COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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APPLICATION OF BLUE GRASS ENERGY COOPERATIVE CORPORATION FOR AN ADJUSTMENT OF RATES

Case No. 2014-00339

MOTION OF BLUE GRASS ENERGY COOPERATIVE CORPORATION FOR CONFIDENTIAL TREATMENT OF MATERIAL UNDER 807 KAR 5:001 SECTION 13 AND KRS 61.878

Blue Grass Energy Cooperative Corporation ("BGE") moves the Kentucky Public Service Commission pursuant to 807 KAR 5:001, Section 13 and KRS 61.878 to grant confidential protection for material provided in movant's responses to (1) Item 16 of "Commission Staff's Second Request for Information" (PSC Item 16) and (2) Item 55 of "Attorney General Initial Request for Information" (AG Item 55).

SPECIFIC GROUNDS PURSUANT TO KRS 61.878 FOR CLASSIFICATION OF MATERIAL AS CONFIDENTIAL

The specific grounds for confidentiality protection are based upon KRS 61.878(1)(a) (unwarranted invasion of personal privacy) and KRS 61.878(1)(c)(1) (generally recognized as confidential permitting unfair commercial advantage to competitors).

DISCUSSION

I. <u>CONFIDENTIAL PERSONAL PRIVACY KRS 61.878(1)(a).</u>

The BGE responses to PSC Item 16 and AG Item 55 reveal wage compensation which can be used to easily identify individual employees and officers of BGE. Compensation by category or office can be easily linked to the names of employees of the organization. BGE treats the compensation of each employee as confidential to protect

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the personal privacy of the employees. The compensation of each employee is not publicly disclosed and is not subject to the Kentucky Open Records law. KRS 61.878(1)(a) protects such material as confidential by excluding from open records, as follows:

(a) Public records containing information of a personal nature where the public disclosure thereof would constitute a clearly unwarranted invasion of personal privacy.

The Kentucky Public Service Commission in Case No. 2013-00167 (application of

Columbia Gas of Kentucky, Inc. for an Adjustment of Rates for Gas Service) granted

confidential protection indefinitely for a specific employee's compensation. That PSC order

noted the significance of privacy with a statement from Zink v. Department of Worker's

Claims, Labor Cabinet, 902 SW 2d 825, 828 (Ky. Ct. App. 1994) as follows:

information such as . . . wage rate . . . [is] generally accepted by society as [a] detail in which an individual has at least some expectation of privacy.

The court in Zink, supra, also stated at page 829, as follows:

Further, few things in our society are deemed of a more intimate nature than one's income.

The disclosures in responses to PSC Item 16 and AG Item 55 would violate the

privacy expectations of employees and officers by revealing compensation which could be

easily linked and attributed to the names of individuals. BGE is obligated to protect the

personal privacy of its employees and officers.

II. <u>CONFIDENTIAL AND PROPRIETARY COMMERCIAL INFORMATION KRS</u> 61.878(1)(c)(1)

KRS 61.878(1)(c)(1) provides confidentiality protection to certain business records and information, as follows:

(c)1. Upon and after July 15, 1992, records confidentially disclosed to an agency or required by an agency to be disclosed to it, <u>generally recognized</u>

as confidential or proprietary, which if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records: (Emphasis Added).

PSC Item 16 includes employee benefits, studies, analysis and surveys from a consultant (Intanden LLC) who was commissioned and paid by BGE. AG Item 55 contains officers' compensation and percentages of increase.

Wage and compensation plans, survey studies, evaluations, projections and forecasts have been given confidential protection by PSC. See PSC Case No. 2012-00520 (Application of Kentucky-American Water Company) and PSC Case No. 2013-00199 (Big Rivers Electric Corporation)

Confidential protection for responses to PSC Item 16 and AG Item 55 is required to prevent unfair commercial advantage to competitors of BGE. The Compensation Plans reveal highly sensitive proprietary information which is necessary to compete in the utility market for qualified employees with competitive compensation. The rates of compensation and consultant's analysis for compensation plans must be confidential in this highly competitive business.

CONCLUSION

1. BGE requests confidential treatment of all response material for PSC Item 16 and AG Item 55 as set forth above.

2. The requested time period for the material to be treated as confidential is indefinite. This period of time should avoid any violation of personal privacy and prevent any proprietary and business disadvantage from revealing the wage compensation payments and plans of BGE.

3. Attached are ten (10) copies of the material in paper medium with request for

confidential treatment of all the responses to PSC Item 16 and AG Item 55 and, in a separate sealed envelope marked "CONFIDENTIAL", one (1) copy of the material in paper medium being responses to PSC Item 16 and AG Item 55 which disclose confidential material.

Dated: February 4, 2015.

Howard Downing

Howard Downing109 South First StreetNicholasville, KY 40356Telephone: 859-885-4619Fax: 859-885-1127hhdowning@windstream.netAttorney for Blue Grass EnergyCooperative Corporation

CERTIFICATE

This is to certify that the electronic filing of "Motion of Blue Grass Energy Cooperative Corporation for Confidential Treatment of Material under 807 KAR 5:00 Section 13 and KRS 61.878" is a true and accurate copy of the same document being filed in paper medium, that the electronic filing has been transmitted to the Public Service Commission on February 4, 2015, that there are no parties that the Commission has excused from participation by electronic means in this proceeding, that an original in paper medium of the Motion and a copy of the material for which confidentiality is requested sealed in an opaque envelope are being delivered to the Commission on February 4, 2015 and that a true copy of the Motion has been mailed to Hon. Gregory T. Dutton, Assistant Attorney General, Utility & Rate Office, 1024 Capital Center Drive, Suite 200, Frankfort, KY 40601-8204 this 4th day of February, 2015.

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ATTORNEY FOR BLUE GRASS ENERGY

COOPERATIVE CORPORATION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BLUE GRASS ENERGY COOPERATIVE CORPORATION FOR AN ADJUSTMENT OF RATES

Case No. 2014-00339

WRITTEN NOTIFICATION OF CONFIDENTIALITY FOR ENTIRE DOCUMENT - 807 KAR 5:001 SECTION 13(2)(9)(3)(6)

This is to notify that confidential treatment is sought for the entire response to PSC

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Item 16 attached hereto.

ATTORNEY FOR BLUE GRASS ENERGY

COOPERATIVE CORPORATION /

Item 16

Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Commission Staff's Second Request For Information

NOTE: CONFIDENTIAL TREATMENT IS REQUESTED FOR ENTIRE 22 PAGES OF RESPONSE TO THIS PSC ITEM 16 807 KAR 5:001 SECTION 13(2)(a)(3)(b)

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

APPLICATION OF BLUE GRASS ENERGY COOPERATIVE CORPORATION FOR AN ADJUSTMENT OF RATES

Case No. 2014-00339

WRITTEN NOTIFICATION OF CONFIDENTIALITY FOR ENTIRE DOCUMENT - 807 KAR 5:001 SECTION 13(2)(9)(3)(6)

This is to notify that confidential treatment is sought for the entire response to AG

Item 55 attached hereto.

ATTORNE UE GRASS ENERGY FOR BL COOPERATIVE CORPORATION

Item 55

Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

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<u>NOTE</u>: CONFIDENTIAL TREATMENT IS REQUESTED FOR ENTIRE TWO (2) PAGES OF RESPONSE TO THIS PSC ITEM 16 807 KAR 5:001 SECTION 13(2)(a)(3)(b)

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- 1. Please reference the Blue Grass Energy ["BGE"] application generally. Please provide all tables and exhibits referenced in or supporting the application and testimony in their native electronic format (i.e. Microsoft Word, Microsoft Excel), with data including formulae in all cells and rows fully intact and fully accessible.
 - a. Please provide all relevant and supporting worksheets in electronic format with data including formulas in all cells and rows fully intact and fully accessible.

See response to Commissions Second Request for Information Item 4.

Item 2

2. Provide all invoices from outside experts, consultants, and legal counsel related to the current rate case. Please provide these on an ongoing basis.

RESPONSE:

Refer to PSC 2nd data request item 20.

3. Provide board of directors meeting minutes for every BOD meeting between January 2008 and September, 2014 where rates were discussed.

RESPONSE:

Each month as part of our Board of Director financial review, rates are discussed as part of our general discussion. Included in Exhibit F of the application is a copy of the resolution giving the President and CEO authorization to file a rate structure change and increase with the Kentucky Public Service Commission. Below is a copy of the June 16, 2014 Board of Director minutes approving the rate case application.

D. Approval of Rate Case

Jane Smith moved to approve the resolution stating the intent to file for a rate increase. Jane Smith's motion included that the rate increase would be filed with the intent of a two-step process. Motion seconded by Doug Fritz. Motion approved.

4. Please provide copies of any and all documents, agendas, meeting notices, and/or annual reports relating to or distributed at any and all annual meetings of the members of the cooperative between 2010 and 2014, which address or otherwise discuss the need for a rate adjustment.

RESPONSE:

This is mainly a rate design change rate case with only a maintenance increase. No documents were presented at any annual meeting between 2010 and 2014 concerning a rate increase.

5. Please provide copies of any and all documents, correspondence, newsletters, and/or annual reports mailed or provided electronically to the members of the cooperative between 2010 and 2014, which address or otherwise discuss the need for a rate adjustment.

RESPONSE:

Since we are filing this case primarily for a rate structure change and only a maintenance increase, we have advertised in the newspaper for 17 county and mailed letters to members in 6 counties as required by the PSC in notifying our members about this rate case. We had one article in our Kentucky Living magazine insert in November 2014 (attached) related to this rate case filing and one article on our web site (attached).

1Tem 5 Page 2 73.

What can you do?

Currently there is no practical way to prevent the EAB from spreading. Most of the spreading is caused by people moving infested firewood and nursery stock.

"The main thing you can do to help stop the spread of the beetle is to not move firewood or wood of any type," said Duncan. "The entire state of Kentucky is under a federal quarantine issued by the United States Department of Agriculture."

So remember, if you experience an interruption in service it could be caused by something no bigger than a penny.

For more information on the EAB, visit Kentucky's Office of the State Entomologist at www.uky.edu/Ag/NurseryInspection.

BGEnergy applies for rate adjustment

While today's cost-of-living continues to rise, electric rates remain steady. Technology and other cost-cutting measures have allowed the cooperative to save more than \$1.5 million in the last three years.

However, as we have maintained our rates, many of our costs are rising. Last month, an application was filed with Kentucky's Public Service Commission requesting an inflationary rate adjustment. The adjustment is needed to maintain the quality and reliability of the service you receive. If approved, members can expect to see the adjusted pricing in the spring.

Blue Grass Energy encourages members to participate in our many energy-efficiency programs to assist in keeping the impact of the rate adjustment as minimal as possible. A full listing of these programs is available on our Web site www. bgenergy.com.

Reliability, affordability... what is the future for electricity in Kentucky?

Electricity has a big impact on our lives in Kentucky.

For decades, our state has had some of the lowest electricity rates in the nation because we have ready access to an abundant coal supply. Recently, there has been much activity in Washington, D.C., specifically by the Environmental Protection Agency (EPA), which could have an impact on the reliability and affordability of electricity.

This summer, the EPA released pieces of its plan to control carbon dioxide from power plants. In the past, East Kentucky Power Cooperative (EKPC) (BGEnergy, along with 15 other co-ops own EKPC) has invested nearly \$1.7 billion to improve emissions from its fleet of coal-fired power plants. However, some coal-fired power plants will close due to previously passed federal pollution regulations intended to cut emissions of mercury, chlorine, and other pollutants. EKPC will close Dale Power Station in 2015. This will reduce generation by 196 megawatts.

The new plan proposes to reduce emissions even further.

What does this mean?

 These rules, should they pass, have the potential to eliminate coal from being a viable fuel source for power generation in Kentucky.

- It appears natural gas will become the preferred fuel source for large power generation. The challenge is the lack of gas pipeline infrastructure that would reliably supply generation facilities with gas.
- Natural gas prices have shown to be volatile in the past.

Blue Grass Energy, along with EKPC, continues to investigate other renewable technologies, like the EnviroWatts program, as part of a diverse power portfolio. This program offers members the opportunity to purchase power generated by solar, wind, hydro, or landfill gas.

We are also investigating the potential of a community solar project. This concept would allow members to lease a solar panel that is part of a larger solar farm. Energy generated by their panel would then be applied to their Blue Grass Energy account.

As fellow members, we too are concerned with the importance of clean air and clean water. We also recognize the importance of affordable and reliable electricity. We are committed to continuing our quest in finding a balance between these important issues.

If you would like to send a message to the EPA on these issues, visit www.action.coop.

Blue Grass Energy files for rate adjustment

November 10, 2014

On Tuesday, Nov. 18, Blue Grass Energy will officially submit a request to the Kentucky Public Service Commission (PSC) to adjust their rate structure. This adjustment will take place in two separate phases, a year apart. The overall effect of the rate adjustment is an increase of 2.17 percent.

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Blue Grass Energy's current cost per kwh is 9.72 cents—well below the national average of 12.12 cents (*U.S. Energy Information Administration*).

Under the proposed rate adjustment, the average residential member will pay 9.96 cents per kwh. The average residential member on Blue Grass Energy's system uses 1,271 kwh per month. Under this scenario, the average residential member's monthly bill will change from \$123.76 to \$126.97. This is an increase of \$3.21 per month, or 10.7 cents per day.

Reliable service for members is a critical area of emphasis at Blue Grass Energy. We have, and will continue, to invest money to improve our infrastructure, ensuring system reliability. Members see the benefits of these investments in less outages and shorter outage times. The improvements are partially attributed to BGEnergy's proactive tree trimming program, and their preventive approach of replacing equipment.

Blue Grass Energy has utilized technology and other cost-cutting measures to save the cooperative over \$1.5 million in the last three years. They have also utilized technology to lower wholesale power costs by reducing peak demand. The cooperative has been aggressively promoting the direct load control program, Simple Saver. Now with more than 8,000 members participating, this further reduces peak demand.

"We are vigilant in controlling costs at the cooperative," said Mike Williams, Blue Grass Energy's President and CEO. "It is our intent to provide the highest quality of service in the most efficient way."

Members are encouraged to take advantage Blue Grass Energy's free energy audits and other tools available at <u>www.bgenergy.com</u> in order to minimize the impacts of the proposed rate adjustments.

If approved by the Kentucky Public Service Commission, the rate adjustment is expected to take effect in spring of 2015.

6. Reference Application, paragraph 1. For each of the 23 counties where BGE operates, provide the median and average income, the average BGE bill during the test period, and the average bill should the proposed rates go into effect.

County	Per Capital Income*	Medium Income*
Anderson	\$24,161	\$52,646
Bourbon	\$24,161	\$52,646
Bracken	\$20,918	\$39,196
Estill	\$16,435	\$29,184
Fayette	\$29,251	\$48,398
Franklin	\$26,243	\$46,071
Garrard	\$21,341	\$44,652
Grant	\$19,829	\$46,159
Harrison	\$21,424	\$36,048
Henry	\$21,923	\$46,016
Jackson	\$15,880	\$26,156
Jessamine	\$25,637	\$49,024
Madison	\$21,800	\$42,312
Mercer	\$24,138	\$45,396
Nelson	\$23,545	\$43,833
Nicholas	\$20,450	\$43,081
Pendleton	\$23,122	\$45,480
Robertson	\$17,641	\$31,786
Scott	\$27,802	\$61,893
Shelby	\$27,039	\$57,298
Spencer	\$26,666	\$65,209
Washington	\$19,837	\$40,845
Woodford	\$29,277	\$57,580

RESPONSE:

*Source: <u>http://quickfacts.census.gov/qfd/states/21000.html</u>

The test year and proposed average bill is below. This can also be found in the original application, Exhibits D and J.

				Phase 1	Phase 2
		Test Year		Proposed	Proposed
-		<u>Average</u>		<u>Average</u>	<u>Average</u>
Rate Class		Bill		<u>Bill</u>	Bill
GS-1					
Residential and Farm	\$	123.76	\$	126.97	\$ 126.97
GS-3					
Residential and Farm TOD	\$	83.96	\$	86.14	\$ 86.14
SC-1					
General Service (0-100 KW)	\$	259.46	\$	268.54	
SC-2					
General Service (0-100 KW) TOD	\$	242.25	\$	250.72	
LP-1					
Large Power (101KW - 500 KW)	\$	4,536.29	\$	4,536.29	
LP-2	•	~~ . ~ ~ ~ ~	•		
Large Power (over 500 KW)	\$	20,192.09	\$	20,192.09	
B-1	•		•		
Large Industrial Rate (100KW - 4999 KW)	\$	-	\$	-	
B-2		405 000 40	<u>م</u>	405 400 00	
Large Industrial Rate (over 5000 KW)	\$	195,099.12	\$	195,120.82	
G-1	•		<u>م</u>		
Large Industrial Rate (over 1500 KW)		1,050,445.70	-	1,050,445.70	
Outdoor Lighting CATV	\$ \$	11.31 3.12	\$ \$	12.19	
-	Ф	3.12	Э	3.78	
Non-Recurring Charges Disconnect Charge	\$	72.00	\$	85.00	
Collection Fee	э \$	25.00	э \$	30.00	
Overtime Disconnect	э \$	25.00 50.00	э \$	30.00 75.00	
Remote Disconnect	э \$	20.00	э \$	75.00 25.00	
Reconnect Fee	\$	25.00	\$ \$	30.00	
Over Time Reconnect	э \$	25.00 50.00	э \$	30.00 75.00	
Returned Check	э \$	20.00	э \$	75.00 25.00	
Meter Reader Charge	\$ \$	25.00	\$ \$	35.00	
Temporary Service	\$ \$	20.00	\$ \$	35.00	
remporary Service	Ψ	-	φ	30.00	

7. Has BGE conducted a study to compare the Company's salary, benefits, and raises per employee with the standard salary, benefits, and raises by the workforce in the counties which it services, including but not limited to the following counties: Anderson, Garrard, Madison, Robertson, Woodford, Bourbon, Harrison, Mercer, Scott, Bracken, Henry, Nelson, Shelby, Estill, Jackson, Nicholas, Spenser, Fayette, Jessamine, Pendleton, and Washington county? If so, please provide copies of all such studies.

RESPONSE:

No.

- Please reference BGE's application, paragraph 5. Please confirm that it is an accurate statement that BGE is requesting "this rate adjustment in order to meet the terms of the mortgage agreement..."
 - a. Provide specific examples and explain in detail how BGE is not currently meeting the mortgage agreement requirements, if any exist.

RESPONSE:

Blue Grass Energy is meeting its mortgage agreement requirements. The primary reason we have filed this case is due to a rate structure change. The rate increase portion is for a small maintenance increase due to inflation since our 2008 case and as a proactive step to maintain a strong financial condition especially since interest rates are anticipated to start increasing the second half of 2015 and since our OTIER is below 2.0. This hopefully, would allow us to proceed several years before another rate case would be needed. We want to maintain a financial condition that exceeds the mortgage minimum requirements so we do not have to seek large increases. We adhere to the philosophy of filing smaller rate increases over a shorter time period vs. filing a larger increase over a longer time period. Since we decided to file a rate structure change and due to the cost of filing a rate case we felt it prudent to seek a small maintenance increase.

According to the application, BGE has to maintain a Net TIER of 1.25 and an OTIER of 1.10 based on an average of two of the three most current years. Please provide BGE's Net TIER for 2014, 2013, 2012, 2011, and 2010 and explain how the Net TIER is calculated.

Item 8 Page 2 of 2 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

RESPONSE:

Net Tier is Total margins plus interest expense divided by interest expense.

	Total TIER	Total TIER	<u>OTIER</u>
		Excluding G&T Patronage	
2014	Not available	Not available	Not available
2013	3.54	1.68	1.55
2012	2.75	1.46	1.30
2011	3.34	1.96	1.84
2010	2.63	1.86	1.75

c. Per the information provided, BGE has maintained its TIER, Net TIER, and OTIER well above the mortgage mandatory requirements, so why is BGE asserting that it is filing for a rate increase to meet the terms of the mortgage agreement?

RESPONSE:

See a. above.

Item 9 Page 1 of 3 Witness: Jim Adkins

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

9. Reference Exhibit G. Provide the percentage increase each class received as a result of the last rate case before the PSC.

RESPONSE:

Please see pages 2 - 3 of this response for the requested information.

BLUE GRASS ENERGY COOPERATIVE CASE NO. 2014-00339

RESPONSE TO ATTORNEY GENERAL'S INITIAL REQUEST FOR INFORMATION

		Normalized		Increase	Percent	Distribuiion		Propos	ed
		Revemie		Amount	Increase	Соор		Amount	Percemt
Schedule GS-1	\$	31,359,435	\$	4,584,731	14.6%	BGE			
Schedule R	\$	13,531,599	\$	1,433,222	10.6%	FC			
Schedule A	\$	15,852,091	\$	337,125	2.1%	HC			
Total Residential	\$	60,743,125	\$	6,355,078	10.5%		\$	2,006,534	2.60%
Schedule GS2-ETS	\$	28,031		3,377	12.0%	BGE			
Schedule R2 ETS	\$	7,605	\$	388	5.1%	FC			
Rate 1 ETS	\$	87,869	\$	2,437	2.8%	HC			
Total ETS	\$	123,505	\$	6,202	5.0%				
Schedule C-1	\$	3,002,036	\$	488,730	16.3%	BGE			
Schedule C	\$	788,156.00	\$	101,331	12.9%	FC			
Schedule Rate 2	\$	580,565	\$	56,497	9.7%	HC			
Total Small Commercial	\$	4,370,757	\$	646,558	14.8%		\$	279,345	3.50%
	~	2 072 205 00	~	50 600	4 60/	DOG			
LP-1 Large Power	\$	3,073,385.00		50,680	1.6%	BGE			
Schedule L Large Power Service	\$	250,019.00	Ş	(59,644)	-23.9%	FC			
Rate 6 Large Power	\$	568,326.00	\$	(40,204)	-7.1%	HC			
Total LP-1	\$	3,891,730	\$	(49,168)	-1.3%				
	ć	2 640 240 22	÷	60.200	4 70/	DOF			
Schedule LP-2	\$	3,618,310.00	•	60,380	1.7%	BGE			
Schedule N	\$	759,277.00	\$	(35,874)	-4.7%	FC			
LPT1 Rate 8	Ş	412,778.00	\$	(51,901)	-12.6%	HC			
Total LP-2 Over 500 kW	\$	4,790,365	\$	(27,395)	-0.6%				

BLUE GRASS ENERGY COOPERATIVE CASE NO. 2014-00339

RESPONSE TO ATTORNEY GENERAL'S INITIAL REQUEST FOR INFORMATION

	Normalized	Increase	Percent	Distribuiion		Propos	ed
	Revemie	Amount	Increase	Соор		Amount	Percemt
Schedule B-1	\$ 1,212,640.00	\$ (20)	0.0%	BG	-		
Schedule B-2	\$ 7,770,800.00	\$ 110,755	1.4%	BGE &FC			
LPR2 Rate 8 (B-2)	\$ 2,707,108.00	\$ (111,680)	-4.1%	HC			
Total B-2	\$ 10,477,908.00	\$ (925)	-2.7%			\$ 1,302	0.00%
Street Lighting	\$ 167,348	\$ 56,239	33.6%	All			
Outdoor Lighting	\$ 1,214,223	\$ 415,854	34.2%	All			
Total Lighting	\$ 1,381,571	\$ 472,093	34.2%			\$ 159,581	7.80%
	\$ 86,991,601	\$ 7,402,423	8.5%				
New Schedules Since Last Case							
GS! Residential & Farm TOD						\$ 974	2.60%
SC-2 General Service TOD						\$ 2,738	3.50%
						\$ 2,450,474	2.10%

Item 10 Page 1 of 1 Witness: Jim Adkins

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

10. Reference Exhibit H-1, page 3. Please explain how much of the \$2,452,901 revenue request increase does the increased customer charge constitute?

RESPONSE:

The increase in the customer charge has nothing specific to do with the overall requested increase. The primary reason for this application is for a change in the rate structure of Blue Grass to better align rates with cost. The purpose of rate design is to develop a cost/rate structure consistent with those functions that causes cost to be incurred. The second reason is the maintenance type increase that Blue Grass is seeking in this application so that it maintains an appropriate financial condition consistent with the seven principles of cooperatives.

a. What percentage does the customer charge constitute of the \$2,452,901 revenue increase?

RESPONSE:

Please see the response provided to the first part of this request.

Item 11 Page 1 of 5 Witness: Jim Adkins

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

- 11. Reference Exhibit H-1, pages 3-4.
 - a. Provide a clear and detailed breakdown of the \$129,304 increase in revenue requirements for wages and salaries.

RESPONSE:

Please see Exhibit 1, pages 1 through 5 of the application.

b. Provide a clear and detailed breakdown of the \$22,760 increase in payroll taxes.

RESPONSE:

Please see Exhibit 2, pages 1 through 3 of the application.

c. Provide a clear and detailed breakdown of the \$134,874 increase in revenue requirements for depreciation expense.

RESPONSE:

Please see Exhibit 3, pages 1 through 6 of the application.

d. Provide a clear and detailed breakdown of the \$482,472 increase in revenue requirements for interest expense.

Item 11 Page 2 of 5 Witness: Jim Adkins

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

RESPONSE:

Please see Exhibit 4, pages 1 through 4 of the application.

e. Provide a clear and detailed breakdown of the \$103,186 increase in revenue requirements for R&S Retirement.

RESPONSE:

Please see Exhibit 5, pages 1 through 11 of the application.

f. Provide a clear and detailed breakdown of the \$16,889 increase in revenue requirements for property taxes.

RESPONSE:

Please see Exhibit 6, pages 1 through 8 of the application.

g. Provide a clear and detailed breakdown of the \$30,000 increase in revenue requirements for rate case expense.

RESPONSE:

Please see Exhibit 11, page 1 of the application.

h. Provide a clear and detailed breakdown of the \$7,776,965 increase in revenue requirements for GTCCs.

Item 11 Page 3 of 5 Witness: Jim Adkins

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

RESPONSE:

It has been a standard procedure of this Commission to exclude East Kentucky Power Cooperative ("EKPC") Capital Credits (GTCC's) from the determination of revenue.

i. Provide a clear and detailed breakdown of the \$29,130 decrease in revenue requirements for professional fees.

RESPONSE:

Please see Exhibit 8, pages 1 through 12 of the application.

j. Provide a clear and detailed breakdown of the \$2,987 decrease in revenue requirements for donations.

RESPONSE:

It is a standard practice of this Commission to exclude donations from the determination of revenue requirements.

 k. Provide a clear and detailed breakdown of the \$17,612 decrease in revenue requirements for director fees.

RESPONSE:

Please see Exhibit 9, pages 1 through 12 of the application.

Item 11 Page 4 of 5 Witness: Jim Adkins

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

1. Provide a clear and detailed breakdown of the \$75,550 decrease in revenue requirements for miscellaneous expenses.

RESPONSE:

Please see Exhibit 10, pages 1 through 10 of the application.

m. Provide a clear and detailed breakdown of the \$17,885 decrease in revenue requirements for CATV Rate Revenue.

RESPONSE:

Please see Exhibit 13, pages 1 through 5 of the application.

n. Provide a clear and detailed breakdown of the \$76,995 decrease in revenue requirements for nonrecurring charge revenue.

RESPONSE:

Please see Exhibit 22, pages 1 through 7 of the application.

o. Provide a clear and detailed breakdown of the \$86,517 decrease in revenue requirements for year-end customer adjustment.

RESPONSE:

Please see Exhibit 15, page 1 of the application.

Item 11 Page 5 of 5 Witness: Jim Adkins

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

p. Provide a clear and detailed breakdown of the \$229,194 decrease in revenue requirements for normalization of purchased power.

RESPONSE:

Please see Exhibit 20, pages 1 through 7 of the application.

q. Provide a clear and detailed breakdown of the \$112,225 decrease in revenue requirements for normalization of base rate revenue.

RESPONSE:

Please see Exhibit 16, pages 1 of the application.

Item 12 Page 1 of 2 Witness: Jim Adkins

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12. Reference Exhibit H-1, page 5. Why was the date of September 25, 2014 chosen to pick the FFB ten year rate BGE intends to use?

RESPONSE:

The date of September 25, 2014 was selected because this was a day when Blue Grass was finalizing its revenue requirements and the amount of increase to be requested in this rate application.

 a. Why didn't BGE obtain a more recent interest rate before filing the application in November 2014? For example the FFB ten year interest rate hovered around 2.31% (2.24% approximate FFB quarterly rate) in November 2014, which is lower than the proposed rate from September 2014.

RESPONSE:

The process for developing an application for an adjustment of rates takes time and is a sequential process for the most part. After the determination of revenue requirements of which interest expense is a significant item, comes the development and completion of a cost of service study, selection of rate design, writing testimony, and compilation of the rest of the filing.

b. What was the average FFB ten year rate during the test period?

RESPONSE:

The requested data is unavailable because rates change at least weekly and Blue Grass

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has not maintained a file on this matter so that such an average rate could be developed.

c. Please provide an archive of all FFB rates for 2014, 2013, and 2012.

RESPONSE:

d. Does BGE admit that the FFB ten year interest rate on January 16, 2015 was 1.77% (1.72% approximate FFB quarterly rate)? If so, please explain how BGE can assert that interest rates will only rise in the future? If not, please explain why not.

RESPONSE:

Blue Grass will accept the fact that the FFB ten year interest rate of January 16, 2015 was 1.77%. Blue Grass continues to believe that interest rates will rise based on the idea that they cannot go much lower than current rates and more importantly, most finance experts such as the Chair of the Federal Reserve System have state their anticipation that rates will rise in the second half of 2015. The Federal Reserve System has held interest rates artificially low in an attempt to stimulate the economy.

 Please reference the application generally. Provide a detailed breakdown and summary of all of BGE's loans, as well as the current interest rate, principal, variable or fixed, current interest payment, current principal payment, etc.

RESPONSE:

See Response to Commission Staff's Second Request for Information Item 6.

14. Please reference the application generally. Provide the average interest rate/cost of debt that BGE has paid for each of the last ten (10) years.

RESPONSE:

Interest Rate / Cost of Debt

3.51%
3.64%
3.76%
3.77%
3.77%
4.05%
4.82%
4.61%
4.10%
3.68%

- 15. Reference Exhibit H-1, page 5, Q9 where it states that "the adjustment for interest expense has been developed in a manner that is slightly different than the standard normalization approach."
 - a. Explain in detail what approach BGE used for the adjustment of interest expense and how it is different than the standard normalization approach.

RESPONSE:

The approach that Blue Grass used was to use a longer term interest rate for all short term interest rates on Federal Financing Bank ("FFB") loans instead of using the actual short term interest rates at the test year end. A ten year rate of 2.5% was used.

b. Explain why BGE did not use the standard normalization approach.

RESPONSE:

Blue Grass chose a different approach for several reasons. One, short term interest rates are not indicative of future interest rates while utility rates are developed for longer term purposes. Two, the Times Interest Earned Ratio ("TIER") does not adequately provide for a reasonable level of margins in times of low interest rates or high interest rates and TIER has been the primary tool of this Commission for providing for the level of margins by distribution cooperatives in Kentucky. Third, an acceptable, alternative means of providing for reasonable levels of margins have not been accepted by those providing oversight in this process. And four, it is a means to provide for some measure of regulatory lag that exists between the end of a test year and the approval of new rates.

c. Please explain in detail why BGE should obtain an increase in rates based upon a nonexistent interest rate that BGE does not currently pay.

RESPONSE:

The interest rate used is a real interest rate that would exist if a loan was taken out at that time. I do not believe that the FFB would put out such information if not factual. Please see the response to part b of this item for reasons as to why it has been used in this case.

d. Please advise why does not wait until the interest rates are actually raised, and then request the additional monies as a rate increase instead of attempting to guess as to what the interest increase may be in the future.

RESPONSE:

Two primary reasons exist as to why Blue Grass has filed an application at this time. One, Blue Grass has filed this application primarily for a change in its rate structure to increase its customer charges. With the volatility in sales for electric cooperatives, an increase in the customer charge would be beneficial to help stabilize its revenue. Since this structure change does cost money to complete, Blue Grass decided to file for a maintenance type increase at the same time. Two, a forecasted test year was looked but was rejected for a couple of significant reasons. One was concern with the sales forecast that comes as a part of a forecasted test year. Second, the quantity and type of data and information required to be filed in forecasted test year rate application.

e. If BGE currently has an extremely low rate on its cost of debt, then should the

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ratepayers not benefit from this by paying lower rates?

RESPONSE:

The ratepayers are benefitting at the current time from these rates through a reduction in cost and resulting larger margins. Larger margins become equity for the cooperative and are eventually paid back to its members in the return of capital credits. I believe that the last thing we want to do is to cause a cooperative to move all its debt to long term interest rates so that it can receive a more favorable treatment in rate application proceedings. The basis for the determining of margins needs to move from a TIER basis to another basis with a return on equity being the most likely at the current situation.

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16. Reference Exhibit H-1, page 5, Q9. Confirm that BGE is using the standard normalization approach for interest expense adjustment on all loans (i.e. using the actual interest rates of the loans), except for the Federal Financing Bank loans that have variable interest.

RESPONSE:

Yes, we are using the standard normalization approach for interest rate adjustment for all loans except for the FFB variables and one CFC variable.

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17. Reference Exhibit H-1, page 5, Q9. Provide all data and information upon which BGE relied in forming the conclusion that it is appropriate to use a longer term interest rate for the FFB loans.

RESPONSE:

Please see the response to Item 15 in this Request for Information.

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18. Reference Exhibit H-1, page 5, Q9. Explain when BGE plans to refinance the variable rate interest loans.

RESPONSE:

We will refinance the variable interest rate loans to a fixed rate when we feel the interest rate curve starts moving upward on the long end. We have maintained a mixture of variable to fixed ratio to maximize savings on the short end and minimize risk on the long end

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19. Please provide any and all citations to base rate cases utilizing a historic test year in which the rate approved by the Kentucky PSC for a jurisdictional electric cooperative were premised upon an assumption that longer term interest rates will be higher than those existing during the preparation of the application. Please explain your answer.

RESPONSE:

Please see the response to Item No. 5 of the Commission Staff's Second Request for Information.

20. Please provide any and all citation to prior base rate cases in which the rate approved by the Kentucky PSC for a jurisdictional electric cooperative used the "different" normalization of interest approach that BGE uses in this application? Please explain your answer.

RESPONSE:

This Commission has not approved the approach used in this case in regards to interest rate normalization in any other case. However, in the Case No, 2014-00339 – Application of Cumberland Valley Electric for an Adjustment in Retail Electric Rates, this Commission did allow an interest rate percent higher than the year end interest rates for FFB loans in the normalization of interest expense. Blue Grass has provided a method different than the normal Times Interest Earned Ratio ("TIER") because the current situation on interest rates very plainly presents a major shortcoming to the use of the TIER method for establishing margins. Low interest rates leads to low interest expense which is good and to low margins without any relationship to the margin needs of a cooperative.

Please see the response to Item 5 of the Commission Staff's Second Request for Information for further information on this matter.

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21. Please reference the application generally and provide what BGE's rate increase request would be if the normal approach were taken to interest expense adjustment which used the actual interest rates of the loans?

RESPONSE:

Please see page 2 of this response.

1 2 3 4	Intere	Case N Statement of	Grass Energy Io. 2014-00339 f Operations, Adjus sed On Test Year I		With	Item 21 page 2 of 2 ness: Jim Adkins
5		Actual	Normalized	Normalized	Proposed	Proposed
6		Test Year	Adjustments	Test Year	Increase	Test Year
7						
8	Operating Revenues:					
9	Base rates	112,934,101	114,566	113,048,667	1,374,381	114,423,048
10	Fuel and surcharge	12,071,811	(12,071,811)	-		-
11	Other electric revenue	3,034,467	181,397	3,215,864		3,215,864
12	-					
13		128,040,379	(11,775,848)	116,264,531	1,374,381	117,638,912
14	-			· · ·		
15	Operating Expenses:					
16	Cost of power:					
17	Base rates	84,333,727	(229,194)	84,104,533		84,104,533
18	Fuel and surcharge	11,736,595	(11,736,595)	-		-
19	Distribution - operation	2,697,746	38,579	2,736,325		2,736,325
20	Distribution - maintenai	6,175,084	71,054	6,246,138		6,246,138
21	Consumer accounts	2,862,998	42,367	2,905,365		2,905,365
22	Customer service	993,181	31,792	1,024,973		1,024,973
23	Sales	-	-	-		-
24	Administrative and gen	4,404,713	(323)	4,404,390		4,404,390
25		, ,		, ,		
26	Total operating expense	113,204,044	(11,782,320)	101,421,724	-	101,421,724
27		- 1 - 1-		- 7 7 7		- 7 7
28	Depreciation	8,253,042	131,252	8,384,294		8,384,294
29	Taxes - other	160		160		160
30	Interest on long-term de	4,219,323	(55,617)	4,163,706		4,163,706
31	Interest expense - other	2,879	-	2,879		2,879
32	Other deductions	23,098	(2,987)	20,111		20,111
33	-	, , ,		,		,,
34	Total cost of electric s	125,702,546	(11,709,672)	113,992,874	-	113,992,874
35	-					
36	Utility operating marg	2,337,833	(66,176)	2,271,657	1,374,381	3,646,039
37		, ,		, ,		,
38	Nonoperating margins, ir	260,389	-	260,389		260,389
39	Nonoperating margins, o	86,005	-	86,005		86,005
40	G & T capital credits	7,776,965	(7,776,965)	-		-
41	Other capital credits	171,273	-	171,273		171,273
42				_, _, _, _, 9		
43	Net Margins	10,632,465	(7,843,141)	2,789,324	1,374,381	4,163,706
44		, ,	×	,, 	, , , , , , , , , , , , , , , , , , , ,	,, , , , , ,
44 45	TIER, total	3.52		1.67		2.00
45 46	TIER, exclude G&T	1.68		1.07		2.00
40 47		1.00				

22. Reference Exhibit H-1, page 6, R10. Provide a chart with BGE's proposed allocations and percentage increases compared to the recommendations in the COSS. This chart should compare the applied for allocations with the recommended allocations in the COSS.

RESPONSE:

The requested chart is provided below.

Rate Class		OSS Suggested	Increase	Proposed Increase		
		Amount	Percent	Amount	Percent	
GS-1, Residential and Farm	\$	2,368,652	3.06%	\$ 2,010,129	2.60%	
GS-1, Residential and Farm T-O-D		25,013	66.65%	976	2.60%	
SC-1, General Service (0-100 KW)		489,805	6.14%	279,315	3.50%	
SC-2, General Service (0-100 KW T-O-D)		43,142	55.14%	2,739	3.50%	
LP-1, Large Power (under 500KW)		(320,291)	-10.49%			
LP-2, Large Power (over 500KW)		(27,367)	-0.49%			
B-2, Large Industrial Rate		(532,533)	-4.55%			
G-1, Large Industrial		(28,281)	-0.54%			
Outdoor Lights		435,984	21.31%	159,741	7.81%	
Envirowatts		(1,223)	-15.93%			
		2,452,901	2.17%	2,452,900	2.17%	

23. Provide any documents, reports, or calculations supporting that were used to prepare the Cost of Service Study.

RESPONSE:

The documents that support the Cost of Service Study ("COSS") include the following ones:

- Exhibit J Revenue Analysis
- Exhibit G- Effect of new Rates on Revenues of Blue Grass Energy
- Exhibit K Various Ratios
- Exhibit Q Monthly Managerial Reports
- Exhibit S Statement of Operations and Balance Sheet
- Exhibit Y Trial Balance for the Test Year
- Exhibit 1 Adjustment for Wages & Salaries
- Exhibit 2 Adjustment for Payroll Taxes
- Exhibit 3 Adjustment for Depreciation
- Exhibit 4 Adjustment for Interest Expense
- Exhibit 5 Adjustment for Retirement & Security
- Exhibit 6 Adjustment for Taxes
- Exhibit 7 Adjustment for Donations
- Exhibit 8 Adjustment for Professional Fees
- Exhibit 9 Adjustment for Director Expenses
- Exhibit 10 Adjustment for Miscellaneous Expenses
- Exhibit 11 Adjustment for Rate Case Expense
- Exhibit 12 Adjustment for GTCC's
- Exhibit 13 Adjustment for CATV Revenue
- Exhibit 14 Adjustment for Disconnect Switch Revenue

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- Exhibit 15 Adjustment for End of Year Customers
- Exhibit 16 Adjustment for Normalized Revenues
- Exhibit 19 Equity Management Plan
- Exhibit 20 Adjustment for Purchased Power
- Exhibit 21 Adjustment for Post-Retirement Benefits
- Exhibit 22 Adjustment for Nonrecurring Charges Revenue

All of these exhibits listed above are a part of the application.

24. Reference Exhibit H-1, page 8, R14. Why is BGE proposing to consolidate the lighting offerings? Please explain the reasoning in full detail.

RESPONSE:

Blue Grass is proposing to consolidate its light offerings from 16 down to 12 because it has several lights that provide the same basic function. One of the reasons is to simplify what is being offered to its members. Second, Blue Grass is proposing to have its rate for lights based on Lumens and not on the specific type of light. Today, if a consumer orders an outdoor light, Blue Grass wishes to price that light on the basis of the lumens whether the light is mercury vapor, sodium vapor or LED. One situation of concern with distribution cooperatives is offer a LED light rate that is different from another type of light with customers calling and wanting their light changed out so that they can have the new type of light. This would cause the cooperative to incur a trip charge and should be able to impose it in these types of situations.

25. Reference Exhibit H-1, page 7, R11 and Exhibit H-2, page 2, A6. Verify that phase I means the year immediately following the PSC's approval of rates and phase 2 is the second year following rate approval. If this is incorrect, please clarify the meaning of phase 1 and phase 2.

RESPONSE:

Refer to PSC 2nd data request no. 7.

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- 26. Reference Exhibit H-2, page 2, A6.
 - a. Please provide a copy of the KAEC Statistical Analysis cited in the answer.

RESPONSE:

- a. Refer to the PSC application exhibit 17.
- Please explain if BGE has conferred with the EKPC distribution coops that have a lower average expense per customer to determine how to bring BGE's costs down further.

RESPONSE:

BGE confers periodically with our other coops to identify best practices. We have several KAEC accounting association meetings annually to discuss these types of issues.

c. What is the "need" that requires BGE to move member related costs to the customer charge, thus more than doubling the customer charge over two years and completely rejecting the notion of gradualism?

RESPONSE:

The purpose and principle behind Blue Grass's proposal to move more of the customer related costs into the customer charge is to better align costs with rates. Customer related costs are costs that are not incurred as a function of the demand level or the

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usage of energy. They are costs that are incurred due the location of and number of customers. The more appropriate rate design is one where rate design is based on costs. The customer/facility related costs are recovered through a customer/facility type charge. The demand related costs are recovered through a demand charge. And energy related costs are recovered through a demand charge.

d. Does BGE agree that by placing a large percentage of the rate increase upon the customer charge it will prevent its customers from having the ability to reduce their bills through less energy usage?

RESPONSE:

Customers will still have the ability to reduce their energy bill by using less energy. With this proposed approach to rates, members will have more appropriate price signals than they currently have and the matching of costs with the appropriate rate structure should provide for optimal efficiency of the utilization of the Cooperative's assets. We believe this is a more appropaite rate design in today's business environment.

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27. Reference Exhibit H-2, page 2, A7. If there is no benefit derived by BGE, then why shift the customer related cost from energy charge to customer charge?

RESPONSE:

The benefit derived is a more appropriate rate design where costs are better aligned with the proper rate charge.

a. How does shifting the majority of the customer cost from the energy charge to the customer charge "minimize the financial impact, on an annual basis, to individual member within each rate class" when the proposed plan would completely remove the easiest way for customers to control their electric expense - conserving energy and reducing usage?

RESPONSE:

Completely removing the easiest way for customers to control their electric expense is not a true statement. Most of the revenue that Blue Grass will derive from any customer will be a result of the energy charge. Thusly, customers will still have the ability to reduce their power bill by using less energy.

b. Reference testimony stating "[w]e will also be offering an optional rate for Residential members which would allow an additional rate offering to our membership given the consideration that Blue Grass Energy already offers several energy efficiency and demand response programs." Explain in detail what the optional rate for Residential members will entail and how it is designated on the tariff sheets.

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RESPONSE:

This optional rate is an inclining block rate and that was failed to be filed with this rate application. Blue Grasss is in the process of developing and filing this as a sepearate item in the near future.

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Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

28. Reference Exhibit H-2, pages 2-3, A7. How does removing any monetary incentive to conserve energy assist members with energy efficiency efforts in managing their monthly electric bill? Please explain this statement generally, as it is contradictory.

RESPONSE:

See Item 26c and d of Attorney General Initial Request for Information.

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Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

29. Reference Exhibit H-2, pages 3, A8. Why did BGE decide to use the twelve months ending December 31, 2013 as the test year?

RESPONSE:

Blue Grass Energy decided that a rate structure change was needed for the reason stated in testimony. As part of the implementation of this plan a decision was made to file after the financial closing of the December 31, 2013 calendar year.

a. Why not use the twelve months ending December 31, 2014?

RESPONSE:

This time period was not used because the case was filed before December 2014.

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30. Reference Exhibit I. Provide the same information for the proposed \$20.00 customer charge in an identical format.

RESPONSE:

See chart on page 2 of this response.

					Present	Proposed 1	Pr	oposed 2	
	Customer (Charge			\$ 9.73	\$ 15.00	\$. 20.00	
3					0.08951	0.08783		0.08384	
kWh			- Phase 1	Proposed			Phase 2		
Usage	Rates	Rates -1	Aı	nount	Percent	Rates -2		Amount	Percent
0	\$ 9.73	\$ 15.00	\$	5.27	54.2%	\$ 20.00	\$	10.27	105.5%
25	11.97	17.20	\$	5.23	43.7%	22.10	\$	10.13	84.6%
50	14.21	19.39	\$	5.19	36.5%	24.19	\$	9.99	70.3%
100	18.68	23.78	\$	5.10	27.3%	28.38	\$	9.70	51.9%
150	23.16	28.17	\$	5.02	21.7%	32.58	\$	9.42	40.7%
200	27.63	32.57	\$	4.93	17.9%	36.77	\$	9.14	33.1%
250	32.11	36.96	\$	4.85	15.1%	40.96	\$	8.85	27.6%
300	36.58	41.35	\$	4.77	13.0%	45.15	\$	8.57	23.4%
350	41.06	45.74	\$	4.68	11.4%	49.34	\$	8.29	20.2%
400	45.53	50.13	\$	4.60	10.1%	53.54	\$	8.00	17.6%
450	50.01	54.52	\$	4.51	9.0%	57.73	\$	7.72	15.4%
500	54.49	58.92	\$	4.43	8.1%	61.92	\$	7.44	13.6%
600	63.44	67.70	\$	4.26	6.7%	70.30	\$	6.87	10.8%
700	72.39	76.48	\$	4.09	5.7%	78.69	\$	6.30	8.7%
800	81.34	85.26	\$	3.93	4.8%	87.07	\$	5.73	7.0%
900	90.29	94.05	\$	3.76	4.2%	95.46	\$	5.17	5.7%
1000	99.24	102.83	\$	3.59	3.6%	103.84	\$	4.60	4.6%
1100	108.19	111.61	\$	3.42	3.2%	112.22	\$	4.03	3.7%
1200	117.14	120.40	\$	3.25	2.8%	120.61	\$	3.47	3.0%
1300	126.09	129.18	\$	3.09	2.4%	128.99	\$	2.90	2.3%
1400	135.04	137.96	\$	2.92	2.2%	137.38	\$	2.33	1.7%
1500	144.00	146.75	\$	2.75	1.9%	145.76	\$	1.76	1.2%
1600	152.95	155.53	\$	2.58	1.7%	154.14	\$	1.20	0.8%
1700	161.90	164.31	\$	2.41	1.5%	162.53	\$	0.63	0.4%
1800	170.85	173.09	\$	2.25	1.3%	170.91	\$	0.06	0.0%
1900	179.80	181.88	\$	2.08	1.2%	179.30	\$	(0.50)	-0.3%
2000	188.75	190.66	\$	1.91	1.0%	187.68	\$	(1.07)	-0.6%
1271	123.50	126.63	\$	3.13	2.5%	126.56	\$	3.06	2.5%
Average us	Average usage amount								

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31. Reference Exhibit K. For all pages in exhibit K, provide the information for calendar year 2013 and 2014.

RESPONSE:

Calendar year 2013 is referenced as Actual Test Year in Exhibit K of the application. Information for 2014 calendar year is not available at this time.

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32. Reference Exhibit L. Provide the information for calendar years 2014, 2013, 2012.

RESPONSE:

2013 is the same as Test Year in Exhibit L of the application and is also on page 2 of this item. Exhibit L for 2012 is on page 2 of this item. Information for 2014 is not available at this time.

Blue Grass Energy Cooperative Case No. 2014-00339 Reconciliation of Rate Base and Capital December 31, 2013

Reconciliation of Rate Base and Capital used to determine revenue requirements are as follows:

-	<u>2013</u>	<u>2012</u>
Equity Capitalization, with		
G&T capital credits	209,997,097	198,281,730
G&T capital credits	(45,257,860)	(39,571,114)
	164,739,237	158,710,616
Reconciling items:		
Capital credits from associated organizations		
(Allocated but unpaid)	(4,579,384)	(2,484,256)
Working capital requirements	2,141,715	2,125,982
Material and supplies, 13 month average	1,348,602	1,465,617
Prepayments, 13 month average	759,293	270,643
Cash and temporary investments	(8,311,060)	(7,857,034)
Accounts receivable	(15,616,931)	(14,745,844)
Material and supplies	(1,370,925)	(1,465,617)
Prepayments	(301,267)	(270,643)
Deferred plant retirements	(4,130,265)	(102,971)
Accumulated operating provisions	9,203,752	7,617,097
Accounts payable	12,213,462	11,097,780
Short term borrowings	0	0
Consumer deposits	1,831,336	1,891,681
Accrued expenses	1,166,613	1,228,510
Net Rate Base	159,094,178	157,481,561

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Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

33. Reference Exhibit N, page 5. Please explain the influx of an additional cash and cash equivalents of approximately \$3,000,000 from 2013 to 2014.

RESPONSE:

The two (2) major reasons for the increase are due to paying \$4,342,389 to NRECA as described in Note 7 of Exhibit N and advancing \$1.8 million more long-term debt in 2014 compared to 2013.

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Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

34. Reference Exhibit N, page 12. Please explain the increase of approximately \$11,000,000 in patronage capitol from 2013 to 2014.

RESPONSE:

The increase is due to East Kentucky capital credits.

a. Has this patronage capitol been distributed to the members? If not, why not?

RESPONSE:

Yes.

b. What level of patronage capitol is required by BGE?

RESPONSE:

The mortgage agreement states equity must exceed 30% before capital credits can be paid. The Equity Management Plan also states and equity to asset ratio of 30%. The equity to asset ratio with East Kentucky Power Cooperative ("EKPC") patronage capital is 38%, and without EKPC capital credits is 23%. The calculations are as follows:

	w/ EKPC	w/o EKPC
Total assets	234,973,051	189,715,191
Equity	88,475,697	43,217,837
Ratio	38%	23%

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Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

35. Reference Exhibit N, page 6. Please explain the approximately \$6,000,000 in cost of power.

RESPONSE:

Exhibit N, page 6 does not list cost of power as approximately \$6 million, but rather \$99 million for 2014 and \$93 million for 2013. The difference between the 2 years is \$6 million. The years listed for 2014 and 2013 are for the years ended April 30 of each year. The test year of 2013 is a calendar year. The main reason for the increase in power cost for the 12 months ended 2014 over 2013 is an increase in kWh purchases of approximately 92 million. At approximately 7 cents per kWh purchased this would result in an increase of approximately \$6.5 million.

a. If this is due to fuel costs, please explain if this expense is recovered through an FAC?

RESPONSE:

Please see response above.

Item 36 Page 1 of 1 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

36. Reference Exhibit N, page 7. Please verify that the 3,785 and 7,507 net change in memberships is 3,785 and 7,507 additional customers.

RESPONSE:

This is not necessarily true. During 2013 Blue Grass made an adjustment to memberships for accounts that have not been active and had not had the membership applied to their final bill.

Item 37 Page 1 of 1 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

- 37. Reference Exhibit N, page 13.
 - a. Verify that BGE has not refinanced its RUS loans since 2006. Please explain why BGE has not refinanced its RUS loans since 2006?

RESPONSE:

Correct. RUS offers discounts for early payoff of certain loans. Blue Grass refinanced the loans that RUS offered this early discount. The remaining loans do not offer a discount that makes refinancing them financially feasible.

b. Please provide a narrative explaining the increase from 2013 to 2014 in total comprehensive income of approximately \$1,000,000.

RESPONSE:

The increase is due to actuarial losses related to FAS No. 106 calculations.

38. Reference Exhibit P, page 1. Please provide detailed breakdowns of the costs for each meeting in the years 2014, 2013, 2012, 2011, and 2010.

RESPONSE:

YEAR	2014	2013	2012	2011	2010
Labor	\$25,000	\$25,319	\$34,158	\$30,685	\$26,380
Expenses	\$80,291	\$76,436	\$71,417	\$71,711	\$73,855
Benefits	\$13,300	\$16,048	\$23,817	\$18,025	\$15,888
Transportation	\$ 2,700	\$ 2,731	\$ 3,201	\$ 3,190	\$ 2,854
Scholarships	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000
Total	\$131,291	\$130,534	\$142,593	\$133,611	\$128,977

39. Reference Exhibit R, pages 26-27. Provide percentage of total kWh used by each class.

RESPONSE:

Energy Sales for Test Year						
	Energy	Percent of				
Rate Class	<u>Sales kWh</u>	<u>Total</u>				
GS-1, Residential and Farm GS-1, Residential and Farm T-O-D	793,939,806 437,447	61.84% 0.03%				
SC-1, General Service (0-100 KW)	70,405,905	5.48%				
SC-2, General Service (0-100 KW T-O-D)	659,159	0.05%				
LP-1, Large Power (under 500KW) LP-2, Large Power (over 500KW)	37,501,047 80,741,257	2.92% 6.29%				
B-2, Large Industrial Rate	198,304,474	15.45%				
G-1, Large Industrial	92,572,452	7.21%				
Outdoor Lights	9,008,707	0.70%				
Envirowatts	271,800	0.02%				
Total	1,283,842,054	100.00%				

Item 40 Page 1 of 1 Witness: Jim Adkins

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

40. Reference Exhibit R, pages 34-35. Why have classes LP1, B-2, and G-1 not been allocated any of the rate increase?

RESPONSE:

The Cost of Service Study indicates that these three rate classes are over recovering their revenue requirements and a reduction in their rates might be in order. However, any reduction in rates could result in an increase in another rate class.

Item 41 Page 1 of 1 Witness: Jim Adkins

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

41. Reference exhibit S, pages 1-2. Provide the information on pages 1-2 for the calendar year 2014.

RESPONSE:

This information is not available yet.

Item 42 Page 1 of 1 Witness: Jim Adkins

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

42. Reference exhibit S, page 1. Explain what the \$131,252 depreciation being adjusted and added to the test year represents.

RESPONSE:

All the detail information for the depreciation adjustment is included with Exhibit 3 of the application.

a. Please also explain what the \$131,252 depreciation being adjusted and subtracted from the test year represents.

RESPONSE:

All the detail information for the depreciation adjustment is included with Exhibit 3 of the application.

Item 43 Page 1 of 1 Witness: Jim Adkins

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

43. Reference exhibit S, page 1. Explain what the \$5,930,670 depreciation being adjusted and subtracted to both lines of patronage capital represents, and why it is being deducted.

RESPONSE:

Exhibit S does not reflect a depreciation adjustment of \$5,930,670. The depreciation adjustment reflects \$131,252. The adjustment to patronage capital is a summary of adjustments to the balance sheet.

Item 44 Page 1 of 2 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

44. Reference exhibit S, page 4. Provide a breakdown of Christmas bonuses that were given to all employees for the past five (5) years.

RESPONSE:

a. Please also explain if the Christmas bonuses have been removed for ratemaking purposes.

Christmas bonuses have been removed for rate-making purposes, as fully explained in Exhibit 1 of the application.

RESPONSE:

 b. Provide a breakdown of all general bonuses that have been given to all employees for the past five (5) years, and advise if the bonuses, if any, have been removed for ratemaking purposes.

RESPONSE:

Please see page 2 of this response.

Item No. 44

- a. Christmas Bonus are removed for ratemaking purposes.
 - 2013 \$14.610
 - 2012 \$14,605
 - 2011 \$14,585
 - 2010 \$14,445
 - 2009 \$14,225
- b. General Bonuses are not removed for ratemaking purposes due to performance and storm outage situations.
 - 2013 \$ 6,823
 - 2012 \$ 2,441
 - 2011 \$ 9,832
 - 2010 \$ 2,529
 - 2009 \$83,343

Item 45 Page 1 of 13 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

45. Reference exhibit S, page 4. Provide a breakdown of donations that were given for the past five (5) years.

RESPONSE:

Please see pages 2 -13 of this response.

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Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

46. Reference exhibit V. Provide this information for calendar year 2014 and 2011.

RESPONSE:

Statement of Operations

2011

Operating Revenue	\$122,395,041
Operating Expenses:	
Cost of Power	88,640,890
Distribution – Operations	2,728,963
Distribution – Maintenance	5,769,969
Consumer Accounts	2,941,502
Consumer Service	1,696,246
Sales	0
Administrative and general	4,406,172
-	106,183,742
Depreciation and amortization	7,681,803
Taxes-other	0
Interest on long term Debt	4,552,109
Other interest expense	108,372
Other deductions	5,475
	118,567,161
Utility Operating Margins	\$3,827,879
Nonoperating margins, interest	319,015
Nonoperating margins, other	38,987
G & T capital credits	6,289,027
Other capital credits	198,352
Net margins	10,673,259
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2014 is not available at this time.

Item 47 Page 1 of 1 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

47. Reference exhibit Z. Provide this information for calendar year 2014.

RESPONSE:

2014 not available at this time.

Item 48 Page 1 of 2 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

- 48. Reference Exhibit I, page 1 of the Application that refers to payroll adjustments.
 - a. Please confirm that all employees have received continuous and systematic pay raises since 2010.

RESPONSE:

No, they have not. Our wage and salary plan is based on performance.

b. Please provide the pay raises BGE provided in 2008 and 2009, when the economic recession began.

RESPONSE:

2008 total salary increases were 3.5%

2009 total salary increases were 4.0%

c. Please explain why continued pay raises between 2.5% and 3% have been given continuously and systemically given since 2010?

RESPONSE:

Blue Grass Energy has a pay plan that tracks the utility labor market and ensures that compensation rates are similar to comparable electric utilities. In the following table, annual changes within the electric cooperative and utility sector are presented. Pay raises between 2.5% and 3.0% since 2010 are well within the values experienced by the

Item 48 Page 2 of 2 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

electric distribution cooperative and utility sector and necessary to remain competitive within the BGE utility labor market.

Year	Overall Average Electric Cooperative Change*	BLS Employment Cost Index Utility Sector Change**
2011	3.4%	2.8%
2012	3.5%	2.4%
2013	3.5%	2.9%
2014	3.1%	2.7%

* Source: NRECA National Compensation Survey (electric distribution cooperative survey) annual change for all participants (>40,000 employees)

**Source: Bureau of Labor Statistics. Table 9. Utility sector Employment Cost Index for wages and salaries, for private industry workers, by occupational group and industry, December 2011, December 2012, December 2013, and September 2014

Item 49 Page 1 of 2 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

- 49. Reference Exhibit 1, page 3 of the Application.
 - a. Please provide a list of each BGE salaried employee's job title with salary, including all benefits, bonuses, etc.

RESPONSE:

See Exhibit 1 of the application for salaries, Page 3 of 5, 4 of 5, and 5 of 5 and Exhibit 18 of the application.

b. Please provide a list of each BGE hourly employee's job title with salary, including all benefits, bonuses, etc.

RESPONSE:

See Exhibit 1 of the application for salaries, Page 3 of 5, 4 of 5, and 5 of 5.

c. Please provide a list of each BGE BOD's salary, including all benefits, bonuses, etc.

RESPONSE:

See Exhibit 9 of the application.

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Page 2 of 2 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

d. Please provide a list of each BGE officer's salary, including all benefits, bonuses, etc.

RESPONSE:

See item 27 PSC 1st data request.

Item 50 Page 1 of 1 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

50. Reference exhibit 11. Explain what the advertising expenses were used for and why BGE should recover these costs.

RESPONSE:

Exhibit 11 advertising is the estimated cost to publish the rate case notification in the newspaper to our membership as required by PSC regulations.

Item 51 Page 1 of 1 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

51. Reference Exhibit 17. Provide this information for calendar year 2014.

RESPONSE:

2014 not available at this time.

Item 52 Page 1 of 2 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

52. Reference BGE response to PSC RFI 1-18. Please provide the information contained on pages 2-3 for the year 2014.

RESPONSE:

Please see page 2 of this response.

Percentage es Total of <u>Revenue Total Revenue</u>	3% \$89,462,125 68.60%	0.03% \$42,004 0.03%	0% \$8,920,912 6.84%	0.10% \$166,564 0.13%	2.81% \$3,427,041 2.63%		Ŷ	7.89% \$6,646,854 5.10%	7% \$2,041,283 1.57%	<u>2% \$6,401</u> 0.00%	0% \$130,410,971 100.00%
Percentag Of Energy Sales <u>KWH</u>	61.93%		5.30%			6.31%	14.94%	7.8	0.67%	0.02%	100.00%
Energy Sales <u>KWH</u>	831,299,145	453,523	71,193,459	1,313,105	37,651,500	84,694,788	200,466,426	105,874,511	9,039,818	269,500	1,342,255,775
Year End Number <u>Customers</u>	53,261	33	2,566	46	61	24	ß	1	154		56,151
Title	Residential and Farm	Residential and Farm TOD	General Service (0-100 KW)	General Service (0-100 KW) TOD	Large Power (under 500 kw)	Large Power (over 500 kw)	Large Industrial Rate	Large Industrial	Outdoor lights	Envirowatts	Total
Rate <u>Schedule</u> <u>Title</u>	GS-1	GS-1	SC-1	SC-2	LP-1	LP-2	B-2	G-1			

Class Peak Demands is load research data from our wholesale supplier, East Kentucky Power, which is not available at this time.

Page 2 of 2 ltem 52

Attorney General Initial request

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

53. Reference BGE response to PSC RF1 1-19. Please provide the information contained on page 2 for the year 2014.

RESPONSE:

2014 Purchase Power Cost

	Demand kW	Energy kWh	Purchased Power
January	381,244	173,523,575	\$ 11,986,721
February	345,776	138,170,231	9,875,209
March	308,988	126,183,056	8,514,021
April	232,321	88,538,107	6,608,956
May	196,638	97,915,233	7,066,332
June	236,569	108,870,180	8,200,208
July	244,750	110,144,609	8,311,528
August	234,425	116,192,826	8,488,028
September	231,890	96,217,316	7,181,396
October	182,352	91,062,311	6,215,760
November	293,123	122,252,322	8,564,023
December	259,093	<u>129,308,458</u>	<u>9,035,555</u>
	3,147,169	1,398,378,224	\$100,047,737

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

54. Reference BGE response to PSC RF1 1-21. Please provide the information contained on page 2 for the year 2014.

RESPONSE:

2014 Analysis of Wage and Salary

Wages charged to Expense					
Distribution expense	\$1,895,448				
Customer accounts expense	760,804				
Consumer service and information	533,001				
Sales Expense					
Administrative and General:					
Administrative and General expense	1,215,504				
Employee hospitalization & benefits	669,297				
Miscellaneous & general	13,304				
Maintenance of general plant	18,656				
Total Administrative and general	1,916,761				
Charged to clearing and others	686,578				
Total salaries and wages charged to expense	5,792,592				
Wages capitalized	1,628,330				
Total salaries and wages	\$7,420,922				
Ratio of salaries and wages charge to					
Expense to total wages	78%				
Ratio of salaries and wages capitalized					
To total wages	22%				
Overtime wages	\$ 425,146				
Overtime hours	10,030				

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BLUE GRASS ENERGY COOPERATIVE CORPORATION FOR AN ADJUSTMENT OF RATES

Case No. 2014-00339

WRITTEN NOTIFICATION OF CONFIDENTIALITY FOR ENTIRE DOCUMENT - 807 KAR 5:001 SECTION 13(2)(9)(3)(6)

This is to notify that confidential treatment is sought for the entire response to AG

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Item 55 attached hereto.

ATTORNE FOR BLUE GRASS ANERGY COOPERATIVE CORPORATION

Item 55

Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

NOTE: CONFIDENTIAL TREATMENT IS REQUESTED FOR ENTIRE TWO (2) PAGES OF RESPONSE TO THIS PSC ITEM 16 807 KAR 5:001 SECTION 13(2)(a)(3)(b)

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Item 56 Page 1 of 1 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

56. Provide copies of all studies BGE conducted addressing the impact that the proposed rate design will have on the elderly, low income, fixed income and home bound segments of its ratepayer base. Please provide detailed information for each specified group.

RESPONSE:

There are no studies.

Item 57 Page 1 of 1 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

57. Does BGE anticipate any changes in any existing contracts as a result of the new rates it seeks to implement in this filing (e.g., engineering, information technology, maintenance, etc.)? If so, please identify each such change.

RESPONSE:

No, BGE does not anticipate any changes.

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Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

58. Does BGE maintain any contracts with vendors whose principals are in any manner related, by blood or marriage, to BGE's officers, members of its Board, its employees, its independent contractors or consultants? If yes:

RESPONSE:

No.

a. Please provide copies of any such contract, and a breakdown of how much money was spent per contract per year for the last ten (10) calendar years; and

RESPONSE:

b. Please state whether the contracts were awarded pursuant to a bid process, and if so, provide specifics of that bid process.

RESPONSE:

Item 59 Page 1 of 3 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

59. Does BGE have any anti-nepotism policies in place? If so, provide copies of any and all such policies, and/or memoranda referring to such policies.

RESPONSE:

Please see pages 2-3 of this response.

ITem 59 Pige 2013

BLUE GRASS ENERGY COOPERATIVE CORPORATION

POLICY NO. 4-14

NEPOTISM

I. OBJECTIVE

To define the policy of the Cooperative with regard to the employment of relatives of Board Members or employees.

II. POLICY CONTENT

- A. The Cooperative may not employ relatives of Cooperative employees when such employment would create a conflict of interest.
- B. The Cooperative may not employ relatives, or any relative living in the household of, a Board Member or the President/CEO on a part-time, temporary or regular basis.
- C. For the purposes of this policy, "relative" refers to a spouse, child, brother, sister, parent, grandparent, aunt, uncle, nephew or niece (by blood, marriage, in-law or adoption) of a Board Member, the President/CEO or any employee of Blue Grass Energy.
- D. If, through his/her own marriage or because of a Cooperative board election, an employee becomes a relative of a Board Member or the President/CEO, one of the affected parties must submit their resignation within 30 days of the marriage or election.
- E. If through his/her own marriage, an employee creates a violation of this policy, such employee may transfer to a position that does not create a conflict of interest if a vacancy exists for which the employee is qualified. If no such vacancy exists, the employee must resign from employment or he/she will be discharged.
- F. Job vacancies are filled on the basis of relevant criteria believed essential to the selection of the best-qualified candidate. However, an otherwise qualified candidate is excluded from consideration for a vacancy if a potential conflict of interest involving a relative would be created.
- G. Candidates are ineligible for employment, promotion, or transfer to a job where an employee who is a relative would recommend or approve hiring, termination, performance appraisals, pay changes, disciplinary actions, promotions, etc., for the candidate.

- H. No employee shall lose his/her position with the cooperative due to becoming a close relative of a board member or employee because of a marriage to which he/she was not a party.
- I. Should a conflict of interest arise between relatives employed by the Cooperative not specifically covered in this policy, the discretion of the President/CEO shall resolve the issue in the best interest of the Cooperative.

III. RESPONSIBLITY

The President/CEO shall be responsible for the administration of this policy.

Adopted: January 1, 2002

2002 Am

Amended: E. A. Gilbert, Chairman

Amended: September 16, 2004

Item 60 Page 1 of 2 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

- 60. Does BGE employ the relatives, by blood or marriage, of:
 - a. Any BGE board member;

RESPONSE:

No.

b. Any BGE officer;

RESPONSE:

No.

c. Any BGE contractor;

RESPONSE:

No.

d. Any BGE consultant; and/or

RESPONSE:

No.

e. Any other BGE employee?

Item 60 Page 2 of 2 Witness: Donald Smothers

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

RESPONSE:

Yes.

f. If so, please provide specific details.

RESPONSE:

Please see response to Item 59 of the Attorney General Initial Request for Information.

Blue Grass Energy Cooperative Corporation Case No. 2014-00339 Response to Attorney General Initial Request for Information

61. Please provide a schedule listing all CWIP projects, if any, included in the rate base. For each project, provide the scheduled completion date, projected cost at completion, and identify any and all PSC orders allowing BGE to include CWIP in the rate base.

RESPONSE:

All open work orders are in the normal course of construction and retirement. Information regarding the scheduled completion date and projected cost at completion are not readily available. Please note that the revenue requirements associated with this proceeding are TIER-based. Rate base is presented in the case as required by regulation; CWIP is a component of rate base.

Item 62 Page 1 of 1 Witness: Donald Smothers

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62. Please reference Exhibit 8, p. 1 of the Application and clarify what the monthly retainer fee is for the attorney, if any, and how services are billed since certain language has been stricken.

RESPONSE:

Attorney 1 bills \$550 per month Attorney 2 bills \$140 per hour