

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**CLARK ENERGY COOPERATIVE INC.'S
RESPONSE TO ATTORNEY GENERAL'S DATA REQUESTS**

Filed: June 22, 2020

Clark Energy Cooperative, Inc.
Case No. 2020-00104
Attorney General's Data Requests

1. Reference the Brewer testimony at pp. 5-6, wherein he describes Clark Energy Cooperative Inc. ("Clark")'s AMI project. State whether the project has resulted in stranded costs from the prior metering system and/or related infrastructure that were retired. If so, provide the amount, and explain whether the Company intends to collect such costs in the current docket.
 - a. Describe all operational savings associated with the AMI program that have resulted in reduced expenses.
 - b. Provide the amount of meter reading expense savings that have occurred under the AMI program.
 - c. Explain whether Clark still retains meter readers. If so:
 - (i) provide a justification for doing so;
 - (ii) explain whether the meter readers are employees of Clark or contractors. If employees, provide the salary increments and benefits provided to them since the date the AMI system was completed.

Response:

Clark Energy's AMI project did not result in stranded cost from the prior outdated and no longer supported project. This is due to the retired legacy infrastructure being retained to maintain the remaining legacy equipment. Meters are still at this time being changed out due to attrition of the legacy AMR devices.

- a. Purely monetarily quantifiable savings are difficult to assign to the AMI system being that this system was an upgrade and natural procession from the original AMR system first installed in 2000-2001. Many savings were already being utilized such as no meter reading personnel. Some additional benefits of the AMI system include, automated outage reporting, distribution automation, and voltage data. This topic is discussed in more detail in Case No. 2016-00220, which was the CPCN approval for the AMI system. Many of the benefits are listed throughout Case No. 2016-00220 and specifically in Exhibit 4 of the Application.

- b. As mentioned in item (a) above, Clark Energy has not had meter readers since the original AMR project in the early 2000's. The estimated savings as listed in Case No. 2016-00220 from the years 2000 through 2015 based on the original AMR program was four million dollars.
- c. Clark Energy does not retain meter readers.

Clark Energy Cooperative, Inc.
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Attorney General's Data Requests

2. Provide Clark's current fees for connections, disconnections, and reconnections, with references to where they can be found in Clark's tariff.

Response:

Field collection fee: \$ 30.00
Reconnection fee: \$ 40.00
\$ 65.00 After hours reconnect.
Service connection: \$ 25.00 Occurring more frequently than once per 12-months.

The fees can be found in Clark Energy's Rules and Regulation, items 26, 27 and 11.

Clark Energy Cooperative, Inc.
Case No. 2020-00104
Attorney General's Data Requests

3. Explain whether Clark's AMI system allows for remote connects and disconnects.

Response:

Yes, Clark Energy's AMI system allows for remote connects and disconnects. The system has allowed Clark Energy to implement a Prepaid Tariff Program, which was approved by the Commission in Case No. 2019-00011, to members in Clark Energy's entire service area.

Clark Energy Cooperative, Inc.
Case No. 2020-00104
Attorney General's Data Requests

4. Explain whether Clark has incurred or will incur any additional costs to allow the AMI system to communicate with other distribution equipment, including but not limited to breakers, reclosers, regulators, capacitors, distributed generation resources, load tap changers, smart inverters, fault circuit indications, and other communications capable devices. If so, provide the amounts so incurred, or cost projections.

Response:

Clark has not incurred any additional cost to allow the AMI system to communicate with any distribution equipment. Clark has budgeted \$90,000 for 2020 to implement distribution automation on select equipment. This budgeted project does not include any monies for AMI infrastructure. All project cost is for individual AMI devices for each piece of equipment and associated software licensing.

Clark Energy Cooperative, Inc.
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5. State whether Clark has a load control or demand response (DR) program. If so:
 - a. Explain the program(s) in detail; and
 - b. Explain whether Clark provides data regarding DR results to EKPC.

Response:

- a. Please see attached.
- b. Yes, Clark Energy provides data to EKPC.

Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
4th Revision Sheet No. 119
Cancelling P.S.C. No. 2
3rd Revision Sheet No. 119

DSM

Touchstone Energy Home

Purpose

In an effort to improve new residential home energy performance, Clark Energy Cooperative has designed the Touchstone Energy Home Program. This program provides guidance during the building process to guarantee a home that is ≥ 25 -30% more efficient than the Kentucky standard built home. The standard built new home in rural Kentucky typically receives a 105 on the Home Energy Rating System ("HERS") Index.

Availability

This program is available to residential members served by Clark Energy Cooperative.

Eligibility

To qualify as a Touchstone Energy Home under Clark Energy Cooperative's program, the participating single-family home must be located in the service territory of Clark Energy Cooperative and must meet the program guidelines following one of the two available paths of approval. Multi-family dwellings pre-approved by East Kentucky Power Cooperative, Inc. may be eligible.


Prescriptive Path:

- Home must meet each efficiency value as prescribed by Clark Energy Cooperative.
- Home must receive pre-drywall inspection and complete Clark Energy Cooperative's pre-drywall checklist (contact the Energy Advisor at Clark Energy Cooperative for a copy of the checklist).
- Home must receive a final inspection, pass a whole house air leakage test and duct leakage test.
- Primary source of heat must be an Air Source Heat Pump \geq current ENERGY STAR[®] specification for Seasonal Energy Efficiency Ratio "SEER" and Heating Season Performance Factor "HSPF" or Geothermal.
- Water Heater must be an electric storage tank water heater that is \geq current Energy and Water conservation standards established by the Federal Department of Energy "DOE".


DATE OF ISSUE: January 30, 2019

DATE EFFECTIVE: March 2, 2019

ISSUED BY:


President & CEO

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION
IN CASE NO. 2019-00060 DATED: NOVEMBER 26, 2019

KENTUCKY PUBLIC SERVICE COMMISSION
Gwen R. Pinson Executive Director
 EFFECTIVE 3/2/2019
PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
4th Revision Sheet No. 120
Cancelling P.S.C. No. 2
3rd Revision Sheet No. 120

DSM - Touchstone Energy Home (continued)

Performance Path:

- Home must receive a HERS Index score of ≤ 75 (At least 30% more efficient than the KY standard built home).
- Home must receive pre-drywall inspection and complete Clark Energy Cooperative's pre-drywall checklist. (contact the Energy Advisor at Clark Energy Cooperative for a copy of the checklist)
- Home must receive a final inspection, pass a whole house air leakage test, and duct leakage test.
- Primary source of heat must be an Air Source Heat Pump \geq current Energy and Water conservation standard established by the Federal DOE or Geothermal.
- Home must pass current energy code requirements established in the KY Residential Code.
- Water Heater must be an electric storage tank water heater that is \geq current Energy and Water conservation standard established by the Federal DOE.

Incentive

Clark Energy Cooperative will provide an incentive of \$750 to residential members that build their new home to meet the requirements of either the Prescriptive or Performance Paths as listed above.

Term

The program is an ongoing program.

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ISSUED BY:

Robert C. Brewster
President & CEO

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KENTUCKY PUBLIC SERVICE COMMISSION
Gwen R. Pinson Executive Director
<i>Gwen R. Pinson</i> EFFECTIVE 3/2/2019
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Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
4th Revised Sheet No. 121
Cancelling P.S.C. No. 2
3rd Revised Sheet No. 121

DSM

ENERGY STAR® Manufactured Home Program

Purpose

Clark Energy Cooperative's ENERGY STAR® Manufactured Home Program ("ESMH") is designed to ensure that members of Clark Energy Cooperative purchase an energy efficient manufactured home. Clark Energy Cooperative will accomplish this by providing the purchaser of a manufactured home with an incentive to purchase and install a new ENERGY STAR® certified manufactured home.

Availability

This program is available to residential members served by Clark Energy Cooperative.

Eligibility

To be eligible for this ESMH incentive, new manufactured homes must meet the following criteria:

- United States Environmental Protection Agency ("EPA") and Systems Building Research Alliance ("SBRA") guidelines as an ENERGY STAR® Manufactured Home.
- Primary source of heat must be a heat pump.
- Home must be all electric.
- Home must be installed by the member on lines served by Clark Energy Cooperative.
- Participants in the ENERGY STAR Manufactured Home Program are not eligible for participation in the Heat Pump Retrofit Program.

Payments

After new home installation and after receiving certification as an ENERGY STAR® manufactured home, Clark Energy Cooperative will tender a \$1,150 incentive payment to their member. The incentive is intended to help cover the cost of upgrading the home from the standard United States Department of Housing and Urban Development (HUD) construction requirements to the SBRA and EPA ENERGY STAR® manufactured home construction requirements.

Term

This program is an ongoing program.

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ISSUED BY: *Robert C. Brown*
President & CEO

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KENTUCKY PUBLIC SERVICE COMMISSION
Gwen R. Pinson Executive Director
<i>Gwen R. Pinson</i> EFFECTIVE 3/2/2019
PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
5th Revision Sheet No. 129
Cancelling P.S.C. Sheet No. 2
4th Revised Sheet No. 129

DSM

Direct Load Control Program – Residential

Purpose

The Direct Load Control Program will encourage the reduction in growth of peak demand, enabling Clark Energy Cooperative to utilize its system more efficiently, manage market purchases, and defer the construction of new generation.

Availability

The Direct Load Control Program is available to residential members in the service territories of Clark Energy Cooperative and will include the control of existing water heaters, existing and new air conditioners and heat pumps.

Availability may be denied where, in the judgment of Clark Energy Cooperative, installation of the load control equipment is impractical.

Eligibility

To qualify for this program, the *new* participant must be located in the service territory of Clark Energy Cooperative and have:

- Central air conditioning or heat pump units with single stage compressors.

The above appliances may be electrically cycled or interrupted in accordance with the rules of this Tariff.


The participant may either own or rent the residence where the qualifying appliances are located. The residence may be either a single-family structure or a multi-family apartment facility.

The participant is responsible for obtaining the permission of the owner of the rented residence to participate in the load control program. Clark Energy Cooperative may require that a rental property agreement be executed between Clark Energy Cooperative and the owner of the rented residence.

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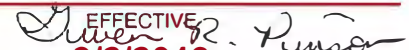
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President & CEO

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**KENTUCKY
PUBLIC SERVICE COMMISSION**

Gwen R. Pinson
Executive Director


EFFECTIVE
3/2/2019

PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
5th Revision Sheet No. 130
Cancelling P.S.C. Sheet No. 2
4th Revised Sheet No. 130

DSM - Direct Load Control Program – Residential (continued)

Program Incentives

Clark Energy Cooperative will provide an incentive to the participants in this program for the following appliances:

Water Heaters: Clark Energy Cooperative will provide the existing participating residential member \$10.00 per water heater annually or provide the incentive via other payment means including, but not limited to, a check. The existing participant will receive this credit regardless of whether the water heater is actually controlled.

Air Conditioners and Heat Pumps: Clark Energy Cooperative will provide an incentive to the participants in this program. The participant may select one of three alternatives. The participant will receive one of these incentives regardless of whether the air conditioner or heat pump is actually controlled during any program month.

Alternative One: For each direct load control switch Clark Energy Cooperative will provide the participating residential member \$20.00 bill credit annually or provide the incentive via other payment means including, but not limited to, a check per air conditioner or heat pump.

Alternative Two: When technically feasible, Clark Energy Cooperative may provide and install at no cost one or more Wi-Fi enabled thermostats as needed for control purposes or Clark Energy Cooperative may provide a Wi-Fi enabled thermostat and a rebate up to \$100 to offset the member's cost to have the thermostat installed by the member's own heating and air-conditioning contractor. The member must sign-up each Clark Energy Cooperative provided thermostat within 60 days or return it to Clark Energy Cooperative or be invoiced by Clark Energy Cooperative for the cost of the thermostat. Wi-Fi enabled means any thermostat utilizing the Wi-Fi communication protocol or similar local networking communication protocols. The member must have a fixed location, reliable internet for communication. Clark Energy Cooperative will reimburse the participating member \$20 per qualifying Wi-Fi enabled thermostat annually.


Alternative Three: Clark Energy Cooperative will provide the participating residential member \$20.00 bill credit per qualifying Wi-Fi enable thermostat provided by the retail member that controls an air conditioner or heat pump annually or provide the incentive via other payment means including, but not limited to, a check. Clark Energy Cooperative will provide a rebate up to \$100 to offset the member's cost to have the thermostat installed by the member's own heating and air-conditioning contractor. The member must have a fixed location, reliable internet for communication.

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KENTUCKY PUBLIC SERVICE COMMISSION
Gwen R. Pinson Executive Director
 EFFECTIVE 3/2/2019
PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
5th Revision Sheet No. 131
Cancelling P.S.C. No.2
4th Revision Sheet No. 131

DSM - Direct Load Control Program – Residential (continued)

When the qualifying appliances are located in rental residences, program incentives will be paid to the participant, regardless of whether the participant owns or rents the residence where the qualifying appliances are located. Nothing contained in this Tariff will prohibit a further disposition of the program incentive between the participant and the owner of a rented residence.

Program Special Incentives

Clark Energy Cooperative will provide a special incentive up to \$25.00 for new participants that install a load control switch on qualifying air conditioners and heat pumps, utility supplied Wi-Fi enabled thermostat or retail member supplied Wi-Fi enabled thermostat. This one-time incentive will be in the form of a bill credit on the electric bill following the switch installation or provided via other payment means including, but not limited to, a check.

Time Periods for Direct Load Control Program

Water Heaters: Existing load control switches may be electrically interrupted for a maximum time period of six (6) hours per event during the May through September months indicated below and for a maximum time period of four (4) hours per event during the October through April months indicated below.

EKPC will cycle the water heaters only during the hours listed below.

<u>Months</u>	<u>Hours Applicable for Demand Billing – EPT</u>
October through April	6:00 a.m. to 12:00 noon 4:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

Air Conditioners and Heat Pumps: A load control device (switch or Wi-Fi enabled thermostat) will be placed on each central air conditioning unit or heat pump that will allow the operating characteristics of the unit to be modified to reduce demand on the system. Communication to the load control device will be accomplished via AMR, AMI, Wi-Fi or similar communication technologies.

EKPC will control the air conditioning units and heat pumps only during its summer on-peak billing hours listed below and up to (4) four hours per event.

<u>Months</u>	<u>Hours Applicable for Demand Billing – EPT</u>
May through September	10:00 a.m. to 10:00 p.m.

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Gwen R. Pinson
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Gwen R. Pinson

PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
5th Revision Sheet No. 132
Cancelling P.S.C. No. 2
4th Revision Sheet No. 132

DSM - Direct Load Control Program – Residential (continued)

Terms and Conditions

1. Prior to the installation of load control devices, Clark Energy Cooperative may inspect the participant's electrical equipment to ensure good repair and working condition, but Clark Energy Cooperative shall not be responsible for the repair or maintenance of the electrical equipment.
2. EKPC, on behalf of Clark Energy Cooperative, will install, in some cases, own, and maintain the load management devices controlling the participant's air conditioner or heat pump, for Alternatives One and Two as noted in this tariff. The participant must allow Clark Energy Cooperative, or their representative, reasonable access to install, maintain, inspect, test and remove load control devices. Inability of Clark Energy Cooperative to gain access to the load management device to perform any of the above activities for a period exceeding thirty (30) days may, at Clark Energy Cooperative's option, result in discontinuance of credits under this tariff until such time as Clark Energy Cooperative is able to gain the required access.
3. Participants may join the program at any time during the year. Participants with air conditioning or heat pump units who join during the months of June through September can select an incentive alternative as described in this Tariff. If the incentive is selected, incentives will be provided annually.
4. If a participant decides to withdraw from the program or change incentive alternatives, Clark Energy Cooperative will endeavor to implement the change as soon as possible.
5. If a participant decides to withdraw from the program, the participant may not apply to rejoin the program for a period of six (6) months. Returning participants for air conditioning and heat pump units will be required to initially select the bill credit alternative, but may change alternatives later as described in this Tariff.

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PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
5th Revision Sheet No. 133
Cancelling P.S.C. No. 2
4th Revision Sheet No. 133

DSM

Direct Load Control Program – Commercial

Purpose

The Direct Load Control Program will encourage the reduction in growth of peak demand, enabling Clark Energy Cooperative to utilize its system more efficiently, manage market purchases, and defer the construction of new generation.

Availability

The Direct Load Control Program is available to commercial members in the service territories of Clark Energy Cooperative and will include the control of air conditioners and existing water heaters.

Availability may be denied where, in the judgment of Clark Energy Cooperative, installation of the load control equipment is impractical.

Eligibility

To qualify for this Program, the new participant must be located in the service territory of Clark Energy Cooperative and have a central air conditioning or heat pump units. The appliance may be electrically cycled or interrupted in accordance with the rules of this Tariff.

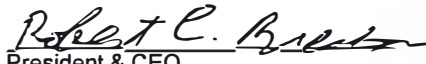
The participant is responsible for obtaining the permission of the commercial property owner to participate in the load control program. Clark Energy Cooperative may require that a rental property agreement be executed between Clark Energy Cooperative and the owner of the rented commercial property.

Program Incentives

Clark Energy Cooperative will provide an incentive to the participants in this program for the following appliances:

Air Conditioners and Heat Pumps: The incentive will be based on the tonnage of the air conditioning unit. Units up to and including five (5) tons will receive \$20.00 per unit. Units over five (5) tons will receive an additional annual credit of \$4.00 per ton per unit. Clark Energy Cooperative will reimburse the participating commercial-member at the applicable incentive credit or provide the incentive via other payment means including, but not limited to, a check. The participant will receive the incentive regardless of whether the air conditioner is actually controlled during any program month.

Water Heaters: Clark Energy Cooperative will provide the existing participating commercial-member \$10.00 per water heater annually or provide the incentive via other payment means including, but not limited to, a check. The participant will receive this credit regardless of whether the water heater is actually controlled.

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**KENTUCKY
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Gwen R. Pinson
Executive Director


EFFECTIVE
3/2/2019
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Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
5th Revision Sheet No. 134
Cancelling P.S.C. No. 2
4th Revision Sheet No. 134

DSM –Direct Load Control Program – Commercial (continued)

Time Period for Direct Load Control Program

Air Conditioners and Heat Pumps: A load control device will be placed on each central air conditioning unit or heat pump that will allow the operating characteristics of the unit to be modified to reduce demand on the system. The member must have internet for communication. Utility of member supplied Wi-Fi enabled thermostat programs may also be available. Communication to the load control device or thermostat will be accomplished via AMR, AMI, Wi-Fi or similar communication technologies.

EKPC will control the air conditioning units only during its summer on-peak billing hours listed below and up to four (4) hours per event:

<u>Months</u>	<u>Hours Applicable for Demand Billing - EPT</u>
May through September	10:00 a.m. to 10:00 p.m.

Water Heaters: Existing load control switches may be electrically interrupted for a maximum time period of six (6) hours per event during the May through September months indicated below and for a maximum time period of four (4) hours per event during the October through April months indicated below.

EKPC will cycle the water heaters only during the hours listed below.

<u>Months</u>	<u>Hours Applicable for Demand Billing - EPT</u>
October through April	6:00 a.m. to 12:00 noon
	4:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

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President & CEO

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Executive Director

Gwen R. Pinson
**EFFECTIVE
3/2/2019**

PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
5th Revision Sheet No. 135
Cancelling P.S.C. No. 2
4th Revision Sheet No. 135

DSM –Direct Load Control Program – Commercial (continued)

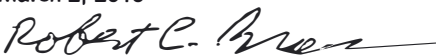
Terms and Conditions

1. Prior to the installation of load control devices, Clark Energy Cooperative may inspect the participant's electrical equipment to ensure good repair and working condition, but Clark Energy Cooperative shall not be responsible for the repair or maintenance of the electrical equipment.
2. EKPC, on behalf of Clark Energy Cooperative, will install, in some cases, own, and maintain the load management devices controlling the participant's air conditioner or heat pump. The participant must allow Clark Energy Cooperative, or their representative, reasonable access to install, maintain, inspect, test and remove load control devices. Inability of Clark Energy Cooperative to gain access to the load management device to perform any of the above activities for a period exceeding thirty (30) days may, at Clark Energy Cooperative's option, result in discontinuance of credits under this tariff until such time as Clark Energy Cooperative is able to gain the required access.
3. Participants may join the program at any time during the year. Participants with air conditioning or heat pumps who join during the months of June through September will receive the bill credits annually.
4. If a participant decides to withdraw from the program, Clark Energy Cooperative will endeavor to implement the withdrawal as soon as possible. If a participant decides to withdraw from the program, the participant may not apply to rejoin the program for a period of six (6) months.

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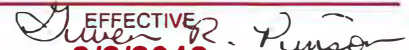
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Executive Director


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PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
3rd Revised Sheet No. 141
Cancelling P.S.C. No. 2
2nd Revised Sheet No. 141

DSM

Button-Up Weatherization Program

Purpose

The Button-Up Weatherization Program offers an incentive for reducing the heat loss of a home. The retail member may qualify for this incentive by improving attic insulation and reducing the air leakage of their home.

Availability

This program is available in all service territories served by Clark Energy Cooperative.

Eligibility

This program is targeted at older single-family, multi-family or manufactured dwellings. Eligibility requirements are:

- Home must be 2-years old or older to qualify for the incentive.
- Primary source of heat must be electricity.

The Button Up incentive will promote the reduction of energy usage through air sealing on the part of retail members. Typical air sealing could include caulking, improved weather stripping, sealing attic accesses, etc. To receive this incentive either an EKPC approved contractor or Clark Energy Cooperative representative must perform a "pre" and "post" blower door test to measure actual Btuh reduced.

The attic insulation portion of the Button Up incentive will promote the reduction of energy usage on the part of the retail members. Heat loss calculation of Btuh reduced will be made by using either the Manual J 8th Edition or through other methods approved by EKPC. Heat loss calculations in Btuh are based on the winter design temperature. In order to receive an incentive for attic insulation, an air seal must be completed.

Incentives

The Button Up incentive will pay a total payment of \$40 per thousand Btuh reduced to the retail member up to the maximum rebate incentive of \$750.

Term

The program is an ongoing program.

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Clark Energy Cooperative, Inc.

For All Counties Served
P.S.C. No. 2
3rd Revision Sheet No. 142
Cancelling P.S.C. No. 2
2nd Revision Sheet No. 142

DSM

Heat Pump Retrofit Program

Purpose

The Heat Pump Retrofit Program provides incentives for residential members to replace their existing resistance heat source with a heat pump.

Availability

This program is available to residential members served by Clark Energy Cooperative.

Eligibility

This program is targeted to members who currently heat their home with a resistance heat source; this program is targeted to site built homes, manufactured homes, and multi-family dwellings. Eligibility requirements are:

- Incentive only applies when homeowner's primary source of heat is an electric resistance heat furnace, ceiling cable heat, baseboard heat, electric thermal storage.
- Existing heat source must be at least 2 years old.
- New manufactured homes are eligible for the incentive.
- Two (2) maximum incentive payments per location, per lifetime for centrally ducted systems.
- Ducted and Ductless mini-splits applying for the incentive will be incentivized at a rate of \$250 per indoor head unit up to a maximum of three head units per location, per lifetime.
- Participants in the Heat Pump Retrofit Program are not eligible for participation in the ENERGY STAR® Manufactured Home Program.

Incentives

Homeowners replacing their existing resistance heat source with a heat pump will qualify for the following incentive based on the equipment type:

Equipment Type

Rebate

Centrally Ducted Systems:

Current Energy Conservation Standard established by the Federal Department of Energy "DOE"

\$500

Current ENERGY STAR® level equipment or greater

\$750

Mini Split Systems:

Ducted or Ductless Mini-Splits ENERGY STAR® level equipment or greater

\$250

Term

The program is an ongoing program.

DATE OF ISSUE: January 30, 2019

DATE EFFECTIVE: March 2, 2019

ISSUED BY:

Robert C. Brown
President & CEO

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION
IN CASE NO. 2019-00060 DATED: NOVEMBER 26, 2019

KENTUCKY PUBLIC SERVICE COMMISSION	
Gwen R. Pinson Executive Director	
<i>Gwen R. Pinson</i> EFFECTIVE 3/2/2019	
PURSUANT TO 807 KAR 5:011 SECTION 9 (1)	

Clark Energy Cooperative, Inc.
Case No. 2020-00104
Attorney General's Data Requests

6. Provide any cost savings resulting from the new AMI system for:
- a. Reduced line loss;
 - b. Reduced outage management expense;
 - c. Reduced energy theft;
 - d. Remote connects/disconnects; and
 - e. Avoidable meter re-reads

Response:

- a. No calculated savings.
- b. Please see the response to Item 1a. above.
- c. The AMI system provides alerts of suspected meter tampering which reduces the amount of theft, but this is difficult to calculate a dollar value for.
- d. This is a new functionality of the AMI system and was utilized in the test year resulting in saving 4,200 individual truck rolls for a connect or disconnect service. This resulted in a savings of approximately \$210,000 annually.
- e. See the response to Item 1a. above.

Clark Energy Cooperative, Inc.
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7. Explain how the AMI system will work with the Company's existing SCADA, outage management, and customer information systems. If any of those systems will require upgrades/replacement to meet compatibility with the new meter system, explain in full detail and provide cost estimates.

Response:

The AMI system is planned to eventually be used as communication routes for distribution equipment to communicate to Clark's existing SCADA, however, this functionality does not yet exist. A software interface does currently exist and is utilized daily between the AMI system and outage management as well as customer information systems. This interface allows for automated outage reporting from the meter directly to Clark's outage management system. This interface not only shows that the meter has lost power but also when power has been restored. The interface between the AMI system and the customer information system allows for automated connect/disconnect functionality such as prepaid metering as well as on demand reads and enhanced usage information that is available to consumers via online services. These interfaces were projected to cost \$26,235 in the Case 2016-00220 when a CPCN for the current AMI system was requested, however, due to vendor software enhancements and updates, no additional cost was incurred.

Clark Energy Cooperative, Inc.
Case No. 2020-00104
Attorney General's Data Requests

8. Identify the DSM programs that Clark either currently has in place, or that it plans on having in place, that can utilize Clark's AMI technology.

Response:

The load control/demand response programs referenced in the response to Item 5(a) above use AMI technology.

Clark Energy Cooperative, Inc.
Case No. 2020-00104
Attorney General's Data Requests

9. State whether Clark makes residential TOU rates available to its customers. If so, explain whether participation in that rate increased after the Company deployed its AMI program.

Response:

Clark offers Schedule D: Time-of-Use Marketing Service to its residential members. This rate is not a general TOU rate offering but instead is offered to Clark's residential members for separately-metered off-peak requirements for Electric Thermal Storage ("ETS") units. As such, participation in this program is unrelated to, and was not affected by, the deployment of AMI.

Clark Energy Cooperative, Inc.
Case No. 2020-00104
Attorney General's Data Requests

10. Provide the Company's uncollectible expense for the test year and the two preceding calendar years.

Response:

The uncollectible expense for 2019 was \$0. The uncollectible expense for 2018 was \$9,000 and for 2017 it was \$8,000. Bad debts are satisfied before a customer receives a refund of capital credits. The credits to the provision for uncollectible accounts has kept our expense accrual to a minimum since Clark Energy started refunding capital credits in 2012.

Clark Energy Cooperative, Inc.
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11. Provide an explanation of how the Covid-19 crisis has affected the Company.
- a. State whether Clark has applied to obtain a Paycheck Protection Program loan, and if so, whether the application was granted. Provide all details regarding the loan.

Response:

The COVID-19 virus has affected Clark Energy in many different ways, both in the field operations and within the office. This is an ongoing issue and is ever-changing so we cannot yet provide a complete response as to how the ongoing state of emergency will ultimately impact our business and operations. Below is a list of some of the effects the COVID-19 virus has had upon our operations and this list could change:

- The office lobbies have all been closed to the public since mid-March;
- Outside personnel have been working from different locations and reporting on staggered shifts since early March;
- All of Clark Energy's personnel have had limited in-person contact with the members. When a face-to-face meeting has had to occur, Clark Energy personnel are practicing social distancing and wearing face coverings;
- Clark Energy has had limited personnel in the office from mid-March to mid-May. Currently, most of the personnel are back in the office but there are some who are still working in the field and only come in on a limited basis;
- Clark Energy has temporarily suspended any kind of business travel related to training;
- Any internal meetings are being conducted in smaller groups and social distancing guidelines are being followed, or the meetings are held via video conference;
- Clark Energy had to cancel its Annual Membership Meeting for 2020;
- Clark Energy has been unable to charge penalties on overdue accounts since the Commission's Order in March 2020. Clark Energy has lost approximately \$110,000 in late fee revenues. Clark Energy has also been unable to disconnect accounts for non-payment since the March 2020 Order. Clark Energy has lost approximately \$24,000 in collection charges; and
- Clark Energy has seen the past due amounts on accounts increase significantly since the beginning of the COVID-19 pandemic. Clark Energy's overdue balances at the end of March 2020 were \$232,266 or 14%. Clark Energy's

overdue balance at the end of May 2020 was \$263,431 or 22%. Clark Energy has forty-six prepaid accounts with a debit balance totaling \$9,600.

- In addition, demand has fallen when compared to test year's sales. Due to the fact that a significant portion of Clark Energy's fixed costs are recovered through its energy charge, the ability to recover fixed costs is diminished, thereby eroding or eliminating the company's margin for the current year.
- a. Clark Energy did not apply for a Paycheck Protection Plan loan. In the beginning, Clark Energy was informed that cooperatives did not qualify for the Paycheck Protection Plan loan. Clark Energy was later informed that cooperatives were eligible but the certification required that Clark Energy state that the loan was necessary for the ongoing operations of the business.

Clark Energy Cooperative, Inc.
Case No. 2020-00104
Attorney General's Data Requests

12. Reference the Brewer testimony at p. 6, regarding employee count. Identify the departments that experienced decreased headcount, and the reasons therefore.

Response:

The Cooperative's department structure has gone through significant changes since the last rate case in 2009, so it is hard to make an apples-to-apples comparison from the 2009 organization to the 2020 organization. However, generally speaking, we are currently operating with fewer employees in our office area and in our operations area than we were in 2009. This reduction in employee numbers is attributed to increased efficiencies due to technology improvements, increased use of cross-training employees and the fact that the members have more ability to manage their accounts on-line than they did in 2009. Anytime an employee leaves service of the cooperative, we do an evaluation to see if that position should be replaced or if the responsibilities can be shifted to other personnel or an outside contractor.

Clark Energy Cooperative, Inc.
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Attorney General's Data Requests

13. Provide the Company's TIER levels for each year 2010 to as recent as possible in 2020.

Response:

We are providing the requested TIER levels and also providing OTIER calculations to show the effect of declining margins and increased operating costs. RUS requires an OTIER level of 1.10.

Year	TIER	OTIER
2010	2.30	1.65
2011	2.88	1.62
2012	2.94	1.55
2013	3.91	1.97
2014	4.24	2.36
2015	2.71	0.97
2016	3.74	1.61
2017	2.51	1.70
2018	3.74	2.43
2019	2.43	1.54
2020	1.42	1.34 (As of April 30, 2020)

Clark Energy Cooperative, Inc.
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14. Provide the Company's current DSC, and the DSC level it is required to maintain by any applicable covenant.

Response:

Clark Energy's DSC level, as of April 30, 2020, is 3.29. RUS requires a DSC of 1.25.

Clark Energy Cooperative, Inc.
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Attorney General's Data Requests

15. Has Clark 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 a study has not been performed.

Response:

Please see the response to Commission Staff's Request No. 12.

Clark Energy Cooperative, Inc.
Case No. 2020-00104
Attorney General's Data Requests

16. Does Clark employ the relatives of:
- a. Any Clark Board Member;
 - b. Any Clark Officer;
 - c. Any Clark Consultant; and/or
 - d. Any other Clark Employee?

If so, provide specific details.

Response:

- a-d. Clark Energy does not employ any relatives of any of the above.

Clark Energy Cooperative, Inc.
Case No. 2020-00104
Attorney General's Data Requests

17. Reference the application generally. Provide copies of all studies that Clark 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. Provide detailed information for each specified group.

Response:

Clark did not conduct a formal analysis of the impact its proposed rate design may have on the elderly, low income, fixed income and home bound segments of its ratepayer base because Clark does not categorize its members according to the specified classifications. 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.

Clark believes that the proposed rate design reflects an equitable apportionment of the fixed costs necessarily incurred to serve each customer; moreover, Clark asserts that all customers (including the selected populations identified by the Attorney General) will benefit from a rate design rooted in cost-of-service principles that minimizes monthly bill volatility and concurrently allows the Cooperative to operate under a more predictable and accurate budget.

Of course, Clark recognizes that any increase in residential rates is likely to affect low- and fixed-income customers somewhat more significantly than those customers of average or above-average means, primarily because customers in the former categories must spend a proportionally-greater amount of their incomes on power expenses compared to customers in the latter categories. In light of this fact, Clark remains committed to ensuring all its customers have access to affordable electric service, and often works with customers (through LIHEAP, primarily) whose circumstances present unique needs. However, based on reasonable consideration of available information and data, Clark believes the rate design it has proposed in this case does not exacerbate the impact of a residential rate increase on low- and fixed-income customers. To the contrary, Clark believes that an increase to its fixed customer charge, rather than a significant increase in its volumetric energy charge, is generally more advantageous to its low- and fixed-income customers at this time.

Support for Clark's conclusion in this regard is relatively straightforward. The cooperative's customers receiving assistance generally consume more energy than other residential customers. Because a rate design that more heavily favors recovery of costs through volumetric charges (rather than fixed charges) necessarily means that higher energy users bear a proportionally-greater burden of any increase than lower energy users, Clark's low-income customers would generally experience relatively higher monthly bills than if Clark's proposed rates were approved as filed. Moreover, it warrants repeating that monthly bill volatility increases the more a customer's bill is based on consumption, which can be particularly difficult for low- and fixed-income customers.

The primary contention often raised in opposition to a proposed residential rate adjustment allocated substantially to an increased fixed customer charge is that it diminishes a low- or fixed income customer's ability to minimize costs through conservation and energy efficiency. Initially, it is important to note the inherent problem with this argument from the perspective of the cooperative's ongoing financial health—essentially, it presumes at the outset that customers will change their consumption patterns following a rate increase, which means the new rates (designed and dependent on a certain amount of expected consumption) will not yield revenues sufficient to maintain adequate margins. This predicament aside, the argument also presupposes that low- and fixed-income customers are readily capable of avoiding costs by using less energy, which in many cases they are not. Furthermore, because the great majority of all residential customer bills consist of charges based on usage (even after increasing the customer charge to move closer to cost-of service), there continues to be opportunity to reduce costs through conservation and similar measures if the customer has the desire and means to implement the same. For these reasons, low and fixed-income customers in Clark's service territory would generally not benefit from a rate design that continues to rely disproportionately upon volumetric charges for the recovery of both fixed and variable costs.

When designing its rates, Clark's overarching goal was to institute fair, just and reasonable rates considering both the constituencies of the discreet classes of the cooperative and the membership as a whole. Clark believes the rates it has proposed satisfy these objectives and requests their approval.

Clark did pull a sample of customers that received a LIHEAP voucher to analyze the impact of the rate design on the low income and the elderly. Clark also pulled all prepaid customer accounts. The vast majority of prepaid customers opt in to prepaid because they cannot pass a credit check and cannot pay the deposit. The result of this analysis is included in the attached spreadsheet.

Clark Energy

Prepaid accounts 142

Low kWh	403
Average kWh	1,295
Median kWh	1,237
High kWh	2,822
Residential customer avg	1,103

61% of prepaid customer's usage is above the residential average

LIHEAP accounts 916

Low kWh	403
Average kWh	1,403
Median kWh	1,369
High kWh	4,089
Residential customer avg	1,103

66.3% of LIHEAP customer's usage is above the residential average

Clark Energy Prepaid Participants

Witnesses: Holly Eades and John Wolfram

	Customer #	12 month Average
1	272962	403
2	272114	470
3	273336	474
4	273270	486
5	272867	497
6	271190	501
7	273424	522
8	273518	541
9	273236	557
10	250353	584
11	273804	589
12	269642	610
13	273262	627
14	273977	634
15	273762	650
16	273199	651
17	273913	665
18	272851	671
19	240356	699
20	211617	704
21	273823	712
22	273173	735
23	272632	752
24	258689	756
25	270902	766
26	273904	795
27	240375	805
28	273447	810
29	256500	829
30	265821	831
31	273691	848
32	272127	865
33	273833	869
34	273860	872
35	260271	875
36	271276	893
37	273324	898
38	272883	902
39	248883	912
40	203153	920
41	273791	929
42	221241	953
43	252907	954
44	273063	964
45	273435	977
46	272847	992
47	273304	994
48	264544	1004

Prepaid participants

Witnesses: Holly Eades and John Wolfram

49	273094	1011
50	242826	1021
51	273875	1022
52	254204	1033
53	273599	1033
54	273065	1034
55	258140	1061
56	273843	1064
57	270834	1104
58	273204	1108
59	249049	1109
60	273046	1113
61	272849	1118
62	273314	1118
63	243401	1125
64	271582	1130
65	273206	1146
66	251966	1202
67	240522	1210
68	273905	1218
69	243572	1231
70	272389	1231
71	240458	1237
72	272946	1256
73	273186	1258
74	15377	1287
75	206605	1297
76	273988	1301
77	273841	1311
78	273985	1313
79	250439	1314
80	205786	1351
81	273358	1366
82	273139	1367
83	211471	1370
84	266050	1378
85	270325	1400
86	221140	1411
87	272888	1420
88	273623	1427
89	270932	1448
90	273637	1451
91	273406	1457
92	272982	1458
93	259701	1463
94	273306	1477
95	273346	1506
96	272976	1525
97	273507	1554
98	243478	1556
99	256068	1563
100	244591	1569

Below avg kwh

Median

Witnesses: Holly Eades and John Wolfram

101	266133	1580
102	273222	1584
103	273432	1594
104	273024	1605
105	254082	1614
106	272251	1646
107	269152	1664
108	267549	1675
109	254490	1701
110	273694	1701
111	248627	1726
112	266628	1731
113	272958	1731
114	273756	1749
115	273410	1770
116	273748	1777
117	268221	1778
118	258112	1786
119	102717	1804
120	243934	1804
121	273256	1838
122	269891	1868
123	272914	1894
124	269717	1901
125	272926	1912
126	252534	1925
127	244101	1930
128	246229	1947
129	259193	2003
130	251070	2026
131	240166	2028
132	273464	2029
133	273387	2038
134	247348	2072
135	272943	2109
136	216183	2118
137	252947	2325
138	207228	2564
139	271744	2572
140	262376	2630
141	273960	2776
142	230443	2822
	183,827	

1,295 Average kwh

	Customer	12 months average kWh
1	273109	<u>403</u>
2	271706	<u>405</u>
3	269495	<u>406</u>
4	265528	<u>412</u>
5	31937	<u>418</u>
6	270399	<u>419</u>
7	253246	<u>421</u>
8	206043	<u>421</u>
9	215315	<u>430</u>
10	269074	<u>433</u>
11	206715	<u>442</u>
12	258991	<u>443</u>
13	9743	<u>443</u>
14	272111	<u>444</u>
15	256334	<u>449</u>
16	250065	<u>449</u>
17	245630	<u>454</u>
18	268073	<u>457</u>
19	32280	<u>458</u>
20	201252	<u>459</u>
21	272697	<u>467</u>
22	270555	<u>470</u>
23	201884	<u>485</u>
24	28478	<u>486</u>
25	264652	<u>487</u>
26	254538	<u>488</u>
27	210405	<u>491</u>
28	272867	<u>497</u>
29	250407	<u>500</u>
30	216189	<u>504</u>
31	272620	<u>507</u>
32	265551	<u>508</u>
33	266855	<u>509</u>
34	6110	<u>510</u>
35	268895	<u>510</u>
36	247164	<u>513</u>
37	200683	<u>520</u>
38	100435	<u>522</u>
39	211443	<u>523</u>
40	254866	<u>525</u>
41	266314	<u>528</u>
42	266163	<u>529</u>
43	102649	<u>530</u>
44	251475	<u>533</u>
45	273494	<u>533</u>

Customer	12 months average kWh	
46	214475	<u>533</u>
47	270515	<u>536</u>
48	230317	<u>539</u>
49	265614	<u>540</u>
50	213753	<u>541</u>
51	203824	<u>541</u>
52	256328	<u>544</u>
53	265196	<u>544</u>
54	9901	<u>544</u>
55	250730	<u>548</u>
56	27858	<u>549</u>
57	243410	<u>555</u>
58	270593	<u>563</u>
59	249857	<u>564</u>
60	252829	<u>566</u>
61	207939	<u>568</u>
62	260529	<u>577</u>
63	26497	<u>579</u>
64	272667	<u>584</u>
65	250353	<u>584</u>
66	251120	<u>584</u>
67	272973	<u>586</u>
68	266900	<u>588</u>
69	205400	<u>591</u>
70	262878	<u>592</u>
71	257720	<u>594</u>
72	219295	<u>595</u>
73	247855	<u>597</u>
74	206419	<u>603</u>
75	261341	<u>604</u>
76	266721	<u>607</u>
77	245893	<u>609</u>
78	245398	<u>610</u>
79	202843	<u>612</u>
80	214585	<u>613</u>
81	240510	<u>614</u>
82	7410	<u>615</u>
83	272542	<u>618</u>
84	246348	<u>621</u>
85	265196	<u>623</u>
86	31840	<u>625</u>
87	208319	<u>626</u>
88	264410	<u>631</u>
89	248254	<u>633</u>
90	254124	<u>633</u>

	Customer	12 months average kWh
91	219501	<u>634</u>
92	263156	<u>636</u>
93	201267	<u>640</u>
94	272062	<u>641</u>
95	244536	<u>644</u>
96	271017	<u>645</u>
97	230735	<u>645</u>
98	216220	<u>646</u>
99	273762	<u>650</u>
100	271752	<u>653</u>
101	208111	<u>655</u>
102	100479	<u>656</u>
103	244476	<u>656</u>
104	205822	<u>656</u>
105	240304	<u>662</u>
106	271564	<u>663</u>
107	208305	<u>664</u>
108	244186	<u>666</u>
109	254620	<u>672</u>
110	240228	<u>674</u>
111	24587	<u>678</u>
112	17507	<u>680</u>
113	18373	<u>680</u>
114	28755	<u>687</u>
115	230773	<u>688</u>
116	270450	<u>689</u>
117	269241	<u>691</u>
118	254251	<u>694</u>
119	270916	<u>694</u>
120	245892	<u>697</u>
121	262960	<u>699</u>
122	270114	<u>699</u>
123	240356	<u>699</u>
124	272260	<u>705</u>
125	205864	<u>711</u>
126	257004	<u>714</u>
127	268160	<u>716</u>
128	230094	<u>716</u>
129	215025	<u>721</u>
130	100210	<u>722</u>
131	206069	<u>728</u>
132	266901	<u>728</u>
133	3362	<u>730</u>
134	268455	<u>732</u>
135	205028	<u>733</u>

Customer	12 months average kWh	
136	230811	<u>736</u>
137	218324	<u>737</u>
138	204670	<u>740</u>
139	253973	<u>743</u>
140	266050	<u>744</u>
141	245245	<u>746</u>
142	12505	<u>746</u>
143	202027	<u>747</u>
144	214890	<u>749</u>
145	258965	<u>752</u>
146	243021	<u>752</u>
147	215331	<u>754</u>
148	245631	<u>757</u>
149	201780	<u>758</u>
150	271931	<u>760</u>
151	211895	<u>760</u>
152	273347	<u>761</u>
153	259705	<u>762</u>
154	253248	<u>763</u>
155	200842	<u>764</u>
156	270902	<u>766</u>
157	258396	<u>768</u>
158	217940	<u>771</u>
159	271115	<u>772</u>
160	215626	<u>777</u>
161	213171	<u>780</u>
162	217406	<u>780</u>
163	250679	<u>783</u>
164	209731	<u>786</u>
165	244212	<u>786</u>
166	263224	<u>790</u>
167	13088	<u>794</u>
168	256723	<u>797</u>
169	218380	<u>800</u>
170	270144	<u>802</u>
171	240375	<u>805</u>
172	205676	<u>806</u>
173	2768	<u>806</u>
174	263469	<u>811</u>
175	243554	<u>812</u>
176	27437	<u>815</u>
177	203114	<u>815</u>
178	259158	<u>817</u>
179	203491	<u>818</u>
180	213416	<u>820</u>

Customer	12 months average kWh	
181	13689	<u>823</u>
182	22792	<u>827</u>
183	266068	<u>831</u>
184	246656	<u>834</u>
185	265546	<u>836</u>
186	242336	<u>838</u>
187	8951	<u>841</u>
188	259966	<u>842</u>
189	257490	<u>843</u>
190	219465	<u>843</u>
191	230109	<u>844</u>
192	255604	<u>845</u>
193	273342	<u>845</u>
194	266515	<u>849</u>
195	257131	<u>854</u>
196	272921	<u>858</u>
197	266813	<u>860</u>
198	230375	<u>864</u>
199	3676	<u>866</u>
200	273833	<u>869</u>
201	251811	<u>870</u>
202	32592	<u>872</u>
203	272966	<u>872</u>
204	245660	<u>876</u>
205	28918	<u>877</u>
206	266167	<u>881</u>
207	272960	<u>882</u>
208	29513	<u>887</u>
209	203594	<u>891</u>
210	257950	<u>894</u>
211	253438	<u>895</u>
212	247633	<u>896</u>
213	200358	<u>898</u>
214	240690	<u>902</u>
215	27654	<u>904</u>
216	266311	<u>906</u>
217	25784	<u>906</u>
218	271781	<u>910</u>
219	217901	<u>913</u>
220	258081	<u>919</u>
221	240099	<u>920</u>
222	203153	<u>920</u>
223	270339	<u>923</u>
224	272521	<u>926</u>
225	12570	<u>927</u>

Customer	12 months average kWh	
226	25618	<u>931</u>
227	242331	<u>931</u>
228	268539	<u>936</u>
229	259831	<u>937</u>
230	201167	<u>945</u>
231	241863	<u>945</u>
232	201627	<u>946</u>
233	6471	<u>951</u>
234	252907	<u>954</u>
235	11738	<u>955</u>
236	249330	<u>956</u>
237	6433	<u>956</u>
238	200288	<u>958</u>
239	27424	<u>961</u>
240	200553	<u>962</u>
241	256692	<u>964</u>
242	17194	<u>967</u>
243	214589	<u>967</u>
244	254380	<u>970</u>
245	270250	<u>972</u>
246	208060	<u>973</u>
247	251320	<u>974</u>
248	271150	<u>976</u>
249	33729	<u>976</u>
250	255087	<u>981</u>
251	267531	<u>983</u>
252	246334	<u>983</u>
253	273454	<u>985</u>
254	268761	<u>985</u>
255	212775	<u>986</u>
256	100941	<u>989</u>
257	12394	<u>990</u>
258	259748	<u>991</u>
259	209591	<u>993</u>
260	248395	<u>994</u>
261	211904	<u>995</u>
262	6255	<u>995</u>
263	14515	<u>999</u>
264	218319	<u>1003</u>
265	265019	<u>1004</u>
266	244646	<u>1006</u>
267	230608	<u>1007</u>
268	255852	<u>1014</u>
269	272989	<u>1016</u>
270	217398	<u>1020</u>

Customer	12 months average kWh	
271	265735	1020
272	205398	1020
273	257238	1022
274	258002	1026
275	271743	1027
276	217349	1030
277	240892	1031
278	254204	1033
279	203907	1034
280	272516	1041
281	200128	1043
282	9771	1045
283	266765	1047
284	250280	1047
285	215321	1049
286	250723	1052
287	254939	1053
288	28579	1054
289	15384	1055
290	270658	1057
291	246268	1058
292	272886	1058
293	24313	1065
294	267449	1067
295	260565	1072
296	269593	1073
297	260501	1074
298	266789	1077
299	256344	1079
300	271750	1082
301	203180	1087
302	265851	1088
303	258553	1090
304	205136	1092
305	273238	1092
306	7896	1094
307	243131	1094
308	261568	1099
309	265282	1102
310	270254	1104
311	213254	1109
312	208281	1112
313	230396	1113
314	269267	1117
315	253871	1120

Below average

Customer	12 months average kWh	
316	253919	<u>1121</u>
317	272821	<u>1122</u>
318	269029	<u>1122</u>
319	243401	<u>1125</u>
320	271582	<u>1130</u>
321	266415	<u>1131</u>
322	261040	<u>1138</u>
323	27842	<u>1140</u>
324	263840	<u>1140</u>
325	255651	<u>1141</u>
326	221382	<u>1144</u>
327	201424	<u>1144</u>
328	255629	<u>1145</u>
329	242054	<u>1145</u>
330	250654	<u>1145</u>
331	240868	<u>1146</u>
332	265211	<u>1147</u>
333	210871	<u>1150</u>
334	250289	<u>1150</u>
335	218577	<u>1153</u>
336	206836	<u>1153</u>
337	249848	<u>1155</u>
338	210701	<u>1155</u>
339	16442	<u>1155</u>
340	252693	<u>1155</u>
341	262693	<u>1156</u>
342	243146	<u>1158</u>
343	269407	<u>1159</u>
344	269195	<u>1159</u>
345	208019	<u>1161</u>
346	247612	<u>1165</u>
347	246496	<u>1168</u>
348	249042	<u>1172</u>
349	270695	<u>1175</u>
350	256570	<u>1175</u>
351	270746	<u>1176</u>
352	268193	<u>1177</u>
353	269367	<u>1177</u>
354	253763	<u>1181</u>
355	26616	<u>1186</u>
356	208029	<u>1187</u>
357	218571	<u>1190</u>
358	273030	<u>1193</u>
359	272976	<u>1196</u>
360	214184	<u>1196</u>

Customer	12 months average kWh	
361	272423	<u>1196</u>
362	273417	<u>1197</u>
363	273401	<u>1204</u>
364	201676	<u>1204</u>
365	28408	<u>1205</u>
366	272247	<u>1210</u>
367	209219	<u>1210</u>
368	249120	<u>1211</u>
369	270296	<u>1212</u>
370	102095	<u>1214</u>
371	257949	<u>1215</u>
372	254015	<u>1216</u>
373	261907	<u>1217</u>
374	272533	<u>1219</u>
375	266168	<u>1219</u>
376	270921	<u>1226</u>
377	269146	<u>1227</u>
378	265854	<u>1227</u>
379	272246	<u>1229</u>
380	269867	<u>1238</u>
381	16621	<u>1241</u>
382	262931	<u>1244</u>
383	218343	<u>1247</u>
384	266498	<u>1248</u>
385	272635	<u>1248</u>
386	272127	<u>1252</u>
387	212505	<u>1252</u>
388	252291	<u>1254</u>
389	200159	<u>1255</u>
390	246798	<u>1260</u>
391	273152	<u>1265</u>
392	19101	<u>1265</u>
393	246593	<u>1265</u>
394	12924	<u>1266</u>
395	254684	<u>1270</u>
396	212767	<u>1274</u>
397	260554	<u>1274</u>
398	254307	<u>1277</u>
399	215804	<u>1279</u>
400	248537	<u>1282</u>
401	209026	<u>1283</u>
402	31732	<u>1284</u>
403	28478	<u>1284</u>
404	254490	<u>1285</u>
405	21627	<u>1286</u>

Customer	12 months average kWh	
406	17088	<u>1287</u>
407	259699	<u>1288</u>
408	244014	<u>1289</u>
409	273006	<u>1294</u>
410	21456	<u>1295</u>
411	200889	<u>1296</u>
412	206605	<u>1297</u>
413	248300	<u>1297</u>
414	203418	<u>1298</u>
415	261025	<u>1300</u>
416	242488	<u>1302</u>
417	254082	<u>1302</u>
418	208119	<u>1306</u>
419	248992	<u>1308</u>
420	272313	<u>1311</u>
421	214107	<u>1312</u>
422	250439	<u>1314</u>
423	271124	<u>1314</u>
424	28136	<u>1317</u>
425	205470	<u>1320</u>
426	258624	<u>1320</u>
427	248951	<u>1321</u>
428	257849	<u>1323</u>
429	243848	<u>1324</u>
430	100685	<u>1325</u>
431	247458	<u>1326</u>
432	272477	<u>1328</u>
433	270447	<u>1330</u>
434	31956	<u>1330</u>
435	270514	<u>1330</u>
436	212534	<u>1333</u>
437	219505	<u>1333</u>
438	254668	<u>1339</u>
439	273482	<u>1339</u>
440	243283	<u>1340</u>
441	200999	<u>1341</u>
442	264222	<u>1343</u>
443	213555	<u>1343</u>
444	216125	<u>1343</u>
445	205786	<u>1351</u>
446	264009	<u>1351</u>
447	244027	<u>1351</u>
448	200895	<u>1351</u>
449	269920	<u>1354</u>
450	212666	<u>1354</u>

Customer	12 months average kWh	
451	271585	1355
452	265349	1358
453	266468	1358
454	262865	1362
455	241089	1363
456	269100	1365
457	18055	1366
458	272248	1369
459	265721	1370
460	256342	1373
461	230588	1373
462	205875	1377
463	14786	1377
464	255358	1377
465	258846	1378
466	11267	1382
467	271206	1384
468	218974	1387
469	8201	1389
470	271426	1390
471	206844	1394
472	270230	1395
473	241970	1396
474	207401	1397
475	249532	1397
476	100790	1398
477	9679	1400
478	204890	1401
479	272574	1402
480	206055	1402
481	201786	1402
482	11077	1403
483	249412	1410
484	259954	1410
485	221140	1411
486	202465	1411
487	215972	1412
488	270426	1412
489	3297	1413
490	240135	1415
491	241903	1416
492	214613	1417
493	217780	1420
494	14600	1421
495	18548	1422

Median

Customer	12 months average kWh	
496	269913	<u>1422</u>
497	254771	<u>1423</u>
498	272228	<u>1429</u>
499	206110	<u>1430</u>
500	201987	<u>1434</u>
501	257111	<u>1436</u>
502	271986	<u>1437</u>
503	217758	<u>1438</u>
504	271411	<u>1439</u>
505	262669	<u>1441</u>
506	252694	<u>1442</u>
507	263648	<u>1444</u>
508	245450	<u>1445</u>
509	204314	<u>1446</u>
510	9784	<u>1446</u>
511	207117	<u>1446</u>
512	271017	<u>1447</u>
513	270932	<u>1448</u>
514	212948	<u>1448</u>
515	241916	<u>1448</u>
516	273666	<u>1449</u>
517	267343	<u>1450</u>
518	230109	<u>1452</u>
519	272460	<u>1452</u>
520	25412	<u>1454</u>
521	217401	<u>1457</u>
522	272982	<u>1458</u>
523	212638	<u>1458</u>
524	253946	<u>1459</u>
525	253609	<u>1459</u>
526	271160	<u>1462</u>
527	208722	<u>1463</u>
528	261902	<u>1464</u>
529	269174	<u>1465</u>
530	202886	<u>1469</u>
531	12049	<u>1471</u>
532	211539	<u>1473</u>
533	256132	<u>1474</u>
534	9614	<u>1475</u>
535	215288	<u>1475</u>
536	215897	<u>1475</u>
537	208920	<u>1476</u>
538	9846	<u>1479</u>
539	267304	<u>1484</u>
540	270946	<u>1485</u>

Customer	12 months average kWh	
541	248874	<u>1487</u>
542	207616	<u>1489</u>
543	269767	<u>1492</u>
544	214414	<u>1494</u>
545	249063	<u>1497</u>
546	262211	<u>1499</u>
547	203799	<u>1501</u>
548	261723	<u>1502</u>
549	260979	<u>1508</u>
550	259585	<u>1509</u>
551	218920	<u>1511</u>
552	270799	<u>1511</u>
553	252145	<u>1514</u>
554	270336	<u>1515</u>
555	203123	<u>1516</u>
556	271736	<u>1520</u>
557	219691	<u>1523</u>
558	217083	<u>1523</u>
559	240776	<u>1523</u>
560	262115	<u>1524</u>
561	265334	<u>1526</u>
562	240137	<u>1527</u>
563	265169	<u>1528</u>
564	247580	<u>1529</u>
565	253862	<u>1532</u>
566	248147	<u>1537</u>
567	257855	<u>1542</u>
568	253106	<u>1543</u>
569	241629	<u>1545</u>
570	208099	<u>1548</u>
571	203002	<u>1549</u>
572	204397	<u>1550</u>
573	213224	<u>1553</u>
574	269894	<u>1554</u>
575	252921	<u>1556</u>
576	214568	<u>1557</u>
577	213248	<u>1559</u>
578	5282	<u>1560</u>
579	256068	<u>1563</u>
580	215683	<u>1564</u>
581	207896	<u>1564</u>
582	270783	<u>1564</u>
583	213268	<u>1564</u>
584	250140	<u>1564</u>
585	273628	<u>1566</u>

Customer	12 months average kWh	
586	11146	<u>1567</u>
587	262194	<u>1567</u>
588	271189	<u>1568</u>
589	206051	<u>1569</u>
590	259149	<u>1570</u>
591	272270	<u>1576</u>
592	269109	<u>1577</u>
593	247031	<u>1577</u>
594	221076	<u>1580</u>
595	267788	<u>1580</u>
596	219599	<u>1586</u>
597	272539	<u>1592</u>
598	269142	<u>1592</u>
599	253662	<u>1593</u>
600	240385	<u>1593</u>
601	273432	<u>1594</u>
602	6319	<u>1597</u>
603	203223	<u>1599</u>
604	207304	<u>1600</u>
605	257949	<u>1603</u>
606	219543	<u>1603</u>
607	244690	<u>1604</u>
608	260658	<u>1604</u>
609	259239	<u>1608</u>
610	6408	<u>1608</u>
611	211634	<u>1611</u>
612	261758	<u>1612</u>
613	201540	<u>1614</u>
614	213914	<u>1614</u>
615	273326	<u>1614</u>
616	264426	<u>1616</u>
617	268283	<u>1621</u>
618	247538	<u>1624</u>
619	215298	<u>1628</u>
620	270308	<u>1629</u>
621	33776	<u>1630</u>
622	263661	<u>1631</u>
623	272677	<u>1631</u>
624	243324	<u>1634</u>
625	219857	<u>1638</u>
626	259282	<u>1640</u>
627	272251	<u>1646</u>
628	272098	<u>1648</u>
629	14161	<u>1650</u>
630	213991	<u>1651</u>

Customer	12 months average kWh	
631	260922	1654
632	209245	1655
633	206667	1656
634	248500	1658
635	270599	1659
636	273296	1660
637	273320	1661
638	214539	1662
639	247688	1663
640	269152	1664
641	268839	1668
642	269261	1672
643	257316	1672
644	272393	1674
645	265880	1675
646	267549	1675
647	18215	1676
648	103865	1680
649	272086	1684
650	30255	1685
651	273178	1687
652	211025	1692
653	271036	1692
654	265732	1694
655	247925	1695
656	263042	1696
657	212265	1697
658	28514	1699
659	261616	1706
660	271714	1707
661	263560	1709
662	255113	1710
663	219377	1711
664	230052	1712
665	260180	1714
666	270588	1715
667	214929	1717
668	272634	1717
669	267109	1718
670	264072	1719
671	240831	1725
672	248627	1726
673	264654	1732
674	211730	1736
675	269952	1738

Customer	12 months average kWh	
676	250938	<u>1738</u>
677	257956	<u>1744</u>
678	267049	<u>1745</u>
679	258043	<u>1745</u>
680	272552	<u>1746</u>
681	207531	<u>1752</u>
682	258587	<u>1755</u>
683	266553	<u>1761</u>
684	271721	<u>1762</u>
685	270955	<u>1764</u>
686	211009	<u>1765</u>
687	265399	<u>1767</u>
688	22340	<u>1767</u>
689	260929	<u>1769</u>
690	273410	<u>1770</u>
691	258775	<u>1777</u>
692	30190	<u>1780</u>
693	252105	<u>1780</u>
694	268803	<u>1785</u>
695	214644	<u>1786</u>
696	270523	<u>1786</u>
697	271532	<u>1789</u>
698	209066	<u>1792</u>
699	208305	<u>1792</u>
700	214695	<u>1796</u>
701	11416	<u>1796</u>
702	271482	<u>1796</u>
703	18395	<u>1797</u>
704	211059	<u>1797</u>
705	267043	<u>1804</u>
706	272301	<u>1804</u>
707	15887	<u>1807</u>
708	206075	<u>1808</u>
709	201482	<u>1812</u>
710	265975	<u>1812</u>
711	270886	<u>1813</u>
712	254135	<u>1814</u>
713	254082	<u>1814</u>
714	249364	<u>1816</u>
715	272841	<u>1820</u>
716	215343	<u>1825</u>
717	268015	<u>1826</u>
718	268591	<u>1826</u>
719	258554	<u>1827</u>
720	271444	<u>1830</u>

Customer	12 months average kWh	
721	30786	<u>1833</u>
722	254170	<u>1837</u>
723	240864	<u>1837</u>
724	255680	<u>1838</u>
725	105587	<u>1840</u>
726	258756	<u>1846</u>
727	210643	<u>1846</u>
728	240532	<u>1846</u>
729	204714	<u>1849</u>
730	272275	<u>1849</u>
731	268924	<u>1853</u>
732	260388	<u>1858</u>
733	267526	<u>1858</u>
734	258772	<u>1860</u>
735	266032	<u>1862</u>
736	5240	<u>1863</u>
737	28096	<u>1864</u>
738	272272	<u>1869</u>
739	211006	<u>1873</u>
740	254770	<u>1879</u>
741	28327	<u>1879</u>
742	263904	<u>1882</u>
743	214048	<u>1883</u>
744	267761	<u>1888</u>
745	244833	<u>1892</u>
746	218295	<u>1892</u>
747	273195	<u>1893</u>
748	21063	<u>1893</u>
749	100711	<u>1894</u>
750	265181	<u>1896</u>
751	269141	<u>1898</u>
752	217489	<u>1902</u>
753	200219	<u>1911</u>
754	218505	<u>1918</u>
755	31517	<u>1921</u>
756	11059	<u>1922</u>
757	254133	<u>1925</u>
758	240788	<u>1931</u>
759	272395	<u>1934</u>
760	7940	<u>1934</u>
761	200945	<u>1935</u>
762	251965	<u>1936</u>
763	270427	<u>1945</u>
764	219917	<u>1948</u>
765	204435	<u>1954</u>

Customer	12 months average kWh	
766	261507	<u>1954</u>
767	264926	<u>1957</u>
768	25781	<u>1961</u>
769	247439	<u>1966</u>
770	271979	<u>1967</u>
771	270768	<u>1967</u>
772	261680	<u>1971</u>
773	213294	<u>1976</u>
774	273231	<u>1983</u>
775	200860	<u>1987</u>
776	210104	<u>1992</u>
777	9922	<u>1993</u>
778	17750	<u>1996</u>
779	249719	<u>1998</u>
780	216798	<u>1999</u>
781	270850	<u>1999</u>
782	262732	<u>1999</u>
783	260913	<u>2006</u>
784	13083	<u>2013</u>
785	268079	<u>2016</u>
786	215778	<u>2021</u>
787	264092	<u>2023</u>
788	251070	<u>2026</u>
789	202586	<u>2032</u>
790	210607	<u>2034</u>
791	251893	<u>2034</u>
792	251496	<u>2037</u>
793	27439	<u>2040</u>
794	213382	<u>2040</u>
795	272529	<u>2046</u>
796	258801	<u>2051</u>
797	5344	<u>2052</u>
798	266593	<u>2058</u>
799	270043	<u>2058</u>
800	202640	<u>2070</u>
801	266425	<u>2072</u>
802	272144	<u>2074</u>
803	270543	<u>2074</u>
804	270998	<u>2075</u>
805	259910	<u>2081</u>
806	262357	<u>2084</u>
807	247849	<u>2085</u>
808	264283	<u>2085</u>
809	248561	<u>2087</u>
810	200519	<u>2088</u>

Customer	12 months average kWh
811	<u>208739</u>
812	<u>2088</u>
813	<u>2096</u>
814	<u>2101</u>
815	<u>2111</u>
816	<u>12367</u>
817	<u>2115</u>
818	<u>270127</u>
819	<u>2118</u>
820	<u>218967</u>
821	<u>2119</u>
822	<u>252831</u>
823	<u>2120</u>
824	<u>258800</u>
825	<u>2127</u>
826	<u>270276</u>
827	<u>2130</u>
828	<u>267156</u>
829	<u>2137</u>
830	<u>204562</u>
831	<u>2139</u>
832	<u>268118</u>
833	<u>2152</u>
834	<u>205911</u>
835	<u>2158</u>
836	<u>203234</u>
837	<u>2177</u>
838	<u>245079</u>
839	<u>2180</u>
840	<u>263469</u>
841	<u>2185</u>
842	<u>272859</u>
843	<u>2186</u>
844	<u>256992</u>
845	<u>2188</u>
846	<u>272861</u>
847	<u>2190</u>
848	<u>215133</u>
849	<u>2190</u>
850	<u>272279</u>
851	<u>2213</u>
852	<u>245191</u>
853	<u>2217</u>
854	<u>268795</u>
855	<u>2219</u>
	<u>255352</u>
	<u>2220</u>
	<u>263874</u>
	<u>2220</u>
	<u>242490</u>
	<u>2222</u>
	<u>272421</u>
	<u>2224</u>
	<u>217256</u>
	<u>2230</u>
	<u>272012</u>
	<u>2231</u>
	<u>25279</u>
	<u>2241</u>
	<u>250942</u>
	<u>2241</u>
	<u>258943</u>
	<u>2243</u>
	<u>266274</u>
	<u>2245</u>
	<u>260563</u>
	<u>2249</u>
	<u>28258</u>
	<u>2256</u>
	<u>6565</u>
	<u>2258</u>
	<u>267405</u>
	<u>2260</u>
	<u>217151</u>
	<u>2264</u>
	<u>252109</u>
	<u>2289</u>
	<u>259782</u>
	<u>2295</u>
	<u>212582</u>
	<u>2314</u>
	<u>267366</u>
	<u>2320</u>
	<u>256870</u>
	<u>2341</u>
	<u>272527</u>
	<u>2341</u>

Customer	12 months average kWh	
856	272828	<u>2344</u>
857	266405	<u>2349</u>
858	252613	<u>2354</u>
859	270170	<u>2375</u>
860	206893	<u>2384</u>
861	271169	<u>2389</u>
862	250447	<u>2391</u>
863	270664	<u>2394</u>
864	216579	<u>2398</u>
865	215208	<u>2404</u>
866	26127	<u>2421</u>
867	268132	<u>2440</u>
868	203997	<u>2456</u>
869	214187	<u>2458</u>
870	270960	<u>2477</u>
871	263834	<u>2481</u>
872	272008	<u>2485</u>
873	214711	<u>2500</u>
874	264833	<u>2500</u>
875	273133	<u>2542</u>
876	16969	<u>2546</u>
877	267674	<u>2550</u>
878	265914	<u>2561</u>
879	216822	<u>2562</u>
880	267161	<u>2582</u>
881	221399	<u>2584</u>
882	267670	<u>2585</u>
883	241128	<u>2595</u>
884	251997	<u>2617</u>
885	262376	<u>2630</u>
886	253469	<u>2632</u>
887	12567	<u>2699</u>
888	244986	<u>2702</u>
889	201574	<u>2740</u>
890	268928	<u>2748</u>
891	221068	<u>2750</u>
892	265143	<u>2769</u>
893	272519	<u>2776</u>
894	257322	<u>2807</u>
895	263006	<u>2828</u>
896	257287	<u>2877</u>
897	200967	<u>2978</u>
898	265816	<u>3034</u>
899	268272	<u>3036</u>
900	250589	<u>3038</u>

	Customer	12 months average kWh	
901	250333	<u>3098</u>	
902	266962	<u>3108</u>	
903	245617	<u>3139</u>	
904	24792	<u>3196</u>	
905	220559	<u>3229</u>	
906	207992	<u>3239</u>	
907	251449	<u>3278</u>	
908	240965	<u>3294</u>	
909	255981	<u>3314</u>	
910	216753	<u>3432</u>	
911	261351	<u>3437</u>	
912	267347	<u>3586</u>	
913	211205	<u>3857</u>	
914	499	<u>4056</u>	
915	5679	<u>4057</u>	
916	262376	<u>4089</u>	12 month average
		<u>1,285,143</u>	1,403

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18. Provide the number of Clark residential customers whose usage falls below the system average for the residential class.

Response:

Clark Energy's billing system does not allow it to generate a report that precisely answers this question. However, approximately 56% of Clark Energy's Rate R Account Customers have a usage that is at or below the average residential customer usage of 1,103kWh per month.

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19. Provide the total amount of all annual bonuses of any type or sort Clark has granted during the test year and the two preceding years, in terms of actual dollar amounts for each position, including bonuses to officers and directors.

Response:

Clark Energy does not award any annual or performance bonuses to any employee, officer or director.

The Board of Directors authorizes a Christmas gift for all employees, excluding the President/CEO, in the amount of \$350.00 each December. The gift is processed through payroll and all applicable taxes are paid.

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20. Confirm that by placing the full amount of the proposed rate change upon the monthly customer charge, Clark will make it more difficult for its customers to conserve energy.
- a. Confirm that the purpose of the proposed rate change is to incentivize energy consumption. If Clark does not agree, explain completely why not.

Response:

Not confirmed. First, Clark does not accept the premise of the question. Clark does not propose to place the full amount of the proposed rate change upon the monthly customer charge; Clark proposes to increase the monthly residential customer charge while simultaneously decreasing the per-unit energy charge. Second, Clark does not agree with the claim that the proposed rates will make it more difficult for members to conserve energy. The ease or difficulty of conserving energy is related to member behavior, technology, conditions at the premise, and other factors not related to the monthly bill. All Clark members that consume energy have an incentive to conserve energy in order to reduce their total 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.

- a. Not confirmed. Clark strongly disagrees with this contention. The purpose of the rate change is to improve vital financial metrics of the cooperative, as stated in the Application specifically in paragraph 5 and generally throughout the direct testimony of the witnesses in this docket.

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21. Do any of Clark's directors have life insurance coverage with benefits in excess of \$50,000? If so:
- a. Provide the amount that Clark 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 purposes of ratemaking.

Response:

- a-b. Clark Energy does not carry life insurance on directors.

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22. Has the Company provided any type of new benefits to employees, officers, or directors in the past four years? If so, provide a complete description, the monetary value(s) thereof, and the sums included in rates.

Response:

Clark Energy implemented vision coverage in January 2017.

The cooperative pays \$5.81 per month for employees. Employees pay the entire portion of dependent coverage. The test year expense was \$ 3,277.

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23. Provide a copy of Clark's anti-nepotism policy.

Response:

Please see attached.

**CLARK ENERGY COOPEATIVE, INC
WINCHESTER, KENTUCKY
BOARD POLICY #110**

SUBJECT: NEPOTISM

I. OBJECTIVE

- A. To set forth a policy to prohibit the employment or continued employment of close relatives of the Board of Directors and employees of Clark Energy Cooperative, Inc.

II. CONTENT

- A. The words close relative shall be interpreted to mean that no person shall be eligible to be employed by the cooperative who is:
- (1) related by blood or adoption by a degree of kinship of first cousin or closer to any member of the Board of Directors or an employee of the cooperative;
 - (2) related by marriage by degree of kinship of first cousin or closer to any member of the Board of Directors or an employee of the cooperative;
 - (3) cohabiting in a spousal-like relationship with any member of the Board of Directors or an employee of the cooperative.
- B. Foster parent and foster child relationships shall be interpreted to be the same as blood or marriage relationships for the purpose of this policy.
- C. This policy shall not apply to relationships among or between employees who were created prior to December 31, 1997. Prohibited relationships among or between employees and/or members of the Board of Directors who are created after January 1, 1998 shall be subject to this nepotism policy.
- D. In the event that employees become closely related by marriage, adoption or otherwise, the employee will be given the choice of which employee will separate. Otherwise, the least senior of the two employees will be separated.

III. RESPONSIBILITY

- A. The President & CEO shall be responsible for the implementation of a program of action to ensure compliance in all personnel recruitment, selection, appointment, promotions, transfers, and terminations.

Adopted: 10-25-88
Revised: 01-27-98
Revised: 01-23-01
Reviewed: 10-31-06
Reviewed: 01/2013
Reviewed: 08/28/18

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

Response:

Clark does not incorporate weather normalization for its base rates.

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25. Reference the Eades testimony at p. 12. Provide all data to support Clark's contention that low-income customers consume more energy than other residential customers.
- a. Explain if the Company is aware of the study accessible at the footnote below indicating that low-income customers contribute less to peak loads than most other customers.

Response:

Please see the response to Item 17 above.

- a. Clark was not aware of the study before receiving this data request. However, upon review of the study, Clark does not consider the study to be representative of conditions prevailing at Clark Energy. The study of Illinois relies on anonymous electric consumption data for residential customers of ComEd and Ameren Illinois, captured through smart meters, and the authors acknowledge on page 7 of the study that lower density areas are excluded from the analysis, which results in an under-sampling of rural low-income customers.

Regardless of that view, the contribution of low-income customers to peak loads (i.e. share of peak demand) is not at issue here; instead, the issue is monthly energy consumption. Clark's own data indicates that the average low-income customer uses more energy than the average residential customer.

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26. Reference Exhibit HSE-2, Independent Auditor's Report dated April 30, 2019 and 2018, note 1 at p. 12 of 22, the statement that "All tax related issues would be passed on to Service Corporation." Reference also Application Exhibit 15, sponsored by witness Eades.
- a. Explain what services Clark Energy Services Corporation ("the Service Corporation") provided with regard to both Clark, and Clark Energy Propane Plus, LLC ("Clark Propane").
 - b. Explain the nature of the tax issues that were passed on to the Service Corporation. Explain also whether the Service Corporation filed a consolidated return, including both Clark and Clark Propane.
 - c. Explain why the Service Corporation was dissolved and confirm that the dissolution occurred on November 6, 2017. If so confirmed, explain why the Independent Auditor's Report dated April 30, 2019 and 2018 makes reference to tax issues being passed on to the Service Corporation.
 - d. State when the next independent auditor's report will become available.

Response:

- a. The Service Corporation did not provide any services to Clark Energy. The Service Corporation existed merely as a holding company and was the sole owner of Clark Propane.
- b. The profits of Clark Propane were passed to the Service Corporation to include on its tax return. Clark Energy was not included on the Service Corporation's tax return. Clark Propane was included on Service Corporation's tax return.
- c. The Service Corporation was originally formed with Clark Energy owning 75% and East Kentucky Power Cooperative ("EKPC") owning 25%. Service Corporation purchased EKPC's share, at which point it owned all outstanding shares of stock. Since Service Corporation owned 100% of the stock there was no need to continue to have a subsidiary that Clark Energy owned 100% and also owned 100% of Clark Propane. The stock purchase was financed through a 10-year note to EKPC. The Service Corporation was dissolved to reduce the unnecessary

level of companies. The audit for the April 30, 2019 and 2018 included the time up to November 6, 2017 the time Service Corporation was dissolved.

- d. The audit has started for the year ending April 30, 2020. There is no date the audit will be complete as our office is closed to the public at this time.

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27. Explain whether any portion of the proposed revenue increase will go toward the operations of Clark Propane. If so, provide a detailed justification.
- a. Explain if any employee of Clark also performs work for Clark Propane. If so, explain what portion of the employee's salary and benefits are allocated to Clark, and what portion to Clark Propane, and the justifications thereof.
 - b. Explain whether Clark Propane shares any offices and/or other facilities, motor vehicles, equipment (including office equipment and data management systems) or other plant with Clark, if so, explain what portion of the costs thereof are paid by Clark Propane.
 - c. Explain whether Clark Propane is a customer of Clark for purposes of electric service. If so, explain whether Clark Propane has its own account with Clark, and whether Clark Propane has one or more electric meters in the sole name of Clark Propane.
 - d. Explain whether Clark Propane is covered under any of Clark's insurance policies. If so, provide the percentage of the insurance premium for each policy that goes toward providing coverage to Clark Propane.
 - e. Explain whether the benefits of Clark Propane employees, officers and directors are paid in full or part by Clark. If so, provided the percentage of all such benefits that are paid by Clark.
 - f. Explain whether employees, officers or directors of Clark Propane participate in the NRECA Retirement and Security Plan. If so, explain whether Clark pays any portion of the funds going toward this fund with regard to Clark Propane's employees, officers or directors.
 - g. Explain whether Clark contributes any sums toward any defined contribution plan on behalf of Clark Propane's employees, officers and directors, and if so, how much.
 - h. Reference Exhibit HSE-2, Independent Auditor's Report, p. 11, note four. Explain the following statement: "During August, 2015, Propane Plus purchased East Kentucky's outstanding stock with a note payable in the amount of \$500,351. The note is for 10 years with monthly principal and interest payments are \$4,740."

Response:

- a. No.
- b. No.
- c. Clark Propane has a separate facility that is not in Clark's service territory.
- d. No.
- e. Clark does not pay any of the benefits offered by Clark Propane.
- f. Clark Propane does not participate in the NRECA R&S plan.
- g. Clark does not contribute to Clark Propane's defined contribution plan.
- h. Reference question 26, part c. Clark Propane inherited all of the assets and liabilities of Clark Services as a result of the dissolution.

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28. Reference Exhibit HSE-2, Independent Auditor's Report, p. 11, note five. Explain whether Clark will have an opportunity to re-negotiate the 4% interest rate on advances taken on the CFC line of credit, and if so, when.
- a. Explain whether other EKPC member-owner cooperatives have a similar interest rate on CFC lines of credit.

Response:

CFC's interest rates are based on the prime. CFC's current interest rate is 2.95%.

- a. Clark is unaware of the specific credit terms afforded by CFC to EKPC's other Owner-Members.

Witnesses: Holly Eades and John Wolfram

Clark Energy Cooperative, Inc.
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29. Reference Application Exhibit 29.
- a. With regard to directors' expenses, confirm that the Company has included \$117,382, and excluded \$58,846.
 - b. Identify Clark's designated NRECA Annual meeting director attendee.
 - c. Confirm that during the test year, the Company has included director's expenses for the Annual NRECA meeting totaling \$2,175 for the following directors: Linville Gale Means, James M. Wells, and Robert Russell.
 - d. Confirm that an additional \$1450 of director expense should be excluded.

Response:

- a. Clark excluded \$117,382 and included \$58,646 (not \$58,846) from the revenue requirement. See Application Exhibit 29, page 7 of 9. Also see Wolfram Testimony, Exhibit JW-2, Reference Schedule 1.09.
- b. Clark's designated NRECA annual meeting director was Linville Gale Means.
- c. Annual meeting registrations were included for Means, Wells and Russell.
- d. James Wells did not attend the meeting and Clark received a refund of \$650.00 in February 2019. Clark agrees there should be an additional exclusion of \$800.00; \$725.00 for Robert Russell's registration and the \$75.00 cancellation fee for James Wells for a total of \$800.00. Clark did exclude all the expenses, \$3,901.17, of Linville Gale Means, the designated NRECA annual meeting director.

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30. Reference Application Exhibit 26. Confirm that during the test year, Clark's president received a 6% salary increment.
- a. Provide the test year salary increments for the following: Vice President of Finance; Vice President of Engineering; Vice President of Operations; and Manager of Employee and Member Relations.
 - b. Provide the test year salary increments for all other employees.

Response:

The above-mentioned salary study is filed under seal in response to Commission Staff's Request No. 12.

Clark Energy's president did receive a 6% salary adjustment.

[REDACTED]

This information is being under seal pursuant to a Motion for Confidential Treatment.

- b. The information for this response is being filed under seal pursuant to a Motion for Confidential Treatment.

THIS EXHIBIT IS BEING FILED
UNDER SEAL PURSUANT
TO A MOTION FOR
CONFIDENTIAL TREATMENT

Clark Energy Cooperative, Inc.
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31. Explain whether Clark has any plans to return any portion of its patronage capital to its members.
- a. Explain the criteria, if any, for establishing the circumstances under which Clark would return any portion of its patronage capital.
 - b. Explain whether Clark has considered using its members' patronage capital to offset all or any portion of the proposed base rate increase, If no, why not?

Response:

Clark has returned over \$8,269,500 in patronage capital to its members since November 2012.

- a. Clark's Board of Directors reviews the financial information annually and decides if the cooperative is able to refund additional patronage capital.
- b. Patronage capital is a balance sheet item not an income statement and does not affect rates.

Clark Energy Cooperative, Inc.
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32. Explain whether Clark has considered obtaining new financing in order to re-finance older debt having higher interest rates. If not, why not?

Response:

Clark Energy has refinanced all debt for which refinancing is currently available.

Clark Energy Cooperative, Inc.
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33. Discuss generally the justification for the proposal to increase the Residential Rate R customer charge from \$12.43 to \$18.00 per month.
- a. The Company suggests that this increase in the customer charge, “is consistent with the ratemaking principle of gradualism.” See Wolfram testimony at 24. That testimony asserts that the COSS supports a fixed monthly charge of \$35.01 for the residential class. Id. at 22. Indicate whether it is the intent of the Company to achieve a customer charge of \$35.01 in future rate cases.
 - b. Identify other cases where the Commission has approved an increase to the customer charge of 44.8% or greater.
 - c. Identify specifically how the Company’s rate-structure, “results in significant under-recovery of fixed costs.” Id. at 22.
 - d. Discuss whether the Company has studied whether the proposed increase in the customer charge will increase delinquencies.
 - e. Discuss how conservation and energy efficiency practices on the part of consumers result in under-recovery of fixed costs.
 - f. Discuss whether under-recovery of fixed costs in the customer charge has been off-set historically by energy charges.

Response:

For a discussion of the justification for the proposal to increase the Residential Rate R customer charge from \$12.43 to \$18.00 per month, *see* the Direct Testimony of John Wolfram, pages 24-26.

- a. At this time, Clark Energy’s intent is to move more toward cost-based rates in a gradual manner as overall financial conditions warrant. Clark Energy does not have a specific plan or intent to achieve a customer charge of \$35.01 in future rate cases.
- b. While Clark did not perform an exhaustive review of Commission orders, Clark Energy is aware of at least five instances where the Commission has approved an increase to the customer charge of 44.8% or greater, including Clark Energy’s last rate case. See table below:

Witnesses: Holly Eades and John Wolfram

Case No.	Utility	Previous	Approved	Increase	Increase %
2009-00314	Clark Energy	\$5.84	\$12.00	\$6.16	105.5%
2016-00174	Licking Valley RECC	\$9.32	\$14.00	\$4.68	50.2%
2016-00365	Farmers RECC	\$9.35	\$14.00	\$4.65	49.7%
2016-00367	Nolin RECC	\$9.04	\$13.50	\$4.46	49.3%
2018-00066	Jackson Energy	\$16.44	\$24.00	\$7.56	46.0%

More importantly, the percentage increase to the customer charge is not a metric specified in the Commission’s streamlined rate procedure orders, nor should it be considered in isolation separately from any reductions to the energy charge (as Clark proposes in this case), because doing so provides an incomplete picture of the impact of the proposed rate changes on member billings. The changes to the customer charge and the energy charge must be examined together to assess the reasonableness of the proposed rates on a comprehensive basis.

- c. The COSS shows that the residential margins are negative and the residential rate of return on rate base is also negative. This shows that the residential class overall is not recovering its costs. For fixed costs, the current monthly residential customer charge is \$12.00. The COSS shows that the actual customer charge should be \$35.01. This means that for every residential member, Clark is under-charging for its fixed costs to serve by \$23.01 per month. In other words, Clark is charging its residential members only 34.3 percent (i.e. \$12.00 / \$35.01) of its actual fixed cost to serve each month. While some of this under-recovery is offset by the energy charge, Clark considers the 65.7 percent of fixed costs not included in the customer charge to represent “significant under-recovery” of its fixed costs.
- d. Clark has not studied whether the proposed rate revisions will increase delinquencies. Clark is unaware of any instance where a customer has refused to pay a bill specifically because the customer charge has increased and the volumetric energy charge has decreased.
- e. Conservation and energy efficiency practices on the part of consumers result in under recovery of fixed costs when fixed costs are incorporated in variable charges. If a utility adopts cost-based rates, where all fixed costs are included in fixed charges and all variable costs are included in variable charges, then the utility will become financially indifferent to member usage—including conservation and energy efficiency practices. However, very few distribution utilities fully adopt cost-based rates, and many have some portion of fixed costs incorporated into the variable charge, as Clark does. The Commission has recognized in recent orders

that for an electric cooperative that is strictly a distribution utility, there is a need for a means to guard against the revenue erosion that often occurs due to the decrease in sales volumes that accompanies poor regional economics, changes in weather patterns, and the implementation or expansion of demand-side management and energy-efficiency programs. For Clark at this juncture, this is certainly the case. This is why Clark is proposing to increase the monthly residential customer charge and to reduce the monthly residential energy charge in this docket.

- f. The COSS indicates that under-recovery of fixed costs in the customer charge was partially off-set by energy charges in the adjusted test period. The off-set is only partial, however, because the overall rate of return on rate base for the residential class is negative. Exhibit JW-3 shows the cost-based rates for residential service; the current customer charge is lower than the cost-based charge, and the current energy charge is higher than the cost-based energy charge. This is one reason Clark proposes to increase the residential customer charge and reduce the residential energy charge in this case.