## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION OF KENERGY	)	CASE NO.
CORP. FOR A GENERAL ADJUSTMENT OF	)	2023-00276
RATES	)	

## COMMISSION STAFF'S REHEARING REQUEST FOR INFORMATION TO KENERGY CORP.

Kenergy Corp. (Kenergy), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 15, 2024. The Commission directs Kenergy 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.

Kenergy shall make timely amendment to any prior response if Kenergy 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 Kenergy fails or refuses to furnish all or part of the requested information, Kenergy 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, Kenergy 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 Kenergy's petition for rehearing, pages 1–2, in which it is stated that both budget billing programs must use the same number of months in the budget billing calculation.
- a. Explain whether Kenergy has, or is in the process, of changing its billing software.

b. Explain why both budget billing programs must use the same number

of months in the budget billing calculation.

c. Explain whether it is possible to upgrade the billing software to allow

the budget billing programs to utilize a different number of months in the budget billing

calculation. If so, explain the extent of the upgrades that would be necessary and provide

an estimated cost.

2. Refer to Kenergy's petition for rehearing, page 4, in which the true-up

mechanism for the fixed budget billing plan is explained. If a fixed budget billing customer

were due a refund at the end of a budget year, explain whether it would be possible to

credit the full amount to the customer at the end of the budget year instead of spreading

the credit out over the next 12 months.

3. Provide a sample calculation, by month, based on a random residential

customer's usage over the past 36 months showing how the customer's monthly bill will

be calculated under the revised fixed budget billing plan.

Linda C. Bridwell, PE

**Executive Director** 

Public Service Commission

P.O. Box 615

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DATED SEP 27 2024

cc: Parties of Record

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