

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF CUMBERLAND)	
VALLEY ELECTRIC, INC. FOR A GENERAL ADJUSTMENT)	CASE NO.
OF RATES PURSUANT TO STREAMLINED PROCEDURE PILOT)	2020-00264
PROGRAM ESTABLISHED IN CASE NO. 2018-00407)	

**CUMBERLAND VALLEY ELECTRIC INC.'S
RESPONSE TO COMMISSION STAFF'S DATA REQUESTS**

Filed: November 9, 2020

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

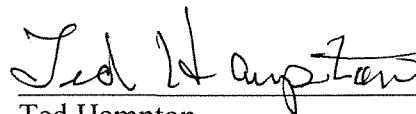
In the Matter of:

THE ELECTRONIC APPLICATION OF)
CUMBERLAND VALLEY ELECTRIC, INC.)
FOR A GENERAL ADJUSTMENT OF) Case No. 2020-00264
RATES PURSUANT TO STREAMLINED)
PROCEDURE PILOT PROGRAM)
ESTABLISHED IN CASE NO. 2018-00407)

VERIFICATION OF TED HAMPTON

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF KNOX)

Ted Hampton, President and Chief Executive Officer of Cumberland Valley Electric, Inc., being duly sworn, states that he has supervised the preparation of certain responses to data requests in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.


Ted Hampton

The foregoing Verification was signed, acknowledged and sworn to before me this 5th day of November, 2020, by Ted Hampton.



Notary Commission Number: 616281

Commission expiration: 2-13-23

Cumberland Valley Electric, Inc.
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1. Refer to the Application, Exhibit 4, Public Notice.
 - a. Cumberland Valley Electric does not propose to increase Rate Sch II – Small Commercial Small Power (Sch II) from the current rate of \$14.00. However, Cumberland Valley Electric is proposing to increase the customer charge for Sch I – Residential, Schools & Churches from \$12.00 to \$17.00. Also, refer to the final Order in Case No. 2019-00053, where the Commission addresses customer charges:

The Commission does not support a rate design in which the small single-phased commercial class pays a monthly customer charge that is lower than that charged to the residential class and finds that a customer charge that, at a minimum, is equal to the residential class is reasonable.

Explain why Cumberland Valley Electric did not propose increasing the customer charge for Sch II consistent with this prior Commission Order.

- b. Refer to Sch II- Small Commercial Small Power Three Phase (Sch II – 3P) and Sch IV-A-Large Power (Sch IV-A). The current and proposed demand is \$4.22.
 - (1) Provide the demand charged to Cumberland Valley Electric by East Kentucky Power Cooperative.
 - (2) If the demand charged to Cumberland Valley Electric by East Kentucky Power Cooperative as reported above is greater than \$4.22, explain why Cumberland Valley is not asking to increase the demand charge to Sch II and Sch IV-A customers.

Response:

- a) Cumberland Valley Electric did not propose increasing the customer charge for Sch II because the rate of return on rate base for the class exceeds that of the

overall system, and thus no rate increase was considered. However, in light of the case precedent raised by Commission Staff, Cumberland Valley Electric agrees that an increase to the Sch II customer charge is appropriate, and should be made in conjunction with a decrease in the Sch II energy charge, such that the class as a whole provides no annual net revenue increase to the utility. To accomplish this, Cumberland Valley Electric recommends maintaining the current difference of \$2.00 between the Sch I and Sch II customer charges and revising the energy charges for Sch II to maintain revenue neutrality. Based on the filed amounts, the following rates achieve this end:

#	Item	Current	<i>New</i>
1	Customer Charge (\$/Month)	14.00	<i>19.00</i>
2	Energy Charge (\$/kWh)	0.08792	0.08230
3	Energy Charge (\$/kWh)	0.08431	0.07892
4	Total Adj Annual Revenue	\$1,588,392	\$1,588,392

- b1) All of Cumberland Valley takes service under East Kentucky Power Cooperative's Rate Schedule E-2. The demand charge under E-2 is \$6.02 per kW of billing demand.

- b2) Cumberland Valley is not seeking to increase the demand charge to Sch II and Sch IV-A customers because the rate of return on rate base for those classes exceeds that of the overall system, and thus no rate increase was considered.

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2. Refer to the Direct Testimony of Ted Hampton (Hampton Testimony), page 4 lines 13-21.
 - a. Provide a quantification of increases of expense since 2016.
 - b. Provide a quantification of the cost reductions, including those gained through the implantation of new Advanced Metering Infrastructure (AMI) system and office communication systems since 2016.

Response:

- a) The table below illustrates the categories on the Form 7 that show cost increases when comparing 2016 to Cumberland Valley's test year of 2019.

Description	2016 Annual Exp.	2019 Annual Exp.	Cost Increase 2016 to 2019
Depreciation & Amortization Expense	\$3,616,753.49	\$4,038,210.54	\$421,457.05
Interest on Long-Term Debt	\$870,468.46	\$1,216,523.39	\$346,054.93
Admin. & General Expense	\$1,686,104.40	\$1,730,238.64	\$44,134.24
Interest Expense – Other	\$1,734.90	\$26,992.28	\$25,257.38
Other Deductions	\$10,625.37	\$15,242.23	\$4,616.86
Tax Expense – Other	\$55,146.22	\$58,193.28	\$3,047.06
Customer Service & Information Expense	\$52,319.94	\$52,995.66	\$675.72
Total	\$6,293,152.78	\$7,138,396.02	\$845,243.24

Over 90% of the cost increase is attributable to Depreciation & Amortization Expense and Interest on Long-Term Debt categories. Cumberland Valley also had cost decreases that occurred when comparing 2016 to 2019. The table below illustrates those decreases in costs.

Description	2016 Annual Exp.	2019 Annual Exp.	Cost Decrease 2016 to 2019
Distribution Expense – Maintenance	\$3,168,266.10	\$2,779,225.14	\$389,040.96
Customer Accounts Expense	\$1,894,893.32	\$1,678,693.57	\$216,199.75
Distribution Expense – Operations	\$1,589,154.42	\$1,492,530.21	\$96,624.21
Total	\$6,652,313.84	\$5,950,448.92	\$701,864.92

As outlined in Cumberland Valley’s application the main driving force behind a need for a rate adjustment has been the substantial loss in sales over the past decade, and that has continued since 2016. Another contributing factor has been the increase costs from Interest on Long-Term Debt and Depreciation and Amortization Expense.

- b) Cumberland Valley provided below quantifications of cost reductions related to AMI and office communication systems. Also, highlighted below are some additional cost reductions achieved by Cumberland Valley since 2016.

Advanced Metering Infrastructure (AMI)

In 2018, Cumberland Valley filed for a Certificate of Public Convenience and Necessity (“CPCN”) to install a new AMI system. This was necessary due to the obsolescence of Cumberland Valley’s existing AMI system. During the filing, Cumberland Valley outlined some benefits of the new AMI system. Benefits such as providing hourly usage data to members, each meter’s capability of supporting all of Cumberland Valley’s rates structures (Time-of-Use, Net Metering, etc.), more data for CSR’s to answer members issues/complaints, improved outage reporting, and increased reliability due to more voltage data. Many of these benefits do not directly correlate with cost reduction but instead are gains in efficiencies, improvements in reliability and members experience.

Due to the gains in efficiencies of the new AMI system, Cumberland Valley has been able to reduce the number of servicemen it employs. In 2019, one of Cumberland Valley’s servicemen retired. Instead of hiring back someone to replace this individual Cumberland Valley redrew and expanded the existing service areas of its remaining servicemen. The reason Cumberland Valley was comfortable doing so was because of the capabilities gained through the implementation of our new AMI system. Cumberland Valley anticipates a cost savings of approximately \$100,000 annually from the elimination of one serviceman position. The analysis of reduction in servicemen positions will continue as those positions become vacant in the future.

Office Communication Systems (Phone System Upgrade)

Cumberland Valley views members' ability to contact the office at any time as a crucial part of our business operations. Members primary form of contact with Cumberland Valley, especially in an outage situation, is by telephone. This philosophy prompted Cumberland Valley to perform an in-depth analysis of our existing Cisco phone system. Upon examination, Cumberland Valley found that many modern features available with other phone systems were not available through our existing Cisco system. In order to gain these features (such as real time monitoring, historical call reporting, call quality analysis, etc.) an upgrade of the Cisco system would be required. The cost of the upgrade coupled with the continuing escalation of maintenance costs on the Cisco system necessitated the need to evaluate other options. Cumberland Valley found that a Mitel system would provide all the features that was required at a much lower annual recurring cost.

Below is a breakdown of the upfront and recurring costs of each system.

Upfront Cost Comparison		Annual Maintenance Comparison	
Cost of Mitel System	\$80,288.43	Mitel - Annual Maint.	\$10,779.00
Cisco Upgrade Cost	\$44,563.35	Cisco - Annual Maint.	\$22,679.39
Upfront Cost Diff.	\$35,725.08	Annual Cost Diff.	\$11,900.39

The Mitel system had a higher upfront cost; however, the annual maintenance savings of \$11,900 offered a 3-year payback on the newer system. Cumberland Valley ultimately decided to select the newer and more feature complete Mitel

system in order to capture the future annual cost savings after the initial 3-year payback. The Mitel system also offered more features that has enabled Cumberland Valley to provide better and more reliable service to our members.

Office Communication Systems (Phone Line Consolidation)

At the same time Cumberland Valley was evaluating its Cisco phone system, an analysis was performed on all of its existing phone and fax lines. The determination was made that some phone lines could be consolidated and others could be eliminated to achieve an estimated savings of \$431.63 per month. These changes were implemented and Cumberland Valley is continuing to monitor ways we can reduce the costs of our communications.

Continuing Evaluation of Cumberland Valley Staffing Levels

In the Direct Testimony of Ted Hampton, page 6, lines 5-6, Mr. Hampton stated *“Going forward management will continue to evaluate any opportunities to gain efficiencies and reduce cost in regards to its staffing levels.”*. Cumberland Valley is committed to this statement, as evident by the reduction of one CSR position due to retirement in October 2020. This position will not be filled and will save an estimated \$78,000 annually.

Retiree Health Insurance

Cumberland Valley moved Medicare eligible retirees from our KREC Insurance plan to Humana effective February 1, 2019. This move resulted in an annual savings of \$46,819.32. In 2020, the estimated savings will be \$50,819.32 and in 2021 an even greater estimated yearly savings of \$59,379.48. The 2021 savings are attributable to a decrease in rates due to the pandemic and rates are expected to increase in 2022.

Employee Contributions Toward Health and Dental

Following the conclusion of the 2016 rate case, Cumberland Valley required salaried employees to begin contributing to the cost of health premiums and increase contributions for dental premiums. The chart below details the contributions Cumberland Valley employees have made toward their health and dental premiums since the 2016 rate case.

Benefits	2017	2018	2019	YTD Oct. 2020	Total
Employee Health Insurance	\$17,650.78	\$47,824.53	\$60,792.23	\$65,616.79	\$191,884.33
Employee Dental Insurance	\$18,846.72	\$19,223.52	\$20,298.14	\$17,140.80	\$75,509.18

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3. Refer to the Hampton Testimony, page 5, line 3. Provide Cumberland Valley Electric's loan covenants.

Response:

Rural Utility Service (RUS)

Section 5.4 Rates to Provide Revenue Sufficient to Meet Coverage Ratios Requirements.

(a) **Prospective Requirement.** The Borrower shall design and implement rates for utility service furnished by it to provide sufficient revenue (along with other revenue available to the Borrower in the case of TIER and DSC) (i) to pay all fixed and variable expenses when and as due, (ii) to provide and maintain reasonable working capital, and (iii) to maintain, on an annual basis, the Coverage Ratios. In designing and implementing rates under this paragraph, such rates should be capable of producing at least enough revenue to meet the requirements of this paragraph under the assumption that average weather conditions in the Borrower's service territory shall prevail in the future, including average utility System damage and outages due to weather and the related costs.

(b) **Retrospective Requirement.** The average Coverage Ratios achieved by the Borrower in the 2 best years out of the 3 most recent calendar years must be not less than any of the following:

TIER = 1.25	DSC = 1.25	OTIER = 1.1	ODSC = 1.1
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CoBank

Debt service coverage (DSC), determined by the average of the best two of the last three years, must not be less than 1.25. Equity to assets, independent fiscal year end, must not be less than 0.27 to 1.00.

NCSC

The Borrower shall achieve an Average DSC Ratio of not less than 1.35. The Borrower shall not decrease its rates for electric service if it has failed to achieve a DSC Ratio of 1.35 for the calendar year prior to such reduction subject only to an order from a Governmental Authority properly exercising jurisdiction over the Borrower.

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4. Refer to the Hampton Testimony, page 5, lines 16-19. Provide the annual energy sales by class for the years 2010 through 2019.

Response:

The table below provides the annual energy sales by class for the years 2010 through 2019.

Year	Residential Sales	50kVA or Less	50-1000 kVA	Over 1000 kVA	Total Sales
2010	354,767,363	27,058,878	58,795,896	104,533,879	545,156,016
2011	317,070,693	26,112,687	57,590,574	106,476,667	507,250,621
2012	300,398,334	27,217,929	54,320,832	91,224,900	473,161,995
2013	314,849,109	26,868,099	54,832,568	68,689,615	465,239,391
2014	324,558,624	26,936,472	57,740,406	68,978,440	478,213,942
2015	306,952,853	26,944,164	60,593,648	57,659,927	452,150,592
2016	306,232,937	27,421,302	52,971,832	53,850,291	440,476,362
2017	285,648,585	27,590,815	47,988,488	52,018,481	413,246,369
2018	316,052,178	29,658,295	50,015,473	53,196,206	448,922,152
2019	303,935,848	28,555,387	51,130,134	41,155,960	424,777,329

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5. Refer to the Application, the Direct Testimony of Robert D. Tolliver (Tolliver Testimony), pages 7-8.
 - a. Provide a copy of the wage and salary plan completed by the wage and salary consultant.
 - b. Explain why no adjustment was made to remove employer contributions for salaried employee's 401(k) plans from the 2019 test year.

Response:

- a) Refer to pages 3 – 43 of this response for a copy of Cumberland Valley's wage and salary plan which is being filed under seal pursuant to a Motion for Confidential Treatment.
- b) The adjustment was made to remove employer cost for salaried employees 401(k) plans from the 2019 test year. Refer to John Wolfram Testimony Exhibit JW-2 Reference Schedule 1.09. This schedule normalizes the test year contributions for NRECA Retirement Security Program and NRECA Savings Plan 401(k) based on the most recent contribution rates. This schedule also removes any employer contributions for salaried employee's 401(k) plan during the test year by only applying the R&S rate to salary employees. No 401(k) contribution rate for salaried employees was applied on Reference Schedule 1.09, therefore Cumberland Valley has complied with the

Commissions instructions to only include either the R&S or 401(k) contributions but not both for rate making purposes. The contribution rate for salaried employees 401(k) was 2% during 2019. All company contribution to salaried employees 401(k) was stopped on June 1, 2020.

ATTACHMENT FILED UNDER
SEAL PURSUANT TO A
MOTION FOR CONFIDENTIAL
TREATMENT

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6. Refer to the Tolliver Testimony, page 8, lines 2-8.
 - a. Provide the most current wage and salary report and plan.
 - b. Provide the annual increases to nonunion employees since 2017.

Response:

- a) Refer to Cumberland Valley response to Commission Staff's First Request for Information question 5(a).
- b) In Cumberland Valley Electric's previous rate case 2014-00159 the Commission said "The Commission believes that any pay increase for salaried employees needs to be properly justified and not simply based on the increase negotiated for union employees" and goes on to say "future increases granted to or proposed for salaried employees will need to be fully justified and documented to show the basis for any proposed increases". No salaried employee received a pay increase in 2016. Cumberland Valley Electric complied with the Commission's request and implemented a formal wage and salary plan for its non-union employees in 2017. Incumbent non-union employees were brought into their pay ranges at an appropriate level commensurate with their experience and abilities. The plan is designed to work toward the midpoint. In all cases, incumbent positioning within

the salary range should reflect the individual's experience and job performance. This one-time placement of Cumberland Valley Electric incumbent employees at or near mid-point is the reason the increases are larger in 2017. Almost all of Cumberland Valley's salaried employees have many years of experience and are fully qualified and highly competent. This essential adjustment was directly attributable to the Wage and Salary Plan's design and purpose. Refer to page 3 of this response for a table showing the annual increases to nonunion employees since 2017.

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Employee Number	2017		2018		2019		2020	
	Annual Increase Amount	Annual Increase Percent	Annual Increase Amount	Annual Increase Percent	Annual Increase Amount	Annual Increase Percent	Annual Increase Amount	Annual Increase Percent
1201	\$12,795.44	12.77%	\$2,260.00	2.00%	\$3,458.00	3.00%	\$2,374.36	2.00%
1211	\$6,538.96	10.82%	\$1,340.00	2.00%	\$6,660.00	9.75%	\$1,500.00	2.00%
1218	\$5,291.06	4.96%	\$2,240.00	2.00%	\$2,285.00	2.00%	\$2,330.51	2.00%
1224	\$5,001.44	7.58%	\$1,420.00	2.00%	\$2,173.00	3.00%	\$1,491.86	2.00%
1226	\$0.00	0.00%	\$0.00	0.00%	\$3,692.85	2.00%	\$3,766.70	2.00%
1227	\$4,655.28	4.64%	\$2,100.00	2.00%	\$2,142.00	2.00%	\$2,184.84	2.00%
1228	\$3,025.12	3.69%	\$1,700.00	2.00%	\$1,734.00	2.00%	\$1,768.68	2.00%
1239	\$6,812.16	9.99%	\$3,000.00	4.00%	\$2,340.00	3.00%	\$1,606.80	2.00%
1245	\$11,933.76	11.04%	\$2,400.00	2.00%	\$3,672.00	3.00%	\$2,521.44	2.00%
1247	\$7,960.32	8.20%	\$2,100.00	2.00%	\$2,142.00	2.00%	\$2,184.84	2.00%

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7. Refer to the Tolliver Testimony, page 12, lines 10-15. Provide the 2018 Key Ratio Trend Analysis.

Response:

Refer to pages 2 – 23 of this response for the 2018 Key Ratio Trend Analysis (“KRTA”), which is being filed under seal pursuant to a Motion for Confidential Treatment.

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8. Refer to the Tolliver Testimony, page 13, lines 11-12. Provide the current collective bargaining agreement.

Response:

Refer to pages 2 – 28 of this response for the current collective bargaining agreement which is being filed under seal pursuant to a Motion for Confidential Treatment.

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9. Refer to the Tolliver Testimony, Exhibit RDT-1.
 - a. Explain why the equity to asset ratio has increased 40.52 percent to 48.80 percent over the past ten years.
 - b. Explain whether Cumberland Valley Electric is in default with its loan covenants.
 - c. Provide the monthly Times Interest Earned Ratio (TIER) and Debt Service Coverage (DSC) to date for 2020.

Response:

- a) The equity to asset ratio includes patronage capital from investments in associated organizations. The patronage capital these organizations have allocated to Cumberland Valley Electric is reflected in the increased equity over the last 10 years. This ratio would include patronage capital from our generation and transmission cooperative, East Kentucky Power. See chart below for Cumberland Valley Electric's modified equity ratio that removes the patronage capital from associated organizations.

YEAR	MARGINS & EQUITY	INV-ASSOC ORG PATRON CAP	TOTAL ASSETS	MODIFIED EQUITY RATIO
2010	\$31,322,996.00	\$13,201,159.00	\$77,308,130.00	23.44
2011	\$34,652,023.00	\$15,943,278.00	\$82,033,414.81	22.81
2012	\$37,000,392.00	\$18,336,192.00	\$85,721,370.00	21.77
2013	\$40,094,172.00	\$21,323,218.00	\$93,207,169.00	20.14
2014	\$42,864,919.00	\$23,873,517.00	\$96,904,768.00	19.60
2015	\$45,000,399.00	\$26,189,277.00	\$102,082,401.00	18.43
2016	\$46,705,201.00	\$28,415,741.00	\$103,510,308.00	17.67
2017	\$48,314,676.00	\$29,345,871.00	\$103,007,681.00	18.41
2018	\$51,106,237.00	\$31,014,418.00	\$104,901,308.00	19.15
2019	\$53,510,119.00	\$32,671,174.00	\$109,287,038.00	19.07

- b) Cumberland Valley Electric met all loan covenants for the test year 2019, however, financial metrics are in decline in 2020. Cumberland Valley Electric's OTIER through August 2020 was .32. RUS requires the average OTIER to be 1.10 in the best two years out of the three most recent years. Cumberland Valley Electric will still be in compliance with loan covenants at year end 2020, however, future years of 2021 and 2022 could be in jeopardy.
- c) The table below shows the monthly Times Interest Earned Ratio (TIER) and Debt Service Coverage (DSC) from January 2020 to August 2020.

Month (2020)	TIER	DSC
January	2.13	4.07
February	2.61	3.65
March	2.54	2.16
April	1.62	2.11
May	1.05	1.95
June	0.61	1.44
July	0.60	1.57
August	0.83	1.71

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10. Refer to the Direct Testimony of John Wolfram (Wolfram Testimony), CVE_Rev_Reg_FILED.xlsx, tab 1.08 Dir.
- a. Provide an explanation of the increase in Board Fees.
 - b. Provide a detail explanation for the rational for determining which Board of Directors expenses to be excluded.
 - c. Provide the total Board of Directors expenses for the past five years.

Response:

- a) Following the conclusion of Cumberland Valley's 2016 rate case¹ the Cooperative's Board of Directors, senior management and counsel spent many months developing a plan to completely reform the Board's compensation structure. The essential elements of that reformation were, first, a phased elimination of health, dental and other forms of insurance for both current and former directors; and, second, a contemporaneous re-setting of the monthly meeting fee for current directors. For decades the monthly meeting fee for Cumberland Valley's Directors was \$500.00. However, informal information obtained from other cooperatives in the East Kentucky Power Cooperative system revealed that a monthly meeting fee of \$1,000.00 per Director was reasonable. Cumberland Valley believes that it has now put a supportable, cost-effective and

¹ Case No. 2016-00169, *Application of Cumberland Valley Electric, Inc. for General Adjustment of Rates*

simplified Director compensation structure in place that can endure for several years to come.

- b) Cumberland Valley Electric's rationale for the rate treatment of Directors Expenses was based on the requirements of the Commission's Streamlined Procedure Pilot Program set forth in the Order dated December 20, 2019 in Case No. 2018-00407. The rationale is also based on our understanding of the rate treatment of these items in other cooperative rate filings. Basically, the cooperative removed the costs for attendance at industry association meetings when the director is not Cumberland Valley Electric's official representative, and director insurance costs (except for liability insurance premiums which are not excluded). Cumberland Valley Electric does not incur costs for directors' spouses or for dependents of deceased directors. Other director expenses associated with the proper discharge of director duties are included.
- c) The table below lists the total Board of Directors expenses for the past five years.

Year	Total Board of Directors Expenses
2019	\$142,980.91
2018	\$134,206.70
2017	\$215,687.01
2016	\$180,820.76
2015	\$181,267.98

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11. Refer to the Wolfram Testimony, Exhibit CVE_COS_2019_Filed.xlsx, tab ZeroInt. Provide the customer charge estimation classifying those accounts where the minimum system is used rather than the zero intercept methods as 100 percent demand related.

Response:

The cost-based customer charges using the minimum system approach and the zero intercept approach for Accounts 365, 367, and 368 as presented on Exhibit JW-8 are tabulated below. The zero intercept analysis did not provide reasonable results for poles, so the minimum system method was applied for poles in both columns. Note that neither approach is 100 percent demand related; both the zero intercept method and the minimum system method allocate some costs to the Distribution Demand classification and other costs to the Distribution Customer classification.

#	Rate	Code	Cost-Based Customer Charge (\$/Month)	
			Zero Intercept	Minimum System
1	Sch I - Residential, Schools & Churches	R	25.53	20.21
2	Sch I - Res TOD	TOD	25.57	20.25
3	Sch II - Small Commercial Small Power	C1	25.57	20.25
4	Sch II - Small Commercial Small Power	C2	27.35	22.03
5	Sch VII - Inclining Block Rate	IB	25.64	20.32
6	Sch III - All 3Phase Schools & Churches	E1	25.45	20.08
7	Sch IV-A - Large Power 50-2500 kW	L1	29.57	24.17

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12. Reconcile Account 403.7 general plant depreciation expense on Exhibit 34, of \$185,231.06 and on tab 1.05 in CVE_Rev_Req_FILED.xlsx of \$187,106.

Response:

The correct amount is \$185,231.06 as noted on Exhibit 34. The amount reported in Exhibit JW-2, Reference Schedule 1.05 came from a financial software Asset Summary report that mistakenly overstated the amount by approximately \$1,875. The amount in Reference Schedule 1.05 should be \$185,231.06.

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13. Reconcile depreciation expense on 2019 annual report filed with the Commission of \$4,198,767.43 and on tab 1.05 in CVE_Rev_Req_FILDSCED.xlsx of \$4,200,643.

Response:

The depreciation amount of \$4,198,767.43 on the 2019 annual report filed with the Commission is correct. The amount on Reference Schedule 1.05 includes the same small reporting error described in response to PSC 1-12. The amount in Reference Schedule 1.05 should be \$4,198,767.43.

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14. Refer to Case No. 2014-00139 and Cumberland Valley Electric's Prepay service tariff in general. The current prepay month service fee is \$3.00 or 10 cents per day which was calculated based on the assumption of funding the annual additional investment, specifically the investment in the AMI meter equipped with a disconnection feature, as well as four monthly communication fee charges.
- a. Refer to Case No. 2018-00056 in which Cumberland Valley Electric's application for a Certificate of Public Convenience and Necessity (CPCN) to purchase and install an AMI was approved. Explain whether the costs associated with the calculation of the annual additional investment needed for the disconnect feature are still relevant. If not, provide a revised calculation.
 - b. Provide support for the continued use of the four monthly communication fee charges of 10 cents.
 - c. Cumberland Valley Electric estimated that approximately 3 percent of its members would elect to participate in the prepay program. Provide the percentage of Cumberland Valley Electric's members that are currently enrolled in the prepay program.

Response:

- a) The costs associated with the calculation of the annual additional investment needed for the disconnect feature for the Cumberland Valley Electric prepay program are different now than anticipated at the time the tariff was filed in 2014. With the implementation of the AMI system, prepay customers use the same meters as other residential members, with no need for any incremental functionality or investment. For this reason, the meter investment portion of the cost from the original Prepay cost worksheet should change from \$225.79 to zero. However, the cooperative also identified incremental costs for the program that

were not anticipated or in the original cost estimate, including the costs associated with various Prepay bill payment options (increased number of monthly transactions using Customer Service Representatives, checks via ebill, checks via IVR (interactive voice response system or automated phone line), and credit card transactions (Visa/Mastercard). Adding these costs results in a revised monthly cost of \$1.20 per prepay program participant. See attached worksheets (also updated with 2019 RUS Form 7 data and other data from company records).

Note that this revision results in a decrease to annual revenues that Cumberland Valley Electric did not factor into its proposed revenue requirement. If the Commission elects to revise the Prepay Fee from \$3.00 to \$1.20, it will be necessary to adjust the revenue deficiency as filed in this case. This change amounts to a known and measurable reduction of annual revenues of \$20,884. To properly allow Cumberland Valley Electric to achieve the target revenue requirement, a pro forma reduction to the test year revenue of \$20,884 is appropriate. (This treatment is like that afforded to revisions in miscellaneous service charges in other cooperative rate filings.) This additional revenue deficiency should be allocated to the residential rate class. See the last page of the worksheet for supporting calculations.

- b) Cumberland Valley Electric pays its telecommunication charges on a comprehensive, integrated basis, and thus the cooperative cannot distinguish with

certainty the portion of those charges related to text messaging for the prepay program. Cumberland Valley believes the 10 cent value is a reasonable estimate of those costs, and recommends continuing its use in the prepay cost calculation as revised in part a of this response.

- c) The table below details the percentage of Cumberland Valley Electric residential members that are enrolled in the prepay program as of October 30, 2020.

Active Prepay Accounts	Total Residential Accounts	% of Accounts that are Prepay
994	22,323	4.45%

Exhibit E

CUMBERLAND VALLEY ELECTRIC

DEVELOPMENT OF ADDER FOR ADDITIONAL METER COSTS

A. Development of Fixed Charge Rate (Excludes Purchased Power Costs)

	Expense	Fixed Rate
1	Depreciation	3.90%
2	Distribution O&M	4.13%
3	Admin & General	1.67%
4	<u>Total Costs - Distribution</u>	<u>9.70%</u>
5	Return	3.90%
6	Annual Revenue Requirements	13.60%
	Monthly Fixed Rate (Excludes Purchased Power Costs)	1.13%

B. Basis for Fixed Charge Rate Percentages:

1. Depreciation Rate is the actual depreciation expense divided by year end investment in distribution plant as provided on RUS Form 7.

Depreciation Expense	Dist Plant	Ratio
\$4,038,211	\$103,494,127	0.0390

2. Distribution O&M rate is the actual distribution O&M expense divided by the year end investment in distribution plant as provided on RUS Form 7.

Dist O&M	Dist Plant	Ratio
\$4,271,755	\$103,494,127	0.0413

3. Admin & General expenses are divided by the year end investment in distribution plant.

A&G Expense	Dist Plant	Ratio
\$1,730,239	\$103,494,127	0.0167

Exhibit E

CUMBERLAND VALLEY ELECTRIC

DEVELOPMENT OF ADDER FOR ADDITIONAL METER COSTS

4. Return is based on Actual Annual Debt and Interest and Return on Equity based on TIER of 2.00. (Margins equal Interest Costs)

<u>Capital Structure</u>		<u>Percent</u>
Debt	\$42,813,061	68.69%
Equity (Excludes GTCC)	\$19,517,122	31.31%
	<u>\$62,330,183</u>	<u>100.00%</u>

<u>Interest and Equity Computations</u>		
Interest on LTD Using Interest Costs for 2019		\$1,216,524
Margins would be equal to interest for 2.00 TIER		\$1,216,524
		<u>\$2,433,048</u>

<u>Return on Capital</u>		<u>Composite</u>
Return on Debt	2.84%	1.95%
Return on Equity	6.23%	1.95%
		<u>3.90%</u>

C. Customer Charge Adder

1. Incremental Meter Costs Associated with Prepay	\$	-
2. Annual Fixed Charge Rate from A. above		13.60%
3. Annual Costs for Distribution Lines	\$	-
4. Divide by 12 for Monthly Rate	\$	-
5. Plus Monthly Fees		
Communication Fees (4 texts x \$0.10)	\$	0.40
Payment Fees	\$	0.78
Check Fees	\$	0.02
<u>Total</u>	<u>\$</u>	<u>1.20</u>
6. Monthly Customer Cost/Charge	\$	1.20

CVE Prepay Customers -- 2019 Number of Payments by Type

		<u>Jan-19</u>	<u>Feb-19</u>	<u>Mar-19</u>	<u>Apr-19</u>	<u>May-19</u>	<u>Jun-19</u>	<u>Jul-19</u>	<u>Aug-19</u>	<u>Sep-19</u>	<u>Oct-19</u>	<u>Nov-19</u>	<u>Dec-19</u>	<u>Average</u>
1	CRPMT	616	398	481	429	512	435	640	605	545	485	490	638	523
2	EAP-PMT	55	195	51	125	29	3	-	-	-	-	1	133	49
3	EBILL-CHK	12	9	7	11	13	10	11	8	11	12	15	18	11
4	EBILL-VM	225	165	148	121	141	128	156	149	154	146	190	179	159
5	GRM-CA	197	126	174	140	159	157	209	216	223	191	214	221	186
6	IVR-CH	30	20	20	12	17	19	24	17	20	21	22	33	21
7	IVR-VM	1,128	828	887	671	763	769	998	901	797	758	1,090	1,138	894
8	MOB-CH	88	39	43	51	62	66	67	62	56	51	87	90	64
9	MOB-VM	1,519	1,078	1,160	925	1,058	1,061	1,339	1,356	1,238	1,175	1,574	1,740	1,269
10	PMT		1			3	1	6		2	5	2	12	4
11	REMIT			1							1			1
12														
13	Total	3,870	2,859	2,972	2,485	2,757	2,649	3,450	3,314	3,046	2,845	3,685	4,202	3,178

CVE Prepay Customers -- 2019 Cost of Payments by Type

		<u>Jan-19</u>	<u>Feb-19</u>	<u>Mar-19</u>	<u>Apr-19</u>	<u>May-19</u>	<u>Jun-19</u>	<u>Jul-19</u>	<u>Aug-19</u>	<u>Sep-19</u>	<u>Oct-19</u>	<u>Nov-19</u>	<u>Dec-19</u>	<u>Average</u>
1	CRPMT	\$ 25,455	\$ 19,464	\$ 27,213	\$ 17,756	\$ 19,793	\$ 15,173	\$ 22,094	\$ 24,268	\$ 21,763	\$ 21,896	\$ 23,578	\$ 26,709	\$ 22,097
2	EAP-PMT	\$ 7,141	\$ 35,839	\$ 9,980	\$ 24,113	\$ 5,482	\$ 570					\$ 98	\$ 18,410	\$ 12,704
3	EBILL-CHK	\$ 760	\$ 520	\$ 425	\$ 610	\$ 1,085	\$ 1,012	\$ 903	\$ 575	\$ 885	\$ 690	\$ 1,002	\$ 885	\$ 779
4	EBILL-VM	\$ 8,129	\$ 7,272	\$ 6,044	\$ 4,346	\$ 5,284	\$ 5,453	\$ 5,593	\$ 5,326	\$ 5,504	\$ 4,957	\$ 7,637	\$ 6,655	\$ 6,017
5	GRM-CA	\$ 5,757	\$ 4,264	\$ 4,495	\$ 4,037	\$ 4,235	\$ 4,237	\$ 6,125	\$ 6,005	\$ 5,261	\$ 5,077	\$ 6,566	\$ 6,484	\$ 5,212
6	IVR-CH	\$ 907	\$ 700	\$ 679	\$ 414	\$ 435	\$ 642	\$ 771	\$ 766	\$ 812	\$ 755	\$ 676	\$ 1,267	\$ 735
7	IVR-VM	\$ 43,733	\$ 34,284	\$ 36,659	\$ 25,487	\$ 27,853	\$ 25,911	\$ 34,057	\$ 31,755	\$ 26,044	\$ 25,780	\$ 40,968	\$ 43,679	\$ 33,018
8	MOB-CH	\$ 4,037	\$ 2,139	\$ 2,393	\$ 1,958	\$ 2,602	\$ 2,487	\$ 3,171	\$ 2,569	\$ 2,440	\$ 2,233	\$ 3,577	\$ 4,239	\$ 2,820
9	MOB-VM	\$ 57,631	\$ 45,153	\$ 47,723	\$ 32,266	\$ 35,438	\$ 35,321	\$ 46,268	\$ 47,756	\$ 41,482	\$ 39,455	\$ 57,193	\$ 63,098	\$ 45,732
10	PMT		\$ 20			\$ 100	\$ 50	\$ -			\$ 35	\$ 120	\$ 100	\$ 61
11	REMIT			\$ 24							\$ 13			\$ 18
12	Total	\$ 153,550	\$ 149,654	\$ 135,635	\$ 110,987	\$ 102,306	\$ 90,856	\$ 118,982	\$ 119,020	\$ 104,190	\$ 100,890	\$ 141,414	\$ 171,527	\$ 129,193

CVE Prepay Customers -- 2019 Transaction Costs - Credit

		<u>Jan-19</u>	<u>Feb-19</u>	<u>Mar-19</u>	<u>Apr-19</u>	<u>May-19</u>	<u>Jun-19</u>	<u>Jul-19</u>	<u>Aug-19</u>	<u>Sep-19</u>	<u>Oct-19</u>	<u>Nov-19</u>	<u>Dec-19</u>	<u>Average</u>
1	EBILL-VM	\$ 8,129	\$ 7,272	\$ 6,044	\$ 4,346	\$ 5,284	\$ 5,453	\$ 5,593	\$ 5,326	\$ 5,504	\$ 4,957	\$ 7,637	\$ 6,655	\$ 6,017
2	IVR-VM	\$ 43,733	\$ 34,284	\$ 36,659	\$ 25,487	\$ 27,853	\$ 25,911	\$ 34,057	\$ 31,755	\$ 26,044	\$ 25,780	\$ 40,968	\$ 43,679	\$ 33,018
3	MOB-VM	\$ 57,631	\$ 45,153	\$ 47,723	\$ 32,266	\$ 35,438	\$ 35,321	\$ 46,268	\$ 47,756	\$ 41,482	\$ 39,455	\$ 57,193	\$ 63,098	\$ 45,732
4	Total	\$ 109,493	\$ 86,709	\$ 90,426	\$ 62,099	\$ 68,575	\$ 66,684	\$ 85,918	\$ 84,838	\$ 73,030	\$ 70,192	\$ 105,798	\$ 113,432	\$ 84,766
5	Percentage Fee	0.8956	0.8956	0.8956	0.8956	0.8956	0.8956	0.8956	0.8956	0.8956	0.8956	0.8956	0.8956	0.8956
6	CVE Expenditure	\$ 980.62	\$ 776.56	\$ 809.86	\$ 556.16	\$ 614.16	\$ 597.23	\$ 769.48	\$ 759.81	\$ 654.06	\$ 628.64	\$ 947.52	\$ 1,015.90	\$ 759.17
7	Active Accounts	944	932	958	957	964	962	943	962	977	993	1010	1000	967
8	Expense per Acct.	\$ 1.04	\$ 0.83	\$ 0.85	\$ 0.58	\$ 0.64	\$ 0.62	\$ 0.82	\$ 0.79	\$ 0.67	\$ 0.63	\$ 0.94	\$ 1.02	\$ 0.78

CVE Prepay Customers -- 2019 Transaction Costs - Checks

		<u>Jan-19</u>	<u>Feb-19</u>	<u>Mar-19</u>	<u>Apr-19</u>	<u>May-19</u>	<u>Jun-19</u>	<u>Jul-19</u>	<u>Aug-19</u>	<u>Sep-19</u>	<u>Oct-19</u>	<u>Nov-19</u>	<u>Dec-19</u>
1	EBILL-CHK	12	9	7	11	13	10	11	8	11	12	15	18
2	IVR-CH	30	20	20	12	17	19	24	17	20	21	22	33
3	MOB-CH	88	39	43	51	62	66	67	62	56	51	87	90
4	Total	130	68	70	74	92	95	102	87	87	84	124	141
5	Transaction Fee	\$ 0.20	\$ 0.20	\$ 0.20	\$ 0.20	\$ 0.20	\$ 0.20	\$ 0.20	\$ 0.20	\$ 0.20	\$ 0.20	\$ 0.20	\$ 0.20
6	CVE Expenditure	\$ 26.00	\$ 13.60	\$ 14.00	\$ 14.80	\$ 18.40	\$ 19.00	\$ 20.40	\$ 17.40	\$ 17.40	\$ 16.80	\$ 24.80	\$ 28.20

CVE Prepay Customers Pro Forma Adjustment to Test Period Revenues if Prepay Fee is Revised

	<u>Jan-19</u>	<u>Feb-19</u>	<u>Mar-19</u>	<u>Apr-19</u>	<u>May-19</u>	<u>Jun-19</u>	<u>Jul-19</u>	<u>Aug-19</u>	<u>Sep-19</u>	<u>Oct-19</u>	<u>Nov-19</u>	<u>Dec-19</u>	<u>Total</u>
1 Active Accounts	944	932	958	957	964	962	943	962	977	993	1,010	1,000	11,602
2 Fee	\$ 3.00	\$ 3.00	\$ 3.00	\$ 3.00	\$ 3.00	\$ 3.00	\$ 3.00	\$ 3.00	\$ 3.00	\$ 3.00	\$ 3.00	\$ 3.00	\$ 36.00
3 Total Revenue	\$ 2,832	\$ 2,796	\$ 2,874	\$ 2,871	\$ 2,892	\$ 2,886	\$ 2,829	\$ 2,886	\$ 2,931	\$ 2,979	\$ 3,030	\$ 3,000	\$ 34,806
4													0
5 Revised Fee	\$ 1.20	\$ 1.20	\$ 1.20	\$ 1.20	\$ 1.20	\$ 1.20	\$ 1.20	\$ 1.20	\$ 1.20	\$ 1.20	\$ 1.20	\$ 1.20	\$ 14.40
6 Total \$	\$ 1,133	\$ 1,118	\$ 1,150	\$ 1,148	\$ 1,157	\$ 1,154	\$ 1,132	\$ 1,154	\$ 1,172	\$ 1,192	\$ 1,212	\$ 1,200	\$ 13,922
7													\$ -
8 Incr(Decr)	\$ (1,699)	\$ (1,678)	\$ (1,724)	\$ (1,723)	\$ (1,735)	\$ (1,732)	\$ (1,697)	\$ (1,732)	\$ (1,759)	\$ (1,787)	\$ (1,818)	\$ (1,800)	\$ (20,884)

9													
10													Test Year Calculation \$ 34,806
11													
12													Pro Forma Calculation \$ 13,922
13													
14													Adjustment \$ (20,884)

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

15. Provide annual wages for each employee for the past five years.

Response:

Refer to pages 2 and 3 of this response for annual wages for the past five years.

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

Employee ID#	Annual Wages for Cumberland Valley Employees (2019 - 2015)				
	2019	2018	2017	2016	2015
1201	\$116,518.63	\$114,003.28	\$102,537.12	\$100,404.56	\$98,145.52
1202	\$87,822.32	\$87,413.77	\$80,998.56	\$82,450.58	\$77,647.59
1203	\$52,646.59	\$52,121.36	\$50,802.56	\$52,006.47	\$48,799.01
1204	\$98,677.70	\$91,000.08	\$87,847.83	\$100,096.82	\$92,554.14
1205	\$139,327.49	\$131,136.99	\$115,571.33	\$121,176.80	\$114,682.85
1206	\$46,872.06	\$46,280.15	\$43,696.96	\$45,589.49	\$42,791.83
1207	\$70,358.39	\$69,030.76	\$66,637.93	\$71,717.65	\$69,656.29
1208	\$51,654.23	\$50,574.68	\$48,894.16	\$49,870.26	\$47,085.80
1209	\$49,171.06	\$48,454.12	\$46,869.28	\$48,152.82	\$46,060.64
1210	\$49,542.12	\$48,932.92	\$47,571.90	\$48,136.07	\$46,205.57
1211	\$70,532.50	\$67,696.72	\$61,750.88	\$60,661.04	\$59,298.00
1212	\$77,898.82	\$80,562.60	\$74,411.64	\$81,093.76	\$59,374.06
1213	\$91,349.26	\$92,524.76	\$83,595.00	\$94,533.10	\$90,719.27
1214	\$88,846.51	\$90,814.91	\$82,688.95	\$89,045.18	\$87,498.87
1215	\$118,272.88	\$106,603.51	\$99,947.46	\$104,690.30	\$103,642.49
1216	\$76,073.78	\$79,813.87	\$75,954.12	\$79,683.88	\$73,168.11
1217	\$49,533.30	\$48,632.92	\$47,322.25	\$47,616.66	\$46,315.43
1218	\$116,410.28	\$112,996.72	\$106,193.73	\$128,590.72	\$101,673.68
1219	\$103,286.77	\$99,885.73	\$95,541.76	\$99,255.44	\$97,481.23
1220	\$85,083.50	\$72,893.57	\$69,846.53	\$70,272.84	\$70,529.72
1221	\$53,794.39	\$53,664.13	\$51,604.28	\$54,930.24	\$49,488.04
1222	\$50,194.65	\$49,582.27	\$48,367.82	\$48,395.77	\$46,502.59
1223	\$83,175.16	\$76,150.54	\$79,208.61	\$88,204.26	\$82,281.23
1224	\$73,303.85	\$71,723.28	\$67,032.12	\$66,198.56	\$64,710.72
1225	\$65,103.46	\$65,234.20	\$62,415.73	\$62,604.70	\$57,526.27
1226	\$185,719.41	\$184,642.32	\$184,842.32	\$184,842.32	\$181,840.08
1227	\$107,974.75	\$105,950.00	\$101,320.60	\$100,544.72	\$98,282.48
1228	\$87,455.75	\$85,816.72	\$82,679.08	\$82,174.88	\$80,326.88
1229	\$86,619.50	\$89,944.36	\$90,665.86	\$95,124.34	\$84,789.60
1230	\$68,342.23	\$8,754.64	\$0.00	\$0.00	\$0.00
1231	\$49,428.58	\$48,306.03	\$47,186.55	\$47,683.70	\$46,040.86
1232	\$101,014.54	\$97,495.40	\$92,541.80	\$89,175.38	\$87,185.38
1233	\$132,844.56	\$118,330.20	\$109,568.09	\$115,067.32	\$101,319.63
1234	\$27,101.52	\$23,077.56	\$24,319.55	\$25,753.94	\$22,502.88
1235	\$64,749.17	\$8,931.82	\$0.00	\$0.00	\$0.00
1236	\$49,550.63	\$48,855.64	\$47,422.79	\$48,018.79	\$46,337.33
1237	\$49,840.32	\$48,762.48	\$47,321.40	\$47,449.14	\$46,443.95
1238	\$89,162.20	\$88,193.98	\$79,234.45	\$79,163.37	\$74,863.05
1239	\$78,932.50	\$76,250.00	\$69,523.20	\$68,387.84	\$66,850.56
1240	\$9,556.73	\$6,928.79	\$8,789.27	\$1,126.60	\$0.00
1241	\$68,162.49	\$68,556.61	\$65,662.09	\$67,934.88	\$62,500.95
1242	\$50,290.42	\$50,010.54	\$47,663.66	\$48,799.57	\$46,395.80

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

Employee ID#	Annual Wages for Cumberland Valley Employees (2019 - 2015)				
	2019	2018	2017	2016	2015
1243	\$27,186.06	\$27,298.21	\$24,208.30	\$23,923.98	\$23,135.15
1244	\$138,858.07	\$124,317.23	\$116,706.62	\$126,088.64	\$122,019.44
1245	\$123,721.00	\$121,050.00	\$110,255.20	\$141,087.21	\$105,829.92
1246	\$74,716.62	\$67,840.15	\$67,765.75	\$71,424.15	\$66,217.34
1247	\$107,974.75	\$105,950.00	\$98,566.40	\$97,239.68	\$95,052.00
1248	\$70,654.56	\$73,233.86	\$69,886.84	\$75,469.40	\$62,614.51
1249	\$92,049.76	\$85,376.36	\$74,134.16	\$80,072.84	\$76,365.35
1250	\$85,435.38	\$83,016.08	\$75,452.89	\$79,032.00	\$76,511.82
1251	\$82,258.73	\$101,445.64	\$99,711.44	\$107,957.28	\$99,483.27
1252	\$59,960.85	\$54,367.01	\$0.00	\$0.00	\$0.00
1253	\$928.00	\$0.00	\$0.00	\$0.00	\$0.00
1254	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
1255	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
1256	\$0.00	\$0.00	\$0.00	\$94,111.77	\$85,589.60
1257	\$0.00	\$30,277.09	\$0.00	\$0.00	\$0.00
1258	\$0.00	\$45,375.40	\$59,831.73	\$62,686.77	\$51,665.28
1259	\$0.00	\$0.00	\$0.00	\$6,500.94	\$46,031.84
1260	\$0.00	\$0.00	\$0.00	\$0.00	\$26,982.30
1261	\$0.00	\$0.00	\$0.00	\$0.00	\$13,189.02
Total	\$4,137,957.78	\$3,988,099.96	\$3,694,585.55	\$3,964,235.42	\$3,772,220.22

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

16. Provide the number of overtime hours for each employee for the past five years.

Response:

Refer to pages 2 and 3 of this response for overtime hours for the past five years.

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

Employee ID#	Annual Overtime Hours for Cumberland Valley Employees (2019 - 2015)				
	2019	2018	2017	2016	2015
1202	464.50	489.00	411.00	444.50	394.50
1203	98.00	110.45	111.00	154.00	91.50
1204	672.50	545.50	527.00	804.50	687.00
1205	1,524.00	1,401.50	1,130.00	1,268.00	1,185.50
1206	36.50	44.50	0.00	67.00	8.50
1207	88.00	86.50	72.50	192.00	182.00
1208	69.75	65.75	54.50	90.25	39.00
1209	0.50	9.50	0.00	39.00	8.00
1210	9.75	18.25	15.50	38.50	12.50
1212	237.50	342.50	245.50	408.00	118.00
1213	538.50	578.00	432.50	703.50	645.50
1214	465.00	540.50	413.00	561.50	572.50
1215	1,083.00	896.00	805.50	905.50	938.50
1216	263.00	333.50	266.50	377.00	274.00
1217	9.50	9.50	8.00	23.00	16.00
1219	767.50	735.50	698.00	786.00	797.00
1220	419.50	170.00	137.00	160.00	202.00
1221	130.50	155.50	135.00	241.25	112.75
1222	29.75	37.00	39.00	46.25	21.50
1223	339.00	228.00	337.50	539.00	482.50
1225	391.50	428.50	394.25	409.00	300.00
1229	431.00	542.50	609.00	716.50	551.50
1230	146.50	0.00	0.00	0.00	0.00
1231	6.50	0.00	4.00	25.00	7.50
1232	705.50	647.00	616.00	532.00	581.00
1233	1,398.00	1,130.50	1,014.00	1,155.00	882.80
1234	0.00	0.00	0.00	13.50	3.00
1235	52.50	4.00	0.00	0.00	0.00
1236	10.00	16.00	11.00	35.00	16.50
1237	18.25	13.25	8.00	18.00	19.75
1238	461.00	473.55	315.00	315.50	260.50
1240	0.00	0.00	0.00	0.00	0.00
1241	37.00	66.00	41.00	132.00	16.00
1242	31.00	49.50	18.00	58.30	18.50
1243	0.00	0.00	0.00	8.00	2.00
1244	1,539.50	1,255.00	1,155.00	1,376.00	1,350.50
1246	178.50	66.50	97.50	185.50	101.50
1248	83.50	197.00	175.00	291.00	143.00
1249	501.00	411.00	212.50	356.50	340.00
1250	414.00	374.50	255.50	348.00	346.00
1251	143.50	784.00	785.00	1,004.00	843.50
1252	305.00	270.00	0.00	0.00	0.00

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

Employee ID#	Annual Overtime Hours for Cumberland Valley Employees (2019 - 2015)				
	2019	2018	2017	2016	2015
1253	0.00	0.00	0.00	0.00	0.00
1254	0.00	0.00	0.00	0.00	0.00
1255	0.00	0.00	0.00	0.00	0.00
1257	0.00	92.00	0.00	0.00	0.00
1258	0.00	34.50	136.50	217.50	131.50
1259	0.00	0.00	0.00	0.00	8.00
1260	0.00	0.00	0.00	0.00	6.50
1261	0.00	0.00	0.00	0.00	0.00
Total	16,119.00	15,670.25	13,703.25	17,061.05	14,733.30

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

17. Provide the employee and company contribution towards vision insurance.

Response:

Cumberland Valley Electric does not purchase vision insurance for any employee. There are provisions in the union contract that reimburse union employees for eye exams and glasses. See union contract provided in response to Question 8 in Cumberland Valley Electric's response to Commission Staff's First Request For Information To Cumberland Valley Electric, Inc. In particular, see Article X-Miscellaneous Allowance, Section 4 and Article XIV-Health and Safety, Section 2.

Cumberland Valley Electric does not furnish any vision insurance or provide vision reimbursement for non-union employees.

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

18. Provide the percentage contribution for medical insurance projected to be paid by salaried employees in the years 2021, 2022, and 2023.

Response:

Cumberland Valley Electric, Inc. salaried employees are currently projected to pay 12.5% in each of the years 2021, 2022, and 2023.

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

19. Provide the percentage contribution of medical insurance projected to be paid by union employees in the years 2021 and 2022.

Response:

See the table below for the projected union employee's contribution to medical insurance for the year 2021. We do not have projections for medical rates for the year 2022, and a new union contract would be in place on September 1, 2022 assuming all negotiations are settled.

Description	2021 Rates	2021 Union Contribution	Percentage
Family	\$ 1,670.95	\$170.07	10.18%
Employee & Spouse	\$ 1,237.52	\$125.56	10.15%
Employee & Child	\$ 1,074.32	\$108.41	10.09%
Employee	\$ 511.78	\$50.64	9.89%

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

20. Provide a copy of the new "Insurance and Other Benefits and Payments for Directors" policy that was adopted on January 9, 2020, and became effective April 1, 2020

Response:

Refer to page 2 – 5 of this response for a copy of the new "Insurance and Other Benefits and Payments for Directors" policy.

Insurance and Other Benefits and Payments for Directors

10. Purpose

To clarify eligibility for health and dental insurance and other recognized benefits for current and former directors of Cumberland Valley Electric. It is the intent of this policy to amend and replace Policy 200.07—Insurance for Directors (last effective amendment January 20, 2019), Policy 200.08—Benefits for Directors (last effective amendment January 20, 2019), and Policy 200.10—Director’s Emeritus (last effective amendment January 20, 2019).

11. Scope

This policy applies to all current and former members of the Board of Directors of Cumberland Valley Electric (“Directors”).

12. Policy

- A. The effective date of this amended policy shall be April 1, 2020 (“Effective Date”).
- B. Beginning on the Effective Date of this policy the payment of stipends by the Cooperative to any Director intended as a substitute for the receipt of any category of insurance benefit to that Director which was contained in prior versions of the above-referenced Cooperative policies is eliminated.
- C. To the extent that this policy conflicts with or fails to specifically address subjects or specific provisions of previous versions of Cumberland Valley Electric Policies 200.07, 200.08 and 200.10, or any other existing Cumberland Valley Electric policy besides those enumerated above, it shall supersede and in all other respects control over such policies.

12.1. Health Insurance

3.1 Policies Consistent with the immediately prior version of this policy and beginning November 15, 2012, no newly elected Directors shall be eligible to receive health insurance with the Cooperative.

3.1.2 The Beginning on the Effective Date all current and former Directors receiving health insurance from the Cooperative shall begin making self-contributions to the cost of premiums for such insurance attributable to that Director by way of reimbursement to the Cooperative as follows:

1. 15% beginning 4/1/2020 until 3/31/2021
2. 30% beginning 4/1/2021 until 3/31/2022
3. 45% beginning 4/1/2022 until 3/31/2023

Thereafter, all Cooperative-provided health insurance coverage for current and former Directors shall cease effective March 31, 2023. However, should a Director wish to continue to receive health insurance, and the Cooperative is able to obtain the insurance from its insurance provider, that Director shall be permitted to reimburse the Cooperative 100% of the cost of premiums attributable to that Director. Excepted from this provision are any dependent spouses of deceased Directors who, as of the Effective Date, were receiving survivor health insurance. Any such dependent spouses shall continue to receive health insurance until the earlier of their death, their remarriage, or a written statement provided to the Cooperative that they no longer desire such insurance.

12.2. Dental Insurance, Accidental Death & Disability Insurance and Life Insurance

Beginning on the Effective Date all current and former Directors receiving dental insurance and/or accidental death & disability insurance and/or life insurance from the Cooperative shall begin making self-contributions to the cost of premiums for such insurance attributable to that Director by way of reimbursement to the Cooperative as follows:

1. 15% beginning 4/1/2020 until 3/31/2021
2. 30% beginning 4/1/2021 until 3/31/2022
3. 45% beginning 4/1/2022 until 3/31/2023

Thereafter, all Cooperative-provided dental insurance and/or accidental death & disability insurance and/or life insurance shall cease effective March 31, 2023. However, should a Director wish to continue to receive any of these categories of insurance, and the Cooperative is able to obtain the insurance from its insurance provider, that Director shall be permitted to reimburse the Cooperative 100% of the cost of premiums attributable to that Director. Excepted from this provision are any dependent spouses of deceased Directors who, as of the Effective Date, were receiving survivor dental insurance. Any such dependent spouses shall continue to receive dental insurance until the earlier of their death or a written statement provided to the Cooperative that they no longer desire such insurance.

12.3. Directors' Emeritus

Beginning on the Effective Date all former Directors receiving a monthly Emeritus fee shall have that fee reduced by the percentages provided below:

1. 15% beginning 4/1/2020 until 3/31/2021
2. 30% beginning 4/1/2021 until 3/31/2022
3. 45% beginning 4/1/2022 until 3/31/2023

Thereafter, effective March 31, 2023 all monthly Emeritus fees shall be eliminated.



13. Compliance

13.1. *Compliance Measurement*

The Chairman of the Board of Directors shall be responsible for advising Board members regarding compliance with this Policy.

13.2. *Exceptions*

There are no exceptions to this policy.

13.3. *Non-Compliance*

An employee found to have violated this policy may be subject to disciplinary action in accordance with the Cooperative’s Progressive Discipline policy.

14. Related Standards, Policies, and Procedures

- Cumberland Valley By-Laws
- Progressive Discipline Policy

15. Definition of Terms

None.

16. Responsibility

16.1. *Responsibilities for this policy are delineated as follows:*

7.1.1. The Board of Directors of Cumberland Valley Electric is responsible for the content of this policy and its implementation.

7.1.2. The Board of Directors shall be responsible for the overall administration of this policy.

7.1.3. The CEO shall direct and monitor the implementation of appropriate practices/procedures in accordance with this policy.

7.1.4. All Cumberland Valley Electric personnel are responsible for following the guidelines and procedures laid out in this policy as well as for reporting known violations of the policy.

17. Approval

Chairman of the Board

Date

18. Revision History

Date of Change(s)	Summary of Change(s)
July 27, 1995	
May 27, 2003	
November 12, 2009	
November 15, 2012	
January 20, 2019	Added Scope, Compliance, Related Standards, and Definitions of Terms sections to comply with new policy format. Responsibility section rewritten to be consistent with other policies.
January 20, 2020	Policy rewritten by General Board consensus.

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

21. Provide the number of occurrences for each nonrecurring charge during the test year.

Response:

The table below shows the occurrences for each nonrecurring charge for the test year 2019.

Charge Code	Description	Fee	Occurrences	Amount
67.00	Non-Sufficient Funds Charge	\$20.00	497	\$9,940.00
216.00	Trip Fee	\$25.00	89	\$2,225.00
217.00	Disconnect Fee	\$25.00	1,566	\$39,150.00
218.00	Reconnect Fee	\$25.00	1,749	\$43,725.00
219.00	After Hours Reconnect Fee	\$65.00	0	\$0.00

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

22. Provide the total amount collected and number of instances late fees were charged during the test year.

Response:

See table below for instances of late fees and amount charged during the test year 2019.

Month	Late Fee Instances	Amount
Jan	5,148	\$ 50,936.46
Feb	5,053	\$ 53,715.15
Mar	4,560	\$ 43,417.04
Apr	5,086	\$ 42,534.50
May	4,792	\$ 29,351.18
Jun	4,377	\$ 28,634.40
Jul	4,947	\$ 31,947.57
Aug	4,836	\$ 37,731.51
Sep	4,848	\$ 39,620.78
Oct	4,870	\$ 36,337.41
Nov	4,251	\$ 27,582.13
Dec	4,999	\$ 39,831.11
Total	57,767	\$461,639.24

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

23. Provide the number of disconnections and reconnections for 2018, 2019, and monthly for 2020.

Response:

See table below for number of disconnections and reconnections for 2018, 2019 and monthly for 2020. These number will not reconcile by month back to the nonrecurring charges listed in response to Commission Staff's First Request For Information To Cumberland Valley Electric, Inc. Question number 21 because of timing issues related to month end processes.

Year/Month	Disconnections	Reconnections
2018	1,749	1,276
2019	1,746	1,353
Jan-20	170	146
Feb-20	151	122
Mar-20	0	0
Apr-20	0	0
May-20	0	0
Jun-20	0	0
Jul-20	0	0
Aug-20	0	0
Sep-20	0	0
Oct-20	0	0
Nov-20	0	0
Dec-20	0	0

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

24. Identify account 390 structures and improvements, in the amount of \$5,382 and reconcile to the 2019 annual report filed with the Commission.

Response:

The amount of \$5,382 identified by the Commission is the year-end balance for account 390.00 – Structures Cumberland Radio Shack. This is a small structure that houses radio equipment in the eastern part of our service territory. The balance of \$5,382 is imbedded in the Structure and Improvements (390) Balance End of Year of \$2,250,794.93 located on Electric Plant in Service Reference Page 4 of the 2019 PSC annual report. In order to reconcile to the 2019 PSC annual report Cumberland Valley has provided a breakdown of the sub-accounts from the general ledger that make up the balance of \$2,250,794.93.

Account	Description	2019 Year End Balance
390.00	STRUCTURES CUMBERLAND RADIO SHACK	\$ 5,381.58
390.10	STRUCTURES-IMPROVE-GRAY OFFICE	\$ 1,186,243.79
390.15	STRUCTURES-IMPROVE-GRAY ENGINEERING	\$ 85,660.91
390.17	STRUCT-IMPROV GRAY TRANSPORTATION BLDG	\$ 86,660.95
390.18	STRUCT-IMPROV GRAY TRANSPORTATION #2 BLDG	\$ 189,623.00
390.19	STRUCT-GENERATOR BLDG-GRAY	\$ 33,473.47
390.20	STRUCTURES CUMBERLAND OFFICE	\$ 481,052.21
390.21	STRUCTURES CUMBERLAND GARAGE	\$ 82,699.02
Account 390 Total		\$ 2,250,794.93

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

25. Confirm that no rate case expense from the prior rate case is included in the test year, if not provide the appropriate adjustment.

Response:

Upon review, Cumberland Valley Electric identified a single invoice for rate case expense from the prior rate case that was inadvertently included in the test year. The amount is \$979.70 and should be removed from the test year expenses. See attached invoice.

••0••C/

979.70 +

979.70 *

CUMBERLAND VALLEY REC'D

Check # 38297

By PO # -

App. By & Date BPC 2/13/19

DATE FEB 08 2019

REC'D

Date Paid 2-13-19

Check # 77843

Account # 928.00 - 979.70

Post. Date 1/31/19

Due Date 2/8/19

2/2/198

Handwritten signature

Goss • Samford PLLC



O/C
200

Mark David Goss
mdgoss@gosssamfordlaw.com
(859) 368-7740

February 5, 2019

Mr. Ted Hampton
President and CEO
Cumberland Valley Electric, Inc.
6219 U.S. Highway 25 East
Gray, KY 40734

Re: Invoice for January 1, 2019 to January 31, 2019

Dear Ted:

Please find enclosed the invoice for legal services performed by Goss Samford, PLLC on behalf of Cumberland Valley Electric, Inc. for the period from January 1, 2019 to January 31, 2019. Please remit payment for the amounts due within thirty days of today's date. A summary of the amounts due and owing, by matter, are as follows:

<u><i>Matter Description</i></u>	<u><i>Amount</i></u>
2016 General Rate Case – current fees/costs	\$979.70
<i>TOTAL:</i>	<i>\$979.70</i>

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

Sincerely,

Mark David Goss

Enclosure

Goss Samford, PLLC

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

February 05, 2019

Invoice No. 4113

Cumberland Valley Electric, Inc.
Attn: Ted Hampton, President & CEO
6219 U.S. Highway 25 East
Gray, KY 40734

Client Number: 0700 Cumberland Valley Electric, Inc.
Matter Number: 1002 Cumberland Valley - 2016 General Rate
For Services Rendered Through 1/31/2019.

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
1/25/2019	MEB	Review KPSC Order re confidentiality of executive compensation information; brief review of precedent re same.	0.30	\$60.00
1/25/2019	MDG	Review of order from KPSC re confidentiality matters; telephone consultation with T. Hampton and R. Tolliver.	0.50	\$147.50
1/29/2019	MEB	Conference with M. Goss re KPSC Order on confidentiality; telephone call with R. Tolliver re same; review case file/record for relevant information and available copies of exhibits; email exchange with R. Tolliver re same.	2.30	\$460.00
1/30/2019	MEB	Telephone call and email exchange with R. Tolliver re unredacted documents; redact, finalize and compile documents for filing; prepare cover letter.	1.00	\$200.00
1/31/2019	MEB	Prepare and execute electronic filing; coordinate delivery of hard copy to KPSC.	0.50	\$100.00
Billable Hours / Fees:			4.60	\$967.50

Timekeeper Summary

Timekeeper MEB worked 4.10 hours at \$200.00 per hour, totaling \$820.00.

Timekeeper MDG worked 0.50 hours at \$295.00 per hour, totaling \$147.50.

Continued On Next Page

Client Number: 0700
Matter Number: 1002

2/5/2019
Page: 2

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
1/31/2019	Photocopies - Compliance Filing (unredacted documents)	\$12.20	
	Total Costs	\$12.20	

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
1/2/2019	Check Number 77433 against Inv# 4026	(\$645.50)
1/2/2019	Check Number 77433 against Inv# 4026	(\$1.63)
	Total Payments Received:	(\$647.13)

Current Invoice Summary

Prior Balance:	\$647.13	
Payments Received:	(\$647.13)	Last Payment: 1/2/2019
Unpaid Prior Balance:	<u>\$0.00</u>	
Current Fees:	\$967.50	
Advanced Costs:	\$12.20	
TOTAL AMOUNT DUE:	<u><u>\$979.70</u></u>	

Cumberland Valley Electric, Inc.
Case No. 2020-00264
Commission Staff's Data Requests

26. Provide an update to the rate case expense with invoices.

Response:

Refer to pages 2 – 30 of this response for an updated breakdown of rate case expenses and accompanying invoices.

Estimated Rate Case Expenses

Legal Services	\$ 40,750.00
Consulting/COS Study	\$ 15,000.00
Expenses/Costs	\$ 1,000.00
Customer Notice	\$ 25,000.00
	<u>\$ 81,750.00</u>

Incurred Rate Case Expenses

Date	Reference	Amount	Name
1/31/2020	CONSULTING SUPPORT	\$ 1,387.50	CATALYST CONSULTING LLC
1/31/2020	LEGAL SERVICES	\$ 1,564.00	GOSS-SAMFORD
2/28/2020	CONSULTING SUPPORT	\$ 555.00	CATALYST CONSULTING LLC
3/25/2020	LEGAL SERVICES	\$ 1,312.90	GOSS-SAMFORD
5/31/2020	CONSULTING SERVICES	\$ 647.50	CATALYST CONSULTING LLC
6/16/2020	LEGAL SERVICES	\$ 59.00	GOSS-SAMFORD
6/30/2020	CONSULTING SERVICES	\$ 555.00	CATALYST CONSULTING LLC
7/31/2020	CONSULTING SERVICES	\$ 1,480.00	CATALYST CONSULTING LLC
8/19/2020	LEGAL SERVICES	\$ 1,564.08	GOSS-SAMFORD
8/31/2020	CONSULTING SERVICES	\$ 2,497.50	CATALYST CONSULTING LLC
8/31/2020	LEGAL SERVICES	\$ 885.00	PATRICK HAUSER, W
8/31/2020	LEGAL SERVICES	\$ 11,169.50	GOSS-SAMFORD
9/30/2020	CONSULTING SERVICES	\$ 2,220.00	CATALYST CONSULTING LLC
9/30/2020	CLASSIFIED AD - NOTICE	\$ 566.64	MIDDLESBORO DAILY NEWS
9/30/2020	CLASSIFIED AD - NOTICE	\$ 966.00	NEWS JOURNAL
9/30/2020	CLASSIFIED AD - NOTICE	\$ 379.69	MOUNTAIN ADVOCATE MEDIA
9/30/2020	CLASSIFIED AD - NOTICE	\$ 566.64	HARLAN DAILY ENTERPRISE
9/30/2020	CLASSIFIED AD - NOTICE	\$ 547.80	TIMES TRIBUNE
9/30/2020	CLASSIFIED AD - NOTICE	\$ 810.90	PINEVILLE SUN
9/30/2020	CLASSIFIED AD - NOTICE	\$ 390.00	THE MCCREARY COUNTY VOICE
9/30/2020	LEGAL SERVICES	\$ 18,189.21	GOSS-SAMFORD
		<u>\$ 48,313.86</u>	

Summary Incurred Rate Case Expenses

Legal Services/Rate Case	\$ 34,743.69
Consulting/COS Study/Rate Case	\$ 9,342.50
Customer Notice	\$ 4,227.67
	<u>\$ 48,313.86</u>

W. Patrick Hauser, P.S.C.
P.O. Box 1900
Barbourville, KY 40906

Invoice submitted to:
Mr. Ted Hampton
Cumberland Valley Electric
P.O. Box 440
Gray, KY 40734

August 27, 2020

In Reference To: Streamlined 2020 Rate Adjustment Case
Invoice #3378

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
8/14/2020 Phone Call to Mark David Goss	0.10 150.00/hr	15.00
8/13/2020 Prepared Resolution for Board of Directors authorizing the Cooperative's Application to PSC for adjustment to residential rate and facility charge.	1.00 150.00/hr	150.00
8/11/2020 Phone Call to Brian Chaney	0.40 150.00/hr	60.00
8/10/2020 Phone Call From Brian Chaney; Phone call to Brian Chaney; Phone call to Mark Abner; Phone call from Mark Abner.	1.00 150.00/hr	150.00
8/7/2020 Review of emails from Mark David Goss regarding annual professional service expenses (Schedule 1.11 - Professional Services explanations) as well as the invoices that are recoverable in the test year.	0.40 150.00/hr	60.00
8/3/2020 Conference Call with Mark David Goss, Robert Tolliver and Brian Chaney	1.00 150.00/hr	150.00
7/30/2020 Phone Call From Ted Hampton; Phone call from Mark David Goss.	0.25 150.00/hr	37.50
7/23/2020 Conference Call with Mark David Goss, John Wolfram, Alan Zumstein, Allyson Honaker, Brian Chaney and Barbara Elliott regarding how to handle the stranded investment.; Phone call (x2) to Mark David Goss; Phone call from Robbie Tolliver.	1.50 150.00/hr	225.00
1/9/2020 Review of email from Mark David Goss with attached PSC Order regarding the Streamlined Rate Case Procedure.	0.25 150.00/hr	37.50

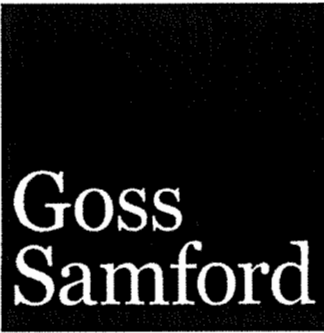
Mr. Ted Hampton

Page 2

	<u>Hours</u>	<u>Amount</u>
For professional services rendered	5.90	\$885.00
Balance due		<u>\$885.00</u>

PLEASE CALL IF YOU HAVE ANY QUESTIONS REGARDING YOUR BILLING STATEMENT.

O.K.
J.D.



ATTORNEYS AT LAW | PLLC

Mark David Goss
mdgoss@gosssamfordlaw.com
(859) 368-7740

September 6, 2020

Mr. Ted Hampton
President and CEO
Cumberland Valley Electric, Inc.
6219 U.S. Highway 25 East
Gray, KY 40734

Re: Invoice for August 1 to August 31, 2020

Dear Ted:

Please find enclosed the invoice for legal services performed by Goss Samford, PLLC on behalf of Cumberland Valley Electric, Inc. for the period from August 1 to August 31, 2020. Please remit payment for the amounts due within thirty days of today's date. A summary of the amounts due and owing, by matter, are as follows:

<u>Matter Description</u>	<u>Amount</u>
General Regulatory - current fees/costs	\$0.00
2020 Rate Adjustment -current fees/costs	\$11,169.50
<i>TOTAL:</i>	<u>\$11,169.50</u>

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

Sincerely,

Mark David Goss

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

September 06, 2020
Invoice No. 5104

Cumberland Valley Electric, Inc.
Attn: Ted Hampton, President & CEO
6219 U.S. Highway 25 East
Gray, KY 40734

Client Number: 0700 Cumberland Valley Electric, Inc.
Matter 1008 Cumberland Valley - 2020 Rate Adjustment
For Services Rendered Through 8/31/2020.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/3/2020	MDG	Telephone conference call with R. Tolliver and P. Hauser to discuss several aspects of streamlined rate case filing, and develop legal action plan.	0.80	\$236.00
8/4/2020	MDG	Review of draft Notice to KPSC to proceed electronically and intent to file streamlined rate case prepared by A. Honaker; telephone and email exchange with R. Tolliver and J. Wolfram re several case issues; email exchange with P. Hauser re need for BOD resolution on rate case.	1.10	\$324.50
8/4/2020	LAH	Review emails from J. Wolfram and attachments; exchange emails with M. Goss re same; review emails re board meeting and resolution needed.	0.50	\$125.00
8/5/2020	MDG	Multiple telephone exchanges with J. Wolfram and R. Tolliver re several aspects of case; review and coordinate filing of pre-application notice at KPSC and receipt and review of KPSC's acknowledgement.	1.60	\$472.00
8/5/2020	LAH	Draft Notice of Intent and Election to Use Electronic Filing Procedures; draft cover letter for filing; review emails re timeline and items needed; prepare drafts for electronic filing and electronically file same; review acknowledgment letter from Commission.	2.00	\$500.00

Continued On Next Page

Client Number: 0700
Matter Number: 1008

9/6/2020
Page: 2

8/7/2020	MDG	Review of email attachments from J. Wolfram containing near-final COSS spreadsheets; telephone consultation with J. Wolfram to discuss same and rate case timeline; multiple email exchanges with R. Tolliver, B. Chaney, et al., re several data points in case.	2.30	\$678.50
8/7/2020	LAH	Review emails re timeline for filing.	0.20	\$50.00
8/10/2020	MDG	Email exchanges with rate case team re upcoming BoD meeting, Board resolution and other items related to pre-decision due diligence.	0.80	\$236.00
8/10/2020	LAH	Review emails and attachments received from J. Wolfram; email exchanges with rate case team re upcoming BoD meeting, Board resolution and other items related to pre-decision due diligence.	2.70	\$675.00
8/11/2020	MDG	Review of J. Wolfram's multiple spreadsheets providing COSS analysis and rate adjustment hypotheticals and recommendation; email exchanges with rate case team to discuss various aspects of same.	1.20	\$354.00
8/11/2020	LAH	Review completed worksheets and pdf summary from J. Wolfram providing COSS analysis, etc.; review multiple emails re various aspects of same.	1.00	\$250.00
8/12/2020	MDG	Receipt and review of J. Wolfram's slide deck for BoD presentation on approval to proceed with streamlined rate case; multiple email exchanges with R. Tolliver, et al., re BoD meeting and other case-related matters.	0.70	\$206.50
8/12/2020	LAH	Review emails re slide presentation for BoD meeting and other case-related matters.	0.30	\$75.00
8/14/2020	LAH	Begin drafting Application and testimony; review multiple documents from previous rate case filing for same.	3.00	\$750.00
8/17/2020	MDG	Multiple email exchanges with R. Tolliver, P. Hauser, J. Wolfram, et al., to discuss various aspects of rate case filing; application, exhibits, testimony, public notice, etc.	1.20	\$354.00
8/17/2020	LAH	Review multiple emails re rate case filing; exchange emails to J. Wolfram re timeline for receiving information for customer notice; multiple office conferences with M. Goss re items needed and timeline for drafts to be completed.	0.60	\$150.00

Continued On Next Page

Client Number: 0700
Matter Number: 1008

9/6/2020
Page: 3

8/18/2020	MDG	Receipt and review of CVE Board Resolution approving rate case filing; receipt and review of final rate case spreadsheets and calculations prepared by J. Wolfram.	1.30	\$383.50
8/18/2020	LAH	Review emails and attachments re BoD meeting; review emails and attachments from J. Wolfram re rate case information to begin drafting customer notice; begin drafts of full and abbreviated customer notice.	2.00	\$500.00
8/19/2020	LAH	Continue drafting customer notices, application and testimony; office conferences with M. Goss re same.	2.50	\$625.00
8/24/2020	LAH	Detailed review of calculations and spreadsheets from J. Wolfram to fill in needed information on drafts of customer notice and Application; review pdf summary sent by J. Wolfram; exchange emails with M. Goss re same.	2.00	\$500.00
8/25/2020	LAH	Complete drafts of Application and both customer notices; email same to M. Goss for review; continue drafting testimony of T. Hampton and R. Tolliver; review last rate case and information provided by J. Wolfram to add in information.	3.00	\$750.00
8/26/2020	MDG	Receipt and review of draft rate case application, short- and long-form customer notices and responsibility index sent by A. Honaker; make revisions to same and re-send to A. Honaker for transmittal to clients.	2.60	\$767.00
8/26/2020	LAH	Review M. Goss' suggested edits to Application and customer notices; edit same; complete draft testimony for T. Hampton and R. Tolliver and email same to M. Goss for review; send revised drafts to T. Hampton, et. al. for review; telephone conference with M. Goss re same.	3.50	\$875.00
8/27/2020	MDG	Re-draft T. Hampton testimony in support of rate case application; transmit to A. Honaker for review and re-formatting.	2.30	\$678.50
8/28/2020	MDG	Telephone consultation with R. Tolliver to confirm information; review and revise draft of T. Hampton testimony and transmit to rate case team.	1.20	\$354.00
8/28/2020	LAH	Review M. Goss' suggested edits to T. Hampton testimony in support of rate case application; edit testimony and re-format M. Goss's edits to same; highlight the questions that need responses inserted by CVE; review emails from M. Goss re same.	1.20	\$300.00

Continued On Next Page

Client Number: 0700
Matter Number: 1008

9/6/2020
Page: 4

Billable Hours / Fees: 41.60 \$11,169.50

Timekeeper Summary

Timekeeper LAH worked 24.50 hours at \$250.00 per hour, totaling \$6,125.00.

Timekeeper MDG worked 17.10 hours at \$295.00 per hour, totaling \$5,044.50.

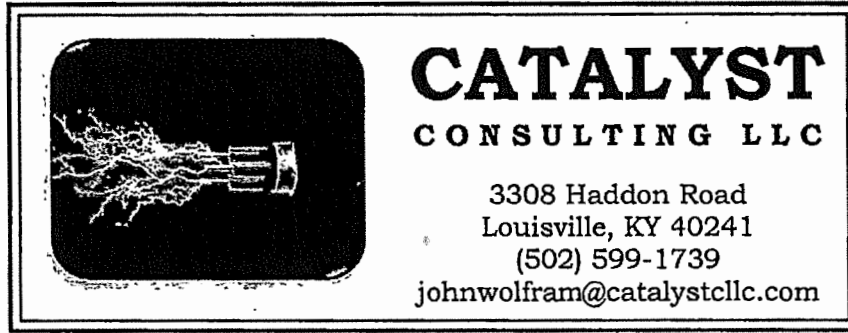
Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/27/2020	Check Number 82269 against Inv# 5057	(\$1,530.00)
8/27/2020	Check Number 82269 against Inv# 5057	(\$34.08)
Total Payments Received:		<u>(\$1,564.08)</u>

Current Invoice Summary

Prior Balance:	\$1,564.08	
Payments Received:	<u>(\$1,564.08)</u>	Last Payment: 8/27/2020
Unpaid Prior Balance:	\$0.00	
Current Fees:	\$11,169.50	
Advanced Costs:	\$0.00	
TOTAL AMOUNT DUE:	<u><u>\$11,169.50</u></u>	

*OK
 J. ed*



INVOICE

Date: October 1, 2020	Invoice #: 200909
Client: Cumberland Valley Electric, Inc. P.O. Box 440 Gray, KY 40734 Attn: Robert Tolliver	Project: 2019 Cost of Service & Rate Review Case No. 2020-00264 For Services Provided in September 2020

	Item	Description	Qty	Rate	Amt
1	Consulting Services	John Wolfram – consulting support for 2019 Cost of Service & Rate Review. Complete testimony and exhibits. Review application and exhibits. Calls or emails with CVE staff and counsel on same.	12.0 Hours	\$185.00	\$ 2,220.00
TOTAL					\$ 2,220.00

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

Keyed

CUMBERLAND VALLEY RECC
 Vend # 38719
 By PO # -
 App. By & Date R. E. 10-2-20
 DATE REC'D **OCT 02 2020**
 Date Paid 10-2-20
 Check # 82561
 Account # 928.00-2,220.00
 Acct. Date 9-30-20
 Due Date 10-2-20

BALANCE FORWARD

0.00

09/16/20	1109422	Middlesboro Daily News	NOTICE Cumberland Valley Elect		8. Inches	188.88
09/19/20	1109422	Middlesboro Daily News	NOTICE Cumberland Valley Elect	OK	8. Inches	188.88
09/23/20	1109422	Middlesboro Daily News	NOTICE Cumberland Valley Elect	2	8. Inches	188.88

OK
2
Jed

CUMBERLAND VALLEY RECC

Vend # 12682

By PO # -

App. By & Date BPC 10/6/20

DATE REC'D OCT 06 2020

Date Paid 10-7-20
 Check # 82592
 Account # 928.00 - 566.64
 Acct. Date 9/30/20
 Due Date 10/6/20

1005

CUSTOMER SUMMARY FOR Account # 216329	31 - 60 DAYS	61 - 90 DAYS	OVER 90 DAYS	CURRENT CHARGES	566.64
Period Ending: 9/30/2020	0.00	0.00	0.00	Past Due	0.00
Previous Balance: 0.00					
Current Charges: 566.64					
Payments/Credits: 0.00					
BALANCE DUE: 566.64				PLEASE PAY THIS AMOUNT	566.64

Corbin! This Week / Whitley Republican

News Journal STATEMENT

PAGE	BILLING DATE	BILLING PERIOD
1	09/30/20	09/30/20

BILLED ACCOUNT
CUMBERLAND VALLEY ELECTRI ATTN RICH PREWITT PO BOX 440 GRAY KY 40734-0440

BILLED ACCOUNT NO.	ADVERTISER/CLIENT NO.
204669-01	204669-01

NAME OF ADVERTISER/CLIENT
CUMBERLAND VALLEY ELECTRI

For invoice information call **606-549-0643**

DATE	CHARGE OR CREDITS DESCRIPTION / PRODUCT CODE	BILLED UNITS	NATIONAL	NET AMOUNT
	PREVIOUS BALANCE			.00
09/16	CLASSIFIED CJ PROPOSED RATE ADJUSTMENT	23	I	322.00
09/23	CLASSIFIED CJ PROPOSED RATE ADJUSTMENT	23	I	322.00
09/30	CLASSIFIED CJ PROPOSED RATE ADJUSTMENT	23	I	322.00

30 DAYS AGING	60 DAYS AGING	90 DAYS AGING	TOTAL AMOUNT DUE	CURRENT NET AMOUNT
.00	.00	.00	966.00	966.00

Mountain Advocate Media Inc
214 Knox Street
Barbourville, KY 40906
(606) 546-9225

Invoice

Bill To
Cumberland Valley RECC Post Office Box 440 Gray, KY 40734

Date	Invoice #
9/10/2020	97883

A finance charge of 1.5% will be assessed on invoices not paid over 30 days from net due date (\$3.00 minimum).

P.O. No.	Terms	Acct No
	Net 30	5315

Item	Description	Quantity	Rate	Amount
Legal Advertising	Rate Increases	33.75	11.25007	379.69

We appreciate your business. Please remit payment to the above address.	Total	\$379.69
	Payments/Credits	\$0.00
	Balance Due	\$379.69

PLEASE DETACH AND RETURN UPPER PORTION WITH YOUR REMITTANCE

Date	Ref #	Pub Name	Description	Size/Quantity	Rate	Amount
BALANCE FORWARD						0.00
09/02/20	1103075	Harlan Enterprise	Trucks for Sale	31.5 Inches	18.1	570.15
09/16/20	1107246	Harlan Enterprise	NOTICE Cumberland Valley Elect	8. Inches	23.61	188.88
09/23/20	1103075	harlandaily.com	Trucks for Sale	31.5 Inches	0	0.00
09/23/20	1107246	Harlan Enterprise	NOTICE Cumberland Valley Elect	8. Inches	23.61	188.88
09/30/20	1107246	Harlan Enterprise	NOTICE Cumberland Valley Elect	8. Inches	23.61	188.88

OK

CUSTOMER SUMMARY FOR Account # 119694	31 - 60 DAYS	61 - 90 DAYS	OVER 90 DAYS	CURRENT CHARGES	1,136.79
Period Ending: 9/30/2020	0.00	0.00	0.00	Past Due	0.00
Previous Balance: 0.00					
Current Charges: 1,136.79					

PLEASE PAY

1,136.79

10 Date	11 Newspaper Reference	12 13 14 Description-Other Comments/Charges	15 SAU Size 16 Billed Units	17 Times Run 18 Rate	19 Gross Amount	20 Net Amount
		PREVIOUS BALANCE				0.00
09/01	LEG TT	BID ON AUTOS	3x10.50	1	177.75	177.75
			31.50	8.300		
09/01	IFS TT	DIGITAL	0x0.00	1	59.25	59.25
			.00	.000		
09/01	CO3 TT	PROCESS COLOR	0x0.00	1	50.00	50.00
			.00	.000		
09/08	LEG TT	BID ON AUTOS	3x10.50	1	0.00	0.00
			31.50	8.300		
09/15	LEG TT	NOTICE	4x5.50	1	182.60	182.60
			22.00	8.300		
09/22	LEG TT	NOTICE	4x5.50	1	182.60	182.60
			22.00	8.300		
09/29	LEG TT	NOTICE	4x5.50	1	182.60	182.60
			22.00	8.300		
SALESREP: HUMPHREY, PATRICIA			-	-		

Handwritten initials: D/C

Statement of Account - Aging of Past Due Amounts

21 Current Net Amount Due	22 30:Days	60:Days	Over:90:Days	Last:Payment:Date	23 Total Amount Due
834.80	0.00	0.00	0.00		834.80

The Times-Tribune
 PO Box 516
 Corbin KY 40701
 (606) 528-2464

Accounts 30 days old - charged 1 1/2% per month service charge. ANNUAL RATE 18%.

* Unapplied amounts are included in Total Amount Due

Handwritten number: 1005

24 Invoice Number	25 Advertiser Information
1 Billing Period	6 Billed Account Number
7 Advertiser/Client Number	2 Advertiser/Client Name

09/16/2020	INV #38585. Orig. Amount \$270.30.	270.30	270.30
09/23/2020	INV #38621. Orig. Amount \$270.30.	270.30	540.60
09/30/2020	INV #38647. Orig. Amount \$270.30.	270.30	810.90

02
20

CUMBERLAND VALLEY RECC
 Vend # open ven. 38761
 By PO # -
 App. By & Date BPC 10/6/20

DATE REC'D OCT 06 2020

Level

Date Paid 10-7-20
 Check # 82610
 Account # 928.00 - 810.90
 Acct. Date 9/30/20
 Due Date 10/6/20

© 2003 INTUIT INC. # 106 1-800-433-8810

CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
810.90	0.00	0.00	0.00	0.00	\$810.90

1006

Pineville Sun Post Office Box 250 Pineville, KY 40977 (606) 337-2333



Pineville Sun, Inc.

Post Office Box 250
 210 W Virginia Avenue
 Pineville, KY 40977

Invoice

DATE	INVOICE #
9/16/2020	38585

BILL TO
Cumberland Valley Electric Post Office Box 490 Gray, KY 40734

P.O. NO.	TERMS	ACCT NO.
	Net 30	1501

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
Classified Display	Classified Display	25	10.812	270.30

Thank you for your business.	Total	\$270.30
	Payments/Credits	\$0.00
	Balance Due	\$270.30

Pineville Sun, Inc.

Post Office Box 250
 210 W Virginia Avenue
 Pineville, KY 40977

Invoice

DATE	INVOICE #
9/23/2020	38621

BILL TO
Cumberland Valley Electric Post Office Box 490 Gray, KY 40734

P.O. NO.	TERMS	ACCT-NO
	Net 30	1501

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
Classified Display	Rate Adjustments	25	10.812	270.30

Thank you for your business.	Total	\$270.30
	Payments/Credits	\$0.00
	Balance Due	\$270.30

Pineville Sun, Inc.
 Post Office Box 250
 210 W Virginia Avenue
 Pineville, KY 40977

Invoice

DATE	INVOICE #
9/30/2020	38647

BILL TO
Cumberland Valley Electric Post Office Box 490 Gray, KY 40734

		P.O. NO.	TERMS	ACCT. NO.
			Net 30	1501
ITEM	DESCRIPTION	QTY	RATE	AMOUNT
Classified Display	Rate Adjustments	25	10.812	270.30

Thank you for your business.	Total	\$270.30
	Payments/Credits	\$0.00
	Balance Due	\$270.30

Statement

The McCreary County Voice
 57 Oaks Lane Suite 15
 P O Box 190
 Whitley City, KY 42653
 606-376-5500

*OK
 JAC*

Date
10/1/2020

To:
CUMBERLAND VALLEY ELECTRIC P.O.BOX 440 GRAY, KY 40734

Terms	Amount Due	Amount Enc.
	\$390.00	

Date	Transaction	Amount	Balance
09/17/2020	INV #432865. Orig. Amount \$130.00. --- 4X6.5-LEGAL AD -OUT, 26 @ \$5.00 = 130.00	130.00	130.00
09/24/2020	INV #432890. Orig. Amount \$130.00. --- 4X6.5-LEGAL AD -OUT, 26 @ \$5.00 = 130.00	130.00	260.00
10/01/2020	INV #432931. Orig. Amount \$130.00. --- 4X6.5-LEGAL AD -OUT, 26 @ \$5.00 = 130.00	130.00	390.00

Kendal

CUMBERLAND VALLEY RECC
 Vend # 11501
 By PO #
 App. By & Date BE 10-7-20
 DATE REC'D OCT 07 2020
 Date Paid 10-7-20
 Check # 82578
 Account # 928.00-390.00
 Acct. Date 9-30-20
 Due Date 10-7-20

CURRENT	1-30 DAYS	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
130.00	260.00	0.00	0.00	0.00	\$390.00

The McCreary County Voice

57 Oaks Lane Suite 15
 P O Box 190
 Whitley City, KY 42653
 606-376-5500

Invoice

Date	Invoice #
9/17/2020	432865

Bill To
CUMBERLAND VALLEY ELECTRIC P.O.BOX 440 GRAY, KY 40734

Ship To

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			9/17/2020			

Quantity	Item Code	Description	Price Each	Amount
26	4X6.5-LEGAL AD ...	LEGAL NOTICE	5.00	130.00

Total	\$130.00
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The McCreary County Voice

57 Oaks Lane Suite 15
 P O Box 190
 Whitley City, KY 42653
 606-376-5500

Invoice

Date	Invoice #
9/24/2020	432890

Bill To
CUMBERLAND VALLEY ELECTRIC P.O.BOX 440 GRAY, KY 40734

Ship To

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			9/24/2020			

Quantity	Item Code	Description	Price Each	Amount
26	4X6.5-LEGAL AD ...	LEGAL AD	5.00	130.00

Total			\$130.00
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Invoice

The McCreary County Voice

57 Oaks Lane Suite 15
 P O Box 190
 Whitley City, KY 42653
 606-376-5500

Date	Invoice #
10/1/2020	432931

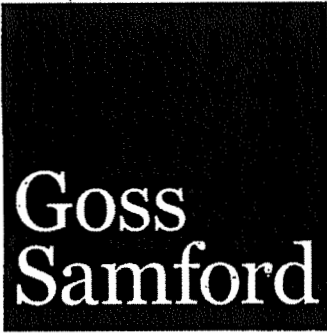
Bill To
CUMBERLAND VALLEY ELECTRIC P.O.BOX 440 GRAY, KY 40734

Ship To

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			10/1/2020			

Quantity	Item Code	Description	Price Each	Amount
26	4X6.5-LEGAL AD ...	LEGAL NOTICE	5.00	130.00

Total			\$130.00
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ATTORNEYS AT LAW | PLLC

Handwritten signature

OK

Mark David Goss
mdgoss@gosssamfordlaw.com
(859) 368-7740

October 8, 2020

Mr. Ted Hampton
President and CEO
Cumberland Valley Electric, Inc.
6219 U.S. Highway 25 East
Gray, KY 40734

Re: Invoice for September 1 to September 30, 2020

Dear Ted:

Please find enclosed the invoice for legal services performed by Goss Samford, PLLC on behalf of Cumberland Valley Electric, Inc. for the period from September 1 to September 30, 2020. Please remit payment for the amounts due within thirty days of today's date. A summary of the amounts due and owing, by matter, are as follows:

<u>Matter Description</u>	<u>Amount</u>
General Regulatory - current fees/costs	\$0.00
2020 Rate Adjustment -current fees/costs	\$18,189.21
TOTAL:	\$18,189.21

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

Sincerely,

Mark David Goss

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

October 08, 2020

Invoice No. 5167

Cumberland Valley Electric, Inc.
Attn: Ted Hampton, President & CEO
6219 U.S. Highway 25 East
Gray, KY 40734

Client Number: 0700 Cumberland Valley Electric, Inc.
Matter 1008 Cumberland Valley - 2020 Rate Adjustment
For Services Rendered Through 9/30/2020.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
9/1/2020	MDG	Prepare initial draft of R. Tolliver's testimony in support of Application on top of A. Honaker's template; extensive review of 2016/17 CVE rate case final order and post-order data requests for preparation of testimony; transmit same to rate case team for review and revisions.	4.70	\$1,386.50
9/1/2020	LAH	Review M. Goss's edits to draft of R. Tolliver testimony; format same; review emails from M. Goss, et. al. re same.	1.00	\$250.00
9/2/2020	MDG	Email exchanges with team re miscellaneous items pertaining to preparation of draft Application; schedule telephone conference call for 9/3/20 to discuss progress and next steps.	1.60	\$472.00
9/3/2020	MDG	Multiple email exchanges with rate case team to address several items in draft Application: capital credits, financial metrics, depreciation, miscellaneous adjustments, etc.	2.40	\$708.00
9/3/2020	LAH	Review J. Wolfram's draft testimony forwarded by J. Wolfram; review edits to R. Tolliver testimony from J. Wolfram; review multiple emails from rate case team re customer notice and exhibits.	3.00	\$750.00

Continued On Next Page

Client Number: 0700
Matter Number: 1008

10/8/2020
Page: 2

9/4/2020	MDG	Telephone consultation with R. Tolliver re progress of pre-Application preparations; receive and review multiple emails from J. Wolfram containing calculations and confirmations of data sufficient for finalization and preparation of customer notices for filing in newspapers; answered questions re tariff sheet revisions and other related matters.	1.40	\$413.00
9/4/2020	LAH	Review timeline for newspaper notices; draft Verifications and email them for signatures; review emails and attachments from J. Wolfram re customer notice; review and revise customer notices, multiple conferences with M. Goss re rate case; forward revised customer notices to rate case team.	1.30	\$325.00
9/5/2020	LAH	Review emails and attachments from B. Chaney re edits to Tolliver Testimony.	1.00	\$250.00
9/7/2020	LAH	Review emails and attached edits from J. Wolfram to R. Tolliver and J. Wolfram testimonies.	1.00	\$250.00
9/8/2020	MDG	Multiple email exchanges with R. Tolliver, et al., re newspaper publications of notice and related pre-filing matters.	0.50	\$147.50
9/8/2020	LAH	Review emails from B. Chaney, et. al. re customer notice; exchange emails with J. Wolfram re verification.	0.30	\$75.00
9/9/2020	MDG	Review of revisions to J. Wolfram and R. Tolliver testimonies sent by team; email exchanges with team re same for inclusion in filing package.	0.70	\$206.50
9/9/2020	LAH	Review of revisions to J. Wolfram and R. Tolliver testimonies sent by rate case team; email exchanges re same.	1.20	\$300.00
9/10/2020	LAH	Review emails from J. Wolfram and B. Chaney with attached exhibits for Application; print entire filing for M. Goss and I to review for completeness.	2.50	\$625.00
9/11/2020	MDG	Review of CVE's revisions to draft Application and T. Hampton testimony sent by B. Chaney; email exchange with B. Chaney re same.	0.60	\$177.00
9/11/2020	MDG	Email exchange with R. Tolliver to discuss newspaper publication requirements; consult KY Administrative Regulations re same.	0.40	\$118.00

Continued On Next Page

Client Number: 0700
Matter Number: 1008

10/8/2020
Page: 3

9/11/2020	LAH	Review email exchange with R. Tolliver re publication requirements for customer notice; review multiple emails and exhibits from B. Chaney; begin review of exhibits provided; review revisions to draft Application from rate case team; review revisions to T. Hampton testimony.	2.80	\$700.00
9/16/2020	LAH	Review exhibit cover pages edited by R. Tolliver and J. Wolfram; make edits to saved cover pages to match their edits; review and check off each exhibit as it is completed on the table of contents; review Application and Testimony and check off each exhibit for each one to make sure we have everything; make notes on items still needed and items to check with J. Wolfram for correct references; exchange emails with M. Goss re Board Resolution needed; review Board Resolution forwarded by M. Goss; complete headers on the attachments; exchange emails with J. Wolfram re references to his exhibits and schedules; review and arrange printed exhibits and cover pages tab ones with questions.	3.50	\$875.00
9/17/2020	LAH	Telephone conference with M. Goss re areas to review on Application and attachments; review and print each exhibit to make sure they are complete; review suggested edits to testimonies and application; print and tab each Application Exhibit; print each cover page for each Application Exhibit; print each testimony exhibit; exchange emails with M. Goss re edits to documents; exchange emails with B. Chaney re verifications needed; review new draft.	4.90	\$1,225.00
9/17/2020	MDG	Read and review draft Application and Testimony of three witnesses for accuracy and consistency; email exchanges with rate case team to address items uncovered in review.	2.30	\$678.50
9/18/2020	LAH	Review edits from M. Goss on Application and Testimonies; make edits; print Application, Testimony, Cover pages for Exhibits and add to paper copy of complete filing; page turn of complete paper document to review for completeness; prepare pdfs of Application, each testimony, each cover page and each exhibit and combine to send to team; multiple conferences with M. Goss re drafts and scheduling telephone conference; email complete application package to team to review; review emails re same; exchange emails with B. Chaney re verifications.	4.30	\$1,075.00

Continued On Next Page

Client Number: 0700
Matter Number: 1008

10/8/2020
Page: 4

9/18/2020	MDG	Re-review of entire draft filing package before release to CVE and J. Wolfram; telephone conference with A. Honaker re same; email exchanges with client re miscellaneous items.	2.20	\$649.00
9/21/2020	MDG	Review of entire draft filing package and make notes of needed revisions; receipt and review of multiple emails from rate case team providing suggested revisions; attend and participate in telephone conference call with rate case team to discuss same and coordinate revisions with A. Honaker post-call.	2.80	\$826.00
9/21/2020	LAH	Review multiple emails from J. Wolfram, et. al. re suggested edits to Application and Exhibits; telephone conference with team re same; revise Application and Exhibits to incorporate changes from team; review excel spreadsheets provided by J. Wolfram.	2.00	\$500.00
9/22/2020	MDG	Telephone call with J. Home, KOAG, to provide notification of upcoming rate case filing.	0.40	\$118.00
9/22/2020	MDG	Continue review of multiple revisions to application package sent by various team members; email and telephone exchanges with A. Honaker to coordinate same; telephone conference with R. Tolliver re newspaper publication status and other last-minute issues.	3.60	\$1,062.00
9/22/2020	LAH	Review emails from J. Wolfram re verification; complete final edits to Application and Exhibits; print, copy tab and bind Application and Exhibits for AG; print, tab and compile copy for paper filing at PSC; create complete pdf version of Application and Exhibits for filing electronically at the PSC; make CDs for filing on Excel spreadsheet Exhibits; draft cover letter for filing; multiple office conferences with M. Goss re filing.	5.50	\$1,375.00
9/23/2020	MDG	Make final review of entire filing package prior to electronic filing; coordinate filing of case at KPSC with A. Honaker; check filing once made for accuracy; subsequent text and email exchanges with client re same; receipt and review of KOAG's Motion to Intervene.	3.80	\$1,121.00

Continued On Next Page

Client Number: 0700
Matter Number: 1008

10/8/2020
Page: 5

9/23/2020	LAH	Make final review of entire filing package prior to electronic filing; prepare final filing package for electronic filing and electronically file same with the PSC; email electronic version to AG; travel to and from post office to mail hard copy to AG; multiple telephone conference with M. Goss re filing; review filing as filed; review AG's Motion to Intervene.	4.70	\$1,175.00
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Billable Hours / Fees: 66.40 \$17,833.00

Timekeeper Summary

Timekeeper LAH worked 39.00 hours at \$250.00 per hour, totaling \$9,750.00.
Timekeeper MDG worked 27.40 hours at \$295.00 per hour, totaling \$8,083.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/3/2020	Telephone conference charges.	\$43.13
9/1/2020	Photocopies of draft testimony.	\$0.96
9/2/2020	Photocopies of draft testimony for review.	\$1.92
9/15/2020	Photocopies of exhibits and testimony for review.	\$110.28
9/16/2020	Photocopies of draft testimony of Tolliver and Hampton.	\$4.32
9/16/2020	Photocopies of J. Wolfram testimony.	\$3.72
9/22/2020	Photocopies of application, exhibits and testimony (4 Copies).	\$122.88
9/22/2020	Office supplies - Tabs, Binding and Covers for Application (Original unbound)	\$69.00
Total Costs		\$356.21

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
9/23/2020	Check Number 82449 against Inv# 5104	(\$11,169.50)
Total Payments Received:		(\$11,169.50)

Continued On Next Page

Client Number: 0700
Matter Number: 1008

10/8/2020
Page: 6

Current Invoice Summary

Prior Balance:	\$11,169.50	
Payments Received:	(\$11,169.50)	Last Payment: 9/23/2020
Unpaid Prior Balance:	<u>\$0.00</u>	
Current Fees:	\$17,833.00	
Advanced Costs:	\$356.21	
TOTAL AMOUNT DUE:	<u><u>\$18,189.21</u></u>	