

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF SOUTH)	
KENTUCKY RURAL ELECTRIC COOPERATIVE)	CASE NO.
CORPORATION FOR A GENERAL)	2024-00402
ADJUSTMENT OF RATES AND OTHER)	
GENERAL RELIEF)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION

South Kentucky Rural Electric Cooperative Corporation (South Kentucky 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 May 7, 2025. The Commission directs South Kentucky 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

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).

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.

South Kentucky RECC shall make timely amendment to any prior response if South Kentucky 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 South Kentucky RECC fails or refuses to furnish all or part of the requested information, South Kentucky 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, South Kentucky 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 South Kentucky RECC's Response to the Attorney General's First Request for Information (Attorney General's First Request), Item 16(b). Provide all rate design options South Kentucky RECC considered that the Board decided not to adopt. Additionally, provide the reasoning behind the Board not adopting those rate design options.

2. Refer to South Kentucky RECC's Response to the Attorney General's First Request, Item 16(e). Provide the analysis South Kentucky RECC conducted in Excel spreadsheet format, unlocked with formulas intact. Additionally, provide the source of the inputs.

3. Refer to Commission Staff's Second Request for Information (Commission Staff's Second Request), Item 14, dated March 14, 2025, and South Kentucky RECC's Response to Commission Staff's Second Request, Item 14, dated March 28, 2025. South Kentucky RECC's Response to Commission Staff's Second Request recited the incorrect request. Commission Staff's Second Request, Item 14 stated:

Refer to Exhibit JW-2 Schedule 1.07. South Kentucky RECC is proposing a \$996,188 increase in Proforma expenses to remove any FEMA declared storm costs and reimbursements. Explain why the adjustment is an increase if it is removing any FEMA declared storm costs and reimbursements.

Reconcile, explain, and, if necessary, correct South Kentucky RECC's Response to Commission Staff's Second Request, Item 14. If the response provided was intended to address another request, identify and explain the same. If the response to Item 14 was not the response intended, provide the correct answer to Item 14.



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Public Service Commission
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DATED APR 23 2025

cc: Parties of Record

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