

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

**In the Matter of:**

<b>THE ELECTRONIC APPLICATION OF</b>	)	
<b>FLEMING-MASON ENERGY COOPERATIVE,</b>	)	
<b>INC., FOR PASS-THROUGH OF EAST</b>	)	<b>Case No. 2021-00109</b>
<b>KENTUCKY POWER COOPERATIVE, INC.'S</b>	)	
<b>WHOLESALE RATE ADJUSTMENT</b>	)	

**RESPONSES TO APPHARVEST MOREHEAD FARM, LLC'S**  
**FIRST REQUEST FOR INFORMATION**  
**TO FLEMING-MASON ENERGY COOPERATIVE**  
**DATED MAY 14, 2021**

**FLEMING-MASON ENERGY COOPERATIVE**

**PSC CASE NO. 2021-00109**

**APPHARVEST MOREHEAD FARM, LLC'S REQUEST DATED 5/14/21**

Fleming-Mason Energy Cooperative, Inc. ("Fleming-Mason") hereby submits responses to the First Request for Information of AppHarvest Morehead Farm, LLC ("AppHarvest Morehead") in this case dated May 14, 2021. Each response with its associated supportive reference materials is individually bookmarked.

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

**In the Matter of:**

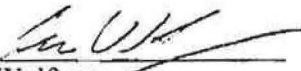
**THE ELECTRONIC APPLICATION OF )**  
**FLEMING-MASON ENERGY COOPERATIVE, )**  
**INC., FOR PASS-THROUGH OF EAST ) Case No. 2021-00109**  
**KENTUCKY POWER COOPERATIVE, INC.'S )**  
**WHOLESALE RATE ADJUSTMENT )**

**CERTIFICATE**


**STATE OF KENTUCKY )**

**COUNTY OF JEFFERSON)**

John Wolfram, being duly sworn, states that he has supervised the preparation of the responses of Fleming-Mason Energy Cooperative, Inc. ("Fleming-Mason") to AppHarvest Morehead Farm, LLC's ("AppHarvest Morehead") First Request for Information in the above-referenced case dated May 14, 2021, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information, and belief, formed after reasonable inquiry.

  
\_\_\_\_\_  
John Wolfram

Subscribed and sworn before me on this 25<sup>th</sup> day of May 2021.

  
\_\_\_\_\_  
Notary ID: KYNP10362  
Expires: 7/23/24



**FLEMING-MASON ENERGY COOPERATIVE**

**PSC CASE NO. 2021-00109**

**RESPONSE TO INFORMATION REQUEST**

**APPHARVEST MOREHEAD FARM, LLC'S FIRST REQUEST FOR INFORMATION**

**DATED 5/14/21**

**REQUEST 1**

**RESPONSIBLE PARTY:** John Wolfram

**Request 1.** Please refer to the top of page 1, Exhibit 3 to the Fleming-Mason application. The text states in each of the four (4) rows: "Revenue Increase Allocated by East Kentucky Power Cooperative."

- a. Where in East Kentucky's application and supporting exhibits or Fleming-Mason's application are those numbers assigned, calculated, and derived for Fleming-Mason.
- b. On pages 5 and 6 it states that there are no current customers in Large Industrial (6B). Is this statement true even though AppHarvest Morehead takes under this tariff, because the test year was January-December, 2019 and AppHarvest was not a customer in 2019?
- c. Please refer to Exhibit 3, page 1, to the application.
  1. In base rate lines 2-14, which category is Large Industrial (6B) a member of?
  2. What other tariff numbers of Fleming-Mason are included in the same category as Large Industrial (6B)?

3. Where in the record of this case or in Fleming-Mason's tariffs describes how specific tariffs are assigned to which lines 2-14.
- d. Why are special and steam calculated separately from the other categories.
- e. How can percentages stay the same when there is no revenue that exists in that category?
- f. How many EKPC category G customers are there in Fleming-Mason's territory?

**Response 1.**

- a. Please see the response to Item 2.
- b. Yes.
- c.
  1. LIS-6B is not included in the summary table because it included no 2019 test period revenues, and thus no increase to annual revenues in the pass-through filing.
  2. See the list of vacant rate classes at the end of Exhibit 3.
  3. The referenced list ties to the detailed listings of non-vacant rate classes in the next few pages of Exhibit 3 (by Item and Code). The vacant rate classes are listed separately.
- d. See the Direct Testimony of John Wolfram, page 8 line 18 through page 9 line 8.
- e. See Wolfram testimony, page 9 lines 9-20.
- f. There is one EKPC Rate G customer served by Fleming-Mason.

**FLEMING-MASON ENERGY COOPERATIVE**

**PSC CASE NO. 2021-00109**

**RESPONSE TO INFORMATION REQUEST**

**APPHARVEST MOREHEAD FARM, LLC'S FIRST REQUEST FOR INFORMATION**

**DATED 5/14/21**

**REQUEST 2**

**RESPONSIBLE PARTY:** John Wolfram

**Request 2.** Please see the direct testimony of John Wolfram beginning in response to the Question on lines 1-2 on page 3.

- a. Please provide a copy of the summary provided to you by EKPC.

**Response 2.**

- a. Please see the attachment.

**East Kentucky Power Cooperative, Inc.**

**Revenue Summary by Rate Class and by Member  
Present, COS Based and Proposed Rate Options**

Line No.	Description	Present Rates	Option 3: \$43M Rate Design		
		Amount	Amount	Increase	As Percent
1		\$	\$	\$	
2	<b><u>Totals Revenues by Rate</u></b>				
3	Rate B	59,815,719	62,102,004	2,286,285	3.8%
4	Rate C	17,153,311	17,968,058	814,747	4.7%
5	Rate E	664,081,280	699,007,015	34,925,736	5.3%
6	Rate G	25,516,274	26,840,240	1,323,966	5.2%
7	Contract	42,471,101	45,852,655	3,381,554	8.0%
8	Steam	10,716,264	10,974,152	257,888	2.4%
9	Rate TGP	6,349,849	6,349,849	-	0.0%
10	<b>Sub-Total COS Based Revenues</b>	826,103,797	869,093,973	42,990,177	5.20%
11	Rate H	49,170	49,170	-	0.00%
12	DSM Riders	(1,109,853)	(1,109,853)	-	0.00%
13	<b>Total Revenues by Rate</b>	825,043,114	868,033,290	42,990,177	5.21%

**East Kentucky Power Cooperative, Inc.**  
**Calculation of Revenues by Rate Class**  
**Present, COS Based and Proposed Rate Options**

Line No.	Description	Units	Present Rates		Option 3: \$43M Rate Design		
			Rate	Amount	Rate	Amount	
1				\$		\$	
2	<b>Rate B</b>						
3	Metering Charge	Meters	-	\$0.00		\$0.00	
4	Demand Charges						
5	Demand Charge	CP kW	1,768,154	\$7.17	12,676,230	\$7.49	13,241,975
6	Excess Demand Charge	CP kW	59,568	\$9.98	594,489	\$10.38	618,316
7	Interruptible (400 Hrs)	CP kW	235,184	-\$5.60	(1,317,030)	-\$5.60	(1,317,030)
8	EDR Discount				(23,719)		(24,773)
9	Energy Charges				-		-
10	Energy Charge	kWh	1,090,848,453	\$0.038982	42,523,454	\$0.040541	44,224,087
11	Min kWh Adjustment	kWh	4,543,620	-\$0.026240	(119,225)	-\$0.026240	(119,225)
12	Sub-Total Base Rates				54,334,199		56,623,350
13	Net Buy Through Charge				77,890		77,890
14	Fuel Adjustment	kWh	1,086,304,833	-\$0.002702	(2,935,048)	-\$0.002702	(2,935,196)
15	Environmental Surcharge			16.200%	8,338,677	15.532%	8,335,959
16	<b>Total Rate B</b>				59,815,719		62,102,004
17							
18	<b>Rate C</b>						
19	Metering Charge	Meters	9	\$0.00			\$0
20	Demand Charges						
21	Demand Charge	CP kW	582,643	\$7.17	4,177,550	\$7.78	4,532,963
22	Energy Charges				-		-
23	Energy Charge	kWh	294,670,389	\$0.038982	11,486,841	\$0.040541	11,946,232
24	Min kWh Adjustment	kWh	4,208,946	-\$0.026240	(110,443)	-\$0.026240	(110,443)
25	Sub-Total Base Rates				15,553,949		16,368,752
26	Fuel Adjustment	kWh	290,461,443	-\$0.002684	(779,575)	-\$0.002684	(779,599)
27	Environmental Surcharge			16.100%	2,378,938	15.260%	2,378,905
28	<b>Total Rate C</b>				17,153,311		17,968,058
29							



**East Kentucky Power Cooperative, Inc.**  
**Calculation of Revenues by Rate Class**  
**Present, COS Based and Proposed Rate Options**

Line No.	Description	Units	Present Rates		Option 3: \$43M Rate Design		
			Rate	Amount	Rate	Amount	
30	<b><u>Rate E</u></b>						
31	<i>Demand Charges</i>						
32	Demand Charge	CP kW	23,934,636	\$6.02	144,086,507	\$6.56	157,011,211
33	Power Factor Penalty	CP kW	15,979	\$6.02	96,194	\$6.56	104,822
34	<i>Energy Charges</i>						
35	On-Peak Energy Charge	kWh	4,998,176,543	\$0.049379	246,804,960	\$0.051566	257,735,972
36	Off-Peak Energy Charge	kWh	4,732,348,143	\$0.040654	192,388,881	\$0.042841	202,738,527
37	Metering Charge	Meters	328	\$144.00	566,208	\$151.20	594,518
38	<i>Sub-Station Charges</i>						
39	1000-2999 kVa	Subs	3	\$1,088.00	39,168	\$1,142.40	41,126
40	3000-7499 kVa	Subs	39	\$2,737.00	1,280,916	\$2,873.85	1,344,962
41	7500-14999 kVa	Subs	224	\$3,292.00	8,848,896	\$3,456.60	9,291,341
42	15000 kVa and Up	Subs	57	\$5,310.00	3,632,040	\$5,575.50	3,813,642
43	Sub-Total Base Rates				597,743,770		632,676,121
44	Special Adjustments				(117,842)		(117,842)
45	Fuel Adjustment	kWh	9,730,524,686	-\$0.002698	(26,249,938)	-\$0.002698	(26,252,956)
46	Environmental Surcharge			16.225%	92,705,290	15.287%	92,701,692
47	<b>Total Rate E</b>				<u>664,081,280</u>		<u>699,007,015</u>
48							
49	<b><u>Rate G</u></b>						
50	Metering Charge	Meters	1	\$144.00	1,728	\$151.20	\$1,814.40
51	Sub-Station Charges	Subs	1	\$5,310.00	63,720	\$5,575.50	\$66,906.00
52	<i>Demand Charges</i>						
53	Demand Charge	CP kW	797,497	\$6.98	5,566,529	\$7.29	5,813,753
54	Interruptible (200 Hrs)	CP kW	83,048	-\$4.20	(348,802)	-\$4.20	(348,802)
55	<i>Energy Charges</i>						
56	Energy Charge	kWh	485,775,112	\$0.036947	17,947,933	\$0.039158	19,021,982
57	Sub-Total Base Rates				23,231,109		24,555,654
58	Net Buy Through Charge				24,178		24,178
59	Fuel Adjustment	kWh	485,775,112	-\$0.002710	(1,316,649)	-\$0.002710	(1,316,451)
60	Environmental Surcharge			16.310%	3,577,636	15.395%	3,576,859
61	<b>Total Rate G</b>				<u>25,516,274</u>		<u>26,840,240</u>
62							

**East Kentucky Power Cooperative, Inc.**  
**Calculation of Revenues by Rate Class**  
**Present, COS Based and Proposed Rate Options**

Line No.	Description	Units	Present Rates		Option 3: \$43M Rate Design		
			Rate	Amount	Rate	Amount	
63	<b>Contract</b>						
64	Metering Charge	Meters	1	\$0.00	\$0.00	\$0.00	
65	Demand Charges						
66	Demand Charge	CP kW	1,952,466	\$6.92	13,511,065	\$7.64	14,916,840
67	Interruptible (10 Min)	CP kW	1,440,000	-\$6.22	(8,956,800)	-\$6.22	(8,956,800)
68	Interruptible (90 Min)	CP kW	332,466	-\$4.20	(1,396,357)	-\$4.20	(1,396,357)
69	Energy Charges						
70	On-Peak Energy Charge	kWh	297,565,905	\$0.038905	11,576,802	\$0.040929	12,179,075
71	Off-Peak Energy Charge	kWh	693,442,687	\$0.035477	24,601,266	\$0.037501	26,004,794
72	Min kWh Adjustment	kWh	9,167,968	-\$0.026240	(240,567)	-\$0.026240	(240,567)
73	Sub-Total Base Rates				39,095,408		42,506,985
74	Load Following Charge				34,539		34,539
75	Net Buy Through Charge				148,228		148,228
76	Fuel Adjustment	kWh	981,840,624	-\$0.002737	(2,680,816)	-\$0.002737	(2,680,816)
77	Environmental Surcharge			16.130%	5,873,742	14.736%	5,843,719
78	<b>Total Contract</b>				42,471,101		45,852,655
79				(0.0027304)			
80	<b>Steam</b>						
81	Metering Charge	Meters	1	\$0.00	\$0.00	\$0.00	
82	Demand Charges						
83	Demand Charge	CP kW	397,389				
84	x MMBTU Conversion		0.00917				
85	x Steam Adjustment		1.01600	\$577.15	2,136,440	\$582.18	2,154,508
86	Energy Charges						
87	Energy Charge	kWh	195,836,964				
88	x MMBTU Conversion		0.00917				
89	x Steam Adjustment	kWh	1.01600	\$4.166	7,605,674	\$4.30	7,845,179
90	Sub-Total Base Rates				9,742,113		9,999,687
91	Fuel Adjustment	kWh	198,970,355	-\$0.002662	(529,973)	-\$0.002662	(529,659)
92	Environmental Surcharge			16.328%	1,504,124	15.883%	1,504,124
93	<b>Total Steam</b>				10,716,264		10,974,152
94							
95	<b>Rate TGP</b>						
96	Metering Charge	Meters	-	\$0.00	\$0.00	\$0.00	
97	Demand Charges						
98	Demand Charge	CP kW	477,063	\$1.75	834,860	\$1.75	834,860
99	Energy Charges (Averaged)						
100	On-Peak Energy Charge	kWh	84,629,228	\$0.030160	2,552,749	\$0.030160	2,552,749
101	Off-Peak Energy Charge	kWh	98,387,617	\$0.022270	2,190,711	\$0.022270	2,190,711
102	Sub-Total Base Rates				5,578,320		5,578,320
103	Net Buy Through Charge				218,754		218,754
104	Fuel Adjustment	kWh	183,016,845	\$0.000000	-	\$0.000000	-
105	Environmental Surcharge			9.909%	552,775	9.909%	552,775
106	<b>Total Rate TGP</b>				6,349,849		6,349,849
107							

**East Kentucky Power Cooperative, Inc.**  
**Calculation of Revenues by Rate Class**  
**Present, COS Based and Proposed Rate Options**

Line No.	Description	Units	Present Rates		Option 3: \$43M Rate Design	
			Rate	Amount	Rate	Amount
108	<b><u>Other Rates and Riders</u></b>					
109	Rate H - Green Energy			49,170		49,170
110	DSM Riders			(1,109,853)		(1,109,853)
111	<b>Total Other Rates and Riders</b>			<u>(1,060,683)</u>		<u>(1,060,683)</u>
112						
113	<b>Total Revenues</b>			<u>825,043,114</u>		<u>868,033,290</u>
114						
115						
116	<b>Revenues Adjusted to Eliminate Non-COS Based Rates and Adjustments</b>					
117	Rate B			61,078,578		63,365,918
118	Rate C			17,153,311		17,968,058
119	Rate E			664,199,122		699,124,857
120	Rate G			25,840,898		27,164,864
121	Contract			52,641,491		56,023,045
122	Steam			10,716,264		10,974,152
123	Rate TGP			6,131,095		6,131,095
124	Rate H - Green Energy			-		-
125	DSM Riders			-		-
126	<b>Total COS Based Revenues</b>			<u>837,760,758</u>		<u>880,751,989</u>
127						
128	<b>Difference</b>			<u>12,717,644</u>		<u>12,718,698</u>
129						
130	<b>Total Non-COS Based Rates and Adjustments</b>					
131	Interruptible Credits			(12,018,989)		(12,018,989)
132	EDR Discount			(23,719)		(24,773)
133	Buy-Through Net			469,050		469,050
134	Special Adjustments			(83,303)		(83,303)
135	Rate H - Green Energy			49,170		49,170
136	DSM Riders			(1,109,853)		(1,109,853)
137	<b>Total Items Eliminated</b>			<u>(12,717,644)</u>		<u>(12,718,698)</u>
138						
139	<b>Total FAC and ES Revenues</b>					
140	FAC Base Rate Revenues	kWh	12,773,877,054	\$0.026240	335,189,524	\$0.026240 335,186,534
141	FAC Adjustment Revenues				(34,491,999)	(34,494,676)
142	<b>Total FAC Revenues</b>				<u>300,697,525</u>	<u>300,691,858</u>
143						
144	<b>ES Revenues</b>				<u>114,931,182</u>	<u>114,894,034</u>
145						
146	<b>Total FAC and ES Revenues</b>				<u>415,628,707</u>	<u>415,585,892</u>
147						
148						

**East Kentucky Power Cooperative, Inc.**  
**Calculation of Revenues by Rate Class**  
**Present, COS Based and Proposed Rate Options**

Line No.	Description	Units	Present Rates		Option 3: \$43M Rate Design		
			Rate	Amount	Rate	Amount	
149	<b>Rate E1 - RATE DESIGN ONLY -- THERE IS CURRENTLY NO LOAD ON THIS RATE</b>						
150	<i>Demand Charges</i>						
151	Demand Charge	CP kW	23,934,636	\$7.99	191,237,740	\$8.37	200,298,881
152	Power Factor Penalty	CP kW	15,979	\$7.99	127,672	\$8.37	133,722
153	<i>Energy Charges</i>						
154	On-Peak Energy Charge	kWh	4,998,176,543	\$0.041232	206,084,815	\$0.043419	217,015,827
155	Off-Peak Energy Charge	kWh	4,732,348,143	\$0.040654	192,388,881	\$0.042841	202,738,527
156	Metering Charge	Meters	328	\$144.00	566,214	\$151.20	594,524
157	<i>Sub-Station Charges</i>						
158	1000-2999 kVa	Subs	3	\$1,088.00	39,168	\$1,142.40	41,126
159	3000-7499 kVa	Subs	39	\$2,737.00	1,280,916	\$2,873.85	1,344,962
160	7500-14999 kVa	Subs	224	\$3,292.00	8,848,896	\$3,456.60	9,291,341
161	15000 kVa and Up	Subs	57	\$5,310.00	3,632,040	\$5,575.50	3,813,642
162	Sub-Total Base Rates				604,206,342		635,272,553
163	Special Adjustments		-		(117,842)		(117,842)
164	Fuel Adjustment	kWh	9,730,524,686	-\$0.002698	(26,252,956)	-\$0.002698	(26,252,956)
165	Environmental Surcharge		-		92,705,290	15.222%	92,704,963
166	<b>Total Rate E</b>				<u>670,540,835</u>		<u>701,606,718</u>
					664,081,280		699,007,015

**East Kentucky Power Cooperative, Inc.**

**Revenue Detail by Member by Rate  
Present, COS Based and Proposed Rate Options**

EKPC Rate	Member	Present Rates		Option 3: \$43M Rate Design		
		Actual Load Factor	Present Total Billing	Prop 2 Total Billing	Prop 1 Change	Percent Change
Rate B	Big Sandy	93.8%	341,987	354,470	12,483	3.7%
Rate B	Blue Grass	95.8%	10,757,845	11,174,840	416,995	3.9%
Rate B	Clark	0.0%	-	-	-	0.0%
Rate B	Cumberland Valley	0.0%	-	-	-	0.0%
Rate B	Farmers	0.0%	-	-	-	0.0%
Rate B	Fleming-Mason	0.0%	-	-	-	0.0%
Rate B	Grayson	86.6%	1,733,635	1,796,440	62,805	3.6%
Rate B	Inter-County	78.4%	3,853,087	4,000,218	147,131	3.8%
Rate B	Jackson	81.0%	3,261,843	3,384,362	122,519	3.8%
Rate B	Licking Valley	0.0%	-	-	-	0.0%
Rate B	Nolin	98.8%	1,546,266	1,603,203	56,937	3.7%
Rate B	Owen	93.5%	15,691,907	16,320,524	628,616	4.0%
Rate B	Salt River	94.5%	7,849,642	8,141,786	292,145	3.7%
Rate B	Shelby	92.8%	9,959,655	10,326,086	366,430	3.7%
Rate B	South Ky	79.5%	3,987,957	4,136,059	148,102	3.7%
Rate B	Taylor	77.4%	831,893	864,016	32,123	3.9%
	<b>Total</b>	<b>90.9%</b>	<b>59,815,719</b>	<b>62,102,004</b>	<b>2,286,285</b>	<b>3.8%</b>
Rate C	Big Sandy	0.0%	-	-	-	0.0%
Rate C	Blue Grass	0.0%	-	-	-	0.0%
Rate C	Clark	0.0%	-	-	-	0.0%
Rate C	Cumberland Valley	0.0%	-	-	-	0.0%
Rate C	Farmers	87.3%	2,875,951	3,013,890	137,939	4.8%
Rate C	Fleming-Mason	93.6%	7,135,643	7,477,546	341,904	4.8%
Rate C	Grayson	0.0%	-	-	-	0.0%
Rate C	Inter-County	0.0%	-	-	-	0.0%
Rate C	Jackson	92.5%	1,001,698	1,047,110	45,412	4.5%
Rate C	Licking Valley	0.0%	-	-	-	0.0%
Rate C	Nolin	0.0%	-	-	-	0.0%
Rate C	Owen	0.0%	-	-	-	0.0%
Rate C	Salt River	0.0%	-	-	-	0.0%
Rate C	Shelby	0.0%	-	-	-	0.0%
Rate C	South Ky	86.0%	5,690,287	5,959,823	269,536	4.7%
Rate C	Taylor	96.2%	449,732	469,689	19,957	4.4%
	<b>Total</b>	<b>90.0%</b>	<b>17,153,311</b>	<b>17,968,058</b>	<b>814,747</b>	<b>4.7%</b>

**East Kentucky Power Cooperative, Inc.**

**Revenue Detail by Member by Rate  
Present, COS Based and Proposed Rate Options**

EKPC Rate	Member		Present Rates	Option 3: \$43M Rate Design		
		Actual Load Factor	Present Total Billing	Prop 2 Total Billing	Prop 1 Change	Percent Change
Rate E	Big Sandy	55.2%	15,194,682	15,990,542	795,860	5.2%
Rate E	Blue Grass	53.2%	75,472,253	79,471,123	3,998,870	5.3%
Rate E	Clark	54.8%	31,113,089	32,745,669	1,632,580	5.2%
Rate E	Cumberland Valley	58.1%	29,974,144	31,540,099	1,565,955	5.2%
Rate E	Farmers	58.2%	31,649,009	33,313,760	1,664,751	5.3%
Rate E	Fleming-Mason	57.2%	30,724,488	32,337,896	1,613,408	5.3%
Rate E	Grayson	55.6%	15,892,923	16,721,492	828,569	5.2%
Rate E	Inter-County	52.5%	29,674,742	31,254,025	1,579,283	5.3%
Rate E	Jackson	55.6%	58,279,094	61,346,436	3,067,342	5.3%
Rate E	Licking Valley	57.6%	17,298,143	18,198,062	899,919	5.2%
Rate E	Nolin	54.0%	43,686,325	46,000,664	2,314,338	5.3%
Rate E	Owen	58.3%	74,903,441	78,799,441	3,896,000	5.2%
Rate E	Salt River	57.5%	75,530,233	79,475,046	3,944,813	5.2%
Rate E	Shelby	56.2%	23,218,841	24,437,428	1,218,587	5.2%
Rate E	South Ky	54.0%	79,696,530	83,928,850	4,232,320	5.3%
Rate E	Taylor	55.7%	31,773,345	33,446,484	1,673,140	5.3%
	<b>Total</b>	<b>55.7%</b>	<b>664,081,280</b>	<b>699,007,015</b>	<b>34,925,736</b>	<b>5.3%</b>
Rate G	Big Sandy	0.0%	-	-	-	0.0%
Rate G	Blue Grass	93.8%	5,730,294	6,022,408	292,114	5.1%
Rate G	Clark	0.0%	-	-	-	0.0%
Rate G	Cumberland Valley	0.0%	-	-	-	0.0%
Rate G	Farmers	0.0%	-	-	-	0.0%
Rate G	Fleming-Mason	100.3%	13,625,132	14,313,810	688,678	5.1%
Rate G	Grayson	0.0%	-	-	-	0.0%
Rate G	Inter-County	0.0%	-	-	-	0.0%
Rate G	Jackson	0.0%	-	-	-	0.0%
Rate G	Licking Valley	0.0%	-	-	-	0.0%
Rate G	Nolin	93.0%	6,160,848	6,504,022	343,175	5.6%
Rate G	Owen	0.0%	-	-	-	0.0%
Rate G	Salt River	0.0%	-	-	-	0.0%
Rate G	Shelby	0.0%	-	-	-	0.0%
Rate G	South Ky	0.0%	-	-	-	0.0%
Rate G	Taylor	0.0%	-	-	-	0.0%
	<b>Total</b>	<b>96.9%</b>	<b>25,516,274</b>	<b>26,840,240</b>	<b>1,323,966</b>	<b>5.2%</b>

**East Kentucky Power Cooperative, Inc.**

**Revenue Detail by Member by Rate  
Present, COS Based and Proposed Rate Options**

EKPC Rate	Member	Present Rates		Option 3: \$43M Rate Design		
		Actual Load Factor	Present Total Billing	Prop 2 Total Billing	Prop 1 Change	Percent Change
Contract	Big Sandy	0.0%	-	-	-	0.0%
Contract	Blue Grass	0.0%	-	-	-	0.0%
Contract	Clark	0.0%	-	-	-	0.0%
Contract	Cumberland Valley	0.0%	-	-	-	0.0%
Contract	Farmers	0.0%	-	-	-	0.0%
Contract	Fleming-Mason	0.0%	-	-	-	0.0%
Contract	Grayson	0.0%	-	-	-	0.0%
Contract	Inter-County	0.0%	-	-	-	0.0%
Contract	Jackson	0.0%	-	-	-	0.0%
Contract	Licking Valley	0.0%	-	-	-	0.0%
Contract	Nolin	0.0%	-	-	-	0.0%
Contract	Owen	69.5%	42,471,101	45,852,655	3,381,554	8.0%
Contract	Salt River	0.0%	-	-	-	0.0%
Contract	Shelby	0.0%	-	-	-	0.0%
Contract	South Ky	0.0%	-	-	-	0.0%
Contract	Taylor	0.0%	-	-	-	0.0%
	<b>Total</b>	<b>69.5%</b>	<b>42,471,101</b>	<b>45,852,655</b>	<b>3,381,554</b>	<b>8.0%</b>
Steam	Big Sandy	0.0%	-	-	-	0.0%
Steam	Blue Grass	0.0%	-	-	-	0.0%
Steam	Clark	0.0%	-	-	-	0.0%
Steam	Cumberland Valley	0.0%	-	-	-	0.0%
Steam	Farmers	0.0%	-	-	-	0.0%
Steam	Fleming-Mason	67.5%	10,716,264	10,974,152	257,888	2.4%
Steam	Grayson	0.0%	-	-	-	0.0%
Steam	Inter-County	0.0%	-	-	-	0.0%
Steam	Jackson	0.0%	-	-	-	0.0%
Steam	Licking Valley	0.0%	-	-	-	0.0%
Steam	Nolin	0.0%	-	-	-	0.0%
Steam	Owen	0.0%	-	-	-	0.0%
Steam	Salt River	0.0%	-	-	-	0.0%
Steam	Shelby	0.0%	-	-	-	0.0%
Steam	South Ky	0.0%	-	-	-	0.0%
Steam	Taylor	0.0%	-	-	-	0.0%
	<b>Total</b>	<b>67.5%</b>	<b>10,716,264</b>	<b>10,974,152</b>	<b>257,888</b>	<b>2.4%</b>

**East Kentucky Power Cooperative, Inc.**

**Revenue Detail by Member by Rate  
Present, COS Based and Proposed Rate Options**

EKPC Rate	Member	Present Rates		Option 3: \$43M Rate Design		
		Actual Load Factor	Present Total Billing	Prop 2 Total Billing	Prop 1 Change	Percent Change
Rate TGP	Big Sandy	0.0%	-	-	-	0.0%
Rate TGP	Blue Grass	0.0%	-	-	-	0.0%
Rate TGP	Clark	0.0%	-	-	-	0.0%
Rate TGP	Cumberland Valley	0.0%	-	-	-	0.0%
Rate TGP	Farmers	0.0%	-	-	-	0.0%
Rate TGP	Fleming-Mason	70.8%	3,422,394	3,422,394	-	0.0%
Rate TGP	Grayson	0.0%	-	-	-	0.0%
Rate TGP	Inter-County	0.0%	-	-	-	0.0%
Rate TGP	Jackson	0.0%	-	-	-	0.0%
Rate TGP	Licking Valley	0.0%	-	-	-	0.0%
Rate TGP	Nolin	0.0%	-	-	-	0.0%
Rate TGP	Owen	0.0%	-	-	-	0.0%
Rate TGP	Salt River	0.0%	-	-	-	0.0%
Rate TGP	Shelby	0.0%	-	-	-	0.0%
Rate TGP	South Ky	0.0%	-	-	-	0.0%
Rate TGP	Taylor	87.5%	2,927,454	2,927,454	-	0.0%
	<b>Total</b>	<b>78.0%</b>	<b>6,349,849</b>	<b>6,349,849</b>	<b>-</b>	<b>0.0%</b>
Total	Big Sandy	55.8%	15,536,669	16,345,012	808,343	5.2%
Total	Blue Grass	58.8%	91,960,392	96,668,371	4,707,979	5.1%
Total	Clark	54.8%	31,113,089	32,745,669	1,632,580	5.2%
Total	Cumberland Valley	58.1%	29,974,144	31,540,099	1,565,955	5.2%
Total	Farmers	60.0%	34,524,960	36,327,650	1,802,690	5.2%
Total	Fleming-Mason	70.0%	65,623,921	68,525,799	2,901,877	4.4%
Total	Grayson	58.0%	17,626,559	18,517,932	891,373	5.1%
Total	Inter-County	54.8%	33,527,829	35,254,243	1,726,414	5.1%
Total	Jackson	57.1%	62,542,635	65,777,908	3,235,273	5.2%
Total	Licking Valley	57.6%	17,298,143	18,198,062	899,919	5.2%
Total	Nolin	58.7%	51,393,440	54,107,889	2,714,450	5.3%
Total	Owen	65.8%	133,066,449	140,972,619	7,906,171	5.9%
Total	Salt River	60.2%	83,379,874	87,616,832	4,236,958	5.1%
Total	Shelby	65.0%	33,178,496	34,763,514	1,585,018	4.8%
Total	South Ky	56.4%	89,374,774	94,024,732	4,649,958	5.2%
Total	Taylor	59.7%	35,982,424	37,707,644	1,725,220	4.8%
Total	<b>Total</b>	<b>60.5%</b>	<b>826,103,797</b>	<b>869,093,973</b>	<b>42,990,177</b>	<b>5.2%</b>



**FLEMING-MASON ENERGY COOPERATIVE**

**PSC CASE NO. 2021-00109**

**RESPONSE TO INFORMATION REQUEST**

**APPHARVEST MOREHEAD FARM, LLC'S FIRST REQUEST FOR INFORMATION**

**DATED 5/14/21**

**REQUEST 3**

**RESPONSIBLE PARTY:** John Wolfram

**Request 3.** Please refer to the testimony on page 4 of Mr. Wolfram at line 5. Were any of the adjustments of contract demand for a “small number of large commercial or industrial customers” within the Fleming-Mason territory? If so, how many?

**Response 3.** Yes. There is one Fleming-Mason member for which demand amounts were adjusted.

**FLEMING-MASON ENERGY COOPERATIVE**

**PSC CASE NO. 2021-00109**

**RESPONSE TO INFORMATION REQUEST**

**APPHARVEST MOREHEAD FARM, LLC'S FIRST REQUEST FOR INFORMATION**

**DATED 5/14/21**

**REQUEST 4**

**RESPONSIBLE PARTY:** John Wolfram

**Request 4.** Please refer to the testimony of John Wolfram on pages 5, 6, 7 and 8.

- a. Please describe with specificity which approach was used for Fleming-Mason and its customers, including adjustments.
- b. Please provide the work papers that reflect how the numbers were derived for Fleming Mason.
- c.
  1. Please confirm that the Kenergy Order method was unreasonable for Fleming Mason.
  2. Assuming that was correct, please provide the work papers for the analysis using the Kenergy method and present year allocations.
  3. Please state why the use of the Kenergy method was unreasonable for Fleming Mason.
  4. What is the "year" that the term "present year" refers to?
- d. For Fleming-Mason, please state that with specificity how the rate classes shifted from the last rate order and the present test year.

- e. See page 6, lines 13-15. For Fleming-Mason please provide support for the following statement: “holding the last rate order component percentages fixed and applying them to 2019 billing units (often) resulted in skewed charges on a per-unit basis.”
- f. Please refer to line 15 on page 6 of Mr. Wolfram’s testimony.
  - 1. Is Fleming-Mason included as one of the “most cooperative?”
  - 2. If yes, then please show work papers that demonstrates the accuracy of that statement.
- g. Please describe what the “traditional test year method” is. Please apply the traditional test year method to Fleming-Mason showing the adjustments and compare that to the “Kenergy Order” method.
- h. Please see line 8, page 8.
  - 1. Did the pass-through method used for Fleming-Mason introduce some revenue distortions within a particular note class?
  - 2. If yes, please state what rate class experienced distortions.
  - 3. What was the amount of those distortions?
  - 4. Would the rate class for which AppHarvest is a member see significant changes in its bill?
  - 5. Please detail those changes which would cause Fleming-Mason to file a “near simultaneous” rate case.

**Response 4.**

- a. Both approaches were analyzed for Fleming-Mason and the present test year allocation method was used to develop the proposed rates.
- b. Please see the response to Staff, Items 4 and 5.
- c.
  - 1. Confirmed.
  - 2. See the response to part b.
  - 3. See the response to Staff Item 3 b.
  - 4. The test year is 2019.
- d. See the response to Staff Item 3 c.
- e. See the response to Staff Item 3 c.
- f.
  - 1. Yes. Under the *Kenergy* method, Fleming-Mason experienced a decline in the base demand charge for Rate LIS7.
  - 2. See the response to Staff Item 3 c.
- g. The “Traditional test year” method refers to using the 2019 billing units and resultant proportions to allocate the increase instead of the proportions from the last rate order. See the response to Staff Item 5.
- h. (1 through 5) It is almost certain that Fleming-Mason will experience revenue distortions within its rate classes, simply due to how the pass-through rate filing process works. The

pass-through filing requires a proportional application of the revenue increase across the billing components, but the actual cost drivers for each rate class do not adhere to those proportions. This introduces revenue distortions, even though quantifying those distortions is beyond the scope of the pass-through rate calculation. If such distortions result in adverse impacts on Fleming-Mason's financials over time, the cooperative could elect to file a rate case, but it is premature to specify the criteria for such a decision at this time.

**FLEMING-MASON ENERGY COOPERATIVE**

**PSC CASE NO. 2021-00109**

**RESPONSE TO INFORMATION REQUEST**

**APPHARVEST MOREHEAD FARM, LLC'S FIRST REQUEST FOR INFORMATION**

**DATED 5/14/21**

**REQUEST 5**

**RESPONSIBLE PARTY:** John Wolfram

**Request 5.** With respect to Fleming-Mason please state which members are served under Special Electric Contract Rate EKPC rate G and "other large special contracts." Please provide work papers to show how these allocations and thus rates were determined.

**Response 5.** See the response to Item 2 and also Exhibit 3.

FLEMING-MASON ENERGY COOPERATIVE

PSC CASE NO. 2021-00109

RESPONSE TO INFORMATION REQUEST

APPHARVEST MOREHEAD FARM, LLC'S FIRST REQUEST FOR INFORMATION

DATED 5/14/21

REQUEST 6

RESPONSIBLE PARTY: John Wolfram

**Request 6.** Please refer to the answer to Question appearing on lines 9 and 10, page 9 of Mr. Wolfram's testimony.

- a. For class LIS-6B please confirm that there were no customers taking under that rate class.
- b. Also, if in fact it was "vacant," please describe if the "per-unit charges" were identical to any "per-unit charges" of any non-vacant rate classes.
- c. If so, please state which non-vacant rate class was used to set the charge "equivalently."
- d. If not, what was the overall rate increase for the utility – Fleming-Mason?
- e. Please describe using examples as to how the rate design "particularly on an interclass basis" will not result in any change.
- f. Please give an example of the rate switching involving class LIS-6B could occur.

**Response 6.**

- a. Confirmed.
- b. The LIS-B customer charge, energy charge, and contract demand charge are identical to those of non-vacant rate class LIS-7.
- c. See part b.
- d. Not Applicable.
- e. If per-unit charges in vacant rate classes are not changed but are equivalent to those of non-vacant rate classes that are increasing, rate switching could be encouraged. This will be avoided if the vacant rate classes are changed accordingly.
- f. If LIS-6B rates are not changed, members on LIS-7 could switch to LIS-6B to take advantage of the unchanged (and thus lower) rates.