

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**


In the Matter of:

THE ELECTRONIC APPLICATION OF )  
 CLARK ENERGY COOPERATIVE, INC. )  
 FOR A GENERAL ADJUSTMENT OF ) Case No. 2020-00104  
 RATES PURSUANT TO STREAMLINED )  
 PROCEDURE PILOT PROGRAM )  
 ESTABLISHED IN CASE NO. 2018-00407 )

**VERIFICATION OF HOLLY S. EADES**

COMMONWEALTH OF KENTUCKY )  
 )  
 COUNTY OF CLARK )

Holly S. Eades, Vice President of Finance of Clark Energy Cooperative, Inc., being duly sworn, states that she has supervised the preparation of certain supplemental 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 her knowledge, information and belief, formed after reasonable inquiry.

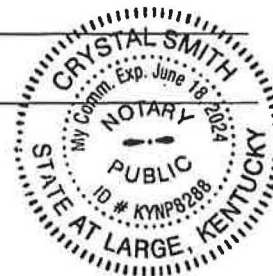
  
 \_\_\_\_\_  
 Holly S. Eades

The foregoing Verification was signed, acknowledged and sworn to before me this 7<sup>th</sup>  
 day of July, 2020, by Holly S. Eades.

  
 \_\_\_\_\_

Notary Commission No. \_\_\_\_\_

Commission expiration: \_\_\_\_\_



**Clark Energy Cooperative, Inc.**  
**Case No. 2020-00104**  
**Commission Staff's Data Requests**

13. Refer to the Eades Testimony, page 13.
- a. Provide supporting invoices for any rate case expenses incurred to date that have not already been provided in the application, Exhibit 36.
  - b. Additionally, refer to the Excel spreadsheet provided as Exhibit 30, entitled "Exhibit\_30\_Clark\_Rev\_Req\_Filed.xlsx", tab 1.10 Int. Provide the three-year and five-year average respectively of interest payments on Clark Energy's debt service starting with the year 2021. Provide any supporting calculations in Excel spreadsheet format.
  - c. Refer to the Excel spreadsheet reference above, tab 1.6 NonRec. Provide a more detailed explanation and history of the AT&T Back-billing for joint pole usage reference in Line #1. Explain why this item is not likely to recur.

**Response:**

- a. Please see attached for updated rate case expense invoices through June 30, 2020.
- b. No changes from previous response.
- c. No changes from previous response.

**Clark Energy**  
**Case No. 2020-00104**

**Incurred rate case expenses**

| Date      | Reference                           | Amount              | Name                    |
|-----------|-------------------------------------|---------------------|-------------------------|
| 1/31/2020 | CONSULTING/COS & RATE REVIEW        | \$ 1,362.95         | CATALYST CONSULTING LLC |
| 1/31/2020 | LEGAL SERVICES/RATE CASE            | \$ 1,789.98         | GOSS SAMFORD PLLC       |
| 2/28/2020 | CONSULTING/RATE CASE/COS STUDY      | \$ 3,908.30         | CATALYST CONSULTING LLC |
| 2/28/2020 | LEGAL SERVICES/RATE CASE            | \$ 1,716.30         | GOSS SAMFORD PLLC       |
| 3/31/2020 | CONSULTING/COS STUDY/RATE CASE      | \$ 5,167.50         | CATALYST CONSULTING LLC |
| 3/31/2020 | LEGAL SERVICES/RATE CASE 2020-00104 | \$ 7,341.14         | GOSS SAMFORD PLLC       |
|           |                                     | <u>\$ 21,286.17</u> |                         |
| 4/28/2020 | POSTCARDS/RATE CASE NOTICE          | \$ 307.40           | ABRACADABRA GRAPHICS    |
| 4/30/2020 | OFFICE SUPPLIES                     | \$ 178.02           | NATIONAL OFFICE SUPPLY  |
| 4/30/2020 | CONSULTING/RATE CASE                | \$ 2,242.50         | CATALYST CONSULTING LLC |
| 5/18/2020 | LEGAL SERVICES/RATE CASE            | \$ 13,913.88        | GOSS SAMFORD PLLC       |
| 5/31/2020 | POSTAGE                             | \$ 1,225.00         | QUADIENT                |
| 5/31/2020 | LEGAL SERVICES/RATE CASE            | \$ 1,730.03         | GOSS SAMFORD PLLC       |
|           |                                     | <u>\$ 19,596.83</u> |                         |
| 6/30/2020 | LEGAL SERVICES/RATE CASE            | \$ 14,720.10        | GOSS SAMFORD PLLC       |
| 6/30/2020 | CONSULTING/RATE CASE                | \$ 6,100.00         | CATALYST CONSULTING LLC |
|           |                                     | <u>\$ 20,820.10</u> |                         |

**Summary incurred rate case expenses**

|                                 |                     |
|---------------------------------|---------------------|
| LEGAL SERVICES/RATE CASE        | \$ 41,211.43        |
| CONSULTING/COS STUDY/RATE CASE  | \$ 18,781.25        |
| POST CARDS/LABELS               | \$ 485.42           |
| POSTAGE/POST CARD NOTIFICATIONS | \$ 1,225.00         |
|                                 | <u>\$ 61,703.10</u> |

**Goss  
Samford**

ATTORNEYS AT LAW | PLLC

**David Samford**  
david@gosssamfordlaw.com  
(859) 368-7740

July 1, 2020

Mr. Chris Brewer, President and CEO  
Clark Energy Cooperative, Inc.  
2640 Iron Works Road  
Winchester, Kentucky 40391

Re: Invoices for June 2020

Dear Chris:

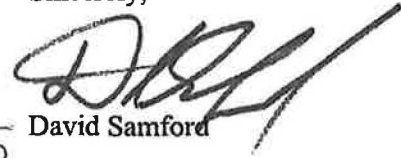
Please find enclosed the invoices for services performed by Goss Samford, PLLC on behalf of Clark Energy Cooperative, Inc. for June 2020. Please remit payment for the amount due within thirty days of today's date. A summary of the amount due and owing is as follows:

| <i>Matter Description</i>                    | <i>Amount</i>             |
|--|---------------------------|
| General Business<br>- Current fees and costs | <b>\$14,720.10</b>        |
| <b><i>TOTAL:</i></b>                         | <b><u>\$14,720.10</u></b> |

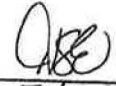
Should you have any questions, please contact me at your convenience. Once again, it is a privilege to represent Clark Energy Cooperative, Inc. and we thank you for allowing us the opportunity to work with you.

06/30/2020  
07/02/2020

Sincerely,



David Samford

APPROVED BY   
APPROVAL DATE 7/1/2020  
CHECK NUMBER \_\_\_\_\_  
DATE PAID \_\_\_\_\_  
ACCOUNT NUMBER 928.00 - 14,720.10

Enclosures

*LEGAL SERVICES/Rate Case*

**Goss Samford, PLLC**

Suite B-325  
2365 Harrodsburg Road  
Lexington, KY 40504  
Telephone: 859-368-7740

June 30, 2020

Invoice No. 4999

Clark Energy Cooperative, Inc.  
Chris Brewer, President and CEO  
2640 Ironworks Road  
Winchester, KY 40392-0748

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Client Number: 0661 Clark Energy Cooperative, Inc.  
Matter 0661 Clark Energy General Business  
For Services Rendered Through 6/30/2020.

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| <b>Fees</b> |                   |   |              |               |
|-------------|-------------------|---|--------------|---------------|
| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u>  | <u>Hours</u> | <u>Amount</u> |
| 6/2/2020    | DSS               | Review and analyze the AG's initial data requests; email exchanges with H. Eades and A. Honaker re same.  | 0.40         | \$114.00      |
| 6/2/2020    | LAH               | Review and analyze the AG's initial data requests; email exchanges with D. Samford re same.   | 0.40         | \$98.00       |
| 6/3/2020    | DSS               | Review public comment filed in the record; email exchange re preparing responses to the AG's data requests.   | 0.20         | \$57.00       |
| 6/3/2020    | LAH               | Review public comment filed in the record; email exchange re preparing responses to the AG's data requests; draft template and witness assignments for AG data requests; email same to D. Samford for review.   | 2.00         | \$490.00      |
| 6/4/2020    | DSS               | Review data requests and initial witness assignments; email exchange with A. Honaker re same; video conference with C. Brewer, et al. to discuss the AG's data requests.  | 1.90         | \$541.50      |
| 6/4/2020    | LAH               | Exchange emails with D. Samford re data request witness assignments; edit witnesses; email draft to C. Brewer, et. al. for review prior to video conference; participate in video conference with C. Brewer, et. al.; make edits to requests and witness assignments from call; review nepotism policy forwarded by H. Eades. | 2.40         | \$588.00      |
| 6/5/2020    | DSS               | Review email and attachment from H. Eades re a response to the AG's data requests.  | 0.10         | \$28.50       |

Continued On Next Page

Client Number: 0661  
Matter Number: 0661

6/30/2020  
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|           |     |  |      |          |
|-----------|-----|--|------|----------|
| 6/8/2020  | DSS | Email exchange with H. Eades re the draft data request responses.  | 0.10 | \$28.50  |
| 6/9/2020  | DSS | Review email and attachments from C. Brewer for the responses to the AG's data requests.   | 0.10 | \$28.50  |
| 6/9/2020  | LAH | Review email and attachments from C. Brewer for the responses to the AG's data requests.   | 0.10 | \$24.50  |
| 6/10/2020 | DSS | Review and comment on draft data request responses provided by J. Wolfram; email exchange with J. Wolfram re same.   | 0.70 | \$199.50 |
| 6/10/2020 | LAH | Review draft data request responses provided by J. Wolfram; review edits proposed by D. Samford; review multiple emails re same; update template with responses provided.  | 1.30 | \$318.50 |
| 6/11/2020 | DSS | Review the Commission's data requests; review email from J. Wolfram re the responses to the AG's data request responses; email exchange with H. Eades re same; review assignments for responses to Staff data requests; email exchange with A. Honaker re same.  | 1.00 | \$285.00 |
| 6/11/2020 | LAH | Review the Commission's data requests; review email from J. Wolfram re the responses to the AG's data request responses; review multiple emails from H. Eades, et. al. re data requests; review multiple attachments re same; draft template for Staff's data requests and witness assignments; email same to D. Samford for review; update AG responses with new items received; update attachment headings; exchange emails with D. Samford re same. | 3.00 | \$735.00 |
| 6/12/2020 | DSS | Telephone conference with C. Brewer re the Commission's data request responses; review and comment upon draft responses to the AG's data requests; email exchanges with A. Honaker and H. Eades re same.   | 1.30 | \$370.50 |
| 6/12/2020 | LAH | Continue adding responses to template; review multiple emails and attachments re same; exchange emails with D. Samford re same; begin draft of Motion for Confidential Treatment; draft verifications for witnesses; review Commission Staff template; review edits from D. Samford for AG responses.  | 3.00 | \$735.00 |
| 6/14/2020 | DSS | Email exchange with A. Honaker re the revised draft data request responses.  | 0.20 | \$57.00  |
| 6/14/2020 | LAH | Review and make edits to draft AG responses; email same to C. Brewer, et. al. to review; review and edit Commission Staff's response template and email same to C. Brewer, et.al for review.   | 0.50 | \$122.50 |

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Matter Number: 0661

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|           |     |   |      |          |
|-----------|-----|---|------|----------|
| 6/15/2020 | DSS | Telephone conference with C. Brewer, et al. re draft responses to data requests; review multiple emails re same; edit and comment on draft; telephone conference with A. Honaker re status.   | 2.00 | \$570.00 |
| 6/15/2020 | LAH | Exchange multiple emails with H. Eades and C. Brewer re revisions to data requests prior to telephone conference; complete edits and email new draft to C. Brewer, et. al. prior to telephone conference; participate in telephone conference with C. Brewer, et al. re draft responses to data requests; review multiple emails re same; edit and comment on draft; telephone conference with D. Samford re status, make edits consistent with telephone conference with team; update Motion for Confidential Treatment; update PSC template; email new drafts to C. Brewer, et. al. | 4.00 | \$980.00 |
| 6/16/2020 | DSS | Review and respond to numerous emails re the draft data request responses; review and comment on various drafts.  | 0.70 | \$199.50 |
| 6/16/2020 | LAH | Review and respond to numerous emails re the draft data request responses; update templates with new responses; exchange texts with J. Pinney re clarification question; exchange emails with M. Purvis re clarification; exchange emails with H. Eades re same; review multiple attachments; update Motion for Confidential Treatment.   | 1.60 | \$392.00 |
| 6/17/2020 | DSS | Review and respond to emails from C. Brewer, H. Eades and J. Wolfram; review and comment on draft data request responses and supporting documentation.  | 1.60 | \$456.00 |
| 6/17/2020 | LAH | Review and respond to emails from C. Brewer, H. Eades and J. Wolfram; review and comment on draft data request responses and supporting documentation; continue inputting additional responses received and edits to same.  | 2.00 | \$490.00 |
| 6/18/2020 | DSS | Review and comment on draft data request responses; email exchanges with H. Eades and C. Brewer re same.  | 0.50 | \$142.50 |
| 6/18/2020 | LAH | Review multiple emails and responses from H. Eades, et. al.; review and edit the Motion for Confidential Treatment.   | 0.80 | \$196.00 |
| 6/19/2020 | DSS | Telephone conference with A. Honaker re the status of the draft responses; review emails re same.   | 0.20 | \$57.00  |

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|           |     |   |      |            |
|-----------|-----|---|------|------------|
| 6/19/2020 | LAH | Review multiple emails re draft responses; telephone conference with D. Samford re status of same; review all edits and responses and complete drafts of both AG and Staff responses; review drafts and email same to D. Samford for review   | 2.50 | \$612.50   |
| 6/20/2020 | DSS | Review and comment on revised drafts of data request responses; review attachments for same; make notes re items for requested confidentiality; send various emails to C. Brewer, et al. re the draft responses and remaining items.  | 2.20 | \$627.00   |
| 6/20/2020 | LAH | Review emails and proposed edits from D. Samford to both sets of responses; review multiple emails re same.   | 0.40 | \$98.00    |
| 6/21/2020 | LAH | Complete edits to both sets of data requests; email same to C. Brewer, et. al. to review prior to call; email reminders re verifications needed; exchange emails with J. Wolfram re same.   | 0.80 | \$196.00   |
| 6/22/2020 | DSS | Email exchange with A. Honaker re the draft responses to data requests from Staff and the AG and motion for confidential treatment; review email from C. Brewer; review and edit draft motion for confidential treatment; telephone conference with C. Brewer, et al. re the revised draft responses; review cover letter; coordinate filing of data request responses with A. Honaker.   | 2.80 | \$798.00   |
| 6/22/2020 | LAH | Email exchange with D. Samford re the draft responses to data requests from Staff and the AG and motion for confidential treatment; review email from C. Brewer; complete D. Samford's edits to Motion for Confidential Treatment; participate in telephone conference with C. Brewer, et al. re the revised draft responses; draft cover letter for filing; complete all edits; convert documents to pdf and compile for filing; prepare cover letter, two sets of responses and additional attachments for electronic filing; print, copy and scan paper copies for filing at Commission; prepare confidential information in sealed envelope; email exchange with R. Smith and B. Bruner re filing confidential information; email confidential information to PSCED@ky.gov; make CDs with excel spreadsheets for paper filing; complete electronic filing; conference with D. Samford re paper filings. | 4.50 | \$1,102.50 |

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Matter Number: 0661

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|           |     |  |      |            |
|-----------|-----|--|------|------------|
| 6/23/2020 | DSS | Email exchange with M. West re the confidential documents from the discovery requests; exchange messages with A. Honaker re preparation of a confidentiality agreement for the AG's office; review and edit draft agreement; review emails from A. Honker and M. West re the confidentiality agreement.  | 0.50 | \$142.50   |
| 6/23/2020 | LAH | Email exchange with M. West re the confidential documents from the discovery requests; exchange messages with D. Samford re preparation of a confidentiality agreement for the AG's office; draft confidentiality agreement; email same to D. Samford for review; email confidentiality agreement to M. West for review; exchange emails with M. West re same; review executed confidentiality agreement; forward confidential information to M. West; telephone conference with D. Samford re same. | 1.30 | \$318.50   |
| 6/24/2020 | DSS | Review signed confidentiality agreement with the AG; forward same to C. Brewer and H. Eades.   | 0.10 | \$28.50    |
| 6/24/2020 | LAH | Review email and attached signed confidentiality agreement with the AG sent to C. Brewer and H. Eades.   | 0.10 | \$24.50    |
| 6/26/2020 | LAH | Exchange emails with H. Eades re filings; email complete filings to H. Eades.  | 0.10 | \$24.50    |
| 6/26/2020 | DSS | Telephone conference with K. Chandler re the procedural status of the case.  | 0.10 | \$28.50    |
| 6/28/2020 | DSS | Prepare draft comments; edit same; review record for footnotes; email C. Brewer, et al. re status; make additional revisions; forward draft to C. Brewer, et al. for final review.   | 4.10 | \$1,168.50 |
| 6/29/2020 | DSS | Review the Attorney General's comments as filed; telephone conference with C. Brewer re same; review emails from H. Eades, et al. re the Attorney General's comments and Clark Energy's draft comments; make revisions to the draft comments; research and locate additional authorities; send revised draft comments to C. Brewer, et al. for review and comment; prepare cover letter; make filing at the PSC.   | 2.30 | \$655.50   |
| 6/29/2020 | LAH | Review and analyze draft comments as filed of Clark Energy and AG.   | 2.00 | \$490.00   |

**Billable Hours / Fees:** 55.90 \$14,619.50

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Matter Number: 0661

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### Timekeeper Summary

Timekeeper DSS worked 23.10 hours at \$285.00 per hour, totaling \$6,583.50.  
Timekeeper LAH worked 32.80 hours at \$245.00 per hour, totaling \$8,036.00.

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### Cost Detail

| <u>Date</u> | <u>Description</u>   | <u>Amount</u>   |
|-------------|--|-----------------|
| 6/22/2020   | Photocopies of responses to data requests from Staff and the AG.       | \$36.00         |
| 6/22/2020   | Binding supplies and tabs for responses to Staff and AG data requests. | \$61.00         |
| 6/29/2020   | Photocopies of filing at the PSC.                                      | \$3.60          |
|             | <b>Total Costs</b>   | <b>\$100.60</b> |

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### Payment Detail

| <u>Date</u> | <u>Description</u>                   | <u>Amount</u>       |
|-------------|--------------------------------------|---------------------|
| 6/22/2020   | Check Number 57006 against Inv# 4965 | (\$1,700.50)        |
| 6/22/2020   | Check Number 57006 against Inv# 4965 | (\$29.53)           |
|             | <b>Total Payments Received:</b>      | <b>(\$1,730.03)</b> |

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### Current Invoice Summary

|                              |                    |                                |
|------------------------------|--------------------|--------------------------------|
| <b>Prior Balance:</b>        | \$1,730.03         |                                |
| <b>Payments Received:</b>    | (\$1,730.03)       | <b>Last Payment: 6/22/2020</b> |
| <b>Unpaid Prior Balance:</b> | \$0.00             |                                |
| <b>Current Fees:</b>         | \$14,619.50        |                                |
| <b>Advanced Costs:</b>       | \$100.60           |                                |
| <b>TOTAL AMOUNT DUE:</b>     | <b>\$14,720.10</b> |                                |



**INVOICE**

|  |  |
|--|--|
| <b>Date:</b> July 1, 2020  | <b>Invoice #:</b> 200614   |
| <b>Client:</b><br><br>Clark Energy Cooperative<br>2640 Ironworks Road<br>Winchester, KY 40391<br><br>Attn: Holly Eades | <b>Project:</b><br><br>2019 Cost of Service & Rate Review<br>Case No. 2020-00104<br><br>For Services Provided in June 2020 |

|              | Item                | Description   | Qty        | Rate        | Amt                |
|--------------|---------------------|---|------------|-------------|--------------------|
| 1            | Consulting Services | John Wolfram – consulting support for 2019 Cost of Service & Rate Review. Prepare draft responses to PSC and AG data requests. Review draft comments. Calls or emails with Clark staff and counsel on same. | 14.5 hours | \$195.00    | \$ 2,827.50        |
| 2            | Consulting          | Fixed price for COSS  |            | \$10,000.00 |                    |
|              |                     | COSS hours billed through Mar 9   |            | \$6,727.50  |                    |
|              |                     | Balance of fixed COSS price due   |            | \$3,272.50  | \$ 3,272.50        |
| <b>TOTAL</b> |                     |   |            |             | <b>\$ 6,100.00</b> |

Routing No.: 083000108  
 Account No.: 3026937313

Please remit payment to Catalyst Consulting LLC by check or ACH as noted above. Thank you.

06/30/2020  
 07/02/2020

APPROVED BY *[Signature]*  
 APPROVAL DATE 7/1/2020  
 CHECK NUMBER \_\_\_\_\_  
 DATE PAID \_\_\_\_\_  
 ACCOUNT NUMBER 928.00 - 6,100.00

*Consulting/COSS/Rate Case*

**Clark Energy Cooperative, Inc.**  
**Case No. 2020-00104**  
**Commission Staff's Data Requests**

19. Provide all costs and benefits Clark Energy has sustained during the COVID-19 state of emergency.

**Response:**

Clark Energy continues to monitor the circumstances surrounding the COVID-19 pandemic and related state of emergency. In addition to the items listed previously in this response, Clark Energy cancelled its annual meeting which resulted in additional cost savings. The cost of the 2019 annual meeting was \$21,568, which is a fair estimation of how much was saved in 2020.