

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF OWEN)	
ELECTRIC COOPERATIVE, INC. FOR PASS-)	CASE NO.
THROUGH OF EAST KENTUCKY POWER)	2021-00115
COOPERATIVE, INC. WHOLESALE RATE)	
ADJUSTMENT)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO OWEN ELECTRIC COOPERATIVE, INC.

Owen Electric Cooperative, Inc. (Owen Electric), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on June 28, 2021. The Commission directs Owen Electric to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Owen Electric shall make timely amendment to any prior response if Owen Electric obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Owen Electric fails or refuses to furnish all or part of the requested information, Owen Electric shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied 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, Owen Electric shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide the monthly usage and revenue for Nucor Steel Gallatin (Nucor) for 2019, 2020, and 2021 to date.

- a. Explain whether a pro forma adjustment for the additional revenue received from the increased usage resulting from the Nucor addition of the new galvanizing line should be applied to Owen Electric's 2019 test-year revenues.

b. If a pro formal adjustment is made, provide this adjustment and an update to Owen Electric's Response to Commission Staff's First Request for Information, Item 5.

c. If Owen Electric disagrees with such an adjustment, explain whether the current allocation of Owen Electric's portion of East Kentucky Power Cooperative, Inc.'s (EKPC) rate increase will result in additional revenues for Owen Electric and whether the other rate classes will pay more than their fair share of the pass-through.

d. Explain whether a pro forma adjustment should be made to EKPC's test-year pro forma revenues.

e. If an adjustment is made to EKPC's test-year pro forma revenues, explain whether the adjustment should then be applied to the calculation of Owen Energy's rate increase.



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Public Service Commission
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DATED JUN 15 2021

cc: Parties of Record

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