

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of Adjustment of Rates)
of Jackson Energy Cooperative) Case No. 2013-00219
)
)

**MOTION FOR LEAVE TO FILE COMPARISON
OF RESIDENTIAL ELECTRIC RATES**

Comes now Jackson Energy Cooperative Corporation (“Jackson Energy”), by counsel, and moves the Public Service Commission of Kentucky (“the Commission”) for an order granting it leave to file in the record of this case a comparison of residential electric rates in the Commonwealth of Kentucky. As grounds for this motion, Jackson Energy states as follows:

Jackson Energy is presently before the Commission in this matter seeking an increase in its electric rates. The rate application submitted in this matter speaks for itself, but to briefly summarize, Jackson Energy seeks an increase in its monthly customer charge over the next three years. Jackson Energy does not seek any increase in its energy charge.

This matter is presently set for a hearing before the Commission on January 28, 2014. Throughout the pendency of this case, various members of the public have submitted comments to the Commission about the rate application. Jackson Energy always welcomes comments of its members, whether those comments are directed to Jackson Energy’s office, its employees or directors, or to the Commission as part of a rate case. Jackson Energy has complied with all directives of the Commission regarding public notice of the rate application and the final hearing in this matter.

Given the public notice, and the number of comments submitted to the Commission, Jackson Energy believes that this rate case is certainly a matter of some interest to its members.

Jackson Energy continually strives to provide its members safe and reliable electricity at the lowest possible rates. Many factors can cause a utility such as Jackson Energy to have to increase its rates, as has been the case with many other utilities throughout the Commonwealth of Kentucky in the past few years. Jackson Energy welcomes the opportunity to discuss with the Commission all the steps it has taken to control its costs in both a short and long term fashion to benefit its members while maintaining the financial health of the Cooperative.

As part of a recent public comment, a comparison of residential electric rates among utilities operating in Kentucky has recently been submitted to the Commission and posted on its website. Based upon the e-mail in which the comparison is contained, the rates were in effect as of October 15, 2012. Based upon that comparison, the commenter concludes that if Jackson Energy is granted the increase in rates it is seeking that its customer charge will be the highest in Kentucky.

Again, while Jackson Energy always encourages its members to make their views known, Jackson Energy would like the opportunity to briefly note that the comparison contained in the commenter's e-mail is outdated. All electric rates of utilities operating in Kentucky are posted on the Commission's website as required by law. Based upon the current information on the Commission's website, Jackson Energy has compiled a more updated comparison of current residential electric rates in Kentucky. Jackson Energy has attached that comparison to this motion, and it hereby moves the Commission to allow it to submit that comparison in the record as part of this case. As shown on the attached comparison, granting the rate increase sought by Jackson Energy will not result in Jackson Energy having the highest monthly customer charge in Kentucky.

Given the importance to the public of this rate case, Jackson Energy believes it is critical that the public have convenient access to the most up to date information available regarding its rates in comparison to those of other utilities. Accordingly, Jackson Energy hereby moves the Commission to grant it leave to submit the attached comparison of current residential rates.

Respectfully submitted by,



Clayton O. Oswald
Taylor, Keller & Oswald, PLLC
1306 W. 5th St., Suite 100
P.O. Box 3440
London, KY 40743-3440
(606) 878-8844
Fax: (606) 878-8850
E-mail: coswald@tkolegal.com
Attorney for Jackson Energy Cooperative

Commonwealth of Kentucky
Comparison of Residential Customer Rates

** Rates in Effect as of 01/20/2014*

Company	Service Charge	Energy Charge cents/kWh
Kentucky Utilities	\$10.75	7.744
Louisville Gas & Electric	10.75	8.076
Meade County RECC	15.27	8.686
Jackson Purchase Energy Corporation	10.99	8.895
Duke Energy	4.50	7.909
Kenergy	13.83	8.978
Salt River Electric	8.84	7.952
Taylor County RECC	9.82	8.220
South Kentucky RECC	12.82	8.543
Owen Electric Cooperative	17.10	8.756
Cumberland Valley Electric	5.74	8.563
Kentucky Power	8.00	8.590
Nolin RECC	9.04	8.598
Fleming-Mason Energy	15.00	8.431
Shelby Energy Cooperative	10.14	8.861
Big Sandy RECC	12.69	9.083
Farmers RECC	9.35	8.895
Blue Grass Energy	9.73	8.951
Clark Energy	12.43	9.243
Licking Valley RECC	9.32	9.355
Inter-County Energy	8.97	9.421
Jackson Energy Cooperative	10.44	9.849
Grayson RECC	15.00	10.910
Pennyrile Electric	18.40	6.757
Warren RECC	18.80	6.560

Owen Electric as of January 20, 2015

20.00

8.491

Rate information compiled from the Public Service Commission website – psc.ky.gov