COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF)	
FARMERS RURAL ELECTRIC COOPERATIVE	Ξ)	
CORPORATION FOR PASS-THROUGH OF)	Case No. 2021-00108
EAST KENTUCKY POWER COOPERATIVE,)	
INC.'S WHOLESALE RATE ADJUSTMENT)	

FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION'S MOTION FOR REHEARING

Comes now Farmers Rural Electric Cooperative Corporation ("Farmers") by counsel, pursuant to KRS 278.400 and other applicable law, and does hereby tender its Motion for Rehearing, respectfully stating as follows:

Farmers filed an Application to pass-through the wholesale rate increase of East Kentucky Power Cooperative, Inc. ("EKPC") on April 1, 2021. The Commission entered an Order in EKPC's general adjustment of rates proceeding, Case No. 2021-00103 and this proceeding on September 30, 2021. The Commission granted Farmers a \$1,624,924 or 4.7% annual increase, which was the amount of the wholesale increase allocated to Farmers from EKPC's \$36,355,254 annual increase. The Commission accepted Farmers' methodology for allocating the wholesale rate increase to its customers.

In Appendix A to the Commission's September 30, 2021 Order in this proceeding, The Commission entered a rate for Farmers' Rate Schedule LPG-1 Large Power Customer Charge ("LPG-1") of \$4,773.70. This charge was not included in Farmers' original rate schedule in this proceeding. The LPG-1 rate was filed as a new tariff during the pendency of this proceeding. The customer charge for the LPG-1, in Farmers' tariff filing, was based on the large customer "-5"

schedules, for example the LPE-5, LBP-5 and LPC-5 rate schedules. In the Commission's September 30, 2021 Order, the large customer "-5" rate schedules had a customer charge of \$4,659.66 ordered.

The Commission's Order also stated "For vacant rate classes, if the per-unit charges were identical to another existing rate class, the per-unit charge applied was equivalent." Therefore, since the LPG-1 customer charge was identical to another existing rate class, the large customer "-5" customer charges, the LPG-1 customer charge should be revised to match the large customer "-5" customer charge of \$4,659.66.

WHEREFORE, on the basis of the foregoing, Farmers respectfully requests that the Commission grant rehearing of its September 30, 2021 Order and change the LPG-1 customer charge from \$4,773.70 to \$4,659.66.

Done this 12th day of October 2021.

Respectfully submitted,

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¹ See In the Matter of the Electronic Application of Farmers Rural Electric Cooperative Corporation for the Pass-Through of East Kentucky Power Cooperative, Inc.'s Wholesale Rate Adjustment, Order, Case No. 2021-00108, p. 4 (Ky. P.S.C. Sep. 30, 2021).