract states that standby wages are paid at \$50 per day. At \$50 per day, this indicates that Salt River paid for 732 days of standby service for these 19 employees. Explain in detail why the test-year level of standby service was necessary.
- b. Indicate whether any of the standby service paid during the test year was related to any extraordinary or unusual circumstances.
- c. In the normalization calculations, the standby service cost was reduced to \$36,500. Explain in detail how this level of normalized cost was determined.
- d. For calendar years 1989 through 1991, indicate the total standby wages paid in each year, the number of employees on standby service during that year, and the standby wage rate in effect during each year.
- e. Describe in detail any additional costs incurred by Salt River related to having employees on standby duty.
- 5. In response to Item 3(d) of the March 24, 1993 Order, it is indicated that the former general manager of Salt River was retained as an independent contractor. Indicate whether the former general manager was still retained by Salt River as of test-year end and as of April 1, 1993.
- 6. In the response to Item 5 of the March 24, 1993 Order, page 6 of 6, is an 11-year analysis of wage increases granted to

employees at five investor-owned electric utilities and East Kentucky. Provide the following information about this analysis:

- a. Indicate whether this analysis was prepared for Salt River or East Kentucky.
- b. Explain why Salt River's wage increase should reflect the same levels of increase as those granted to East Kentucky or surrounding investor-owned electric utilities.
- 7. In the response to Item 9 of the March 24, 1993 Order, Salt River discusses how the amount of life insurance provided to eliqible employees is determined.
- a. Explain in detail how the life insurance coverage factors of two times the base salary for bargaining unit employees and five times the base salary for non-bargaining unit employees were determined. Include copies of any studies or analyses which support the level of life insurance provided to these employee groups.
- b. Provide copies of any studies or analyses which indicate that the current levels of coverage for employee life insurance were a necessary part of the compensation package.
- c. Explain why coverage of \$50,000 for each eligible employee would not be considered adequate as part of a total compensation package.
- 8. The response to Item 9 of the March 24, 1993 Order includes a copy of Salt River's board policy on the personal use of cooperative vehicles. On page 8 of 8 of this response, the policy indicates that three methods could be used to determine the income

value to employees from the personal use of cooperative vehicles. For each method indicated, provide the following information:

- a. Explain how the income value is calculated.
- b. Explain how the rates or value factors used in the calculation are determined. Include the rates or value factors used at the beginning and end of the test year.
- c. Explain how Salt River determines which method will be used and why that method would be preferred over another method.
- 9. The response to Item 12 of the March 24, 1993 Order does not adequately answer the request. Salt River was requested to explain the circumstances which resulted in total Net Losses of \$580,829 during the test year in the reserve for depreciation. The response notes this is a memorandum amount and gives a general description of how net losses are calculated. The response does not explain what circumstances existed which resulted in the test-year amount. The request seeks a general description of what caused this level of net losses, such as an unusual number of early retirements or the impact of adopting a new depreciation study. It does not seek an explanation on each retirement made in the test year. Considering this clarification, provide the information originally requested.
- 10. The response to Item 13 of the March 24, 1993 Order includes copies of the 1991 and 1992 tax year Revenue Cabinet Form K recap for Salt River. Provide the following information:

- a. A copy of the 1992 tax year assessments, Revenue Cabinet Form K, which reports the value of utility property as of December 31, 1991, for each county served by Salt River.
- b. A copy of the 1993 tax year assessments, Revenue Cabinet Form K, which reports the value of utility property as of December 31, 1992, for each county served by Salt River. If this information is not available by May 14, 1993, indicate the date the information can be provided.
- 11. The response to Item 16 of the March 24, 1993 Order is not an adequate answer to the request. For each of the National Bank for Cooperatives ("CoBank") loans shown in Exhibit 3 of the Application, page 23 of 48, Salt River was to identify the interest rate option in effect for each listed loan as of test-year end, the interest rate option and interest rate in effect for each listed loan as of March 1, 1993, and indicate when the interest rate for each listed loan was next scheduled to change. The response listed the interest rate options and corresponding interest rates as of test-year end and March 1, 1993, but did not match the option and rate to each listed CoBank loan. The request sought to match each outstanding loan with the interest rate option and interest rate in effect at test-year end and as of March 1, 1993. Given this clarification, provide the information originally requested.
- 12. In the response to Item 16(c) of the March 24, 1993 Order, Salt River has indicated that it tries to price some debt on long-term rates when long-term interest rates are low based on historical standards. Explain in detail the analysis undertaken by

Salt River when it contemplates pricing debt on long-term rates.

Also, explain in detail how Salt River determines its most desirable mix of long- and short-term interest rate financing.

- 13. The response to Item 17 of the March 24, 1993 Order is not an adequate answer to the question. The Commission requested that Salt River provide a schedule showing the short-term borrowings made by it during the test year. The schedule was to show the purpose of the borrowing, the terms and conditions of each borrowing, and the outstanding balance of the borrowing as of test-year end. Salt River's response did not include the terms and conditions of the short-term borrowings. Provide the information originally requested.
- 14. The response to Item 20 of the March 24, 1993 Order contains a schedule showing the calculation of the adjustment to dental and medical insurance cost. Provide the following information:
- a. The schedule indicates that union employees pay a portion of their dental insurance coverage. Explain in detail why this is the case, since the union labor contracts specifically state that Salt River will pay the full cost of the dental coverage (Outside employees Article XI, Section 11:03; Inside employees Article XIII, Section 13:01).
- b. Explain in detail why management employees are not required to pay a portion of the cost of their dental or medical insurance coverage.

- 15. Exhibit 3 of the Application, pages 32 through 43 of 48, contains a detailed schedule of director fees and expenses. Provide the following information:
- a. The test year in this proceeding is the 12 month period ending November 30, 1992. Explain in detail why director fees and expenses with transaction dates outside of the test year have been included in the schedule.
- b. Explain in detail why all six directors attended the Kentucky Association of Electric Cooperatives ("KAEC") Annual Meeting.
- c. Explain in detail why all six directors attended the KAEC training conference held in February 1992.
- 16. Concerning the response to Item 22 of the March 24, 1993 Order, provide the following information concerning the compensation and test-year activities of Salt River's directors:
- a. Indicate when the compensation package provided to directors was last reviewed. Explain in detail how the reasonableness of the package was determined.
- b. With the exception of the special board meeting on June 12, 1992, explain in detail why the decisions considered at the other special board meetings held during the test year could not have been considered and decided during the regular board meetings.
- c. Explain in detail why the costs of the special board meetings held during the test year should be included for rate-making purposes.

- d. Based on the response to Item 22(h), it appears that the Congressional Breakfast could be considered a form of lobbying. Explain in detail why such expenses should be included for ratemaking purposes.
- e. Submit a copy of the program which identifies the lectures, discussions, and other activities which were part of the Region 2 and 3 meeting held during the test year. If a copy of the program is not available, prepare a schedule which lists each lecture, discussion, or activity held as part of that meeting.
- f. Explain in detail why it would not be as beneficial to send a few of the directors to the National Rural Electric Cooperative Association ("NRECA") and KAEC meetings and conferences and have them report back to the full board, instead of sending all six to these meetings and conferences.
- g. Explain in detail the benefits derived by Salt River from having a director attend the annual meeting of another distribution cooperative.
- 17. The response to Item 23 of the March 24, 1993 Order contains a schedule of the directors' fees and expenses for calendar years 1989 through 1991. Provide the following information concerning this analysis and the level of directors' fees and expenses reported for the test year:
- a. Explain in detail the reason(s) for the overall increase in fees and expenses during the period 1989 through the test year.

- b. Explain in detail what cost containment actions, if any, Salt River has undertaken relative to the directors' fees and expenses.
- 18. Concerning the response to Item 26(a) of the March 24, 1993 Order, explain in detail why the revenue received for the rental of temporary meter poles was recorded in Account No. 415. Indicate which accounts are used to record associated labor and material costs for this activity.
- 19. The response to Item 27 of the March 24, 1993 Order contains a copy of the 1992 Auditor's Report. On page 14 of 36, last paragraph, is a discussion of the decision to retire accumulated sick leave benefits for non-bargaining unit employees. Explain in detail how this retirement was handled during the test year. Include an identification of all accounts used to record the transaction. Also indicate the dollar impact on the test year.
- 20. In the response to Item 32 of the March 24, 1993 Order, Salt River provided a schedule of credit card transactions occurring during the test year. For each of the groups of transactions listed below, explain in detail why it was appropriate to record the transaction in the referenced account number.
- a. Gasoline purchase recorded in Account No. 408 Taxes Other than Income Taxes, page 2 of 13.
- b. Meals and Lodging recorded in Account No. 184 Clearing Accounts, pages 2, 3, and 6 of 13.

- c. Air Fare, Meals, Lodging, and Gasoline purchases recorded in Account No. 588 Miscellaneous Distribution Expenses, pages 2, 4, 5, 6, 8, and 12 of 13.
- d. Meals and Gasoline purchases recorded in Account No. 107 Construction Work in Progress, pages 3, 4, 6, 11, and 12 of 13.
- e. Supplies recorded in Account No. 350 Land and Land Rights, page 8 of 13.
- 21. For each of the credit card transactions listed below, provide a copy of all supporting documentation for the transaction and explain in detail the purpose of the transaction.
- a. December 31, Employee No. 2, Landacaping, Account No. 921, page 2 of 13.
- b. December 3, Director No. 5, Meals, Account No. 930, page 2 of 13.
- c. February 12, Employee No. 10, Meals, Account No. 920, page 3 of 13.
- d. February 13, Employee No. 10, Lodging, Account Nos. 930 and 920, page 3 of 13.
- e. February 10, Director No. 2, Meals, Account No. 930, page 4 of 13.
- f. March 26, Director No. 6, Lodging, Account No. 930, page 5 of 13.
- g. March 21, Director No. 2, Meals, Account No. 930, page 5 of 13.

- h. May 19, Employee No. 2, Supplies, Account No. 930, page 6 of 13.
- i. July 10, Employee No. 11, Supplies, Account No. 146, page 8 of 13.
- j. August 14, Employee No. 10, Lodging, Account 920, page 9 of 13.
- k. November 30, Employee No. 10, Supplies, Account No.930, page 13 of 13.
- 22. The response to Item 35 of the March 24, 1993 Order indicates that Salt River has not prescribed a specific rotation cycle for the general retirement of capital credits. Explain in detail how Salt River determined it was appropriate to discount the payment to deceased members' estates without having established a specific general retirement rotation cycle. Also explain how Salt River can determine the appropriate discounted amount to be paid to deceased members' estates without establishing a specific rotation cycle.
- 23. Provide copies of any authoritative studies, reports, or other documentation which support the practice of discounting the payment of deceased members' capital credits.
- 24. Concerning the La Plata Electric Association, Inc. ("La Plata") of Durango, Colorado, provide the following information:
- a. Indicate whether La Plata is regulated by the State of Colorado. Describe the requirements state regulation places on La Plata's retirement of capital credits.

- b. Indicate whether La Plata has established a specific rotation cycle for the general retirement of its capital credits. Supply the rotation cycle, if known.
- c. Supply copies of La Plata's procedures for discounting the payment of capital credits to deceased members' estates.
- 25. The response to Item 36 of the March 24, 1993 Order indicates that 60 deceased members' estates were paid their capital credits under Salt River's discounting approach.
- a. Of the 60 estates paid, indicate the number of these members who originally joined Salt River after calendar year 1968.
- b. For each paid estate where the member joined Salt River after calendar year 1968, provide a schedule similar to that shown on page 3 of 3 of the response, indicating the amount paid to the estate and the amount assigned to donated capital.
- 26. In the response to Item 36 of the March 24, 1993 Order, Salt River calculated the payment to a deceased member's estate under certain hypothetical conditions. The calculation is shown on page 3 of 3 of the response. Explain in detail why it is appropriate to begin the discounting factors with the year 1969 when the member did not join Salt River until 1989.
- 27. The response to Item 37 of the March 24, 1993 Order includes information concerning different advertising transactions. Provide the following information:
- a. Check No. 9413 to Pioneer News was listed in Account No. 913 as rental display. Explain the purpose of this display.

- b. Explain why the advertisement shown on page 14 of 16 for "DustEater" was recorded in Account No. 913.
- c. Explain why radio scripts are not kept on file for accounts other than Account No. 913.
- d. Explain why the advertisement for meter readers would be a recurring item.
- 28. The response to Item 38 of the March 24, 1993 Order provided the accounting entries made by Salt River to record ETS transactions. Explain in detail why the sale of ETS units is recorded in Account No. 456, Other Electric Revenue, instead of Account No. 415, Revenues from Merchandising, Jobbing and Contract Work.
- 29. In the response to Item 39 of the March 24, 1993 Order, Salt River has indicated the purpose of several expenses recorded in Account No. 930.
- a. Provide copies of any surveys or other documentation which support Salt River's contention that the employee Christmas party and picnic make day-to-day operations more efficient.
- b. Indicate whether the purpose of the purchases listed in Item 39(c) is to enhance and maintain a good corporate image for Salt River.
- c. Explain why the fee for the Council of Rural Electric Communicators would not constitute a promotional or image improving expense for Salt River.
- d. For each of the tuition reimbursements identified in Item 39(f), identify the name of the class or seminar, explain the

nature of the class or seminar, and explain how the class or seminar was related to the employee's work at Salt River.

- e. Explain in detail how the expenses referenced in Items 39(k) and 39(m) are related to the provision of electric service to Salt River's members.
- f. Explain what activities Salt River participates in which require it to maintain Federal Communications Commission licensing.
- g. Explain why the contribution to St. Catherine College was recorded in Account No. 930 instead of Account No. 426.
- 30. The response to Item 40 of the March 24, 1993 Order contains a category breakdown of annual meeting expenses. Provide the following information:
- a. Of the amount for annual meeting report and advertisement, indicate separately the amounts spent for the report and the advertisement.
- b. Supply a detailed schedule of the items included as election expense. The schedule should include a document or voucher reference, the check number, the payee, the amount, and the purpose of the expenditure.
- c. Supply a detailed schedule of the items included as prizes, games, and entertainment. The schedule should include a document or voucher reference, the check number, the payee, the amount, and the purpose of the expenditure.

- d. Indicate whether KAEC provided any services related to the annual meeting. Describe the service and the amount expended for the service.
- 31. The response to Item 42 of the March 24, 1993 Order contains information concerning Salt River's three branch offices. Provide the following information:
- a. The response to Item 42(e) provided the direct costs during the test year for the three branch offices. Supply the test-year indirect or allocated costs associated with the three branch offices.
- b. For each branch office, indicate the amount of testyear electric revenues collected by each office.
- c. Explain in detail what procedures have been established to minimize the risk of theft or robbery at the Taylorsville and Springfield offices, since each is staffed by only one employee.
- d. Indicate the number of Salt River members served by each branch office.
- 32. For the branch offices maintained in Taylorsville and Springfield, provide the following information:
- a. Explain how the particular site was selected. Include a discussion of whether a competitive bidding procedure was used.
- b. Indicate whether either of the lessors is a member of Salt River.

- c. Indicate whether either of the lessors has a business, professional, or personal relationship with members of the board of directors or management of Salt River.
- d. Indicate the total square footage of each of these branch offices.
- e. Both leases indicate an expiration date in 1991. Indicate when each lease was renewed, the period of time the renewal is in force, any changes in the terms of the lease resulting from the renewal, and the lease payment in effect at test-year end.
- 33. As noted in Item 43 of the March 24, 1993 Order, Salt River has a wholly owned subsidiary, the Salt River Service Corporation ("Service Corporation"). Provide the following information:
- a. A copy of any service contracts or service agreements between Salt River and the Service Corporation.
- b. A detailed description of the cost allocation methodologies used by Salt River to allocate costs to the Service Corporation. Include with this description an explanation and documentation supporting the use of each methodology.
- 34. In the response to Item 44(d) of the March 24, 1993 Order, it is indicated that when no one authorized to sign checks for the Service Corporation is available, Salt River will pay the vendor and will be reimbursed later. Prepare a schedule showing each transaction paid during the test year by Salt River on behalf of the Service Corporation and the subsequent reimbursement to Salt

River. At a minimum, this schedule should include the transaction date, check number, voucher reference, transaction amount, nature of the transaction, the Salt River accounts debited and credited for the transaction, and the date of reimbursement.

- 35. The response to Item 44(g) of the March 24, 1993 Order is not an adequate answer to the request. The Commission requested that Salt River provide copies of all policies and procedures in effect during the test year dealing the treatment of cost allocations and asset transfers between it and the Service Corporation. Salt River referred to its response to Item 5 of the December 28, 1988 Order in Administrative Case No. 326. The response to the December 28, 1988 Order discusses the treatment of receipts and expenses associated with the Service Corporation. If written policies and procedures have not been developed, explain in detail why Salt River has not prepared these items.
- 36. In the response to Item 44(h) of the March 24, 1993 Order, Salt River has indicated that its board of directors also serves as the board of directors for the Service Corporation. Included in Addendum F to Salt River's response to the December 28, 1988 Order in Administrative Case No. 326, Salt River provided a copy of suggested guidelines issued by the Rural Electrification Administration ("REA") concerning REA borrower involvement in activities such as satellite-delivered television programming

Administrative Case No. 326, An Investigation Into the Diversification of Rural Electric Cooperative Corporations Into the Satellite-Delivered Television Programming Services, final Order dated March 18, 1991.

services ("satellite-TV"). In these guidelines, the REA suggested that REA borrowers and their separate satellite-TV corporations should have separate boards of directors. Explain in detail why Salt River has chosen to have its directors also serve as the directors for the Service Corporation.

- 37. Provide copies of the minutes of the Salt River board of directors' regular meetings held during the test year, except for those minutes provided in the response to Item 44(j) of the March 24, 1993 Order.
- 38. Explain in detail why a portion of the directors' fees and expenses paid for Salt River board meetings held on March 5, 1992, April 2, 1992, and October 2, 1992 should not be allocated to the Service Corporation, since both boards of directors met on the same days.
- 39. The response to Item 44(e) of the March 24, 1993 Order contains a schedule of transactions recorded in Account No. 146 during the test year. Provide the following information:
- a. For each labor distribution referenced in the response, indicate by employee number which Salt River employees' wages and salaries were allocated to the Service Corporation. Explain in detail the basis for the cost allocation.
- b. For each employee listed in the response to Item 44(h) of the March 24, 1993 Order, indicate the total hours worked during the test year for Salt River and the total worked for the Service Corporation.

- c. The schedule makes periodic reference to the allocation of postage expenses. Explain in detail how this cost was allocated to the Service Corporation.
- d. Explain in detail why the schedule shows no cost allocations for items such as office rental, office expenses, utilities, insurance, or other related costs.
- 40. Provide the number of customers served by the Service Corporation as of test-year end.
- 41. Provide the following information concerning the use of Salt River's Bardstown facilities by the Service Corporation:
- a. Indicate the amount of square footage in the Bardstown office utilized by the Service Corporation and the total square footage of the Bardstown office.
- b. Indicate whether the Service Corporation has its own telephone service or utilizes Salt River's. If the Service Corporation does not have its own telephone service, indicate the volume of calls received during the test year for the Service Corporation and the total volume of calls received at the Bardstown office.
- 42. In reference to Item 45 of Salt River's response to the March 24, 1993 Order:
- a. What is the reason for East Kentucky possibly changing its demand billing to coincidental billing?
 - b. When is this change going to occur?
- 43. In reference to Item 51 of Salt River's response to the March 24, 1993 Order and Application Exhibit 3 page 45:

- a. For the proposed increase adjustment of \$6,754, provide all supporting calculations used to compute this amount. Reconcile the difference between the \$12,737 and the \$6,754 showing all supporting calculations.
- b. Is the amended normalized adjustment of \$5,628 to replace the normalized adjustment of \$10,614, or is it in addition to this amount?
- 44. In reference to Item 55 of Salt River's response to the March 24, 1993 Order:
- a. Describe the Salt River survey and provide a copy of the questionnaire.
- b. The NARUC Electric Utility Cost Allocation Manual 1992 ("the NARUC manual") page 90 says that Accounts 360, 361 and 362 are normally classified as demand related. Provide the survey results and a description of the results which leads to the conclusion that the percentages used in footnote a of Exhibit 26 page 2 of 12 of the cost-of-service study are justified.
- 45. In reference to Item 58 of Salt River's response to the March 24, 1993 Order, you state that the 35 foot class 5 pole is the most common pole in Salt River's system. However, the general idea of using the minimum mile variation of the minimum plant method is to attempt to calculate the cost of the minimum plant, currently being installed, needed for the system to function. See the NARUC manual section II page 90-92.
- a. Is the 35 foot class 5 pole the smallest pole that is currently being installed on Salt River's system?

- b. If not, recalculate the minimum mile customer and demand cost allocation ratios.
- 46. In reference to Item 59 of Salt River's response to the March 24, 1993 Order:
- a. The response to Item 59(a) of the question shows that the minimum size methodology would have yielded an inappropriate answer. However, in that calculation Salt River used the 10 CSP transformer with a cost of \$359.11. Explain why the smallest transformer size in either the CSP or the CONV transformer class is not used for the minimum size calculation.
- b. The response to Item 59(a) of the question gives the results of a regression where the cost per unit has been weighted by the number of poles. Provide a complete description, using math if necessary, of the weighting process and the regression analysis.
- c. Adding data points to the sample is one of the surest and simplest ways to increase the R squared value. Provide the regression results of the CSP transformers with the inclusion of the 75 and 100 KV transformers and an explanation of the results.
- 47. In reference to Item 60 of Salt River's response to the March 24, 1993 Order, since you have chosen to use the minimum size method and three strands of #8 copper WP as the minimum necessary for a service drop, explain why the minimum distance for a service drop was not used in the analysis.
- 48. In reference to Item 62 of Salt River's response to the March 24, 1993 Order, it would seem that the cost and relative cost

figures that are used in Exhibit 26 page 9 of 12 are not on the same basis. The CSP transformers cost includes other types of plant, while the CONV transformers are simply transformers.

- a. Explain this discrepancy and recalculate footnote d in Exhibit 26 page 9 of 12 using CONV transformers and provide a comparison to the original footnote d.
- b. Explain the relevance of O & M costs in this allocation scheme.
- 49. In reference to Item 62(a) of Salt River's response to the March 24, 1993 Order, provide regression results for CSP transformers, where the CONV equivalent of fused cut-outs and lightning arrestors have been subtracted from the cost. Explain the impact of the results.
- 50. In reference to Item 63 of Salt River's response to the March 24, 1993 Order, explain why footnote e in Exhibit 26 page 9 of 12 should not use actual numbers of consumers.
- 51. In reference to Item 64 of Salt River's response to the March 24, 1993 Order, explain precisely how East Kentucky load research data is translated into Salt River load research data.
- 52. In reference to Schedule B of Exhibit 26, page 3 of 12, of Salt River's response to the March 24, 1993 Order, in the cost-of-service study, explain why lines 8 and 9 are not combined and to which accounts these lines refer.

PUBLIC SERVICE COMMISSION

ATTEST:

Executive Director