

DORSEY, GRAY, NORMENT & HOPGOOD

ATTORNEYS-AT-LAW

318 SECOND STREET

HENDERSON, KENTUCKY 42420

JOHN DORSEY (1920-1986)
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January 4, 2016

Mr. Jeff DeRouen
Public Service Commission
Post Office Box 615
Frankfort, Kentucky 40602

Re: Kenergy Application for General Adjustment in Rates
2015-00312

Dear Mr. DeRouen:

Enclosed for filing are Kenergy's responses to the Attorney
General's Initial Data Requests.

Very truly yours,

DORSEY, GRAY, NORMENT & HOPGOOD

By



J. Christopher Hopgood
Counsel for Kenergy Corp.

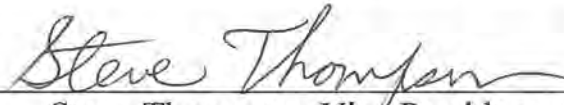
JCH/cds
Encls.
cc:
Attorney General
Office of Rate Intervention

CASE NO. 2015-00312

Attorney General's Initial Request for Information

VERIFICATION

I verify, state and affirm that the data request responses filed with this verification and for which I am listed as a witness are true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.



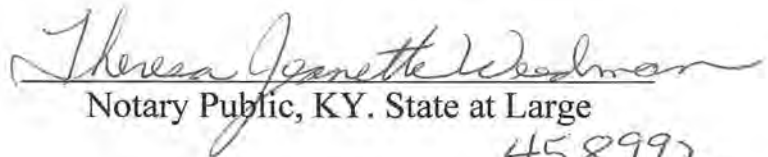
Steve Thompson, Vice President - Finance

STATE OF KENTUCKY

COUNTY OF: DAVIESS

The foregoing was signed, acknowledged and sworn to before me by Steve Thompson, this 29th day of December, 2015.

My commission expires 3-20-2016


Notary Public, KY. State at Large
458992

(seal)

CASE NO. 2015-00312

VERIFICATION

I verify, state, and affirm that I prepared or supervised the preparation of the responses to the Attorney General's First Data Request for Information filed with this verification and for which I am listed as a witness; and, that those responses are true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.



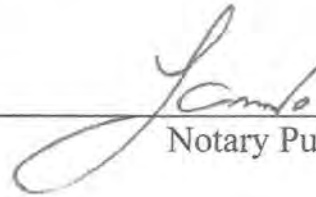
Jack D. Gaines, JDG Consulting, LLC

STATE OF GEORGIA

COUNTY OF: Dekalb

The foregoing was signed, acknowledged and sworn to before me by Jack D. Gaines, this 31 day of December, 2013.

My commission expires 11-05-2017



Notary Public

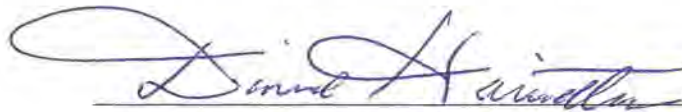
(seal)



CASE NO. 2015-00312

ATTORNEY GENERAL'S INITIAL REQUEST FOR INFORMATION
VERIFICATION

I verify, state and affirm that the data request responses filed with this verification and for which I am listed as a witness are true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.



David Hamilton, Vice President - Member Services

STATE OF KENTUCKY

COUNTY OF: DAVIESS

The foregoing was signed, acknowledged and sworn to before me by David Hamilton, this 29th day of December, 2015



Notary Public, KY, State at Large 458992

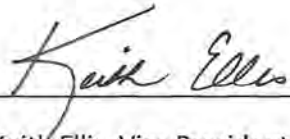
My Commission expires 3-20-2016

(seal)

CASE NO. 2015 -00312

ATTORNEY GENERAL'S INITIAL REQUEST FOR INFORMATION
VERIFICATION

I verify, state and affirm that the data request responses filed with this verification and for which I am listed as a witness are true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.



Keith Ellis, Vice President, Administrative Services & Human Resources

STATE OF KENTUCKY

COUNTY OF: DAVIESS

The foregoing was signed, acknowledged and sworn to before me by Keith Ellis, the 4th day of January, 2016.

My commission expires 5-24-2019



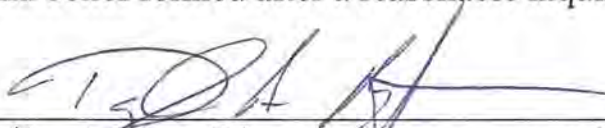
Notary Public, KY. State at Large

CASE NO. 2015-00312

Attorney General's initial request for Information

VERIFICATION

I verify, state and affirm that the data request responses filed with this verification and for which I am listed as a witness are true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.




Douglas A. Hoyt, Director of Procurement & Contracts

STATE OF KENTUCKY

COUNTY OF: DAVIESS

The foregoing was signed, acknowledged and sworn to before me by Douglas A. Hoyt, this 4th day of January, 2016.

My commission expires 5-24-2019



Notary Public, KY. State at Large

(seal)



**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

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Item 1) Reference the Kenergy Corp. ["Kenergy" or the "Company"] 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 formulae in all cells and rows fully intact and fully accessible.

Response) Please see the electronic Excel files provided in response to the Commission Staff's Second Request for Information Items 3, 31b, 41a, and 44. In addition, please see the following Excel files related to Exhibit 11 of the application, which are provided electronically:

- "AG1 Item 1, Exhibit 11, File 1 Analysis Summary Jun 26.xlsx"
- "AG1 Item 1, Exhibit 11, File 2 Five Yr Forecast Detail.xlsx"
- "AG1 Item 1, Exhibit 11, File 3 Annual Rets and Net Salvage.xlsx"
- "AG1 Item 1, Exhibit 11, File 4 Theoretical Reserve.xlsx"
- "AG1 Item 1, Exhibit 11, File 5 Reserve Summary.xlsx"
- "AG1 Item 1, Exhibit 11, File 6 Acct Inv Summaries.xlsx"

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

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Item 2) Reference the Kenergy Application generally. Provide all invoices from outside experts, consultants, and legal counsel related to the current rate case. Please provide these on an ongoing basis throughout the pendency of the case.

Response) Refer to the response to item 34 of the Commission Staff's first data request.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

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Item 3) Reference the Kenergy Application generally. Provide the Board of Directors ("BOD") meeting minutes for every BOD meeting between January 2011 and the present where rates were discussed.

Response) Item 3, pages 2-5 of 5 contains the above referenced information.

Witness) Steve Thompson

KENERGY CORP.
EXCERPT FROM JULY 9, 2013
MINUTES OF MEETING OF BOARD OF DIRECTORS

Following the adoption of the agenda, the Chairman called upon Vice President of Finance Steve Thompson who stated that the board would be asked to approve to resolutions in connection with the loan application. He then introduced Aaron Johnson of RUS who reviewed details of the RUS loan application process and documents to be executed in connection with the loan application.

Director Bill Denton moved, seconded by Director Billy Reid, that the following resolution be adopted. Motion carried by unanimous vote.

WHEREAS, The Ten (10) Year Financial Forecast for the period of 2013 through 2022 as prepared and included with this loan application is an acceptable projection of the financial trend and conditions of Kenergy Corp.; and

WHEREAS, the Board of Directors of Kenergy Corp. has reviewed the attached Long Range Financial Forecast prepared by Kenergy's staff; and

WHEREAS, the Financial Forecast includes estimates taken from a previously Board approved Load Forecast and four-year Construction Work Plan, both of which have been approved by the Rural Utilities Service (RUS); and

WHEREAS, the Long Range Financial Forecast is based upon Board approved policies, operating rules and plans and sets forth appropriate management goals, all of which are acceptable to the Board of Directors as an overall plan of operations;

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of Kenergy Corp. hereby approves and accepts the Ten Year Long Range Financial Forecast, as proposed, as a plan of operations, and has reviewed the projected rates which are included in the Forecast and is committed to take whatever action may be necessary to implement such rate changes as may be required, on a timely basis to achieve the goals outlined therein.

KENERGY CORP.
EXCERPT FROM MAY 12, 2015
MINUTES OF MEETING OF BOARD OF DIRECTORS

Vice President of Finance and Accounting Steve Thompson provided a financial overview for March and covered items in the management report related to finance and accounting, including plans to request the board's approval of a resolution at the June meeting to file a rate application later in the year.

KENERGY CORP.

EXCERPT FROM JUNE 9, 2015

MINUTES OF MEETING OF BOARD OF DIRECTORS

Vice President of Finance and Accounting Steve Thompson presented to the board details supporting the need for Kenergy to consider preparation of a new increase in base rates based on degrading financial performance. Upon motion by Glenn Cox, seconded by Chris Mitchell, and by unanimous vote, the board approved the following resolution regarding preparation of a rate case application.

WHEREAS, the Long Range Financial Forecast (LRFF), approved by the Board on July 9, 2013, in conjunction with the \$43,000,000 2013-2017 construction work plan projected a \$2,200,000 – 2.5% adjustment in non-dedicated revenues (excluding power cost) in late 2015,

WHEREAS, the Board approved an expenditure of approximately \$10,000,000 related to the automated metering infrastructure on October 14, 2014 that was not included in the LRFF,

WHEREAS, the 2015 operating budget base case approved by the Board on December 9, 2014 projected an operating times interest earned ratio of .99 while the Rural Utilities Service loan contract minimum is 1.10 when applying the two best of latest three calendar years,

WHEREAS, the 2015 operating budget includes \$100,000 for the cost of outside consultants, attorney and legal notices to prepare and file a rate application,

WHEREAS, the most recent (10) ten months of actual results (July 2014 – April 2015) and the next (2) two months of budgeted results (May 2015 – June 2015) when adjusted for estimated proforma adjustments indicate a revenue increase of approximately \$2,900,000 (2.3%) utilizing the 2.00 times interest earned ratio approach currently allowed by the Kentucky Public Service Commission,

NOW, THEREFORE, BE IT RESOLVED that management of Kenergy Corp. is directed and authorized to employ JDG Consulting, LLC; and Welsh Group, LLC to prepare cost of service and depreciation studies and develop proposed rates to be reviewed with the Board on October 13, 2015 with a projected filing date of December 2, 2015.

KENERGY CORP.

EXCERPT FROM SETPEMBER 8, 2015

MINUTES OF MEETING OF BOARD OF DIRECTORS

Vice President of Finance and Accounting Steve Thompson presented for the board's consideration documentation supporting the filing of a rate application. Director Steve Henry moved, seconded by John Warren, that the following resolution be approved. Motion carried by unanimous vote.

WHEREAS, management was authorized and directed on June 9, 2015, to engage the necessary consultants who, along with staff, would prepare the necessary information required for a rate application filing and submit the proposed revenue increase to the board.

WHEREAS, management has submitted to the board information detailing an overall revenue increase of \$2,563,868 and 1.9%.

WHEREAS, the board recognizes Kenergy's contractual obligation to its creditors, including the obligation to maintain a Times Interest Earned Ratio (TIER) and operating TIER that averages a minimum not less than 1.25 and 1.10 when the two highest of the three preceding years are considered.

NOW, THEREFORE, BE IT RESOLVED that management of Kenergy is authorized and directed to notify Kenergy's members and other parties at the appropriate time of Kenergy's proposed revenue increase (including any subsequent minor changes made) and to file an application for a general adjustment in rates, and further that management has the authority to negotiate a settlement of the retail rate adjustment.

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

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Item 4) Reference the Kenergy Application generally. 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 with the members of the cooperative between 2011 and 2015, which address or otherwise discuss the need for a rate adjustment.

Response) Nothing was distributed that addresses or discusses the 2015-00312 rate application.

Witness) David Hamilton

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

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Item 5) Reference the Kenergy Application generally. 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 2011 and 2015, which address or otherwise discuss the need for a rate adjustment.

Response) Item 5, pages 2-12 of 12 contains the above referenced information.

Witness) David Hamilton



2015-2016 Rate Case Communications Strategy

Friday, Oct. 23	Finalize press release and Q&A
Friday, Oct. 23 (4:30 p.m.)	Schedule press conference (media partners, directors)
Sunday, Oct. 25	First ads run in <i>M-I</i> and <i>Gleaner</i>
Monday, Oct. 26 (10 a.m.)	Press conference at HEADQUARTERS
Monday, Oct. 26 (11:57 a.m.)	E-mail letter to C&I members on Schedule 7
Monday, Oct. 26 (2 p.m.)	Press release goes on website
Friday, Oct. 30	Rate case filing
Monday, Nov. 2	Post rate-case info on website (Ad, PSC link, member Q&A, rate comparison sheet)
Monday, Nov. 2	Post notice on social media w/link to website info
December	Story on front page of Member Matters
December	Electronic newsletter with link to info on our website



Content guide for AG request folder

Name of PDF	Additional Information
Communications Strategy	Outline of rate-case communications
December 2015 Member Newsletter	Mailed in all 56,000+ bill statements
C&I letter	e-mailed to C&I members on Schedule 7
Gleaner Story Oct 27	Henderson newspaper story
Kenergy ads about 2015 rate case	Ad copy for Kentucky Press Service
Kenergy website	Information posted on corporate website
Kenergy10	Ads for newspapers
Kenergy4.6	Supplemental ads for newspapers
Kenergy11-20	Kentucky Press Service affidavit of ad runs throughout Kenergy's service area
Kenergy12-11	Kentucky Press Service affidavit of ad runs throughout Kenergy's service area
Mailchimp e-mail to Kenergy members	This e-mail was sent to 12,695 Kenergy members via e-mail on Wed., Nov. 4, 2015, at 11 a.m. Total opens = 5,169
Messenger-Inquirer story about ...	Newspaper story that ran in M-I, which covers Daviess, McLean, Ohio, Hancock and Muhlenberg counties
Rate case press release	Kenergy hosted a press conference at 10 a.m. on Monday, Oct. 26, 2015, about the rate case. News crews from three TV stations (WEVV, WEHT and WFIE), two newspapers (Messenger-Inquirer and Gleaner) and Henderson radio station WSON participated. In addition, Kenergy's communications manager sent the press release to about 20 other regional media outlets. The story about Kenergy's rate filing was publicized extensively throughout the co-op's service area.
Rate Case Q&A	This document is published on Kenergy's website.
Rate page on Kenergy's website	Rate case information is found in several places on Kenergy's website, including a link to the PSC filing.
Sidebar to rate-case press release	This document accompanied Kenergy's press release.



FOR IMMEDIATE RELEASE

October 26, 2015

Contact: Renee Beasley Jones, Communications and PR Manager
270.316.4335 or rjones@kenergycorp.com

Kenergy prepares to file rate application

HENDERSON, Ky. — On Friday, Oct. 30, Kenergy plans to file a request with the Kentucky Public Service Commission (PSC) for a 2.46 percent rate increase.

This is the first rate increase the electric distribution cooperative has sought since 2011. At that time, the PSC approved a 2.87 percent increase.

If the PSC approves Kenergy's proposal, the cooperative expects its new rate to take effect by May 1, 2016.

If approved, the proposed rate would increase the average residential bill by \$3.90 a month. Kenergy's average residential use is 1,352 kilowatt hours.

"The decision to raise rates is always a difficult one," said Kenergy's President and CEO Jeff Hohn. "But the utility business is very capital intensive, and expenses continue to climb. We hope our member-owners understand rate increases are sometimes needed to protect the financial health of their electric cooperative."

Hohn said the main driver for the proposed increase is depreciation expense, which has gone up nearly \$3 million a year since 2011. Kenergy has invested about \$60 million in infrastructure — about 40 percent of that amount was used to extend service to new members — during the past five years. That \$60 million is not included in the cooperative's current rates. Depreciation allows the co-op to recover that investment over a 30-year period.

In addition, labor costs and other overheads have increased 8 percent during the same time period, largely due to inflation, Hohn said.

Kenergy has taken these measures to cut costs since the last rate increase in 2011:

- Refinanced loans to lower interest rates, which resulted in saving about \$1 million annually.
- Asked employees to pay a larger percentage of their health-care premiums, saving the cooperative \$80,000 a year.
- Saved about \$118,000 annually — without sacrificing reliability — trimming trees and limbs near power lines.
- Replaced about 100 miles of deteriorated power lines. Besides improving Kenergy's service reliability, this upgrade has reduced line loss, which saves, on average, \$100 per mile of line per year.
- Reduced the size of the co-op's vehicle fleet. Between 2011 and 2014, fleet maintenance costs declined 1.2 percent and expenses for 2015 are on track to achieve another decrease of about 0.5 percent. Two more vehicles are scheduled to be cut in 2016.
- Changed the way it provides fire-retardant uniforms and other life-saving clothing to line techs and servicemen. Clothing expenses declined 41.5 percent between 2011 and 2014.

In addition to cutting costs, the cooperative generated new revenue since the last rate increase by leasing cell tower space to large telecommunications companies, increasing Kenergy's income by \$55,000 annually.

Kenergy is a not-for-profit electric distribution cooperative that is owned by those it serves. As a not-for-profit business, Kenergy returned about \$10 million to its members since the last rate increase. That money was returned to past and present members in the form of capital credit retirements.

Kenergy serves more than 56,000 meters in all or parts of 14 western Kentucky counties.

Kenergy seeking to raise rural residential electric rates

By Chuck Stinnett of The Gleaner

Posted: Oct. 26, 2015

Henderson-based Kenergy Corp. will ask state regulators to raise rural residential electric rates almost 2.5 percent while increasing overall revenues more than \$2.5 million per year.

The rural co-op is proposing to raise the monthly residential customer charge by \$3 per month in addition to a small increase in its per-kilowatt hour energy charge.

A typical home served by Kenergy would see monthly bills increase to \$162.71 per month, up \$3.90, or 2.46 percent.

Homes would bear the bulk of the increase — just over \$2.1 million per year — while many businesses will have no increase at all.

That's because both Kenergy and the Kentucky Public Service Commission have a long-term goal to adjust rates so that various classes of customers pay their share of the cost of electricity as determined by a cost-of-service study, according to Steve Thompson, the co-op's vice president for finance.

Historically, industries and commercial customers have paid rates that are greater than their proportional share of power companies' cost of doing business, effectively subsidizing residential rates. The PSC's stated policy is to gradually adjust rates to eliminate such subsidies.

Under Kenergy's proposal, smaller and mid-sized commercial customers — those whose peak usage is less than 1,000 kilowatts — would see no change in rates, although those using more than 1,000 KW would pay 3.8 percent more, with an average increase of nearly \$1,800 per month.

The two Century Aluminum smelters and Kenergy's three other largest industries

would see no change in rates while 10 other industries would see a decline of 0.18 percent, saving them an average of about \$210 per month.

The proposed rate changes are subject to review and approval by the PSC. Kenergy said it intends to file its rate request with the Frankfort-based agency on Friday. At that time, copies of the application will be available for review at Kenergy offices in Henderson and elsewhere as well as at KenergyCorp.com (click

telecom companies in recent years.

Hohn said the upcoming rate request will represent Kenergy's first internal rate since a 2.87 percent increase was approved by the PSC since 2011.

However, its customers are paying more for electricity because of increases in wholesale electricity charged by its power provider, Big Rivers Electric Corp. of Henderson.

Kenergy passed along a rate increase in late 2013 that hiked average residential rates \$17.57 per month, or 16.3 percent, to help Big Rivers make up for the loss of its largest customer, Century Aluminum's Hawesville smelter.

The PSC approved a second rate increase for Big Rivers, tied to the subsequent loss of Century's Sebree smelter, that is expected to increase residential rates for Kenergy customers about \$15 per month on average when it takes effect in mid-2016. Churches, schools and farms will also pay more.

Industrial rates are expected to rise in a couple of months.

Looking ahead, Hohn said the co-op anticipates it will need to seek rate increase of 2 to 3 percent every three or four years, not counting any increase in wholesale rates from Big Rivers.

Kenergy is a not-for-profit electric distribution co-op that serves more than 45,000 homes and businesses in parts of Henderson, Union, Webster and 11 other Western Kentucky counties.

It said it has returned about \$10 million in capital credits — profits, essentially — since its last rate increase in 2011.

Find this article at:

<http://www.theleaner.com/news/kenergy-seeking-to-raise-rural-residential-electric-rates-230392f0-2452-50c6-e053-0100007f7347-337098321.html>

Check the box to include the list of links referenced in the article.

From: Lawrence, Keith <klawrence@messenger-inquirer.com>
Sent: Wednesday, December 23, 2015 12:59 PM
To: Renee Jones

Kenergy seeking increase in rates

Owensboro Messenger-Inquirer (KY) - Tuesday, October 27, 2015

Author: Keith Lawrence ; Messenger-Inquirer

Kenergy is asking the Kentucky Public Service Commission to approve a 2.46 percent rate increase that will add \$3.90 a month to the average residential bill.

That will take the average bill from \$134.45 to \$138.35.

The average home uses 1,352 kilowatt hours of electricity per month, the cooperative said. **Kenergy** is hoping to put the rate increase into effect May 1 if the PSC approves.

Jeff Hohn, **Kenergy** 's president and chief executive officer, said this is the first rate increase the cooperative has sought since 2011, when the PSC approved a 2.87 percent increase.

But Big Rivers Electric Corp., which supplies electricity to **Kenergy** , has passed three rate increases on to **Kenergy** customers since 2011.

A recent PSC audit of Big Rivers says those increases totaled approximately 33 percent.

Hohn said, "The decision to raise rates is always a difficult one. But the utility business is very capital intensive, and expenses continue to climb. We hope our member-owners understand rate increases are sometimes needed to protect the financial health of their electric cooperative."

If the PSC rejects the increase, he said, "It would put us in a financial bind."

Hohn said the main reason for the proposed increase is depreciation expense, which has gone up nearly \$3 million a year since 2011.

Kenergy said it has invested about \$60 million in infrastructure — about 40 percent of which was used to extend service to new members — during the past five years.

About 60 percent of the growth during the past five years has been in Daviess County, the utility said.

Hohn said labor costs and other overhead have increased 8 percent during those years, largely due to inflation.

He said the cooperative have taken the following measures to cut costs since 2011:

- * Refinanced loans to lower interest rates, saving about \$1 million annually.
- * Asked employees to pay a larger percentage of their health-care premiums, saving the cooperative \$80,000 a year.
- * Saved about \$118,000 annually on trimming trees and limbs near power lines by negotiating lower rates with

contractors.

* Replaced about 100 miles of deteriorated power lines.

* Reduced the size of its vehicle fleet.

* Changed the way it provides fire-retardant uniforms and other life-saving clothing to line techs and servicemen, cutting those expenses by 41.5 percent between 2011 and 2014.

Kenergy said it also generated new revenue by leasing cell tower space to large telecommunications companies, increasing its income by \$55,000 annually.

Kenergy is owned by those it serves.

It said it has returned about \$10 million to its members in the form of capital credit retirements since the last rate increase.

The utility serves more than 56,000 customers in 14 western Kentucky counties.

A **Kenergy** spokeswoman said if members lower their water heater setting from 140 degrees to 120 degrees, they can save up to \$48 a year.

And for each degree they lower their thermostats in winter, they can save 3 percent on their heating bills. And in the summer, they can save about 3 percent for every degree they raise their thermostats.

Keith Lawrence, 691-7301, klawrence@messenger-inquirer.com

Dear Commercial/Industrial Member:

In the Sunday *Messenger-Inquirer* and *Gleaner*, you may have seen an advertisement regarding Kenergy's request for a rate increase.

This ad will run in every newspaper in Kenergy's service area during the next three weeks.

The proposed increase for the three-phase rate class (1,001 KW & Over) is 3.81 percent. The request will be filed with Kentucky Public Service Commission on Oct. 30, and, if approved as submitted, it will become effective on May 1, 2016.

Kenergy's last retail rate increase was in September 2011.

We wanted to let you know as soon as possible about the increase so you may budget accordingly.

If you have questions, please email Todd Blackburn at tblackburn@kenergycorp.com or email Kyle Heavrin at kheavrin@kenergycorp.com.



MEMBER Matters

December 2015

KENERGYCORP.COM
1.800.844.4832

[HENDERSON, KY]

Three directors to be elected in 2016

Prior to Kenergy's Annual Membership meeting to be held on June 14, 2016, individuals will be elected to represent Districts 1, 3 and 5.

A ballot listing the qualified candidates in a contested district election will be mailed in May to each Kenergy member residing within the district. Members will also have the option to vote online.



District 1, which currently is represented by Glenn Cox, includes all of Lyon and Caldwell counties and that portion of Hopkins County west of Highway 109 and the area south of Highway 70 in Crittenden County.



District 3, which currently is represented by Chris Mitchell, includes all of Webster County and that portion of Hopkins County east of Highway 109.



District 5, which currently is represented by Bill Denton, includes the area of Henderson County east of the Pennyriple Parkway and east of that portion of Highway 41 that runs to the north of the Pennyriple Parkway.

Any 15 or more members may make nominations of eligible persons for district director.

Such nominations shall be by signed written petition and shall be submitted to the corporation not less than 110 days prior to Annual Meeting. Only members eligible to vote in a district are authorized to sign a petition nominating a member from that district. Directors shall be elected only from nominations by petition.

It is not a requirement to use a petition form prepared by Kenergy; however, anyone wishing to do so may request one by contacting Debbie Hayden at 270-689-6101 or email at dhayden@kenergycorp.com.

The petition must be submitted to the cooperative by 4 p.m., Feb. 25, 2016. Thereafter, if the petition is valid, the name of the nominee will be posted.

KENERGY APPLIES FOR RATE INCREASE

The cooperative has filed an application with the Kentucky Public Service Commission (PSC) for a proposed 2.46 percent rate increase.

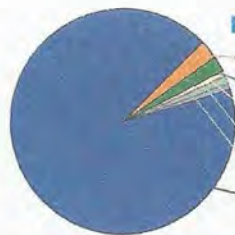
If the co-op's request is approved, the average residential bill will increase \$3.90 a month.

The last time Kenergy sought a rate increase was 2011.

"The decision to raise rates is always a difficult one," said Kenergy's President and CEO Jeff Hohn. "But the utility business is very capital intensive, and expenses continue to climb. We hope our member-owners understand rate increases are sometimes needed to protect the financial health of their electric cooperative."

Major factors driving the request are depreciation expenses, labor costs and overhead expenses.

For more information, go to kenergycorp.com and search for articles in the news postings.



Kenergy's Total Cost of Electric Service

- Distribution O & M Expense: 3%
- Depreciation: 2%
- Interest on Long-Term Debt: 1%
- Administrative, General, Taxes and Other: 1%
- Customer Accts./Customer Service: 1%
- Wholesale Purchased Power Supply: 92%



Read the last story in a three-part series titled *On the Farm*, featuring Philip Parish of P&H Farms near Eddyville, Page 2.

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

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Item 6) Reference the Kenergy Application generally. Provide the average Kenergy bill for each rate class during the test period, as well as the average bill should the proposed rates go into effect. Also include the percentage rate increase from current rates to proposed rates for the average bill in each rate class.

Response) Refer to Exhibit 4, page 4 of the application.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
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Item 7) Reference the Kenergy Application generally. Provide copies of all studies that Kenergy has 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) No studies were performed by Kenergy Corp.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
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Item 8) Reference the Kenergy Application generally. Provide copies of all studies that Kenergy has conducted addressing the impact that the proposed rate increase 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) No studies were performed by Kenergy Corp.

Witness) Steve Thompson

**KENERGY CORP.
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Item 9) Reference the Kenergy Application generally. Has Kenergy 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: Daviess, Hancock, Henderson, Hopkins, McLean, Muhlenberg, Ohio, Webster, Breckinridge, Union, Crittenden, Caldwell, Lyon, and Livingston County? If so, please provide copies of all such studies. If not, please explain why a study has not been performed.

Response) Kenergy Corp. secured the services of the NRECA National Consulting Group to conduct a compensation study factoring national, regional, and state wages in similar industries although not specific to the 14-county area Kenergy Corp. serves. Refer to the Commission Staff's First Information Request Item 14, pages 86-96 for a copy of the Compensation Study proposal.

Witness) Keith Ellis

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
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2015-00312 RATE APPLICATION

1

2 **Item 10)** Reference the Kenergy Application, Paragraph (a) and provide the per capita money
3 income as well as the poverty rate percentage of the residents for each of the fourteen (14)
4 counties where Kenergy operates.

5

6 **Response)** Item 10, Pages 2-4 of 4 contains the above referenced information.

7

8 **Witness)** Keith Ellis

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Search

U.S. Census Quick Facts



www.census.gov/en.html)



QuickFacts

Hopkins County, Kentucky

QuickFacts provides statistics for all states and counties, and for cities and towns with a population of 5,000 or more.

All Topics	HOPKINS COUNTY, KENTUCKY	MUHLENBERG COUNTY, KENTUCKY
<i>People</i>		
<i>Income and Poverty</i>		
Median household income (in 2014 dollars), 2010-2014	\$42,404	\$38,849
Per capita income in past 12 months (in 2014 dollars), 2010-2014	\$22,632	\$19,200
Persons in poverty, percent	17.5%	25.1%
<i>Businesses</i>		
<i>Geography</i>		

This geographic level of poverty and health estimates are not comparable to other geographic levels of these estimates

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info icon to the left of each row in TABLE view to learn about sampling error.

The vintage year (e.g., V2014) refers to the final year of the series (2010 thru 2014). Different vintage years of estimates are not comparable.

- (a) Includes persons reporting only one race
- (b) Hispanics may be of any race, so also are included in applicable race categories
- (c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data

D Suppressed to avoid disclosure of confidential information

F Fewer than 25 firms

FN Footnote on this item in place of data

Search



[/www.census.gov/en.html](http://www.census.gov/en.html))



U.S. Census Quick Facts

QuickFacts

Union County, Kentucky

QuickFacts provides statistics for all states and counties, and for cities and towns with a population of 5,000 or more.

All Topics	UNION COUNTY, KENTUCK	HENDERS COUNTY, KENTUCK	MCLEAN COUNTY, KENTUCK	OHIO COUNTY, KENTUCK	HANCOCK COUNTY, KENTUCK	DAVIESS COUNTY, KENTUCK
<i>People</i>						
<i>Income and Poverty</i>						
Median household income (in 2014 dollars), 2010-2014	\$38,367	\$41,006	\$40,851	\$39,574	\$50,311	\$45,760
Per capita income in past 12 months (in 2014 dollars), 2010-2014	\$19,611	\$22,968	\$20,789	\$18,991	\$22,637	\$23,140
Persons in poverty, percent	18.7%	19.5%	18.1%	19.1%	15.4%	15.3%
<i>Businesses</i>						
<i>Geography</i>						

1. Data may be subject to publication minimums that vary by industry and geography.

This geographic level of poverty and health estimates are not comparable to other geographic levels of these estimates

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info icon to the left of each row in TABLE view to learn about sampling error.

The vintage year (e.g., V2014) refers to the final year of the series (2010 thru 2014). Different vintage years of estimates are not comparable.

(a) Includes persons reporting only one race

(b) Hispanics may be of any race, so also are included in applicable race categories

Search

U.S. Census Quick Facts



[/www.census.gov/en.html](http://www.census.gov/en.html))



QuickFacts

Livingston County, Kentucky

QuickFacts provides statistics for all states and counties, and for cities and towns with a population of 5,000 or more.

All Topics	LIVINGSTON COUNTY, KENTUCKY	LYON COUNTY, KENTUCKY	WEBSTER COUNTY, KENTUCKY	BRECKINRIDGE COUNTY, KENTUCKY	CRITTENDEN COUNTY, KENTUCKY	CALDWELL COUNTY, KENTUCKY
<i>People</i>						
<i>Income and Poverty</i>						
Median household income (in 2014 dollars), 2010-2014	\$40,580	\$43,715	\$40,852	\$40,039	\$33,356	\$40,135
Per capita income in past 12 months (in 2014 dollars), 2010-2014	\$20,700	\$23,621	\$20,983	\$18,151	\$20,548	\$21,194
Persons in poverty, percent	▲ 15.9%	▲ 17.4%	▲ 17.0%	▲ 19.2%	▲ 22.2%	▲ 19.0%
<i>Businesses</i>						
<i>Geography</i>						

1. Data may be subject to publication minimums that vary by industry and geography.

▲ This geographic level of poverty and health estimates are not comparable to other geographic levels of these estimates

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info icon to the left of each row in TABLE view to learn about sampling error.

The vintage year (e.g., V2014) refers to the final year of the series (2010 thru 2014). Different vintage years of estimates are not comparable.

(a) Includes persons reporting only one race

(b) Hispanics may be of any race, so also are included in applicable race categories

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
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2015-00312 RATE APPLICATION

1

2 **Item 11)** Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted
3 Income Statement to answer the following questions. Provide a detailed breakdown and overview
4 of the following pro forma adjustments.

5 a. "Non-Direct Served Base Rate" pro forma adjustment.

6

7 **Response)** Refer to Exhibit 9, page 1, line 38, column i of the application for the detailed
8 breakdown of the \$2,594,981. Also, refer to Exhibit 9, pages 2 – 6a of the application for the
9 consumption analysis data by class.

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11 **Witness)** Steve Thompson

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**KENERGY CORP.
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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

b. "Direct Served (exc. Smelters) -Base Rate" pro forma adjustment.

Response) Refer to Exhibit 9, page 1a, line 50, column i of the application for the detailed breakdown of the \$(42,808). Also, refer to Exhibit 9, page 12 of the application for the consumption analysis data of the class C direct served customers.

Witness) Steve Thompson

**KENERGY CORP.
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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

c. "Other Revenue" pro forma adjustment.

Response) Refer to Exhibit 9, page 1a, line 54, column i of the application for the detailed breakdown of the \$11,633. Also, refer to Exhibit 9, page 13, line 42, column k of the application.

Witness) Steve Thompson

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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

d. "Distribution - Operation" pro forma adjustment.

Response) Refer to Application Exhibit 5A, page 4, line 31, column s for the breakdown of the \$190,484 amount. Also, refer to Exhibit 5A, page 6, line 32, column j for the labor amount of \$26,261, exhibit 5A, page 7, line 24, column f for the overhead amount of \$22,194, exhibit 5A, page 8A, line 36, column f for the disallowed expense amount of (\$32,151), and exhibit 5A, page 9, line 13, dist ops column for the non-recurring item amount of \$174,180.

Witness) Steve Thompson

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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

e. "Distribution - Maintenance" pro forma adjustment.

Response) Refer to Application Exhibit 5A, page 4, line 31, column t for the breakdown of the (\$97,387) amount. Also refer to Exhibit 5A, page 6, line 33, column j for the labor amount of \$40,856, exhibit 5A, page 7, line 25, column f for the overhead amount of \$30,190, exhibit 5A, page 8A, line 37, column h for the disallowed expense amount of (\$46,883), exhibit 5A, page 9 , line 13, dist maint. column for the non-recurring item amount of (\$296,731), and exhibit 5A, page 10, line 8, column b for the contractor vegetation management amount of \$175,179.

Witness) Steve Thompson

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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

f. "Consumer Accounts" pro forma adjustment.

Response) Refer to the Application Exhibit 5A, page 5, line 31, column u for the breakdown of the \$73,401 amount. Also refer to Exhibit 5A, page 6, line 34, column j for the labor amount of \$38,065, exhibit 5A, page 7, line 26, column f for the overhead amount of \$34,273, exhibit 5A, page 8A, line 36, column i for the disallowed expense amount of (\$32,500), and exhibit 5A, page 19, line 7, column b for the bad debt amount of \$33,853.

Witness) Steve Thompson

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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

g. "Customer Service and Informational" pro forma adjustment.

Response) Refer to the Application Exhibit 5A, page 5, line 31, column v for the breakdown of the \$123,620 amount. Also refer to Exhibit 5A, page 6, line 35, column j for the labor amount of \$1,761, exhibit 5A, page 7, line 27, column f for the overhead amount of \$1,700, and exhibit 5A, page 8B, line 37, column k for the disallowed expense amount of (\$2,536).

Witness) Steve Thompson

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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

h. "Sales" pro forma adjustment.

Response) Refer to the Application Exhibit 5A, page 5, line 31, column w for the breakdown of the (\$120,815) amount. Also refer to Exhibit 5A, page 6, line 36, column j for the labor amount of \$1,024, exhibit 5A, page 7, line 28, column f for the overhead amount of \$856, and exhibit 5A, page 21, line 6, for the reclassify amount of (\$122,675).

Witness) Steve Thompson

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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

i. "Administrative and General" pro forma adjustment.

Response) Refer to the Application Exhibit 5A, page 5, line 31, column x for the breakdown of the (\$181,281) amount. Also refer to Exhibit 5A, page 6, line 37, column j for the labor amount of \$34,264, exhibit 5A, page 7, line 29, column f for the overhead amount of \$25,502, exhibit 5A, page 8f, line 36, A&G column for the disallowed expense amount of (\$248,002), and exhibit 5A, page 15, line 6, for the rate case amount of \$33,333.

Witness) Steve Thompson

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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

j. "Depreciation" pro forma adjustment.

Response) Refer to the Application exhibit 5A, page 5, line 29 for the breakdown of the \$1,237,133 depreciation amount. Also refer to exhibit 5A, page 11, line 25, column i for the \$848,661 depreciation expense amount, and exhibit 5A, page 20, line 7, column b for the regulatory asset amortization amount of \$388,472.

Witness) Steve Thompson

**KENERGY CORP.
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1

2 **Item 11)** Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted
3 Income Statement to answer the following questions. Provide a detailed breakdown and overview
4 of the following pro forma adjustments.

5 k. "Tax Expense -Other" pro forma adjustment.

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7 **Response)** Item 11 k, page 2 of 2 contains the above referenced information.

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9 **Witness)** Steve Thompson

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Item 11 k, page 1 of 2.

KENERGY CORP.
2015 RATE APPLICATION
ADJUSTMENT - PSC TAX ASSESSMENT

Line No.	(a)	(b)	(c)	(d)	(g) Distribution Increase		
1	Revenues:	Exhibit 10, page 1, line 55		Normalized \$456,533,615	\$459,097,422		
2							
3	Power costs:						
4		No 1/2 Power Cost Deduction for Smelters	\$ -		\$ -		
5		Exhibit 10, page 10, line 25	\$ 39,170,655		\$ 39,170,655		
6		Exhibit 10, page 11, line 22	\$ 22,284,384		\$ 22,284,384		
7		Exhibit 10, page 13, line 19	\$ 97,816,118		\$ 97,816,118		
8			<u>\$ 159,271,157</u>		<u>\$ 159,271,157</u>		
9			\$ (79,635,579)		\$ (79,635,579)		
10		Less 1/2 power costs	\$ 79,635,579		\$ 79,635,579		
11		assessable revenues (line 1 less line 9)	\$ 376,898,037		\$ 379,461,844		
12		Times proforma tax rate	(1) 0.0019010		0.0019010		
13			\$ 716,483		\$ 721,357		
14		test year tax	(2) \$ 592,331		\$ 716,483		
15		adjustment	<u>\$ 124,152</u>		<u>\$ 4,874</u>		
16							
17		tax paid July 2015 -	\$ 764,453.0				
18		assessable revenue	\$ 402,132,051				
19		proforma tax rate	0.0019010	(1)			
20		(2) see exhibit 11, accounts 408.710-408.740					
21							
22							
23							
24							
25		nondedicated	\$ 135,878	\$ 85,814,934	\$ 163,134	\$ 27,257	\$ 4,874
26		class A	\$ 407,916	\$ 258,862,507	\$ 492,098	\$ 84,181	\$ -
27		class B	\$ 31,117	\$ 19,797,607	\$ 37,635	\$ 6,518	\$ -
28		class C	\$ 17,420	\$ 12,422,989	\$ 23,616	\$ 6,196	\$ -
29			<u>\$ 592,331</u>	<u>\$ 376,898,037</u>	<u>\$ 716,483</u>	<u>\$ 124,152</u>	<u>\$ 4,874</u>

**KENERGY CORP.
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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

I. "Interest on Long Term Debt" pro forma adjustment.

Response) Refer to the Application exhibit 5A, page 5A, line 31 for the \$437,763 total interest expense adjustment. Refer to exhibit 5A, page 12a for the \$715,706 interest expense amount and exhibit 5a, page 13 for the refinancing interest expense amount of (\$277,943).

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
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2015-00312 RATE APPLICATION

1

2 **Item 11)** Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted
3 Income Statement to answer the following questions. Provide a detailed breakdown and overview
4 of the following pro forma adjustments.

5 m. "Interest on Customer Deposits and Other" pro forma adjustment.

6

7 **Response)** Refer to the Application exhibit 5A, page 14 for the (\$1,690) adjustment.

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9 **Witness)** Steve Thompson

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**KENERGY CORP.
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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

n. "Other Deductions" pro forma adjustment.

Response) Refer to the Application exhibit 5A, page 5a, line 29, column ac for the details of the (\$144,883) other deductions. Also refer to exhibit 5A, page 8, line 36, column e for the (\$99,355) disallowed amount and exhibit 5A, page 9, line 13, column "other deductions" for the (\$45,528) non-recurring amount.

Witness) Steve Thompson

**KENERGY CORP.
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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

o. "Operating Margins" pro forma adjustment.

Response) There is not an Operating margins adjustment.

Witness) Steve Thompson

**KENERGY CORP.
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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

p. "Non-Operating Margins -Interest" pro forma adjustment.

Response) Refer to the Application exhibit 5A, page 16 for details on the non-operating margins – interest adjustment.

Witness) Steve Thompson

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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

q. "Non-Operating Margins -Other" pro forma adjustment.

Response) Refer to the Application exhibit 5A, page 5A, line 29, column ae for the \$674 adjustment. Also, refer to exhibit 5A, page 8f, non op column for the \$144 disallowed expense amount, exhibit 5A, page 9, line 13, column non op for the \$40 non-recurring amount, and exhibit 5A, page 18, line 8 for the \$490 geothermal program amount.

Witness) Steve Thompson

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Item 11) Reference the Kenergy Application, Exhibit 5A, Page 1 concerning the Adjusted Income Statement to answer the following questions. Provide a detailed breakdown and overview of the following pro forma adjustments.

r. "Non-Cash Capital Credits" pro forma adjustment.

Response) Refer to the Application exhibit 5A, page 17, line 13, column d.

Witness) Steve Thompson

**KENERGY CORP.
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Item 12) Reference the Kenergy Application, Exhibits 5A, Pages 6 – 7AA, concerning payroll/labor information to answer the following:

- a. Please provide a list of each Kenergy salaried employee's job title with salary, overtime if any, percent pay increase for each of the past five years, and also include all benefits, bonuses, awards, etc.

Response) Item 12a, pages 2-4 of 4 contains the above referenced information.

Witness) Keith Ellis

KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
FIRST DATA REQUEST ITEM 12a
CASE NO. 2015-00312

Job Title	Regular Wages paid during test year	Overtime Amt	Lump Amount	Incentive	Bonus	Tax Veh Amt	Adjusted Dollars	Vac Max Amt	Life 50 Amt	Srv Award Amt
1 Coordinator Risk Mgmt	74,745.84		0.00	442.92	0.00	\$1,193.74			228.12	\$100.00
2 Mgr of Field Engineering	83,755.38		0.00	483.00	700.78			\$154.80	396.73	\$0.00
3 District Operations Mgr.	111,480.72		0.00	662.31	0.00	\$1,611.08			353.52	\$0.00
4 Mgr. of Comm. & PR	79,883.44		0.00	472.62	0.00		\$31.44		1502.50	\$100.00
5 Co/Econ Dev Specialist	75,925.20		451.90	451.90	350.38				237.32	\$0.00
6 District Operations Mgr.	110,828.08		0.00	662.31	0.00	\$1,170.52		\$3,874.11	819.51	\$0.00
7 VP Human Resources	143,242.32		0.00	851.76	0.00	\$641.40			1087.73	\$200.00
8 Organizational Dev Coord	76,278.80		454.02	454.02	815.00				244.60	\$0.00
9 Mgr of Member Acct.	102,588.72		0.00	609.52	0.00		\$28.18		1382.02	\$0.00
10 Mgr. of Tech. Services	108,020.64		0.00	639.48	0.00			\$204.96	1448.97	\$350.00
11 VP Member Services	118,026.48		0.00	694.51	0.00	\$2,078.40			1649.30	\$0.00
12 Executive Assistant	81,188.64		383.25	484.10	0.00				1050.52	\$0.00
13 Operational Services Mgr	105,017.12		0.00	622.13	0.00	\$1,191.28			1419.80	\$0.00
14 Coordinator Energy Effic.	66,887.60		0.00	397.11	0.00				363.11	\$250.00
15 Co/Econ Dev Specialist	67,274.64		0.00	393.00	0.00				109.28	\$0.00
16 Manager of Construction	103,744.16		0.00	615.39	0.00	\$1,561.76	\$31.49		1053.24	\$0.00
17 Dir. Procurement & Contra	117,414.96		0.00	693.76	0.00	\$632.82		\$2,289.14	868.18	\$0.00
18 MGR PROCUREMENT/CONTRACTS(1)	39,448.06		0.00	0.00	0.00	\$257.05			106.44	\$0.00
19 MATERIALS MGMT SPECIALIST	70,167.76	1,931.10	0.00	411.96	0.00		\$19.88		219.17	\$0.00
20 District Operations Mgr.	114,107.76		0.00	678.41	0.00	\$1,399.84		\$434.88	1546.41	\$0.00
21 MGR PROCUREMENT/CONTRACTS	64,744.16		0.00	372.40	1014.20		\$17.61		158.13	\$0.00
22 VP Engineering	143,560.56		0.00	851.76	0.00	\$394.08			5956.30	\$0.00
23 Mgr. Substations	101,423.92		603.66	603.66	0.00	\$3,568.33			1363.79	\$0.00
24 Manager of Construction	90,645.20		0.00	524.28	0.00	\$1,268.57	\$20.10	\$3,360.80	1498.12	\$450.00
25 PROCUREMENT SPECIALIST	52,655.20		0.00	312.00	0.00				274.40	\$0.00
26 PROCUREMENT SPECIALIST	66,794.00		0.00	397.11	0.00				1270.95	\$0.00
27 Mgr of Gen. Accounting	120,738.80		0.00	715.73	0.00	\$1,706.88			339.04	\$0.00
28 President & CEO	245,130.74		0.00	0.00	14171.60	\$392.50	\$10,454.24		1898.26	\$0.00
29 VP Operations	146,325.92		0.00	864.36	0.00	\$471.99			599.22	\$0.00
30 Mgr. of Plan. & Design	106,367.04		0.00	630.12	0.00			\$4,443.12	778.11	\$150.00
31 VP Finance & Accounting	146,881.28		0.00	871.85	0.00	\$361.62			3174.00	\$0.00

(1) retired during year

KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST ITEM 12a
 CASE NO. 2015-00312

Job Title	Retirement Award	Misc Taxable Benefit	401k Admin.Fee	Dental Insurance	EAP	General Liability	401-K Match	Life Insurance Premium	Long Term Disability	Medical Insurance	Defined Benefit Plan
1 Coordinator Risk Mgmt		0.00	275.98	796.30	\$10.20	\$1,800.73	\$2,242.41	\$589.56	\$495.77	\$16,079.99	\$13,356.67
2 Mgr of Field Engineering		0.00	275.98	796.30	\$10.20	\$2,018.23	\$2,512.58	\$610.53	\$508.00	\$16,079.99	\$13,644.86
3 District Operations Mgr.		0.00	275.98	796.30	\$10.20		\$3,344.49	\$839.07	\$716.88	\$10,171.35	\$21,251.10
4 Mgr. of Comm. & PR		50.00	275.98	378.35	\$10.20		\$2,396.49	\$602.26	\$526.17	\$4,658.53	\$14,116.82
5 Co/Econ Dev Specialist		0.00	275.98	796.30	\$10.20	\$1,829.12	\$2,277.66	\$602.15	\$503.11	\$16,079.99	\$13,540.21
6 District Operations Mgr.		0.00	275.98	796.30	\$10.20	\$2,670.26	\$3,324.85	\$875.48	\$733.20	\$16,079.99	\$21,728.07
7 VP Human Resources		0.00	275.98	796.30	\$10.20		\$4,297.29	\$1,126.93	\$952.97	\$16,079.99	\$24,832.09
8 Organizational Dev Coord		0.00	275.98	796.30	\$10.20		\$2,288.31	\$602.15	\$505.88	\$16,079.99	\$13,609.54
9 Mgr of Member Acct.		50.00	275.98	796.30	\$10.20		\$3,077.67	\$829.43	\$682.02	\$11,832.14	\$20,285.64
10 Mgr. of Tech. Services		0.00	275.98	796.30	\$10.20		\$3,240.65	\$879.67	\$715.89	\$16,079.99	\$21,247.14
11 VP Member Services		0.00	275.98	796.30	\$10.20	\$2,843.67	\$3,540.77	\$925.72	\$766.00	\$11,832.14	\$20,133.19
12 Executive Assistant		0.00	275.98	378.35	\$10.20		\$2,435.69	\$671.19	\$541.67	\$2,041.93	\$16,299.16
13 Operational Services Mgr		0.00	275.98	378.35	\$10.20	\$2,530.06	\$3,150.54	\$840.99	\$692.54	\$8,750.05	\$20,581.97
14 Coordinator Energy Effic.		0.00	275.98	796.30	\$10.20	\$1,611.48	\$2,006.68	\$538.47	\$444.35	\$16,079.99	\$12,068.45
15 Co/Econ Dev Specialist		0.00	275.98	378.35	\$10.20	\$1,621.20	\$2,018.28	\$490.02	\$425.36	\$4,658.53	\$11,583.07
16 Manager of Construction		50.00	275.98	796.30	\$10.20	\$2,499.52	\$3,112.29	\$814.25	\$688.68	\$11,832.14	\$20,473.89
17 Dir. Procurement & Contra		0.00	275.98	796.30	\$10.20	\$2,828.73	\$3,522.50	\$918.18	\$768.80	\$16,079.99	\$20,204.90
18 MGR PROCUREMENT/CONTRACTS(1)	\$750.00	0.00	10.54	408.00	\$0.00	\$945.24	\$85.22	\$55.22	\$41.14	\$6,708.12	\$1,783.59
19 MATERIALS MGMT SPECIALIST		50.00	275.98	796.30	\$10.20	\$1,690.66	\$712.98	\$548.01	\$458.95	\$16,079.99	\$12,432.99
20 District Operations Mgr.		0.00	275.98	796.30	\$10.20	\$2,749.13	\$3,423.20	\$924.24	\$759.02	\$11,832.14	\$22,469.85
21 MGR PROCUREMENT/CONTRACTS		50.00	275.98	796.30	\$10.20		\$1,942.38	\$488.00	\$417.17	\$11,832.14	\$11,385.79
22 VP Engineering		0.00	275.98	796.30	\$10.20	\$3,458.66	\$4,306.77	\$1,235.03	\$952.97	\$11,832.14	\$27,980.14
23 Mgr. Substations		0.00	275.98	378.35	\$10.20	\$2,443.45	\$3,042.79	\$821.73	\$675.36	\$11,832.14	\$20,097.39
24 Manager of Construction		50.00	275.98	796.30	\$10.20	\$2,184.27	\$2,719.35	\$693.30	\$563.62	\$11,832.14	\$16,901.72
25 PROCUREMENT SPECIALIST		0.00	275.98	796.30	\$10.20		\$1,579.66	\$426.56	\$348.86	\$16,079.99	\$10,822.88
26 PROCUREMENT SPECIALIST		0.00	275.98	796.30	\$10.20	\$1,609.26	\$2,003.87	\$585.62	\$444.35	\$11,832.14	\$13,536.16
27 Mgr of Gen. Accounting		0.00	275.98	796.30	\$10.20		\$3,622.16	\$931.74	\$794.08	\$16,079.99	\$20,842.60
28 President & CEO		0.00	275.98	796.30	\$10.20		\$7,667.62	\$1,872.03	\$1,609.05	\$16,079.99	\$41,643.50
29 VP Operations		0.00	275.98	796.30	\$10.20	\$3,525.37	\$4,389.70	\$1,123.74	\$967.08	\$12,509.67	\$25,185.94
30 Mgr. of Plan. & Design		0.00	275.98	796.30	\$10.20	\$2,562.62	\$3,191.05	\$844.89	\$701.97	\$16,079.99	\$20,848.75
31 VP Finance & Accounting		0.00	275.98	796.30	\$10.20		\$4,406.43	\$1,191.84	\$975.46	\$11,832.14	\$28,818.77

(1) retired during year

KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST ITEM 12a
 CASE NO. 2015-00312

Job Title	Temporary Reinsurance Fee	Umbrella Policy	increase 2011	increase 2012	increase 2013	increase 2014	increase 2015
1 Coordinator Risk Mgmt	\$225.15	\$412.41	6%	5%	5%	2%	3%
2 Mgr of Field Engineering	\$225.15	\$462.08	3%	2%	3%	16%	9%
3 District Operations Mgr.	\$166.88	\$615.14	25%	11%	10%	9%	2%
4 Mgr. of Comm. & PR	\$55.67	\$440.76	3%	3%	3%	3%	3%
5 Co/Econ Dev Specialist	\$225.15	\$418.97	2%	3%	2%	3%	2%
6 District Operations Mgr.	\$225.15	\$611.43	10%	13%	4%	4%	3%
7 VP Human Resources	\$225.15	\$790.18	7%	4%	2%	2%	2%
8 Organizational Dev Coord	\$225.15	\$420.80	3%	2%	3%	3%	2%
9 Mgr of Member Acct.	\$111.21	\$565.92	2%	2%	3%	2%	2%
10 Mgr. of Tech. Services	\$225.15	\$595.96	3%	2%	2%	2%	3%
11 VP Member Services	\$111.21	\$651.21	2%	2%	4%	5%	4%
12 Executive Assistant	\$21.48	\$448.02	3%	3%	2%	2%	1%
13 Operational Services Mgr	\$89.73	\$579.37	2%	2%	4%	3%	3%
14 Coordinator Energy Effic.	\$225.15	\$368.98	2%	2%	2%	2%	2%
15 Co/Econ Dev Specialist	\$55.67	\$371.11				9%	9%
16 Manager of Construction	\$111.21	\$572.31	2%	2%	4%	2%	3%
17 Dir. Procurement & Contra	\$225.15	\$647.75	3%	2%	2%	4%	3%
18 MGR PROCUREMENT/CONTRACTS(1)	\$68.25	\$218.29	2%	2%	2%	2%	
19 MATERIALS MGMT SPECIALIST	\$225.15	\$387.09	3%	2%	3%	3%	5%
20 District Operations Mgr.	\$111.21	\$629.61	2%	2%	2%	2%	2%
21 MGR PROCUREMENT/CONTRACTS	\$111.21	\$357.24	2%	3%	9%	2%	10%
22 VP Engineering	\$111.21	\$791.94	2%	2%	2%	2%	3%
23 Mgr. Substations	\$111.21	\$559.66	11%	7%	2%	2%	2%
24 Manager of Construction	\$111.21	\$500.05	2%	2%	9%	11%	9%
25 PROCUREMENT SPECIALIST	\$225.15	\$290.47	2%	2%	13%	2%	3%
26 PROCUREMENT SPECIALIST	\$111.21	\$368.51	2%	2%	2%	2%	2%
27 Mgr of Gen. Accounting	\$225.15	\$666.15				4%	3%
28 President & CEO	\$225.15	\$1,352.36			0%	2%	15%
29 VP Operations	\$195.18	\$807.26		0%	2%	2%	3%
30 Mgr. of Plan. & Design	\$225.15	\$586.77	3%	2%	2%	3%	3%
31 VP Finance & Accounting	\$111.21	\$810.42	3%	3%	2%	2%	2%

(1) retired during year

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

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Item 12) Reference the Kenergy Application, Exhibits 5A, Pages 6 – 7AA, concerning payroll/labor information to answer the following:

b. Please provide a list of each Kenergy hourly employee's job title with salary, overtime if any, percent pay increase for each of the past five years, and also include all benefits, bonuses, awards, etc.

Response) Item 12b, pages 2-13 of 13 contains the above referenced information.

Witness) Keith Ellis

KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST ITEM 12b
 CASE NO. 2015-00312

Job Title	Terminated	Added	Regular Wages paid during test year	Overtime Amt	Lump Amount	Incentive	Bonus	Adjusted Dollars	Vac Max Amt	Life 50 Amt	Retirement Award	Srv Award Amt	Misc Taxable Benefit
1 System Controller		3/12/2015	\$12,124.80	416.80						25.48		\$0.00	0.00
2 Veg. Mgmt. Coordinator		2/25/2015	\$45,674.31	125.78		418.58				1491.39	725.00	\$0.00	0.00
3 Computer Specialist			\$66,971.86	6,317.88	\$0.00	\$397.11	\$0.00			267.41		\$0.00	0.00
4 Line Technician			\$65,419.12	12,633.00	\$0.00	\$387.63	\$0.00			804.52		\$0.00	0.00
5 Member Service Rep.			\$44,599.44	1,034.10	\$0.00	\$264.45	\$0.00	\$24.65		103.05		\$100.00	70.00
6 Branch Representative			\$53,318.72	1,225.76	\$0.00	\$316.99	\$0.00	\$37.46		458.48		\$200.00	60.00
7 Line Technician			\$65,559.52	23,557.84	\$0.00	\$387.63	\$0.00	\$19.87		193.02		\$0.00	50.00
8 Intern		1/26/2015	\$1,649.40										
9 Field Engineering Tech.			\$66,971.84	169.58	\$0.00	\$397.11	\$0.00	\$31.23		385.41		\$100.00	50.00
10 Crew Leader			\$76,189.36	22,609.91	\$0.00	\$452.03	\$0.00			522.52		\$0.00	0.00
11 Cashier			\$42,555.78	643.39	\$0.00	\$252.47	\$0.00	\$27.84		244.20		\$0.00	70.00
12 Crew Leader			\$76,357.84	16,468.88	\$0.00	\$452.03	\$0.00			187.60		\$0.00	0.00
13 Crew Leader			\$71,621.28	16,605.27	\$0.00	\$431.43	\$0.00			226.66		\$0.00	0.00
14 Service Technician			\$66,192.88	23,706.17	\$0.00	\$392.50	\$0.00			577.88		\$0.00	0.00
15 Service Technician			\$65,460.72	8,785.43	\$0.00	\$387.88	\$0.00			363.73		\$350.00	0.00
16 Meter Tech. I/Crew Leader			\$72,079.28	15,601.39	\$0.00	\$426.69	\$0.00			344.96		\$0.00	0.00
17 Line Technician			\$65,559.52	16,292.62	\$0.00	\$387.63	\$0.00		\$434.84	358.83		\$0.00	0.00
18 Field Member Service Rep.			\$49,311.60	196.43	\$0.00	\$292.78	\$0.00			187.21		\$0.00	0.00
19 Line Technician			\$65,419.12	12,890.85	\$0.00	\$387.63	\$0.00			179.56		\$0.00	0.00
20 Appr Line Tech II			\$41,626.34	4,705.35	\$0.00	\$255.09	\$0.00			44.98		\$0.00	0.00
21 Line Technician			\$64,141.92	15,321.31	\$0.00	\$387.63	\$0.00			445.83		\$0.00	0.00
22 Service Technician			\$65,419.12	14,769.77	\$0.00	\$387.63	\$0.00			769.37		\$0.00	0.00
23 Field Engineering Tech.			\$66,847.04	14,703.20	\$0.00	\$396.36	\$0.00	\$19.87		834.49		\$0.00	50.00
24 Coord., Empl. Benefits			\$65,427.50	5,351.27	\$0.00	\$388.13	\$0.00	\$19.88		387.02		\$250.00	50.00
25 Line Technician			\$57,962.24	7,580.41	\$0.00	\$355.68	\$0.00			89.24		\$0.00	0.00
26 Crew Leader			\$76,189.36	16,475.54	\$0.00	\$452.03	\$0.00			734.86		\$0.00	0.00
27 Elect. Comm. Analyst			\$75,181.60	10,404.83	\$0.00	\$443.79	\$700.78			945.85		\$0.00	0.00
28 Crew Leader			\$76,357.84	15,384.53	\$0.00	\$452.03	\$0.00			352.34		\$150.00	0.00
29 Comp. Network Specialist			\$66,446.67	1,481.09	\$0.00	\$340.20	\$0.00			822.49		\$0.00	0.00
30 Field Service Member Rep.	2/17/2015		\$32,537.65	89.74	\$0.00	\$292.78	\$0.00			571.25	1000.00	\$0.00	0.00
31 Apprentice Line Tech I			\$33,564.89	7,553.51	\$0.00	\$280.43	\$0.00			61.14		\$0.00	0.00
32 Service Technician			\$65,460.73	20,074.75	\$0.00	\$387.88	\$0.00			365.64		\$0.00	0.00
33 Line Technician			\$65,419.12	15,226.34	\$0.00	\$387.63	\$0.00			287.32		\$0.00	0.00

KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST ITEM 12b
 CASE NO. 2015-00312

Job Title	Terminated	Added	Regular Wages paid during test year	Overtime Amt	Lump Amount	Incentive	Bonus	Adjusted Dollars	Vac Max Amt	Life 50 Amt	Retirement Award	Srv Award Amt	Misc Taxable Benefit
34 Member Service Rep.			\$45,626.88	1,484.57	\$0.00	\$266.57	\$0.00	\$23.86		116.80		\$50.00	110.00
35 Branch Representative	1/3/2015		\$29,578.30	1,250.83	\$0.00	\$316.99	\$0.00	\$37.46		462.70	900.00	\$0.00	60.00
36 Member Service Rep.			\$56,328.51	823.01	\$265.87	\$335.84	\$0.00	\$27.84		830.65		\$300.00	70.00
37 Cashier		4/27/2015	\$5,112.80	20.54	0.00	0.00	0.00			7.96		\$0.00	0.00
38 Member Service Rep.			\$53,318.72	1,092.04	\$0.00	\$316.99	\$0.00	\$37.49		719.96		\$0.00	60.00
39 Member Service Rep.		10/6/2014	\$29,433.60	1,098.57	\$0.00	\$58.87	\$0.00			41.31		\$0.00	0.00
40 Line Technician			\$68,304.73	15,387.71	\$0.00	\$387.63	\$0.00			468.04		\$250.00	0.00
41 Line Technician			\$63,255.84	15,516.43	\$0.00	\$382.89	\$0.00			275.70		\$0.00	0.00
42 Appr Line Tech IV			\$50,930.88	11,999.74	\$0.00	\$280.43	\$0.00			61.88		\$0.00	0.00
43 Branch Representative			\$53,318.72	1,948.15	\$0.00	\$316.99	\$0.00	\$27.85		144.48		\$0.00	70.00
44 System Controller			\$54,909.59	15,958.11	\$0.00	\$339.58	\$0.00	\$0.00	\$163.26	849.28		\$0.00	0.00
45 Crew Leader			\$71,532.24	19,858.11	\$0.00	\$410.72	\$0.00			158.31		\$0.00	0.00
46 Service Technician			\$66,788.80	14,482.90	\$0.00	\$395.12	\$0.00			448.77		\$150.00	0.00
47 Crew Leader			\$76,357.86	12,594.87	\$0.00	\$452.03	\$0.00	\$226.57		353.99		\$0.00	567.22
48 Service Technician			\$65,419.13	12,991.08	\$0.00	\$387.63	\$0.00			497.57		\$0.00	0.00
49 Appr Line Tech IV			\$48,004.90	18,608.26	\$0.00	\$280.43	\$0.00			73.59		\$0.00	0.00
50 Field Engineering Tech.			\$66,971.84	287.64	\$0.00	\$397.11	\$0.00	\$31.24		148.35		\$0.00	50.00
51 Field Engineering Tech.			\$55,286.40	1,113.79	\$0.00	\$214.20	\$0.00	\$31.25		96.81		\$0.00	50.00
52 Member Service Rep.			\$47,810.88	1,273.61	\$0.00	\$283.05	\$0.00	\$43.73		122.54		\$0.00	70.00
53 Member Service Rep.		7/4/2014	\$8,369.30	95.25	\$0.00	\$0.00	\$0.00	\$0.62		38.91	330.00	\$250.00	0.00
54 SYSTM CNTRL & VEG MGM SUP			\$66,749.60	4,411.05	\$0.00	\$399.36	\$0.00			184.84		\$0.00	0.00
55 OPER. SERV. SUPPORT TECH.			\$65,709.28	21,531.69	\$0.00	\$387.63	\$0.00	\$19.87		210.43		\$0.00	50.00
56 Graphic Media Coordinator			\$61,753.12	604.63	\$291.46	\$368.16	\$0.00	\$79.53		552.34		\$0.00	150.00
57 Computer Database Spec			\$64,836.19	214.83	\$0.00	\$324.49	\$0.00			170.60		\$0.00	0.00
58 Member Service Rep.			\$43,047.14	884.30	\$0.00	\$255.84	\$0.00	\$30.69		212.26		\$0.00	50.00
59 Branch Representative			\$53,318.72	2,154.07	\$0.00	\$316.99	\$0.00	\$56.21		981.15		\$0.00	90.00
60 Intern		8/15/2014	\$3,520.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00		0.00		\$0.00	0.00
61 System Controller			\$55,454.94	16,577.09	\$0.00	\$342.08	\$0.00	\$19.89		362.57		\$350.00	50.00
62 Member Service Rep.			\$55,185.54	1,815.05	\$328.47	\$328.47	\$0.00	\$49.99		294.86		\$0.00	80.00
63 Member Service Rep.			\$53,318.72	922.41	\$0.00	\$316.99	\$0.00	\$23.87		288.08		\$0.00	60.00
64 Work Order Clerk			\$42,611.94		\$0.00	\$252.47	\$0.00			284.33		\$0.00	0.00
65 Substation Technician I			\$65,203.84	706.56	\$0.00	\$387.63	\$0.00			785.06		\$100.00	0.00
66 Section Leader			\$68,902.10	4,627.04	\$0.00	\$408.47	\$0.00			1320.67		\$0.00	0.00

KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST ITEM 12b
 CASE NO. 2015-00312

Job Title	Terminated	Added	Regular Wages paid during test year	Overtime Amt	Lump Amount	Incentive	Bonus	Adjusted Dollars	Vac Max Amt	Life 50 Amt	Retirement Award	Srv Award Amt	Misc Taxable Benefit
67 Cashier		7/28/2014	\$34,075.79	481.25	\$0.00	\$96.41	\$0.00	\$19.89		41.79		\$0.00	50.00
68 Administrative Assistant			\$53,067.72	320.09	\$0.00	\$316.62	\$0.00			145.16		\$0.00	0.00
69 Appr Line Tech II			\$41,016.72	6,268.39	\$0.00	\$255.09	\$0.00			43.90		\$0.00	0.00
70 DAYSHIFT SYSTEM CONTROLLER			\$54,468.48	16,690.03	\$0.00	\$336.71	\$0.00	\$19.87		672.21		\$0.00	50.00
71 Service Technician			\$66,134.67	16,509.28	\$0.00	\$391.25	\$0.00	\$19.91		158.12		\$0.00	50.00
72 Line Technician			\$65,419.12	16,022.32	\$0.00	\$387.63	\$0.00			246.82		\$0.00	0.00
73 Crew Leader			\$76,189.36	10,786.60	\$0.00	\$452.03	\$0.00			928.27		\$0.00	0.00
74 Electronics Technician			\$68,242.82	2,205.00	\$0.00	\$403.73	\$0.00	\$19.89		885.47		\$0.00	50.00
75 Veg. Mgmt. Coordinator			\$49,589.28	3,546.41	\$0.00	\$287.54	\$700.78	\$19.88		130.35		\$100.00	50.00
76 Field Member Service Rep.			\$49,881.52	27,223.49	\$0.00	\$295.53	\$0.00	\$21.29		107.60		\$0.00	50.00
77 Veg. Mgmt. Coordinator	1/1/2015		\$45,444.86	0.00	\$0.00	\$398.11	\$0.00	\$0.00		1010.80	625.00	\$300.00	0.00
78 Line Technician			\$51,481.73	8,794.20	\$0.00	\$387.63	\$0.00			806.37		\$0.00	0.00
79 Administrative Assistant			\$65,525.24	899.51	\$309.24	\$390.62	\$0.00	\$19.87		1813.72		\$0.00	50.00
80 Office Engineer			\$59,892.56		\$0.00	\$354.81	\$0.00			546.99		\$0.00	0.00
81 Member Service Rep.	7/19/2014		\$11,442.70	342.9	\$0.00	\$0.00	\$0.00			138.92	675.00	\$0.00	0.00
82 Member Service Rep.		1/15/2015	\$18,368.80	272.99						44.37		\$0.00	0.00
83 Crew Leader			\$77,284.48	29,449.45	\$0.00	\$456.52	\$0.00			972.52		\$0.00	0.00
84 Computer Systems Analyst			\$68,647.30	12,761.33	\$0.00	\$404.98	\$0.00	\$9.38		211.17		\$75.00	15.00
85 Maintenance			\$54,894.32	2,060.40	\$326.73	\$326.73	\$0.00	\$31.24	\$2,199.12	960.20		\$300.00	50.00
86 Administrative Assistant			\$63,663.61	253.77	\$378.89	\$378.89	\$0.00			476.17		\$0.00	0.00
87 Member Service Rep.			\$53,318.72	1,063.61	\$0.00	\$316.99	\$0.00	\$6.25		275.45		\$0.00	35.00
88 Service Technician			\$66,134.64	13,350.94	\$0.00	\$391.25	\$0.00	\$19.89		452.48		\$125.00	50.00
89 Meter Technician I			\$66,227.20	1,439.40	\$0.00	\$392.87	\$0.00			611.70		\$0.00	0.00
90 Intern	2/18/2014		\$4,890.00	0.00	\$0.00	\$0.00	\$0.00			0.00		\$0.00	0.00
91 Meter Tech 1/Crew Leader			\$73,728.72	6,572.35	\$0.00	\$435.80	\$1,051.15			240.41		\$250.00	0.00
92 Field Engineering Tech.		4/22/2015	\$8,080.32	159.49						10.72		\$0.00	0.00
93 Crew Leader			\$66,839.52	19,974.05	\$0.00	\$387.63	\$0.00			152.23		\$0.00	0.00
94 Meter/Service Tech.			\$49,311.60	858.62	\$0.00	\$292.78	\$0.00	\$0.00	\$2,357.73	563.44		\$350.00	0.00
95 Materials Technician			\$55,192.65	9,072.25	\$260.14	\$328.60	\$0.00	\$19.87	\$2,422.36	482.27		\$0.00	50.00
96 Crew Leader			\$76,357.85	27,016.72	\$0.00	\$452.03	\$0.00			730.97		\$0.00	0.00
97 Plant Accountant			\$58,645.60	888.25	\$0.00	\$347.94	\$0.00	\$39.74		261.76		\$100.00	100.00
98 Cashier	4/10/215	3/2/2015	\$4,300.23	9.04	\$0.00	\$0.00	\$0.00	\$0.00		5.28		\$0.00	0.00
99 Meter/Service Tech.			\$49,283.52	446.12	\$0.00	\$292.78	\$0.00	\$0.00	\$2,932.50	854.42		\$0.00	0.00

KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST ITEM 12b
 CASE NO. 2015-00312

Job Title	Terminated	Added	Regular Wages paid during test year	Overtime Amt	Lump Amount	Incentive	Bonus	Adjusted Dollars	Vac Max Amt	Life 50 Amt	Retirement Award	Srv Award Amt	Misc Taxable Benefit
100 Crew Leader			\$72,714.80	14,713.79	\$0.00	\$431.43	\$0.00	\$0.00	\$3,681.71	498.34		\$300.00	0.00
101 Line Technician			\$65,419.14	9,016.72	\$0.00	\$387.63	\$0.00			792.56		\$150.00	0.00
102 Line Technician			\$65,419.12	10,701.05	\$0.00	\$387.63	\$0.00			437.26		\$0.00	0.00
103 Materials Technician			\$54,650.40	9,584.55	\$277.48	\$324.85	\$0.00	\$0.00	\$2,603.00	326.86		\$0.00	0.00
104 Crew Leader			\$76,189.36	12,888.39	\$0.00	\$452.03	\$0.00			949.30		\$0.00	0.00
105 Substation Technician I			\$65,203.84	622.13	\$0.00	\$387.63	\$0.00			967.36		\$0.00	0.00
106 Maintenance			\$54,894.32	2,217.47	\$326.73	\$326.73	\$0.00	\$19.88	\$2,591.82	344.32		\$300.00	50.00
107 Service Technician			\$55,976.89	15,635.78	\$0.00	\$387.63	\$0.00			437.81		\$350.00	0.00
108 System Controller			\$49,151.46	18,905.77	\$0.00	\$303.64	\$0.00			136.59		\$0.00	0.00
109 Appr Line Tech I			\$26,233.12	695.99	\$0.00	\$45.60	\$0.00			37.90		\$0.00	0.00
110 Appr Line Tech II			\$41,626.32	9,015.79	\$0.00	\$255.09	\$0.00			44.98		\$0.00	0.00
111 Cashier	4/6/2015		\$31,551.74	419.80	\$0.00	\$232.13	\$0.00	144.31		65.84		\$0.00	260.00
112 Prin Accountant/Sec. Ldr			\$75,277.28	1,672.46	\$540.47	\$447.28	\$0.00	\$39.73		740.97		\$0.00	100.00
113 Line Technician			\$63,255.84	16,936.34	\$0.00	\$382.89	\$0.00			159.45		\$0.00	0.00
114 SUPERVISOR CONSTRUCTION			\$79,779.44	14,345.65	\$0.00	\$471.99	\$0.00			1302.96		\$0.00	0.00
115 Service Technician			\$65,419.12	15,737.47	\$0.00	\$387.63	\$0.00	\$0.00	\$1,459.82	798.72		\$0.00	0.00
116 Service Technician	1/3/2015		\$42,660.91	3,820.40	\$0.00	\$387.63	\$0.00	\$0.00		655.90	675.00	\$0.00	0.00
117 Veg. Mgmt. Coordinator			\$66,960.40		\$0.00	\$398.11	\$0.00			830.31		\$0.00	0.00
118 Office Engineer			\$68,485.06		\$407.60	\$407.60	\$0.00			1265.20		\$0.00	0.00
119 Accounting Clerk			\$42,736.74	601.91	\$0.00	\$253.22	\$0.00	\$39.75		170.71		\$0.00	100.00
120 Member Service Rep.			\$53,806.49	571.40	\$0.00	\$319.86	\$0.00	\$35.10	\$64.08	770.59		\$0.00	60.00
121 Appr Line Tech II			\$41,016.72	12,674.04	\$0.00	\$255.09	\$0.00			66.59		\$0.00	0.00
122 Administrative Assistant		12/29/2014	\$27,470.70	2,159.91						455.04		\$0.00	0.00
123 Section Leader			\$67,691.61	4,050.34	\$0.00	\$400.98	\$0.00	\$19.89		876.01		\$175.00	50.00
124 Appr Line Tech IV			\$49,390.88	11,205.41	\$0.00	\$280.43	\$0.00			53.48		\$0.00	0.00
125 Materials Technician			\$52,286.00	5,888.95	\$0.00	\$310.63	\$0.00	\$19.87		925.74		\$0.00	50.00
126 Accounting Clerk			\$53,318.72	2,068.31	\$0.00	\$316.99	\$350.38	\$18.41		148.72		\$0.00	50.00
127 Member Service Rep.		12/8/2014	\$22,075.20	555.89	\$0.00	\$14.72	\$0.00			31.87		\$0.00	0.00
128 Field Engineering Tech.			\$68,929.13	1,195.73	\$0.00	\$408.97	\$0.00	\$19.88	\$3,080.38	847.08		\$0.00	50.00
129 Line Technician			\$62,519.52	13,309.72	\$0.00	\$382.89	\$0.00			155.81		\$0.00	0.00
130 Electronics Technician			\$67,121.60	1,408.74	\$0.00	\$397.11	\$0.00	\$28.20	\$0.00	418.08		\$0.00	50.00
131 Line Technician		2/23/2015	\$17,600.00	825.01						46.24		\$0.00	0.00

KENERGY CORP.
 RESPONSE TO THE ATTORNEY
 FIRST DATA REQUEST ITEM 1
 CASE NO. 2015-00312

Job Title	401k Admin.Fee	Dental Ins.	EAP	General Liability	401-K Match	Life Insurance Premium	Long Term Disability	Medical Insurance	Defined Benefit Plan	Temp. Reinsuranc e Fee	Umbrella Policy	increase 2011	increase 2012
1 System Controller	46.32	176.50	\$5.10		\$242.48	\$92.65	\$80.55	\$2,231.05	\$1,591.40	\$34.01	\$66.66		
2 Veg. Mgmt. Coordinator	148.60	478.60	\$0.85	1096.64	\$1,208.84	\$375.52	\$276.16	\$7,639.76	\$8,483.46	\$75.41	\$252.36	2%	2%
3 Computer Specialist	275.98	796.30	\$10.20		\$2,009.14	\$520.72	\$431.39	\$16,079.99	\$11,734.61	\$225.15	\$369.45	2%	2%
4 Line Technician	275.98	796.30	\$10.20	\$1,576.09	\$1,962.50	\$559.11	\$433.68	\$16,079.99	\$11,801.12	\$225.15	\$360.98	9%	7%
5 Member Service Rep.	275.98	796.30	\$10.20		\$1,338.04	\$352.48	\$287.45	\$16,079.99	\$8,125.03	\$222.32	\$246.09	7%	5%
6 Branch Representative	275.98	796.30	\$10.20		\$1,599.58	\$440.96	\$354.72	\$13,318.06	\$9,817.89	\$160.35	\$294.10	2%	2%
7 Line Technician	275.98	796.30	\$10.20	\$1,579.49	\$1,966.71	\$521.16	\$433.68	\$16,079.99	\$11,801.12	\$225.15	\$361.80	10%	3%
8 Intern											\$9.10		
9 Field Engineering Tech.	275.98	796.30	\$10.20	\$1,613.48	\$2,009.14	\$530.43	\$436.07	\$16,079.99	\$11,853.17	\$225.15	\$369.45	2%	13%
10 Crew Leader	275.98	796.30	\$10.20	\$1,835.49	\$2,285.69	\$611.60	\$505.75	\$13,097.99	\$15,280.06	\$182.19	\$420.38	2%	2%
11 Cashier	275.98	796.30	\$10.20		\$1,276.69	\$347.81	\$282.54	\$11,788.35	\$8,006.02	\$181.20	\$234.79	4%	4%
12 Crew Leader	275.98	796.30	\$10.20	\$1,839.59	\$2,290.72	\$599.85	\$505.75	\$16,079.99	\$13,609.49	\$225.15	\$421.31	8%	6%
13 Crew Leader	275.98	796.30	\$10.20	\$1,725.83	\$2,148.64	\$559.23	\$469.36	\$16,079.99	\$12,686.03	\$225.15	\$395.09	2%	2%
14 Service Technician	275.98	378.35	\$10.20	\$1,594.77	\$0.00	\$505.98	\$439.07	\$4,658.53	\$13,387.91	\$58.29	\$365.17	2%	2%
15 Service Technician	275.98	796.30	\$10.20	\$1,577.13	\$1,963.79	\$530.99	\$438.34	\$13,538.99	\$13,368.87	\$203.67	\$361.10	0%	0%
16 Meter Tech. I/Crew Leader	275.98	796.30	\$10.20	\$1,736.56	\$2,162.46	\$576.98	\$476.32	\$16,079.99	\$14,443.93	\$225.15	\$397.68	2%	2%
17 Line Technician	275.98	796.30	\$10.20	\$1,579.49	\$1,966.71	\$526.91	\$433.68	\$16,079.99	\$11,801.12	\$225.15	\$361.80	2%	2%
18 Field Member Service Rep.	275.98	796.30	\$10.20	\$1,187.98	\$1,479.25	\$391.84	\$327.64	\$11,832.14	\$10,220.44	\$111.21	\$271.97	2%	2%
19 Line Technician	275.98	796.30	\$10.20	\$1,576.09	\$0.00	\$519.41	\$433.68	\$16,079.99	\$11,801.12	\$225.15	\$360.98	5%	7%
20 Appr Line Tech II	275.98	378.35	\$10.20	\$1,002.98	\$1,248.77	\$308.22	\$267.41	\$2,041.93	\$7,617.05	\$21.48	\$229.60		
21 Line Technician	275.98	796.30	\$10.20	\$1,545.13	\$1,924.19	\$536.11	\$433.68	\$16,079.99	\$11,801.12	\$225.15	\$353.95	2%	13%
22 Service Technician	275.98	796.30	\$10.20	\$1,576.09	\$1,962.50	\$535.61	\$433.68	\$11,832.14	\$13,233.86	\$111.21	\$360.98	2%	2%
23 Field Engineering Tech.	275.98	796.30	\$10.20	\$1,610.47	\$2,005.36	\$570.67	\$443.55	\$16,079.99	\$13,512.16	\$225.15	\$368.81	4%	3%
24 Coord., Empl. Benefits	275.98	796.30	\$10.20		\$1,962.87	\$522.95	\$431.13	\$16,079.99	\$13,158.21	\$225.15	\$360.90	3%	3%
25 Line Technician	275.98	378.35	\$10.20	\$1,396.73	\$1,738.93	\$435.54	\$379.63	\$4,658.53	\$10,433.58	\$55.67	\$319.75	5%	17%
26 Crew Leader	275.98	796.30	\$10.20	\$1,835.49	\$2,285.69	\$617.10	\$505.75	\$16,079.99	\$15,280.06	\$225.15	\$420.38	2%	2%
27 Elect. Comm. Analyst	275.98	796.30	\$10.20	\$1,811.38	\$2,255.35	\$628.66	\$497.05	\$16,079.99	\$15,034.41	\$225.15	\$414.83	2%	2%
28 Crew Leader	275.98	796.30	\$10.20	\$1,839.59	\$2,290.72	\$607.90	\$505.75	\$16,079.99	\$13,609.49	\$225.15	\$421.31	2%	2%
29 Comp. Network Specialist	275.98	378.35	\$10.20		\$1,993.44	\$559.39	\$444.20	\$4,658.53	\$12,068.22	\$55.67	\$366.62		
30 Field Service Member Rep.	160.18	549.20	\$3.40	781.43	\$897.30	\$297.32	\$222.92	\$8,571.40	\$6,919.24	\$82.57	\$179.75	2%	2%
31 Apprentice Line Tech I	275.98	796.30	\$10.20	\$809.10	\$0.00	\$340.93	\$293.59	\$11,832.14	\$8,271.70	\$111.21	\$185.06		0%
32 Service Technician	275.98	796.30	\$10.20	\$1,577.13	\$1,963.79	\$530.99	\$438.34	\$16,079.99	\$13,368.87	\$225.15	\$361.10	0%	0%
33 Line Technician	275.98	796.30	\$10.20	\$1,576.09	\$1,962.50	\$526.91	\$433.68	\$16,079.99	\$13,233.86	\$225.15	\$360.98	8%	7%

KENERGY CORP.
 RESPONSE TO THE ATTORNEY
 FIRST DATA REQUEST ITEM 1
 CASE NO. 2015-00312

Job Title	401k Admin.Fee	Dental Ins.	EAP	General Liability	401-K Match	Life Insurance Premium	Long Term Disability	Medical Insurance	Defined Benefit Plan	Temp. Reinsuranc e Fee	Umbrella Policy	Increase 2011	Increase 2012
34 Member Service Rep.	275.98	378.35	\$10.20		\$1,368.79	\$356.99	\$290.94	\$10,171.35	\$8,212.69	\$166.88	\$251.65	12%	4%
35 Branch Representative	137.02	197.40	\$0.00		\$853.44	\$243.78	\$208.91	\$2,616.60	\$6,551.97	\$34.19	\$163.58	2%	2%
36 Member Service Rep.	275.98	796.30	\$10.20		\$1,689.84	\$478.18	\$375.96	\$11,832.14	\$10,352.44	\$111.21	\$310.81	2%	2%
37 Cashier	11.58	105.90	\$3.40		\$43.82	\$40.89	\$34.92	\$1,893.03	\$297.77	\$28.64	\$28.11		
38 Member Service Rep.	275.98	796.30	\$10.20		\$1,599.58	\$454.96	\$354.72	\$11,832.14	\$9,817.89	\$111.21	\$294.10	4%	4%
39 Member Service Rep.	160.04	246.75	\$10.20		\$686.84	\$221.96	\$191.61	\$3,027.09	\$4,270.82	\$32.00	\$162.18		
40 Line Technician	275.98	796.30	\$10.20	\$1,645.22	\$2,049.13	\$617.10	\$505.75	\$16,079.99	\$15,280.06	\$225.15	\$376.90	2%	2%
41 Line Technician	275.98	796.30	\$10.20	\$1,524.26	\$1,897.66	\$495.21	\$406.56	\$16,079.99	\$11,106.63	\$225.15	\$348.92		
42 Appr Line Tech IV	275.98	378.35	\$10.20	\$1,227.50	\$1,527.95	\$335.18	\$293.59	\$4,658.53	\$8,271.70	\$55.67	\$280.89		0%
43 Branch Representative	275.98	796.30	\$10.20		\$1,599.58	\$417.01	\$354.72	\$10,171.35	\$9,817.89	\$169.71	\$294.10	2%	2%
44 System Controller	275.98	796.30	\$10.20		\$1,716.74	\$485.88	\$379.97	\$11,832.14	\$11,708.13	\$111.21	\$302.95	2%	2%
45 Crew Leader	275.98	796.30	\$10.20	\$1,723.75	\$2,145.91	\$531.41	\$446.66	\$16,079.99	\$12,118.52	\$225.15	\$394.56		6%
46 Service Technician	275.98	796.30	\$10.20	\$1,609.04	\$2,003.56	\$543.93	\$442.17	\$16,079.99	\$12,011.72	\$225.15	\$368.45	3%	3%
47 Crew Leader	275.98	796.30	\$10.20	\$1,839.59	\$2,290.72	\$607.90	\$505.75	\$16,079.99	\$13,609.49	\$225.15	\$421.31	2%	2%
48 Service Technician	275.98	796.30	\$10.20	\$1,576.09	\$1,962.50	\$531.31	\$433.68	\$16,079.99	\$13,233.86	\$225.15	\$360.98	5%	3%
49 Appr Line Tech IV	275.98	796.30	\$10.20	\$1,156.62	\$1,440.18	\$341.48	\$293.59	\$11,832.14	\$8,271.70	\$111.21	\$264.74		
50 Field Engineering Tech.	275.98	518.75	\$10.20	\$1,613.48	\$2,009.14	\$512.92	\$444.35	\$7,159.65	\$12,068.45	\$79.25	\$369.45	7%	8%
51 Field Engineering Tech.	275.98	796.30	\$10.20	\$1,332.13	\$1,658.59	\$435.57	\$359.70	\$16,079.99	\$9,944.51	\$225.15	\$305.10		
52 Member Service Rep.	275.98	796.30	\$10.20		\$1,434.25	\$376.02	\$308.34	\$4,658.53	\$8,650.77	\$55.67	\$263.83	7%	5%
53 Member Service Rep.	10.54	136.00	\$0.00		\$60.96	\$38.94	\$29.42	\$2,066.28	\$1,307.19	\$26.25	\$46.29	2%	2%
54 SYSTM CNTRL & VEG MGM SU	275.98	796.30	\$10.20	\$1,608.28	\$2,002.49	\$503.61	\$421.32	\$16,079.99	\$11,473.60	\$225.15	\$368.17	2%	2%
55 OPER. SERV. SUPPORT TECH.	275.98	796.30	\$10.20	\$1,583.11	\$1,971.27	\$519.41	\$433.68	\$16,079.99	\$11,801.12	\$225.15	\$362.62	10%	3%
56 Graphic Media Coordinator	275.98	796.30	\$10.20	\$1,487.70	\$1,852.62	\$501.51	\$412.23	\$11,832.14	\$12,623.55	\$111.21	\$340.71	3%	2%
57 Computer Database Spec	244.36	796.30	\$10.20		\$1,720.53	\$513.74	\$439.72	\$10,171.35	\$11,955.01	\$166.88	\$357.65		
58 Member Service Rep.	275.98	796.30	\$10.20		\$1,291.44	\$345.01	\$273.61	\$16,079.99	\$7,777.00	\$225.15	\$237.45	7%	6%
59 Branch Representative	275.98	796.30	\$10.20		\$1,599.58	\$481.41	\$354.72	\$11,832.14	\$10,989.37	\$111.21	\$294.10	2%	2%
60 Intern	0.00	0.00	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$19.48		
61 System Controller	275.98	378.35	\$10.20		\$1,733.63	\$466.51	\$382.84	\$4,658.53	\$11,788.25	\$55.67	\$305.90	2%	2%
62 Member Service Rep.	275.98	378.35	\$10.20		\$1,655.64	\$449.66	\$365.90	\$4,658.53	\$10,097.89	\$55.67	\$304.52	2%	2%
63 Member Service Rep.	275.98	796.30	\$10.20		\$533.23	\$434.26	\$354.72	\$16,079.99	\$9,817.89	\$225.15	\$294.10	2%	2%
64 Work Order Clerk	275.98	796.30	\$10.20		\$852.27	\$366.21	\$283.74	\$16,079.99	\$8,037.09	\$225.15	\$235.03	2%	13%
65 Substation Technician I	275.98	378.35	\$10.20	\$1,570.83	\$1,956.06	\$547.11	\$433.68	\$16,079.99	\$11,801.12	\$225.15	\$359.81	2%	2%
66 Section Leader	275.98	796.30	\$10.20		\$2,066.99	\$587.11	\$455.05	\$11,832.14	\$12,334.03	\$111.21	\$380.09	2%	2%

KENERGY CORP.
 RESPONSE TO THE ATTORNEY
 FIRST DATA REQUEST ITEM 1
 CASE NO. 2015-00312

Job Title	401k Admin.Fee	Dental Ins.	EAP	General Liability	401-K Match	Life Insurance Premium	Long Term Disability	Medical Insurance	Defined Benefit Plan	Temp. Reinsuranc e Fee	Umbrella Policy	increase 2011	increase 2012
67 Cashier	223.28	345.45	\$10.20		\$934.61	\$268.28	\$235.94	\$4,250.67	\$5,916.84	\$47.78	\$107.13		
68 Administrative Assistant	275.98	796.30	\$10.20		\$627.64	\$409.45	\$341.06	\$14,924.99	\$9,466.15	\$214.41	\$292.72		
69 Appr Line Tech II	275.98	378.35	\$10.20	\$988.37	\$1,230.47	\$308.22	\$267.41	\$4,658.53	\$7,617.05	\$55.67	\$226.21		
70 DAYSHIFT SYSTEM CONTROLLI	275.98	796.30	\$10.20		\$1,702.82	\$473.88	\$376.76	\$11,832.14	\$10,371.72	\$111.21	\$300.49	2%	2%
71 Service Technician	275.98	796.30	\$10.20	\$1,593.35	\$1,984.08	\$522.60	\$437.81	\$16,079.99	\$11,903.83	\$225.15	\$364.81	2%	3%
72 Line Technician	275.98	796.30	\$10.20	\$1,576.09	\$1,962.50	\$521.16	\$433.68	\$16,079.99	\$11,801.12	\$225.15	\$360.98	2%	13%
73 Crew Leader	275.98	796.30	\$10.20	\$1,835.49	\$2,285.69	\$590.65	\$505.75	\$10,171.35	\$15,280.06	\$166.88	\$420.38	2%	2%
74 Electronics Technician	275.98	796.30	\$10.20	\$1,644.07	\$2,047.30	\$578.26	\$451.93	\$16,079.99	\$12,256.00	\$225.15	\$376.51	2%	2%
75 Veg. Mgmt. Coordinator	275.98	796.30	\$10.20		\$1,487.70	\$388.62	\$320.23	\$16,079.99	\$8,953.20	\$225.15	\$273.58	7%	6%
76 Field Member Service Rep.	275.98	378.35	\$10.20	\$1,201.71	\$1,496.42	\$382.29	\$330.74	\$4,658.53	\$9,216.40	\$55.67	\$275.16	2%	3%
77 Veg. Mgmt. Coordinator	171.76	549.20	\$3.40	\$1,091.63	\$1,305.73	\$415.44	\$303.12	\$11,862.92	\$8,154.53	\$167.87	\$251.12	2%	2%
78 Line Technician	275.98	796.30	\$10.20	\$1,238.23	\$1,544.36	\$547.61	\$433.68	\$11,832.14	\$13,233.86	\$111.21	\$284.30	2%	2%
79 Administrative Assistant	275.98	796.30	\$10.20		\$1,965.76	\$577.80	\$437.60	\$11,832.14	\$11,898.96	\$111.21	\$361.48	3%	3%
80 Office Engineer	275.98	796.30	\$10.20		\$1,796.79	\$493.53	\$395.27	\$16,079.99	\$12,138.64	\$225.15	\$330.45	2%	2%
81 Member Service Rep.	21.08	65.80	\$0.00		\$121.92	\$47.34	\$29.42	\$815.72	\$1,158.39	\$13.15	\$63.30	2%	2%
82 Member Service Rep.	92.64	148.05	\$10.20		\$392.48	\$124.92	\$104.76	\$5,679.09	\$2,382.16	\$71.60	\$100.99		
83 Crew Leader	275.98	796.30	\$10.20	\$1,861.97	\$2,318.46	\$631.84	\$508.28	\$16,079.99	\$15,349.30	\$225.15	\$426.41	2%	2%
84 Computer Systems Analyst	275.98	796.30	\$10.20		\$2,059.40	\$540.31	\$451.03	\$16,079.99	\$12,234.94	\$225.15	\$378.72	2%	2%
85 Maintenance	275.98	796.30	\$10.20	\$1,322.55	\$1,646.80	\$483.01	\$364.43	\$11,832.14	\$11,266.38	\$111.21	\$302.95	3%	3%
86 Administrative Assistant	275.98	796.30	\$10.20		\$1,909.81	\$524.45	\$423.80	\$16,079.99	\$12,951.28	\$225.15	\$351.29	2%	2%
87 Member Service Rep.	275.98	796.30	\$10.20		\$1,599.58	\$434.26	\$354.72	\$16,079.99	\$9,817.89	\$225.15	\$294.10	2%	2%
88 Service Technician	275.98	796.30	\$10.20	\$1,593.35	\$1,984.08	\$533.35	\$437.81	\$12,946.58	\$13,349.99	\$149.64	\$364.81	5%	3%
89 Meter Technician I	275.98	796.30	\$10.20	\$1,595.63	\$1,986.77	\$527.97	\$425.37	\$16,079.99	\$11,583.21	\$225.15	\$365.32	3%	6%
90 Intern	0.00	0.00	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$27.04		
91 Meter Tech 1/Crew Leader	275.98	796.30	\$10.20	\$1,776.36	\$2,211.93	\$579.05	\$483.78	\$16,079.99	\$13,056.33	\$225.15	\$406.71	2%	2%
92 Field Engineering Tech.	11.58	49.35	\$3.40	\$195.86	\$63.79	\$56.97	\$50.85	\$556.89	\$416.72	\$7.16	\$44.46		
93 Crew Leader	275.98	796.30	\$10.20	\$1,610.49	\$2,005.11	\$516.56	\$433.68	\$16,079.99	\$11,801.12	\$225.15	\$368.80	2%	2%
94 Meter/Service Tech.	275.98	796.30	\$10.20	\$1,187.98	\$1,479.25	\$435.54	\$327.64	\$16,079.99	\$10,220.44	\$225.15	\$271.97	2%	2%
95 Materials Technician	275.98	796.30	\$10.20	\$1,329.65	\$1,655.72	\$458.86	\$368.05	\$16,079.99	\$11,370.19	\$225.15	\$304.45	2%	2%
96 Crew Leader	275.98	796.30	\$10.20	\$1,839.59	\$2,290.72	\$617.10	\$505.75	\$16,079.99	\$15,280.06	\$225.15	\$421.31	2%	2%
97 Plant Accountant	275.98	796.30	\$10.20		\$1,759.32	\$472.77	\$389.38	\$16,079.99	\$10,688.28	\$225.15	\$323.62	2%	2%
98 Cashier	0.00	32.90	\$3.40		\$0.00	\$26.36	\$23.28	\$371.26	\$0.00	\$3.58	\$23.65		
99 Meter/Service Tech.	275.98	796.30	\$10.20	\$1,187.28	\$1,478.43	\$450.49	\$327.64	\$11,832.14	\$10,220.44	\$111.21	\$271.85	2%	2%

KENERGY CORP.
 RESPONSE TO THE ATTORNEY
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 CASE NO. 2015-00312

Job Title	401k Admin.Fee	Dental Ins.	EAP	General Liability	401-K Match	Life Insurance Premium	Long Term Disability	Medical Insurance	Defined Benefit Plan	Temp. Reinsuranc e Fee	Umbrella Policy	increase 2011	increase 2012
100 Crew Leader	275.98	796.30	\$10.20	\$1,752.06	\$2,181.43	\$562.68	\$470.68	\$11,832.14	\$14,273.26	\$111.21	\$401.10	5%	3%
101 Line Technician	275.98	796.30	\$10.20	\$1,576.09	\$1,962.50	\$547.61	\$433.68	\$11,832.14	\$11,801.12	\$111.21	\$360.98	2%	2%
102 Line Technician	275.98	796.30	\$10.20	\$1,576.09	\$1,962.50	\$536.11	\$433.68	\$12,946.58	\$13,233.86	\$149.43	\$360.98	7%	7%
103 Materials Technician	275.98	796.30	\$10.20	\$1,316.58	\$1,639.46	\$432.41	\$363.92	\$10,171.35	\$11,250.07	\$166.88	\$301.52	10%	-12%
104 Crew Leader	275.98	796.30	\$10.20	\$1,835.49	\$2,285.69	\$616.60	\$505.75	\$11,832.14	\$15,280.06	\$111.21	\$420.38	2%	2%
105 Substation Technician I	275.98	378.35	\$10.20	\$1,570.83	\$1,956.06	\$547.61	\$433.68	\$11,832.14	\$11,801.12	\$111.21	\$359.81	2%	2%
106 Maintenance	275.98	796.30	\$10.20	\$1,322.55	\$1,646.80	\$447.36	\$364.43	\$5,124.02	\$10,062.97	\$42.96	\$302.95	3%	3%
107 Service Technician	275.98	796.30	\$10.20	\$1,349.84	\$1,679.25	\$536.11	\$433.68	\$14,262.90	\$13,233.86	\$182.19	\$308.72	2%	2%
108 System Controller	275.98	796.30	\$10.20		\$1,550.71	\$403.92	\$332.85	\$16,079.99	\$9,267.56	\$225.15	\$271.17		
109 Appr Line Tech I	160.04	524.30	\$10.20	\$633.77	\$650.22	\$206.94	\$178.24	\$7,699.58	\$4,003.54	\$63.96	\$144.48		
110 Appr Line Tech II	275.98	378.35	\$10.20	\$1,002.98	\$1,248.77	\$308.22	\$267.41	\$4,658.53	\$7,617.05	\$55.67	\$229.60		
111 Cashier	218.08	329.00	\$6.80		\$937.98	\$265.64	\$215.24	\$4,101.64	\$5,995.99	\$48.51	\$174.17		4%
112 Prin Accountant/Sec. Ldr	275.98	796.30	\$10.20		\$2,258.40	\$613.36	\$501.07	\$16,079.99	\$15,146.66	\$225.15	\$415.26	2%	2%
113 Line Technician	275.98	796.30	\$10.20	\$1,524.26	\$1,897.66	\$485.96	\$406.56	\$16,079.99	\$11,106.63	\$225.15	\$348.92		
114 SUPERVISOR CONSTRUCTION	275.98	796.30	\$10.20	\$1,922.11	\$2,393.37	\$655.79	\$528.25	\$11,832.14	\$15,921.06	\$111.21	\$440.13	2%	3%
115 Service Technician	275.98	796.30	\$10.20	\$1,576.09	\$1,962.50	\$557.61	\$433.68	\$15,584.42	\$13,233.86	\$210.83	\$360.98	2%	2%
116 Service Technician	137.02	549.20	\$0.00	\$1,024.41	\$1,043.56	\$402.68	\$295.08	\$8,571.40	\$8,423.90	\$82.57	\$235.82	2%	2%
117 Veg. Mgmt. Coordinator	275.98	378.35	\$10.20	\$1,613.16	\$2,008.81	\$563.13	\$445.50	\$11,832.14	\$13,568.28	\$111.21	\$369.44	2%	2%
118 Office Engineer	275.98	796.30	\$10.20		\$2,054.50	\$604.71	\$454.02	\$16,079.99	\$13,808.05	\$225.15	\$377.78	2%	2%
119 Accounting Clerk	275.98	796.30	\$10.20		\$1,282.11	\$354.01	\$283.34	\$16,079.99	\$8,027.39	\$225.15	\$235.80	2%	1%
120 Member Service Rep.	275.98	796.30	\$10.20		\$1,614.12	\$462.66	\$357.94	\$11,832.14	\$11,081.49	\$111.21	\$296.81	2%	2%
121 Appr Line Tech II	275.98	796.30	\$10.20	\$988.37	\$1,230.47	\$323.02	\$267.41	\$12,712.35	\$7,617.05	\$188.36	\$226.21		
122 Administrative Assistant	138.96	213.85	\$10.20		\$805.20	\$255.57	\$225.38	\$2,449.79	\$5,160.20	\$21.48	\$151.08	2%	2%
123 Section Leader	275.98	796.30	\$10.20		\$2,030.72	\$570.67	\$446.55	\$16,079.99	\$13,595.80	\$225.15	\$373.44	5%	5%
124 Appr Line Tech IV	275.98	378.35	\$10.20	\$1,190.19	\$0.00	\$335.18	\$293.59	\$4,658.53	\$8,271.70	\$55.67	\$272.39		
125 Materials Technician	275.98	796.30	\$10.20	\$1,259.58	\$1,568.68	\$455.83	\$344.25	\$11,832.14	\$10,689.18	\$111.21	\$288.49	2%	2%
126 Accounting Clerk	275.98	796.30	\$10.20		\$1,599.58	\$427.36	\$354.72	\$16,079.99	\$9,817.89	\$225.15	\$294.10	2%	2%
127 Member Service Rep.	115.80	388.30	\$10.20		\$490.60	\$169.18	\$143.33	\$6,941.11	\$3,289.40	\$85.92	\$121.45		
128 Field Engineering Tech.	275.98	378.35	\$10.20	\$1,660.68	\$2,067.95	\$574.46	\$457.67	\$11,832.14	\$13,916.78	\$111.21	\$380.25	3%	2%
129 Line Technician	275.98	378.35	\$10.20	\$1,506.62	\$1,875.57	\$487.16	\$406.56	\$4,658.53	\$11,106.63	\$55.67	\$344.84		
130 Electronics Technician	275.98	796.30	\$10.20	\$1,617.10	\$2,013.70	\$509.72	\$444.35	\$10,171.35	\$12,068.45	\$166.88	\$370.27	2%	2%
131 Line Technician	69.48	247.10	\$6.80	\$426.64	\$396.00	\$143.22	\$122.71	\$4,417.07	\$2,579.22	\$57.28	\$96.80		

**KENERGY CORP.
 RESPONSE TO THE ATTORNEY
 FIRST DATA REQUEST ITEM 1
 CASE NO. 2015-00312**

Job Title	increase 2013	increase 2014	increase 2015
1 System Controller			
2 Veg. Mgmt. Coordinator	2%	2%	
3 Computer Specialist	6%	8%	3%
4 Line Technician	3%	2%	3%
5 Member Service Rep.	6%	8%	3%
6 Branch Representative	2%	2%	2%
7 Line Technician	2%	2%	3%
8 Intern			
9 Field Engineering Tech.	5%	6%	3%
10 Crew Leader	2%	2%	3%
11 Cashier	2%	2%	3%
12 Crew Leader	2%	2%	3%
13 Crew Leader	7%	8%	5%
14 Service Technician	2%	2%	3%
15 Service Technician	0%	0%	3%
16 Meter Tech. I/Crew Leader	4%	2%	3%
17 Line Technician	2%	2%	3%
18 Field Member Service Rep.	2%	2%	2%
19 Line Technician	3%	2%	3%
20 Appr Line Tech II		17%	3%
21 Line Technician	7%	2%	3%
22 Service Technician	2%	2%	3%
23 Field Engineering Tech.	4%	2%	3%
24 Coord., Empl. Benefits	3%	3%	3%
25 Line Technician	2%	29%	3%
26 Crew Leader	2%	2%	3%
27 Elect. Comm. Analyst	2%	2%	4%
28 Crew Leader	2%	2%	3%
29 Comp. Network Specialist			3%
30 Field Service Member Rep.	2%	2%	
31 Apprentice Line Tech I	10%	17%	3%
32 Service Technician	0%	0%	3%
33 Line Technician	7%	2%	3%

KENERGY CORP.
 RESPONSE TO THE ATTORNEY
 FIRST DATA REQUEST ITEM 1
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Job Title	increase 2013	increase 2014	increase 2015
34 Member Service Rep.	7%	7%	6%
35 Branch Representative	2%	2%	
36 Member Service Rep.	2%	2%	1%
37 Cashier			
38 Member Service Rep.	2%	2%	2%
39 Member Service Rep.			0%
40 Line Technician	2%	-13%	3%
41 Line Technician		14%	4%
42 Appr Line Tech IV	10%	17%	20%
43 Branch Representative	2%	2%	2%
44 System Controller	2%	2%	3%
45 Crew Leader	4%	8%	10%
46 Service Technician	2%	2%	3%
47 Crew Leader	2%	2%	3%
48 Service Technician	2%	2%	3%
49 Appr Line Tech IV	10%	17%	20%
50 Field Engineering Tech.	2%	2%	3%
51 Field Engineering Tech.			9%
52 Member Service Rep.	7%	8%	3%
53 Member Service Rep.	2%	2%	
54 SYSTM CNTRL & VEG MGM SU	9%	14%	3%
55 OPER. SERV. SUPPORT TECH.	2%	2%	4%
56 Graphic Media Coordinator	2%	2%	1%
57 Computer Database Spec			3%
58 Member Service Rep.	7%	12%	3%
59 Branch Representative	2%	2%	2%
60 Intern			
61 System Controller	2%	2%	3%
62 Member Service Rep.	2%	3%	2%
63 Member Service Rep.	2%	2%	2%
64 Work Order Clerk	4%	2%	3%
65 Substation Technician I	2%	2%	2%
66 Section Leader	3%	3%	3%

KENERGY CORP.
 RESPONSE TO THE ATTORNEY
 FIRST DATA REQUEST ITEM 1
 CASE NO. 2015-00312

Job Title	increase 2013	increase 2014	increase 2015
67 Cashier			3%
68 Administrative Assistant		10%	7%
69 Appr Line Tech II		17%	3%
70 DAYSHIFT SYSTEM CONTROLLI	2%	2%	2%
71 Service Technician	2%	2%	3%
72 Line Technician	7%	2%	3%
73 Crew Leader	2%	2%	3%
74 Electronics Technician	2%	2%	3%
75 Veg. Mgmt. Coordinator	7%	3%	10%
76 Field Member Service Rep.	2%	2%	3%
77 Veg. Mgmt. Coordinator	2%	2%	
78 Line Technician	2%	2%	3%
79 Administrative Assistant	3%	2%	1%
80 Office Engineer	2%	3%	3%
81 Member Service Rep.	2%	2%	
82 Member Service Rep.			
83 Crew Leader	2%	3%	4%
84 Computer Systems Analyst	3%	3%	4%
85 Maintenance	3%	3%	2%
86 Administrative Assistant	2%	2%	2%
87 Member Service Rep.	2%	2%	2%
88 Service Technician	3%	2%	3%
89 Meter Technician I	5%	9%	3%
90 Intern			
91 Meter Tech 1/Crew Leader	5%	4%	3%
92 Field Engineering Tech.			
93 Crew Leader	2%	2%	8%
94 Meter/Service Tech.	2%	2%	2%
95 Materials Technician	3%	2%	1%
96 Crew Leader	2%	2%	3%
97 Plant Accountant	2%	2%	3%
98 Cashier			
99 Meter/Service Tech.	2%	2%	2%

KENERGY CORP.
 RESPONSE TO THE ATTORNEY
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 CASE NO. 2015-00312

Job Title	increase 2013	increase 2014	increase 2015
100 Crew Leader	8%	7%	5%
101 Line Technician	2%	2%	3%
102 Line Technician	2%	2%	3%
103 Materials Technician	2%	2%	2%
104 Crew Leader	2%	2%	3%
105 Substation Technician I	2%	2%	2%
106 Maintenance	3%	3%	2%
107 Service Technician	2%	2%	3%
108 System Controller		6%	8%
109 Appr Line Tech I			2%
110 Appr Line Tech II		17%	3%
111 Cashier	2%	10%	
112 Prin Accountant/Sec. Ldr	2%	2%	2%
113 Line Technician		14%	4%
114 SUPERVISOR CONSTRUCTION	2%	2%	3%
115 Service Technician	2%	2%	3%
116 Service Technician	2%	2%	
117 Veg. Mgmt. Coordinator	2%	2%	2%
118 Office Engineer	2%	3%	2%
119 Accounting Clerk	2%	2%	3%
120 Member Service Rep.	2%	2%	2%
121 Appr Line Tech II		17%	3%
122 Administrative Assistant	3%	2%	0%
123 Section Leader	4%	3%	3%
124 Appr Line Tech IV	10%	17%	20%
125 Materials Technician	2%	4%	2%
126 Accounting Clerk	2%	2%	2%
127 Member Service Rep.			
128 Field Engineering Tech.	2%	2%	3%
129 Line Technician		14%	4%
130 Electronics Technician	2%	2%	3%
131 Line Technician			

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

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Item 12) Reference the Kenergy Application, Exhibits 5A, Pages 6 – 7AA, concerning payroll/labor information to answer the following:

c. Please provide a list of each Kenergy BOD's job title with salary, overtime if any, percent pay increase for each of the past five years, and also include all benefits, bonuses, awards, etc.

Response) Kenergy Corp. Board of Directors are not employees of the cooperative and thus not on the payroll.

Witness) Keith Ellis

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
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Item 12) Reference the Kenergy Application, Exhibits 5A, Pages 6 – 7AA, concerning payroll/labor information to answer the following:

- d. Please provide a list of each Kenergy officer's job title with salary, overif any, percent pay increase for each of the past five years, and also include all benefits, bonuses, awards, etc.

Response) Item 12d, pages 2-4 of 4 contains the above referenced information.

Witness) Keith Ellis

KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST ITEM 12D
 CASE NO. 2015-00312

Job Title	Regular Wages	Overtime Amt	Lump Amount	Incentive	Bonus	Tax Veh Amt	Adjusted Dollars	Vac Max Amt	Life 50 Amt	Srv Award Amt
1 Executive Assistant/Asst. Corporate Secretary	81,188.64		383.25	484.10	0.00				1050.52	\$0.00
2 Executive Officer	245,130.74		0.00	0.00	14171.60	\$392.50	\$10,454.24		1898.26	\$0.00
3 VP Human Resources	143,242.32		0.00	851.76	0.00	\$641.40			1087.73	\$200.00
4 VP Member Services	118,026.48		0.00	694.51	0.00	\$2,078.40			1649.30	\$0.00
5 Dir. Procurement & Contracts	117,414.96		0.00	693.76	0.00	\$632.82		\$2,289.14	868.18	\$0.00
6 VP Engineering	143,560.56		0.00	851.76	0.00	\$394.08			5956.30	\$0.00
7 VP Operations	146,325.92		0.00	864.36	0.00	\$471.99			599.22	\$0.00
8 VP Finance & Accounting	146,881.28		0.00	871.85	0.00	\$361.62			3174.00	\$0.00

KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST ITEM 12D
 CASE NO. 2015-00312

Job Title	Retirement Award	Misc Taxable Benefit	401k Admin.Fee	Dental Insurance	EAP	General Liability	401-K Match	Life Insurance Premium	Long Term Disability	Medical Insurance
1 Executive Assistant/Asst. Corporate Secretary		0.00	275.98	378.35	\$10.20		\$2,435.69	\$671.19	\$541.67	\$2,041.93
2 Executive Officer		0.00	275.98	796.30	\$10.20		\$7,667.62	\$1,872.03	\$1,609.05	\$16,079.99
3 VP Human Resources		0.00	275.98	796.30	\$10.20		\$4,297.29	\$1,126.93	\$952.97	\$16,079.99
4 VP Member Services		0.00	275.98	796.30	\$10.20	\$2,843.67	\$3,540.77	\$925.72	\$766.00	\$11,832.14
5 Dir. Procurement & Contracts		0.00	275.98	796.30	\$10.20	\$2,828.73	\$3,522.50	\$918.18	\$768.80	\$16,079.99
6 VP Engineering		0.00	275.98	796.30	\$10.20	\$3,458.66	\$4,306.77	\$1,235.03	\$952.97	\$11,832.14
7 VP Operations		0.00	275.98	796.30	\$10.20	\$3,525.37	\$4,389.70	\$1,123.74	\$967.08	\$12,509.67
8 VP Finance & Accounting		0.00	275.98	796.30	\$10.20		\$4,406.43	\$1,191.84	\$975.46	\$11,832.14

KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST ITEM 12D
 CASE NO. 2015-00312

Job Title	Defined Benefit Plan	Temporary Reinsurance Fee	Umbrella Policy	increase 2011	increase 2012	increase 2013	increase 2014	increase 2015
1 Executive Assistant/Asst. Corporate Secretary	\$16,299.16	\$21.48	\$448.02	3%	3%	2%	2%	1%
2 Executive Officer	\$41,643.50	\$225.15	\$1,352.36			0%	2%	15%
3 VP Human Resources	\$24,832.09	\$225.15	\$790.18	7%	4%	2%	2%	2%
4 VP Member Services	\$20,133.19	\$111.21	\$651.21	2%	2%	4%	5%	4%
5 Dir. Procurement & Contracts	\$20,204.90	\$225.15	\$647.75	3%	2%	2%	4%	3%
6 VP Engineering	\$27,980.14	\$111.21	\$791.94	2%	2%	2%	2%	3%
7 VP Operations	\$25,185.94	\$195.18	\$807.26		0%	2%	2%	3%
8 VP Finance & Accounting	\$28,618.77	\$111.21	\$810.42	3%	3%	2%	2%	2%

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Item 13) Reference the Kenergy Application, Exhibit 5A, Page 6E where it states that the general wage adjustment of 2% was given on 1/1/2015 plus merit and step increases for new employees moving to mid-point of their grade level. Please provide the general wage adjustments that Kenergy has provided to all of its employees from each year from 2009 to the present.

- a. Provide Kenergy's policies and rules on wage adjustments as well as merit and step increases.

Response)

2009	2%
2010	0%
2011	2%
2012	2%
2013	2%
2014	2%

Kenergy Corp.'s policy is to pay for performance relative to adjustments to the salary structure. A merit increase is awarded to an employee whose performance is documented to exceed expectations. A step increases is awarded to an employee in the lower part of the pay scale to advance that employee, assuming satisfactory performance, to the mid-point of the pay grade over a specified period of time.

Witness) Keith Ellis

**KENERGY CORP.
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Item 14) Reference the Kenergy Application, Exhibit 5A, Pages 7 and 7(d) to answer the following questions:

- a. Provide a detailed overview of the employee assistance program. Include in the overview how the program is funded, the purpose of the program, and employee versus employer contribution breakdowns.

Response) The employee assistance program (EAP) is designed to assist employees and their immediate families with personal / emotional issues that may affect their work/life balance. The employee is allowed up to six confidential visits with a medical professional to address such issues as, but not limited to: marriage consulting, financial consulting, will preparation, child counseling, alcohol/drug dependence. In addition, Kenergy Corp. may require an employee to attend EAP sessions as a term and condition of employment relative to any anger management or chemical dependence issues. Kenergy Corp. pays 100% of the cost. The employee is responsible for paying 100% of the cost of visits beyond six visits in one calendar year.

Witness) Keith Ellis

**KENERGY CORP.
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Item 14) - Reference the Kenergy Application, Exhibit 5A, Pages 7 and 7(d) to answer the following questions:

b. Explain how the health insurance premiums appear to have decreased 7.90%.

Response) Kenergy Corp. premiums paid into the plan exceeded the claims paid out thereby causing a decrease in the claim funding for the following claim year.

Witness) Keith Ellis

**KENERGY CORP.
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Item 14) Reference the Kenergy Application, Exhibit 5A, Pages 7 and 7(d) to answer the following questions:

c. Confirm that the employee contribution for an employee only health insurance plan is only \$41.25 per month, employee and spouse is \$103.52 per month, employee and child is \$88.89 per month, and employee and family is \$140.22 per month.

Response) Confirmed.

Witness) Keith Ellis

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Item 14) Reference the Kenergy Application, Exhibit 5A, Pages 7 and 7(d) to answer the following questions:

d. Confirm that an employee only dental insurance premium is \$0 a month, with Kenergy paying the full cost of the dental insurance.

Response) Confirmed.

Witness) Keith Ellis

**KENERGY CORP.
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Item 14) Reference the Kenergy Application, Exhibit 5A, Pages 7 and 7(d) to answer the following questions:

e. Why has Kenergy not implemented an employee contributed dental insurance premium to assist with the rising costs?

Response) Kenergy Corp. philosophy is to maintain a discretionary benefit cost to payroll at around 43-46%. Kenergy Corp. benefit cost to payroll is between those numbers so management has not felt compelled to implement a premium share to employees in order to maintain that commitment to manage benefit cost. In addition, dental insurance cost is 1% of Kenergy Corp. payroll.

Witness) Keith Ellis

**KENERGY CORP.
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Item 14) Reference the Kenergy Application, Exhibit 5A, Pages 7 and 7(d) to answer the following questions:

- f. Confirm that Kenergy employees do not pay for life insurance whether it is under \$50,000, over \$50,000, or life insurance including amounts for spouse and children. If not, why has Kenergy not implemented an employee contributed life insurance premium to assist with the rising costs?

Response) Kenergy Corp. employees did not pay for basic life insurance premiums in excess of \$50,000. However, they are taxed on the value of the benefit for the amount over \$50,000. As stated earlier, Kenergy Corp. philosophy is to maintain discretionary benefit cost between 43-46% of payroll. Life insurance is less than 1% of payroll so any premium share would have minimal impact on cost savings

Witness) Keith Ellis

**KENERGY CORP.
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Item 14) Reference the Kenergy Application, Exhibit 5A, Pages 7 and 7(d) to answer the following questions:

g. Has Kenergy contemplated increasing employee health, dental, or life insurance premiums and/or copays to defray some of the rising insurance costs?

Response) Kenergy Corp. has increased employee premium share on medical insurance from 6% to 10% while at the same time Kenergy Corp. medical insurance premium was reduced by 7.9%.

Witness) Keith Ellis

**KENERGY CORP.
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Item 15) Reference the Kenergy Application generally. Does Kenergy 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) Kenergy Corp. does not anticipate any changes in any existing contracts as a result of the new rates it seeks to implement in this filing.

Witness) Doug Hoyt

**KENERGY CORP.
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Item 16) Reference the Kenergy Application generally. Does Kenergy maintain any contracts with vendors whose principals are in any manner related, by blood or marriage, to Kenergy's officers, members of its Board, its employees, its independent contractors or consultants? If yes:

- 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

Response) To the best of my knowledge, Kenergy Corp. does not maintain any contracts with vendors whose principals are in any manner related, by blood or marriage, to Kenergy Corp. officers, members of its Board, its employees, its independent contractors or consultants.

Witness) Doug Hoyt

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Item 16) Reference the Kenergy Application generally. Does Kenergy maintain any contracts with vendors whose principals are in any manner related, by blood or marriage, to Kenergy's officers, members of its Board, its employees, its independent contractors or consultants? If yes:

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

Response) To the best of my knowledge, Kenergy Corp. does not maintain any contracts with vendors whose principals are in any manner related, by blood or marriage, to Kenergy Corp. officers, members of its Board, its employees, its independent contractors or consultants.

Witness) Doug Hoyt

**KENERGY CORP.
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Item 17) Reference the Kenergy Application generally. Does Kenergy employ the relatives, by blood or marriage, of:

a. Any Kenergy board member; If so, please provide specific details.

Response) No.

Witness) Keith Ellis

**KENERGY CORP.
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Item 17) Reference the Kenergy Application generally. Does Kenergy employ the relatives, by blood or marriage, of:

b. Any Kenergy officer; If so, please provide specific details.

Response) One officer of the company is married to another management employee but there is no direct day-to-day oversight. Marriage occurred prior to Kenergy Corp. nepotism policy at consolidation in July 1999.

Witness) Keith Ellis

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
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2 **Item 17)** Reference the Kenergy Application generally. Does Kenergy employ the
3 relatives, by blood or marriage, of:

4 c. Any Kenergy contractor; If so, please provide specific details.

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6 **Response)** To the best of my knowledge Kenergy Corp. does not employ the relatives, by blood or
7 marriage, of any Kenergy Corp. contractor.

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11 **Witness)** Doug Hoyt

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**KENERGY CORP.
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Item 17) Reference the Kenergy Application generally. Does Kenergy employ the relatives, by blood or marriage, of:

d. Any Kenergy consultant; If so, please provide specific details.

Response) To the best of my knowledge Kenergy Corp. does not employ the relatives, by blood or marriage, of any Kenergy Corp. consultant.

Witness) Doug Hoyt

**KENERGY CORP.
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Item 17) Reference the Kenergy Application generally. Does Kenergy employ the relatives, by blood or marriage, of:

e. Any other Kenergy employee; If so, please provide specific details.

Response) Kenergy Corp. has two married couples working in separate departments. This situation pre-dates the nepotism policy Kenergy Corp. created at consolidation in July 1999.

Witness) Keith Ellis

**KENERGY CORP.
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Item 18) Reference the Kenergy Application generally. Does Kenergy 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)

POLICY

Kenergy Corp. will not employ any member of the immediate family of a director or employee. Immediate family is defined as (a) parent, child, spouse, sibling, step-child, mother-in-law, father-in-law, son or daughter-in-law, aunt, uncle, grandparent, or grandchild, niece, nephew, and, (b) any person who is living in the same household as the employee. This policy excludes individuals hired for summer or temporary employment.

Witness) Keith Ellis

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Item 19) Reference the Kenergy Application, Exhibit 5A, Pages 8 - 8F, and please provide a document clearly identifying the disallowed expense adjustments.

a. Confirm the total amount of disallowed expense adjustments.

Response) Refer to Application exhibit 5A, page 8, line 36, column b, which shows \$493,732 as the total amount of disallowed expenses for rate-making purposes.

Witness) Steve Thompson

**KENERGY CORP.
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Item 19) Reference the Kenergy Application, Exhibit 5A, Pages 8 - 8F, and please provide a document clearly identifying the disallowed expense adjustments.

b. Further confirm that the Company is not requesting that any of these amounts be included in rates.

Response) See response to item 19 a of the Attorney General's Initial Request for Information.

Witness) Steve Thompson

**KENERGY CORP.
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Item 20) Reference the Kenergy Application, Exhibit 5A, Page 9 and provide a detailed breakdown of the following expenses/costs. Additionally, provide a detailed overview of each category.

a. CEO Search Expenses,

Response) Refer to Application exhibit 5A, page 9e of the application. These costs have been excluded for rate-making purposes.

Witness) Steve Thompson

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Item 20) Reference the Kenergy Application, Exhibit 5A, Page 9 and provide a detailed breakdown of the following expenses/costs. Additionally, provide a detailed overview of each category.

b. Legal Costs - Territorial dispute,

Response) Refer to Application exhibit 5A, pages 9f-9j, column h of the application. These costs have been excluded for rate-making purposes.

Witness) Steve Thompson

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Item 20) Reference the Kenergy Application, Exhibit 5A, Page 9 and provide a detailed breakdown of the following expenses/costs. Additionally, provide a detailed overview of each category.

c. Legal Costs - Sales Tax Dispute,

Response) Refer to Application exhibit 5A, page 9f – 9j. These costs have been excluded for rate-making purposes.

Witness) Steve Thompson

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Item 20) Reference the Kenergy Application, Exhibit 5A, Page 9 and provide a detailed breakdown of the following expenses/costs. Additionally, provide a detailed overview of each category.

d. Kenergy Website Redesign,

Response) Refer to exhibit 5B, pages 28-40 of 116, column v of the application. The total website design costs were \$22,475. A total of 17% or \$3,821 was excluded for rate-making purposes. Of the remaining \$18,654, a total of \$14,923 was excluded for rate-making purposes as being non-recurring per exhibit 5A, page 9, and line 4 of the application.

Witness) Steve Thompson

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Item 20) Reference the Kenergy Application, Exhibit 5A, Page 9 and provide a detailed breakdown of the following expenses/costs. Additionally, provide a detailed overview of each category.

e. Loss on Disposition of Marion Property,

Response) The loss on the disposition of unused Marion property (new building constructed at a different site) was excluded for rate-making purposes as a non-recurring event.

Witness) Steve Thompson

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Item 20) Reference the Kenergy Application, Exhibit 5A, Page 9 and provide a detailed breakdown of the following expenses/costs. Additionally, provide a detailed overview of each category.

f. Capital Credit Allocation Statements,

Response) Refer to Application exhibit 5A, page 9B of the application showing the invoice costs for mailing the allocation statements during June 2014. This cost was included as a pro forma adjustment to the test year, since this cost is a recurring annual event.

Witness) Steve Thompson

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Item 21) Reference the Kenergy Application, Exhibit 5A, Page 9 and state the amount that Kenergy is requesting to be included as non-recurring items during the test year, and how Kenergy proposes the items to be incorporated into rates.

Response) Exhibit 5A, page 9 of the application has grouped both items to be excluded and included to arrive at a net adjustment to the test year. To the best of our knowledge, Kenergy Corp. has not requested any non-recurring item to be included for rate-making purposes. For the substation and line maintenance along with the meter removal cost items, Kenergy Corp. has proposed using the five year average to adjust the test year amounts.

Witness) Steve Thompson

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Item 22) Reference the Kenergy Application, Exhibit 5 A, Page 9B, and provide a detailed overview of the \$61,353.00 expenditure.

Response) This invoice represents page 2 of the monthly billing for services rendered, including the mailing of the capital credits allocation statements in June 2014. This document is intended to provide support for the amount added back to the test year on Exhibit 5A, page 9 of the application.

Witness) Steve Thompson

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Item 23) Reference the Kenergy Application, Exhibit 5A, Page 11 and provide evidence that justifies the proposed increased depreciation rates.

a. Provide an explanation as to what the \$492,138 adjustment year end plan at current rates represents.

Response) This pro forma adjustment increases test year depreciation expense for distribution plant additions net of retirements during the test year using depreciation rates approved by the Commission in case no. 2011-00035 based on the 2010 depreciation study.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

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Item 23) Reference the Kenergy Application, Exhibit 5A, Page 11 and provide evidence that justifies the proposed increased depreciation rates.

b. Provide an explanation as to what the \$356,523 adjustment new rates represents.

Response) Adjustment uses distribution plant balances at June 30, 2015 applied to the changes occurring in the depreciation rates. Refer to exhibit 8 and 11 of the application which is the testimony of Robert N. Welsh and the 2015 depreciation study.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 23) Reference the Kenergy Application, Exhibit 5A, Page 11 and provide evidence that justifies the proposed increased depreciation rates.

c. Provide an explanation as to what the \$848,661 total adjustment rate represents.

Response) The total \$848,661 represents the sum of the \$492,138 (item 23a) and the \$356,523 (item 23b) of the Attorney General's Initial Request for Information.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 24) Refer to Exhibit 5A, Pages 12 - 12A, and provide a detailed break-down of the \$715,706 interest expense adjustment.

Response) Adjustment calculates pro forma interest expense by multiplying June 30, 2015 long-term debt balances by note times the interest rate in effect at June 30, 2015. The pro forma interest expense of \$5,423,635 is subtracted from actual test year expense of \$4,707,929 to arrive at the adjustment amount of \$715,706.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 25) Reference Exhibit 5A, Page 21 and provide a detailed overview of the \$122,695 reclassify costs.

Response) Refer to the explanation on lines 10-13 of exhibit 5A, page 21 of the application. The word ideas should be areas.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 26) Reference Exhibit 5B, Lead Sheet 1 and 2 and confirm that the \$743,693.70 costs are disallowed amounts that Kenergy is not requesting to place in the rate base.

Response) Amounts with a (1) are excluded for rate-making purposes. These amounts are carried forward to exhibit 5A, page 8 of the application and combined with items from other accounts to arrive at the total amount excluded for rate-making purposes of \$493,732.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 27) Reference Exhibit 5B, Pages 1-116 and confirm that the expenses listed are all disallowed amounts that Kenergy is not requesting to place in the rate base.

Response) Totals for column headings on Exhibit 5B pages 1-116 are summed on pages 14, 27, 40, 53, 73, 94 and 115. These totals are carried forward to the lead sheets. Only the items with a (1) are excluded for rate-making purposes and carried forward to exhibit 5A, page 8 of the application.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 28) Reference Exhibit 5C, Page of 8 of 10 and provide a detailed explanation of the OSHA Citation.

Response) Kenergy Corp. was fined for employee removing rubber gloves while doing work on energized line and for the truck not being grounded. Employee suffered burns to both hands requiring hospitalization and skin grafts.

Witness) Keith Ellis

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

1

2 **Item 29)** Reference the Testimony of Steve Thompson, Question 10 for the following
3 questions:

4 a. Where it is stated that the depreciation expense increase is due in part to plant
5 investment for new customer growth, please elaborate on both the plant investment
6 and new customer growth.

7

8 **Response)** Item 29, pages 2-8 of 8 contain the information requested above.

9

10 **Witness)** Steve Thompson

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Steven L. Beshear
Governor

Leonard K. Peters
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

David L. Armstrong
Chairman

James W. Gardner
Vice Chairman

Linda Breathitt
Commissioner

August 30, 2013

Hon. J. Christopher Hopgood
Dorsey, King, Gray, Norment & Hopgood
Attorneys at Law
318 Second Street
Henderson, KY 42420

PSC STAFF OPINION 2013-010

Re: Kenergy Corp.
2013-2017 Construction Work Plan

Dear Mr. Hopgood:

Commission Staff acknowledges receipt of your letter dated August 14, 2013 requesting a staff advisory opinion that a Certificate of Public Convenience and Necessity ("CPCN") is not required for any part of Kenergy Corp.'s ("Kenergy") 2013-2017 Construction Work Plan ("CWP") as all of the items in the CWP are replacement items in the ordinary course of business. You stated that Kenergy proposes to commence this work on August 1, 2013 and acknowledge that the request for a staff opinion on the CWP was submitted after the proposed start date.

This letter responds to your request. Pursuant to the Commission's decision that each construction project contained in a CWP should be analyzed on an individual basis to determine whether that individual project is exempt from the requirement in KRS 278.020(1) to obtain a CPCN, Commission Staff has reviewed the projects outlined in Kenergy's 2013-2017 CWP. This letter represents the Commission Staff's opinion, which is advisory in nature, and not binding on the Commission should the issues herein be formally presented for Commission resolution.

Commission Staff understands the facts as follows:

Kenergy's CWP and the Addendum thereto, filed August 16, 2013, outlines the scope of work Kenergy proposes to complete during the 2013-2017 time frame. The Addendum to the 2013-2017 CWP indicates that the projected system peak load and number of customers served used in the report were originally based on the 2011 Load Forecast

Energy and Peak Demand Projections ("LF") for 2011-2025, developed by GDS Associates, Inc. in cooperation with Big Rivers Electric Corporation and Kenergy. However, due to economic issues related to potential closure of the Century Aluminum Smelter in Hancock County, a new LF forecast was developed in March, 2013, which occurred after the CWP had already been completed. This created the need for an Addendum. The effect that the 2013 LF had on the CWP was to lower the projected number of new customers and to lower the projected KW demand. The number of new customers served during the CWP period was lowered from 2,699 to 2,259. The 2016 summer peak load was lowered from 312.0 to 305.6 MW and the 2016-2017 winter peak load was lowered from 318.3 to 308.8 MW. The amount of total CWP improvements was lowered from \$46,540,977 to \$43,092,948.

Kenergy's 2013-2017 CWP consists of 42.4 miles of new underground lines and 84.2 miles of new overhead lines. Various distribution line changes are proposed for 142.3 miles. Kenergy proposes additional meters and transformers to be used in the construction of facilities for new members.

The 2013-2017 CWP also identifies the installation, upgrade, and relocation of regulators, and the relocation of regulator banks. The CWP also includes pole replacements and the purchase of security lights.

As with all legal opinions requesting a determination of the "ordinary extensions of existing systems in the usual course of business" exemption from the requirement of a CPCN, Commission Staff's review does not consider the reasonableness or the need for the project. Therefore, because reasonableness and need are not considered herein, nor in other non-rate cases, such a project can be denied recovery in a rate case if found to be unreasonable or unnecessary.

KRS 278.020(1) provides, in relevant part, as follows:

No person, partnership, public or private corporation, or combination thereof shall commence providing utility service to or for the public or begin the construction of any plant, equipment, property, or facility for furnishing to the public

any of the services enumerated in KRS 278.010, except retail electric suppliers for service connections to electric-consuming facilities located within its certified territory and ordinary extensions of existing systems in the usual course of business, until that person has obtained from the Public Service Commission a certificate that public convenience and necessity require the service or construction.

Regarding the exception to the CPCN requirement, Administrative Regulation 807 KAR 5:001, Section 15(3), provides, in full, as follows:

Extensions in the ordinary course of business. A certificate of public convenience and necessity shall not be required for extensions that do not create wasteful duplication of plant, equipment, property or facilities, or conflict with the existing certificates or service of other utilities operating in the same area and under the jurisdiction of the commission that are in the general or contiguous area in which the utility renders service, and that do not involve sufficient capital outlay to materially affect the existing financial condition of the utility involved, or will not result in increased charges to its customers.

In analyzing whether the proposed projects would materially affect Kenergy's financial condition, Commission Staff takes notice of Kenergy's 2012 Annual Report which shows Kenergy has a net utility plant as of December 31, 2012 of approximately \$189,351,231.80. When reviewed separately, each proposed construction project based on its estimated cost would not materially impact Kenergy's existing financial condition. Therefore, each construction project is generally considered to be an extension in the ordinary course of business. Likewise, the cost estimate of each project considered separately in the 2013-2017 CWP will not have an immediate or significant impact on Kenergy's rates. Thus, Commission Staff is of the opinion that each of the proposed projects set out in Kenergy's 2013-2017 CWP satisfies the "ordinary course of business" exemption from the CPCN requirement.

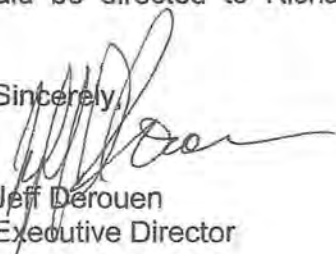
Your letter indicates that Kenergy proposes to commence work on the CWP projects prior to obtaining a legal opinion on whether those projects could be exempt from the CPCN requirement. While the commencement of work by Kenergy in this instance would not be in violation of KRS 278.020 due to Staff's determination herein that those projects satisfy the "ordinary course of business" exemption, the Commission has not looked favorably upon a utility's commencement of work prior to its obtaining a

Hon. J. Christopher Hopgood
August 30, 2013
Page 4

CPCN.¹ The better practice is not to commence any work prior to obtaining either a CPCN, or a Commission Staff opinion that the applicable CWP or project satisfies the "ordinary course of business" exemption from the CPCN requirement.

This letter represents Commission Staff's interpretation of the law as applied to the facts presented. This opinion is advisory in nature and not binding on the Commission should the issues herein be formally presented for Commission resolution. Questions concerning this opinion should be directed to Richard G. Raff, General Counsel, at (502) 564-3940.

Sincerely,



Jeff Derouen
Executive Director

FB/kar

cc: Mr. Bill Corum
President and CEO
Kentucky Association of Electric Cooperatives, Inc.
4515 Bishop Lane
Louisville, KY 40218

¹ See Case No. 2012-00219, *Clark Energy Cooperative, Inc. Alleged Failure To Comply with Administrative Regulations* (Ky. PSC Nov. 20, 2012).

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENERGY CORP. FOR A CERTIFICATE)	
OF CONVENIENCE AND NECESSITY AUTHORIZING)	CASE NO.
CERTAIN PROPOSED CONSTRUCTION IDENTIFIED AS)	2010-00110
THE 2010-2013 CONSTRUCTION WORK PLAN)	

ORDER

Kenergy Corp. ("Kenergy") filed its application on March 12, 2010 for a Certificate of Public Convenience and Necessity ("CPCN") to construct certain improvements and additions to its existing plant at an estimated cost of \$35,314,855. In support of its application, Kenergy filed its 2010-2013 work plan, which describes in detail the improvements and additions to its plant that are required over the next three years.

Kenergy seeks approval for the following extensions and additions to its plant:

1. New Construction	\$10,316,310
2. Distribution Line Conversions	8,005,400
3. Substation Items	1,073,817
4. Transformers & Meters	3,361,442
5. Service Upgrades	728,729
6. Sectionalizing Equipment	1,182,483
7. Line Regulators	350,800
8. Pole Replacements	4,552,355
9. Conductor Replacements	4,863,692
10. Security Lights	879,827
TOTAL	\$35,314,855

The Commission staff issued one data request, to which Kenergy responded on June 2, 2010. There being no intervenors, the case stands submitted for decision.

Kenergy's data response stated that it currently has two ongoing pilot programs involving Advanced Metering Infrastructure ("AMI") systems. These pilots involve 1,100 meters, some of which rely on software for a TWACS system and others which rely on software designed for a Cannon system. Implementation of the pilots was undertaken pursuant to prior construction work plans at a total cost of approximately \$355,000.

Kenergy explained that its 2010–2013 work plan includes no additional AMI deployment since it is monitoring its existing pilot programs and will continue to do so for the next three years. It also indicated that the further deployment of AMI will depend upon a future decision based on the tangible benefits of such deployment and that the value of such benefits is still in the development stage.

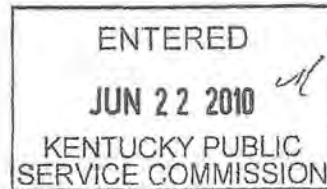
SUMMARY

The proposed construction will enable Kenergy to continue to provide adequate and dependable electric service to its customers. The system improvements recommended in this work plan will not duplicate existing facilities and are needed to correct voltage problems, improve phase balance, and provide for improved service reliability.

Based upon the application including the supporting work plan, as well as the data responses, and being otherwise sufficiently advised, the Commission finds that the proposed improvements and additions to be constructed by Kenergy are necessary to provide adequate, reliable electric service to existing customers and anticipated new customers.

IT IS THEREFORE ORDERED that Kenergy is granted a CPCN to construct the facilities described in its 2010-2013 work plan.

By the Commission



ATTEST:

Jeff Derouen by [Signature]
Executive Director

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 29) Reference the Testimony of Steve Thompson, Question 10 for the following questions:

b. Where it is stated that the depreciation expense increase is due in part to the replacement of existing facilities to maintain and improve reliability, please elaborate on this statement.

Response) Refer to response 29 a of the Attorney General's initial request for information.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

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Item 29) Reference the Testimony of Steve Thompson, Question 10 for the following questions:

c. What amount of the \$1,150,000 increased labor and overhead costs is attributed to the three (3) full-time positions?

1. Provide a list of the three full-time positions including title, salary, overtime if any, benefits, awards, date of hire, and why the positions were necessary.

Response) Item 29c, pages 2-4 of 4 contains the above referenced information.

Witness) Steve Thompson

KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST ITEM 29C
 CASE NO. 2015-00312

Job Title	sh	Hire date	Wages during test yr.	Overtime Amt	Lump Amount	Incentive	Bonus	Tax Veh Amt	Adjusted Dollars	Vac Max Amt	Life 50 Amt	Srv Award Amt
1 Manager General Accounting	S	3/25/2013	120,738.80	0.00	0.00	715.73	0.00	\$1,706.88	0.00	0.00	339.04	\$0.00
2 Computer Network Specialist	H	2/17/2014	66,446.67	1,481.09	0.00	340.20	0.00	0.00	0.00	0.00	822.49	0.00
3 Cashier	H	11/8/2010	34,075.79	481.25	0.00	96.41	0.00	0.00	\$0.00	0.00	41.79	\$0.00
			221,261.26	1,962.34	0.00	1,152.34	0.00	1,706.88	0.00	0.00	1,203.32	0.00

Why positions were necessary:

Manager General Accounting
 Computer Network Specialist
 Cashier

Filling a vacant position with succession planning in mind.
 Increasing need for Network presence in remote areas.
 Filling a vacant position

KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST ITEM 29C
 CASE NO. 2015-00312

Job Title	Retirement Award	Misc Taxable Benefit	401k Admin.Fee	Dental Insurance	EAP	General Liability	401-K Match	Life Insurance Premium	Long Term Disability	Medical Insurance	Defined Benefit Plan	Reinsurance Fee
1 Manager General Accounting	0.00	0.00	275.98	796.30	10.20		3,622.16	931.74	794.08	16,079.99	20,842.60	225.15
2 Computer Network Specialist	0.00	0.00	275.98	387.35	10.20		1,993.44	559.39	444.20	4,658.53	12,068.22	55.67
3 Cashier	\$0.00	0.00	223.28	345.45	10.20		934.61	268.28	235.94	4,250.67	5,916.84	47.78
	0.00	0.00	775.24	1,529.10	30.60	0.00	6,550.21	1,759.41	1,474.22	24,989.19	38,827.66	328.60

KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
FIRST DATA REQUEST ITEM 29C
CASE NO. 2015-00312

Job Title	Umbrella Policy	
1 Manager General Accounting	666.15	
2 Computer Network Specialist	366.62	
3 Cashier	107.13	
	1,139.90	304,690.27

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 29) Reference the Testimony of Steve Thompson, Question 10 for the following questions:

d. What amount of the \$1,150,000 additional overhead and labor cost is attributed to the wage increases of approximately 8% over a five year period?

Response) Approximately \$823,000 is attributed to the 8% increase.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 30) Reference the Testimony of Jack Gaines, Question 9. Provide the increase in number of customers and the test year average consumption.

Response) Increase in customers and test year average consumption are shown in Exhibit 9, page 2 through 4. The increase in customers is shown in footnote 1. The average consumption is calculated in footnote 2. Also, please refer to the summary on Page 1 which shows the increase in customers and kWh for each rate classification.

Witness) Jack Gaines

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 31) Reference the Testimony of Jack Gains, Question 24 where he states that, "...Kenergy has increased base rates to flow through wholesale power cost by approximately 30% since its last general rate case..."

- a. Due to the magnitude of the recent rate increases on Kenergy's customers, how has Kenergy attempted to keep costs/expenses low in order to prevent further rate increases?

Response Refer to the testimony of Steve Thompson, exhibit 6, page 3, lines 17-23. Also refer to item 8c, pages 1-4 of the response to the Commission's first data request.

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 31) Reference the Testimony of Jack Gains, Question 24 where he states that,
"...Kenergy has increased base rates to flow through wholesale power cost by approximately 30%
since its last general rate case ..."

b. Provide evidence that Kenergy's customers can afford the recent 30% rate
increases in addition to the rate increase request in the present case.

Response) No studies were performed by Kenergy Corp. of this nature. _____

Witness) Steve Thompson

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

2015-00312 RATE APPLICATION

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Item 32) Reference the Testimony of Jack Gaines, Question 26 where he states that 74.4% of the proposed residential distribution increase is generated from the facilities charge or customer charge, and only 25.6% comes from the energy charge.

- a. Provide the rationale and justification for applying a large bulk of the rate increase upon the facilities/customer charge instead of upon the usage charge.

Response) Primary objective is to move the Facilities Charge to full cost of service as quickly as reasonable.

Witness) Jack Gaines

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 32) Reference the Testimony of Jack Gaines, Question 26 where he states that 74.4% of the proposed residential distribution increase is generated from the facilities charge or customer charge, and only 25.6% comes from the energy charge.

b. Does the Company admit that by placing a large percentage of the rate increase upon the facilities/customer charge instead of the usage charge, it will deprive its customers of the monetary incentive for conserving energy through less usage?

Response) No.

Witness) Jack Gaines

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 32) Reference the Testimony of Jack Gaines, Question 26 where he states that 74.4% of the proposed residential distribution increase is generated from the facilities charge or customer charge, and only 25.6% comes from the energy charge.

c. Please identify what incentives residential customers will have to conserve energy if the Company's requested rate design is approved.

Response) Kenergy Corp. will be charging more for energy under the proposed base rates. Therefore, customers should have more incentive for conservation under the proposed rates than they do under the present rates.

Witness) Jack Gaines

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 32) Reference the Testimony of Jack Gaines, Question 26 where he states that 74.4% of the proposed residential distribution increase is generated from the facilities charge or customer charge, and only 25.6% comes from the energy charge.

d. Cite all studies the Company has conducted of its own ratepayer base to support the Company's decision to seek the proposed rate design in the instant case.

Response) To the extent any such studies have been used, they are included in the Application

Witness) Jack Gaines

**KENERGY CORP.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

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Item 33) Reference the Kenergy Application generally. Please identify the test year, filing date, rate effective date, and rate increase (both dollar and percentage) for the Company's last five rate cases.

a. Please provide the level of rate case expense incurred for the last five rate cases.

1. Also, indicate which cases were settled and which were litigated. For the settled cases, please also indicate at which stage they were settled.

Response) Item 33, page 2 of 2 contains the above referenced information.

Witness) Steve Thompson

**KENERGY CORP.
 RESPONSE TO THE ATTORNEY GENERAL'S
 FIRST DATA REQUEST FOR INFORMATION**

CASE NO. 2015-00312 ITEM 33a - LAST FIVE RATE CASES

LINE NO.	CASE NO.	TEST YR.	DATE FILED	EFFECTIVE DATE	TYPE	INCREASE		CASE SETTLED	DATE SETTLED	COST OF RATE CASE
		12 MONTHS ENDING				DOLLAR	PERCENT			
1	2013-00385	11/30/2012	12/2/2013	2/1/2014	WHOLESALE FLOW-THROUGH	\$ 21,946,905	17%	NO	N/A	(1)
2	2013-00035	11/30/2012	3/1/2013	8/20/2013	WHOLESALE FLOW-THROUGH	\$ 38,660,558	13%	NO	N/A	(1)
3	2011-00035	6/30/2010	3/1/2011	9/1/2011	WHOLESALE FLOW-THROUGH	\$ 19,094,608	7%	NO	N/A	(2)
4	2011-00035	6/30/2010	3/1/2011	9/1/2011	DISTRIBUTION	\$ 1,801,916	3%	YES	7/5/2011	\$ 81,667 (3)
5	2008-00323	12/31/2007	9/3/2008	2/1/2009	DISTRIBUTION	\$ 3,021,448	4%	YES	1/8/2009	\$ 44,284
6	2006-00369	12/31/2005	9/1/2006	3/1/2007	DISTRIBUTION	\$ 3,919,603	6%	YES	12/7/2007	\$ 39,206

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- (1) These cases were filed under KRS 278.455 which allows for an abbreviated set of documents. The cost of these two cases were approximately \$15,000 each.
- (2) One case was filed for both the wholesale flow-through and distribution portions, with cost running \$81,667.
- (3) Kenergy required to start publishing notice in all 14 newspapers in service area instead of three with largest circulation.