

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF FLEMING-MASON ENERGY) CASE NO. 2021-00109
COOPERATIVE, INC'S PASS-THROUGH OF EAST KENTUCKY)
POWER COOPERATIVE, INC'S WHOLESALE RATE)
ADJUSTMENT)

**APPHARVEST MOREHEAD FARM, LLS'S
FIRST REQUEST FOR INFORMATION TO
FLEMING-MASON ENERGY COOPERATIVE, INC.**

In accordance with the Public Service Commission's ("Commission") April 15, 2021, Order, Intervenor AppHarvest Morehead Farm, LLC ("AppHarvest Morehead") propounds the following data requests upon the Applicant Fleming-Mason Energy Cooperative, Inc. ("Fleming-Mason"). Fleming-Mason shall respond to these requests in accordance with the provisions of the Commission's April 15, 2021, Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate AppHarvest Morehead's request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for AppHarvest Morehead.
4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much

information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

7. If Fleming-Mason objects to any request on any grounds, please notify counsel for AppHarvest Morehead as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

10. These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

Requests for Information

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?
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.
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?

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 Kenegy Order method was unreasonable for Fleming-Mason.
 2. Assuming that was correct, please provide the work papers for the analysis using the Kenegy method and present year allocations.
 3. Please state why the use of the Kenegy 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 “Kenegy 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.
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.
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.