## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF JACKSON ENERGY COOPERATIVE CORPORATION FOR A GENERAL ADJUSTMENT IN EXISTING RATES

CASE NO. 2019-00066

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## JACKSON ENERGY'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

Filed: May 13, 2019

Question 1 Page 1 of 1 Witness: John Wolfram

## Jackson Energy Cooperative Corporation Case No. 2019-00066 Commission Staff's First Request for Information

#### **Request:**

Refer to the Direct Testimony of John Wolfram (Wolfram Testimony), page 16, Table 4. Table 4 indicates that the Cost of Service Study (COSS) results indicates that only Rate 10 – Residential Services is being subsidized. Explain why Jackson Energy did not propose an increase in revenue to meet the 1.85 Streamline TIER requirements and additionally propose a revenue allocation between the rate classes so to lower subsidization from the other rate classes.

#### **Response:**

Jackson Energy did not propose an increase in revenue to meet the 1.85 TIER requirements because current overall revenues are sufficient to meet the financial obligations of the cooperative – thus a revenue neutral filing was preferred, and no overall increase in revenue was needed. (This also reduced the number of filing requirements and correspondingly the cost of filing the case, in keeping with the objectives of the streamlined rate filing procedure.)

With respect to subsidization, two problems exist with the residential rate class. First, there is an imbalance between the recovery of fixed costs and variable costs; the fixed charge is too low and the variable charge is too high relative to cost-based rates. Second, the class overall is being subsidized by the other rate classes. In this case, Jackson Energy adopted a gradual approach and elected to address only the first issue, before potentially addressing the second issue in future filing(s).

With this being the first case filed under the streamlined procedure, Jackson Energy elected to adopt a minimum number of changes in rates for the initial exercise of these procedures.

Question 2 Page 1 of 1 Witness: Carol Wright

# Jackson Energy Cooperative Corporation Case No. 2019-00066 Commission Staff's First Request for Information

## **Request:**

Provide a cross-tab of the usage and income from Jackson Energy's last Residential End-Use Survey.

#### **Response:**

The data required to do a cross-tab of the usage and income is not provided in the last Residential End-Use Survey, nor is it otherwise available to Jackson Energy.

Below is the income data provided in the most recent Residential End-Use Survey.

Total Household Income								
Less than \$15,000	\$15,000 to \$24,999	\$25,000 to \$34,999	\$35,000 to \$49,999	\$50,000 to \$74,999	\$75,000 to \$99,999	\$100,000 to \$149,999	\$150,000 to \$199,999	\$200,000 or over
24.1%	14.9%	11.8%	13.6%	16.7%	8.9%	6.5%	1.7%	1.9%

Question 3 Page 1 of 1 Witness: Carol Wright

# Jackson Energy Cooperative Corporation Case No. 2019-00066 Commission Staff's First Request for Information

## **Request:**

Provide the average monthly use for customers receiving assistance.

# **Response:**

The average monthly usage for the members who received assistance from November 30, 2018 through February 28, 2019 for the period February 2018 through January 2019 is 1,238 kWh.

Question 4 Page 1 of 1 Witness: Carol Wright

# Jackson Energy Cooperative Corporation Case No. 2019-00066 Commission Staff's First Request for Information

#### **Request:**

Provide Jackson Energy's TIER, OTIER, and TIER excluding G&T capital credits for each year since Jackson Energy's last rate case.

#### **Response:**

Year	TIER	OTIER	TIER excl. GTCC's
2013	2.49	1.28	1.33
2014	2.70	1.60	1.61
2015*	1.46*	0.39*	0.56*
2016	3.10	2.10	2.18
2017	2.19	1.63	1.71
2018	2.82	1.93	2.01

\*Jackson Energy adopted the new revenue recognition standard, FASB ASU2014-09, Revenue from Contracts and Customers in 2015. This allows Jackson Energy to book their revenue in the same month the energy is consumed by the members. This resulted in booking one month of 2015 revenue in 2016.

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Case No. 2019-00066

#### **VERIFICATION OF JOHN WOLFRAM**

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COMMONWEALTH OF KENTUCKY

COUNTY OF JEFFERSON

John Wolfram, being duly sworn, states that he has supervised the preparation of his responses to requests for information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

John Wolfram

The foregoing Verification was signed, acknowledged and sworn to before me this  $\frac{\leq r}{d}$  day of May, 2019, by John Wolfram.

Commission expiration:



JOSEPH SINCLAIR NEWTON Notary Public State at Large Kentucky My Commission Expires July 27, 2022

#### STATE OF KENTUCKY)

#### COUNTY OF JACKSON)

I, Carol Wright, state that I am the President and Chief Executive Officer, of Jackson Energy Cooperative, that I have personal knowledge of the matters set forth in this response to the request for information, and that the statements and calculations contained in each are true as I verily believe.

This <u>(</u> day of _	May	2019
	_	Carol Wright

SUBSCRIE	BED AN	D SWORN	to before me	by Carol Wright this
Lett.				

 $\frac{215a}{\text{Notary Public, KY State at Large}} = \frac{1/19/22}{1/19/22}$