

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF JACKSON)	
ENERGY COOPERATIVE CORPORATION)	CASE NO.
FOR A GENERAL ADJUSTMENT IN)	2019-00066
EXISTING RATES)	

**JACKSON ENERGY'S RESPONSE TO ATTORNEY GENERAL'S DATA
REQUESTS**

Filed: May 13, 2019

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Does JEC make contributions toward both a defined benefit retirement plan and a 401(k) for each employee? If so, explain whether JEC has taken any steps to reduce or phase out its contribution to one of these retirement plans given the Commission's stance on this issue.

Response:

Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Has JEC conducted any studies to compare the Company's salary, benefits, raises and bonuses per employee with the standard salary, benefits, raises and bonuses of the workforce in the counties that it services? If so, provide copies of all such studies. If not, explain why such a study has not been performed.

Response:

Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Provide JEC's current debt service coverage, and the debt service coverage level it is required to maintain by any applicable covenant.

Response:

As of March 31, 2019, Jackson Energy's debt service coverage is 1.64.

CoBank is Jackson Energy's only lender with an applicable debt service coverage covenant and they require a debt service coverage of 1.35.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Confirm that JEC has AMI meters.

- a. State whether JEC conducts connects/disconnects remotely utilizing the AMI technology.
- b. Provide a break-out, by category, of all savings JEC has achieved by installing AMI. The break-out should include, at a minimum: reduction in member complaints, meters not reporting, energy theft, no-voltage calls, transformer damage, connects and disconnects, meter reading, meter re-reads, line loss, end of line voltage recordings, outage management, and contract meter reads.

Response:

Confirmed.

- a. Yes. All of our meters utilize AMI technology, but not all of them have remote connect/disconnect functionality. As of May 2, 2019, Jackson Energy currently has 53,828 total meters deployed in the field. 29,919 of those meters have remote connect/disconnect functionality. All newly installed meters include remote connect/disconnect functionality.
- b. Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Provide JEC's uncollectible expense for each of the past five (5) years, and 2019 to date.

Response:

2014	\$265,511
2015	\$230,570
2016	\$267,705
2017	\$218,258
2018	\$187,995
2019 (Through April 2019)	\$47,077

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Identify the current JEC Board of Directors' designated NRECA representative, and the name of the representative for each of the past five (5) years.

- a. Provide travel expenses for each member for the Board of Directors for each of the past five (5) years, including an explanation of the reason for the travel.

Response:

Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.

- a. Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Reference the JEC Application generally. Provide all invoices from outside experts, consultants, and legal counsel related to the current rate case, as well as the total amount expended thus far. Provide this information on an ongoing basis.

Response:

Below is an overview of outside expert and consultant expenses related to Case No. 2019-00066. Invoices are attached as Exhibit 1.

Cost of Service Study and Rate Consultant (Catalyst Consulting)

- 10/01/2018 Invoice	\$740.00
- 12/01/2018 Invoice	\$925.00
- 02/01/2019 Invoice	\$3,885.00
- 03/01/2019 Invoice	\$4,418.56
- 04/01/2019 Invoice	\$1,480.00
- 05/01/2019 Invoice	\$370.00

Total: \$11,818.56

All expenses incurred in relation to our legal counsel with regards to Case No. 2019-00066 have been covered under the retainer fee paid by Jackson Energy.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

State to what extent, if any, JEC utilizes weather normalization for its base rates.

Response:

Jackson Energy does not incorporate a weather normalization adjustment into its base rates.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Refer to Exhibit JW-9. Confirm that under JEC's proposed rate change, customers using less than the system average of 1,066 kWh will see their bills increase.

- a. Explain how customers consuming less than the system average will receive adequate notice that their rates are increasing.
- b. Explain how customers using more than the system average will be incentivized to conserve energy going forward.

Response:

Confirmed.

- a. Jackson Energy has complied with the notice requirements outlined in the Streamlined Pilot Program Order dated December 11, 2018 in Case No. 2018-00407.
- b. All Jackson Energy members with energy consumption have an incentive to conserve energy in order to reduce their electric bills. This will remain the case if the Commission approves the proposed rate revision. Using less energy will reduce electric bills under the proposed rates.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Reference the JEC application generally. Provide copies of all studies that JEC has conducted addressing the impact that the proposed rate design will have on the elderly, low-income, fixed-income, and homebound segments of its ratepayer base. Provide detailed information for each specified group.

Response:

Jackson Energy has not conducted the referenced studies. The impact of the proposed rate revision on these member segments will depend on the usage of the individual members in those segments. See Exhibit JW-9.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Provide copies of all studies JEC has conducted regarding the ability of JEC customers to conserve energy if the proposed revenue neutral rate design change is approved, which take into consideration the reduced DSM offerings that JEC and EKPC have made available to residential customers.

Response:

Jackson Energy has not conducted the referenced studies.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Provide copies of all studies or estimates JEC has produced indicating the degree to which consumption will increase if its proposed rate change is approved.

Response:

Jackson Energy has not produced studies or otherwise estimated the price elasticity associated with the proposed revenue neutral rate revisions.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Explain the process JEC followed in determining whether to classify costs as “fixed” or “variable.”

- a. Does JEC agree that at some point in all time, all costs become variable? If JEC does not so agree, explain why not.

Response:

Jackson Energy adheres to the classification of costs as fixed or variable as set forth in *The NARUC Electric Utility Cost Allocation Manual* and consistent with previous Commission findings in other dockets, including some of those listed in Exhibit JW-1.

- a. No. Jackson Energy believes that there will always be at least some fixed costs that Jackson Energy must incur to serve its members, including but not limited to something as simple as a meter. These costs do not vary with consumption, now or in the future.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Refer to Wolfram Direct at 18–20. Confirm that if approved, JEC's proposed residential customer charge would be the highest amount out of all the sixteen distribution cooperatives on the EKPC system.

- a. Explain how this rate design, together with the proposed subsidy reduction comports with the principle of gradualism.
- b. Provide and explain any other support for JEC's proposed increase on the residential customer charge.

Response:

Confirmed.

- a. The proposed rate increase closes less than half of the gap between the current residential monthly fixed charge and the cost-based charge. Furthermore, Jackson Energy has not increased its base rates for over five years. There is no overall increase since the proposed rate design is revenue neutral. The average member will experience no change to electric billings. The filing meets the requirements of the streamlined pilot program, which was established for the expressed purpose of supporting gradualism by avoiding or at least diminishing rate shock that may result from large infrequent rate increases. For these reasons, the proposed rate design comports with the principle of gradualism.
- b. JEC's residential customer charge is currently \$16.44 per month. The cost of service study shows that the actual cost per month per member is \$31.95 per month. JEC proposes to increase that charge from \$16.44 to \$24.00 per month. The increase closes 48.74 percent of the gap between the current rate and the cost-based rate. In other words, the proposed rate change moves about one half of the way toward cost-based rates. The energy charge is reduced accordingly such that the overall revenue remains unchanged.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Provide the number of JEC residential customers whose usage falls below the system average for the residential class. Break this out by the categories of monthly kWh as provided in the chart included in Exhibit JW-9, pg. 3.

Response:

See attached Exhibit 2.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Reference the JEC application generally. Provide the policies and procedures upon which JEC relies when making the determination to award a wage and/or salary increase to an employee, and whether or not a performance evaluation is the basis for the increase.

Response:

Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Provide the salary increases JEC has approved for each year since JEC's last rate case, in terms of percentages for each position.

Response:

Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Provide the annual bonuses JEC has granted for each year since JEC's last rate case, in terms of actual dollar amounts for each position.

Response:

Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

State whether JEC employees are required to pay for any portion of their health insurance, and life insurance. If so, provide details.

Response:

Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Confirm that by placing the full amount of the proposed rate change upon the monthly customer charge, JEC will make it more difficult for its customers to conserve energy.

Response:

This is incorrect. The rate may affect how much a member saves by conserving energy, but it does not make it any more or less difficult to conserve. The degree to which an individual consumer can conserve energy is not driven by the rates; instead, it is driven by the conditions of the premise, the amount and manner of consumption at the premise, and the personal preferences or needs of the member. JEC members with energy consumption will remain able to conserve energy with no more or less difficulty under the proposed rates than under the current rates.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Do any JEC officers, directors or employees have life insurance coverage with benefits in excess of \$50,000? If so:

- a. Provide the amount that JEC pays for that portion of the premium attributable to coverage over \$50,000; and
- b. State whether any portion of this amount is included for the purposes of ratemaking.

Response:

Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.

- a. Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.
- b. Jackson Energy objects to this request on the grounds that it is not likely to lead to the discovery of admissible evidence, and on the grounds that it is overreaching and unduly burdensome. Jackson Energy is not seeking an increase in revenue in this matter, and as such, the type of information sought by this request is not relevant to this proceeding, nor is it in keeping with the objectives of the streamlined rate case procedure for revenue neutral filings.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Refer to Wolfram Direct at 14 regarding the zero-intercept study. Explain why, if the cost of poles does not correlate to the number of customers, JEC believes it is reasonable to allocate any pole cost on the basis of number of customers. If JEC disagrees with the premise of the question, explain what JEC believes the results of the zero-intercept study regarding poles indicates.

Response:

The NARUC Electric Utility Cost Allocation Manual states on page 90 that distribution plant accounts involve demand and member costs. The two methods that are used to determine the demand and member components of distribution facilities are the zero-intercept method and the minimum system method. In most instances the zero-intercept method is more accurate. If the zero intercept does not provide reasonable results, as was the case for poles in this analysis, the minimum system method should be applied. The minimum system method, however, does not simply classify all costs solely on the basis of demand. Instead, the minimum cost per unit is determined and applied to the number of units; the resulting cost is the amount of the total cost that should be classified on the basis of the number of members. For poles in this case, using the minimum system method, 25 percent of the costs were classified as member-related and 75 percent were classified as demand-related. See Exhibit JW-8, page 1.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Explain what impact on class returns would occur if account 364.00 was allocated solely on demand. Provide any worksheets used in calculating the impact.

Response:

It would be inconsistent with *The NARUC Electric Utility Cost Allocation Manual* and thus inappropriate to allocate Account 364 solely on demand. See the response to Item 22.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Explain what impact on class returns would occur if account 368.00 was allocated solely on demand. Provide any worksheets used in calculating the impact.

Response:

It would be inconsistent with *The NARUC Electric Utility Cost Allocation Manual* and thus inappropriate to allocate Account 368 solely on demand. The zero-intercept analysis provides reasonable results for this account, and even if it did not, the minimum system approach would be used, and that approach does not allocate solely on demand, as explained in the response to Item 22.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Explain, in complete detail, what effect allocating accounts 364.00 and/or 368.00 has on JEC's alleged support for its proposed increase of the residential customer charge. Provide any worksheets used in calculating impacts.

Response:

The allocation of Accounts 364 and 368 affect the cost-based rates determined in the cost of service study and presented on Exhibit JW-3, page 2. The degree to which each Account is classified as member-related affects the monthly cost-based customer charge, and the degree to which each is classified as demand-related affects either the cost-based energy charge (for two-part rates) or the cost-based demand charge (for three-part rates). The worksheets that demonstrate these effects are in the cost of service study, in the zero intercept calculations in Exhibit JW-8 and the Functionalization & Classification calculations in Exhibit JW-4.

Jackson Energy Cooperative Corporation
Case No. 2019-00066
Attorney General's Data Requests

Request:

Provide JEC's margins by month, and by class if available, for each month for 2017 and 2018.

Response:

Margins by class are not available. Margins by month for 2017 and 2018 are provided below.

Year	Margins	
	2018	2017
January	\$ 1,983,583.00	\$ 735,135.00
February	\$ 641,032.00	\$ 957,599.00
March	\$ 799,155.00	\$ 212,121.00
April	\$ (229,926.00)	\$ 189,957.00
May	\$ 6,946.00	\$ (98,065.00)
June	\$ 362,617.00	\$ 234,531.00
July	\$ (7,192.00)	\$ (68,794.00)
August	\$ 258,422.00	\$ 219,073.00
September	\$ 68,310.00	\$ 195,486.00
October	\$ 194,520.00	\$ (52,554.00)
November	\$ 482,038.00	\$ 215,237.00
December	\$ 3,608,733.00	\$ 2,491,200.00
	<u>\$ 8,168,238.00</u>	<u>\$ 5,230,926.00</u>



INVOICE

Date: October 1, 2018	Invoice #: 180913
Client: Jackson Energy Cooperative 115 Jackson Energy Lane McKee KY 40447 Attn: Ryan Henderson	Project: 2018 Cost of Service & Rate Review Case No. _____ For Services Provided in September, 2018

	Item	Description	Qty	Rate	Amt
1	Consulting Services	John Wolfram – consulting support for 2018 Cost of Service & Rate Review. Prepare initial assessment of impact of wholesale rate increase using flow-through model. Calls and emails with JEC staff on same.	4.0 hours	\$185.00	\$ 740.00
TOTAL					\$ 740.00

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.



INVOICE

Date: December 1, 2018	Invoice #: 181109
Client: Jackson Energy Cooperative 115 Jackson Energy Lane McKee KY 40447 Attn: Ryan Henderson	Project: 2018 Cost of Service & Rate Review Case No. _____ For Services Provided in November, 2018

	Item	Description	Qty	Rate	Amt
1	Consulting Services	John Wolfram – consulting support for 2018 Cost of Service & Rate Review. Initialize COS model. Review initial data request response. Begin processing financial data. Calls and emails with JEC staff on same.	5.0 hours	\$185.00	\$ 925.00
TOTAL					\$ 925.00

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.



CATAYST
CONSULTING LLC

3308 Haddon Road
Louisville, KY 40241
(502) 599-1739
johnwolfram@catalystllc.com

INVOICE

Date: February 1, 2019	Invoice #: 190109
Client: Jackson Energy Cooperative 115 Jackson Energy Lane McKee KY 40447 Attn: Ryan Henderson	Project: 2018 Cost of Service & Rate Review Case No. _____ For Services Provided in January 2019

	Item	Description	Qty	Rate	Amt
1	Consulting Services	John Wolfram – consulting support for 2018 Cost of Service & Rate Review. Update purchased power, billing determinants, and pro forma adjustments. Complete draft revenue requirement, cost of service study, and consumption analysis. Calls and emails with JEC staff on same.	21.0 hours	\$185.00	\$ 3,885.00
TOTAL					\$ 3,885.00

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.

	<p>CATAYST CONSULTING LLC</p> <p>3308 Haddon Road Louisville, KY 40241 (502) 599-1739 johnwolfram@catalystllc.com</p>
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INVOICE

Date: March 1, 2019	Invoice #: 190207
Client: Jackson Energy Cooperative 115 Jackson Energy Lane McKee KY 40447 Attn: Ryan Henderson	Project: 2018 Cost of Service & Rate Review Case No. 2019-00066 For Services Provided in January 2019

	Item	Description	Qty	Rate	Amt
1	Consulting Services	John Wolfram – consulting support for 2018 Cost of Service & Rate Review. Complete draft revenue requirement, cost of service study, and consumption analysis. Travel to JEC for 2/11 team review. Prepare summary materials. Calls and emails with JEC staff on same.	23.0 hours	\$185.00	\$4,255.00
2	Mileage	2/11 Travel to McKee, KY	282	\$ 0.580	\$ 163.56
TOTAL					\$ 4,418.56

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.



CATAYST
CONSULTING LLC

3308 Haddon Road
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INVOICE

Date: April 1, 2019	Invoice #: 190309
Client: Jackson Energy Cooperative 115 Jackson Energy Lane McKee KY 40447 Attn: Ryan Henderson	Project: 2018 Cost of Service & Rate Review Case No. 2019-00066 For Services Provided in March 2019

	Item	Description	Qty	Rate	Amt
1	Consulting Services	John Wolfram – consulting support for 2018 Cost of Service & Rate Review. Complete testimony and exhibits. Review application, testimony and exhibits. Emails with JEC staff and counsel on same.	8.0 hours	\$185.00	\$1,480.00
TOTAL					\$ 1,480.00

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.



INVOICE

Date: May 1, 2019	Invoice #: 190412
Client: Jackson Energy Cooperative 115 Jackson Energy Lane McKee KY 40447 Attn: Ryan Henderson	Project: 2018 Cost of Service & Rate Review Case No. 2019-00066 For Services Provided in April 2019

	Item	Description	Qty	Rate	Amt
1	Consulting Services	John Wolfram – consulting support for 2018 Cost of Service & Rate Review. Prepare responses to PSC and AG data requests. Emails with JEC staff and counsel on same.	2.0 hours	\$185.00	\$ 370.00
TOTAL					\$ 370.00

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.

JACKSON ENERGY COOPERATIVE										
Monthly Base Rate Increase by KWH Residential										
#	Monthly kWh	Present Base Rates			Proposed Base Rates			Increase		Meters Affected
		Customer	Energy	Total	Customer	Energy	Total	\$	%	
		\$ 16.44	\$ 0.10		\$ 24.00	\$ 0.09				
1	-	\$ 16.44	\$ -	\$ 16.44	\$ 24.00	\$ -	\$ 24.00	\$ 7.56	46.0%	1247
2	100	\$ 16.44	\$ 9.59	\$ 26.03	\$ 24.00	\$ 8.88	\$ 32.88	\$ 6.85	26.3%	3841
2	200	\$ 16.44	\$ 19.18	\$ 35.62	\$ 24.00	\$ 17.76	\$ 41.76	\$ 6.14	17.2%	1676
3	300	\$ 16.44	\$ 28.77	\$ 45.21	\$ 24.00	\$ 26.65	\$ 50.65	\$ 5.43	12.0%	1301
4	400	\$ 16.44	\$ 38.36	\$ 54.80	\$ 24.00	\$ 35.53	\$ 59.53	\$ 4.72	8.6%	1416
2	500	\$ 16.44	\$ 47.96	\$ 64.40	\$ 24.00	\$ 44.41	\$ 68.41	\$ 4.01	6.2%	1552
3	600	\$ 16.44	\$ 57.55	\$ 73.99	\$ 24.00	\$ 53.29	\$ 77.29	\$ 3.31	4.5%	1717
4	700	\$ 16.44	\$ 67.14	\$ 83.58	\$ 24.00	\$ 62.17	\$ 86.17	\$ 2.60	3.1%	1801
5	800	\$ 16.44	\$ 76.73	\$ 93.17	\$ 24.00	\$ 71.06	\$ 95.06	\$ 1.89	2.0%	1943
6	900	\$ 16.44	\$ 86.32	\$ 102.76	\$ 24.00	\$ 79.94	\$ 103.94	\$ 1.18	1.1%	2097
7	1,000	\$ 16.44	\$ 95.91	\$ 112.35	\$ 24.00	\$ 88.82	\$ 112.82	\$ 0.47	0.4%	2289
8	1,100	\$ 16.44	\$ 105.50	\$ 121.94	\$ 24.00	\$ 97.70	\$ 121.70	(\$ 0.24)	-0.2%	2385
9	1,200	\$ 16.44	\$ 115.09	\$ 131.53	\$ 24.00	\$ 106.58	\$ 130.58	(\$ 0.95)	-0.7%	2429
10	1,300	\$ 16.44	\$ 124.68	\$ 141.12	\$ 24.00	\$ 115.47	\$ 139.47	(\$ 1.66)	-1.2%	2475
11	1,400	\$ 16.44	\$ 134.27	\$ 150.71	\$ 24.00	\$ 124.35	\$ 148.35	(\$ 2.37)	-1.6%	2406
12	1,500	\$ 16.44	\$ 143.87	\$ 160.31	\$ 24.00	\$ 133.23	\$ 157.23	(\$ 3.08)	-1.9%	2267
13	1,600	\$ 16.44	\$ 153.46	\$ 169.90	\$ 24.00	\$ 142.11	\$ 166.11	(\$ 3.78)	-2.2%	2012
14	1,700	\$ 16.44	\$ 163.05	\$ 179.49	\$ 24.00	\$ 150.99	\$ 174.99	(\$ 4.49)	-2.5%	1804
15	1,800	\$ 16.44	\$ 172.64	\$ 189.08	\$ 24.00	\$ 159.87	\$ 183.87	(\$ 5.20)	-2.8%	1530
16	1,900	\$ 16.44	\$ 182.23	\$ 198.67	\$ 24.00	\$ 168.76	\$ 192.76	(\$ 5.91)	-3.0%	1333
17	2,000	\$ 16.44	\$ 191.82	\$ 208.26	\$ 24.00	\$ 177.64	\$ 201.64	(\$ 6.62)	-3.2%	1101
18	2,100	\$ 16.44	\$ 201.41	\$ 217.85	\$ 24.00	\$ 186.52	\$ 210.52	(\$ 7.33)	-3.4%	960
19	2,200	\$ 16.44	\$ 211.00	\$ 227.44	\$ 24.00	\$ 195.40	\$ 219.40	(\$ 8.04)	-3.5%	787
20	2,300	\$ 16.44	\$ 220.59	\$ 237.03	\$ 24.00	\$ 204.28	\$ 228.28	(\$ 8.75)	-3.7%	594
21	2,400	\$ 16.44	\$ 230.18	\$ 246.62	\$ 24.00	\$ 213.17	\$ 237.17	(\$ 9.46)	-3.8%	438
22	2,500	\$ 16.44	\$ 239.78	\$ 256.22	\$ 24.00	\$ 222.05	\$ 246.05	(\$ 10.17)	-4.0%	381
23	2,600	\$ 16.44	\$ 249.37	\$ 265.81	\$ 24.00	\$ 230.93	\$ 254.93	(\$ 10.88)	-4.1%	284
24	2,700	\$ 16.44	\$ 258.96	\$ 275.40	\$ 24.00	\$ 239.81	\$ 263.81	(\$ 11.58)	-4.2%	233
25	2,800	\$ 16.44	\$ 268.55	\$ 284.99	\$ 24.00	\$ 248.69	\$ 272.69	(\$ 12.29)	-4.3%	190
26	2,900	\$ 16.44	\$ 278.14	\$ 294.58	\$ 24.00	\$ 257.58	\$ 281.58	(\$ 13.00)	-4.4%	157
27	3,000	\$ 16.44	\$ 287.73	\$ 304.17	\$ 24.00	\$ 266.46	\$ 290.46	(\$ 13.71)	-4.5%	634

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION


In the Matter of:

ELECTRONIC APPLICATION OF JACKSON)
ENERGY COOPERATIVE CORPORATION FOR) Case No. 2019-00066
A GENERAL ADJUSTMENT IN EXISTING RATES)

VERIFICATION OF JOHN WOLFRAM

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

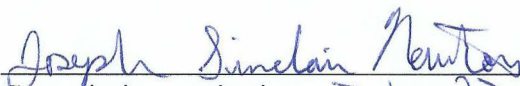
John Wolfram, being duly sworn, states that he has supervised the preparation of his responses to requests for information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable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



John Wolfram

The foregoing Verification was signed, acknowledged and sworn to before me this 3rd day of May, 2019, by John Wolfram.

<p>JOSEPH SINCLAIR NEWTON Notary Public State at Large Kentucky My Commission Expires July 27, 2022</p>
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Commission expiration: 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 6th day of May 2019

Carol Wright
Carol Wright

SUBSCRIBED AND SWORN to before me by Carol Wright this
6th day of May, 2019.

Lisa Baker # 592818
Notary Public, KY State at Large

My Commission Expires: 1/19/22