

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CLARK)	
ENERGY COOPERATIVE, INC. FOR AN)	CASE NO.
ALTERNATIVE RATE ADJUSTMENT PURSUANT)	2025-00230
TO 807 KAR 5:078)	

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

Clark Energy Cooperative, Inc. (Clark 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 22, 2025. The Commission directs Clark 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.

Clark Energy shall make timely amendment to any prior response if Clark 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 Clark Energy fails or refuses to furnish all or part of the requested information, Clark 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, Clark 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 the Direct Testimony of John Wolfram (Wolfram Direct Testimony), Exhibit JW-6 at 1. Confirm that General Power Service 1000-5000kW rate serves zero customers. If not confirmed, provide the correct number of customers.

2. Refer to Wolfram Direct Testimony, Exhibit JW-6 at 1. Confirm the Residential Time of Use rate serves 1 customer. If not confirmed, provide the correct number of customers.

3. Refer to Wolfram Direct Testimony, Exhibits JW-3 at 1, and JW-5 at 1. Explain, in detail, how the Residential Time of Use rate contributes to a rate of return on rate base of 136.97 percent.

4. Refer to Wolfram Direct Testimony, generally. Explain how the Residential Time of Use customer qualifies as a Residential customer when the monthly kWh usage mimics that of a commercial customer.

5. Provide the 2022, 2023, 2024, and 2025 year to date monthly usage data for the Residential Time of Use class.

6. Refer to Wolfram Direct Testimony, Exhibit JW-3 at 1. Explain why the Public Facilities class did not receive a slight increase so that it would not be subsidized after rate revisions.

7. Refer to Wolfram Direct Testimony, Exhibit JW-9 at 1. Explain the reasoning behind decreasing the energy charge for the Residential class.

8. Refer to Wolfram Direct Testimony at 24, lines 1-5. Refer also to Exhibits JW-3 at 2, and JW-9 at 1. The Cost-of-Service Study (COSS) supports a demand charge of \$5.01 per kW and an energy charge of \$0.05733 per kWh for the General Power Service 50-500kW class. The rate currently has a demand charge of \$6.69 per kW and an energy charge of \$0.08129 per kWh. Explain how the proposed rate changes move the demand and energy charges closer to cost-based rates.

9. Refer to Wolfram Direct Testimony at 24, lines 1-5. Refer also to Exhibits JW-3 at 2, and JW-9 at 1. The COSS supports a demand charge of \$6.25 per kW and an energy charge of \$0.05733 per kWh for the General Power Service 500+kW class. The rate currently has a demand charge of \$6.42 per kW and an energy charge of

\$0.07078 per kWh. Explain how the proposed rate changes move the demand and energy charges closer to cost-based rates.

10. Refer to Wolfram Direct Testimony at 24, lines 1-5. Refer also to Exhibits JW-3 at 2, and JW-9 at 1. The COSS supports a demand charge of \$7.39 per kW and an energy charge of \$0.04663 per kWh for the Large Industrial Rate class. The rate currently has a demand charge of \$7.41 per kW and an energy charge of \$0.062436 per kWh. Explain how the proposed rate changes move the demand and energy charges closer to cost-based rates.

11. Refer to Wolfram Direct Testimony, Exhibit JW-2, page 8, Schedule 1.07, line 45 and Clark-PresentProposedRates-2024-FILED, Excel spreadsheet, Actuals vs. Calculated Billings, Line 20 and 21. Explain the difference between the total purchased power (454,759,977 kWh) and the total billing power (430,754,489 kWh).

12. Refer to Wolfram Direct Testimony, Exhibit JW-2, Schedule 1.07. Confirm that the depreciation rates used in this proceeding are the depreciation rates the Commission ordered Clark Energy to implement in Case No. 2009-00314.² If confirmed explain any increases in depreciation since Clark Energy's last rate case. If not confirmed, explain the response.

13. Refer to Wolfram Direct Testimony, Exhibit JW-2, Schedule 1.08. Refer also to Application, Exhibit 25, FERC Account 930 and Exhibit 26, FERC Account 426. Provide an update to Exhibits 25 and 26 highlighting the expenses that were removed to calculate the adjustment in Schedule 1.08.

² Case No. 2009-00314, *Application of Clark Energy Cooperative, Inc. For An Adjustment of Rates* (Ky. PSC April 16, 2025), Order.

14. Refer to Wolfram Direct Testimony, Exhibit JW-2, Schedule 1.09. Refer also to Application, Exhibit 25, FERC Account 930. Provide an update to Exhibit 25 highlighting the expenses that were removed to calculate the adjustment in Schedule 1.09.

15. Refer to Wolfram Direct Testimony, Exhibit JW-2, Schedule 1.10.

a. Provide an explanation for each debt issuance with a variance of over 50 percent from the actual amount to the pro forma amount.

b. Refer also to Exhibit 15, Debt Instruments. Explain the difference in the Annualized Cost in Exhibit 15 and the Pro Forma Amount in Schedule 1.10.

16. Refer to Wolfram Direct Testimony, Exhibit JW-2, Schedule 1.12.

a. Confirm that the total pro forma adjustment amount of \$340,995 includes both costs to be capitalized and operating and maintenance (O&M) expense. If confirmed, provide a breakdown of the Wages Expense detailing the increase amount to be capitalized and the increase amount to O&M expense.

b. Explain why Clark Energy is requesting a \$340,995 increase to wages and salaries with no changes in payroll tax expense.

17. Refer to Wolfram Direct Testimony, Exhibit JW-9, page 1 (spreadsheet Excel file). Explain how column F (Energy Charge per kWh for the test year rate) was calculated and provide the calculations.

18. Refer to Wolfram Direct Testimony generally. Explain, in detail, the reasons behind allocating 100 percent of the revenue increase to Residential customers.

19. Refer to the Direct Testimony of Billy O'Brian Frasure at 9, lines 14-18. Provide the annual wage and salary study used in determining wages and salaries in this proceeding.

20. Provide a running total of the following information concerning the cost of preparing this case:

a. A detailed schedule of expenses incurred to date for the following categories. For each category, the schedule should include the date of each transaction, check number or other document reference, the vendor, the hours worked, the rates per hour, amount, a description of the services performed, and the account number in which the expenditure was recorded. Provide copies of any invoices, contracts, or other documentation that support charges incurred in the preparation of this rate case. Indicate any costs incurred for this case that occurred during the test year for the following:

- (1) Accounting;
- (2) Engineering;
- (3) Legal;
- (4) Consultants; and
- (5) Other Expenses (Identify separately).

b. An itemized estimate of the total cost to be incurred for this case. Expenses should be broken down into the same categories as identified in Item 19.a. above, with an estimate of the hours to be worked and the rates per hour. Include a detailed explanation of how the estimate was determined, along with all supporting workpapers and calculations.

c. Provide monthly updates of the actual costs incurred in conjunction with this rate case, reported in the manner requested in Item 20.a. above. Updates will be due when Clark Energy files its monthly financial statements with the Commission, until this matter is submitted for a decision on the record.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED SEP 04 2025

cc: Parties of Record

Case No. 2025-00230

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