

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF FLEMING-MASON )  
ENERGY COOPERATIVE, INC. FOR A GENERAL ) CASE NO. 2021-00109  
ADJUSTMENT OF RATES, APPROVAL OF )  
DEPRECIATION STUDY, AMORTIZATION OF )  
CERTAIN REGULATORY ASSETS, AND OTHER RELIEF )

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**APPHARVEST MOREHEAD FARM, LLC’S  
SUPPLEMENTAL REQUEST FOR INFORMATION TO  
FLEMING-MASON ENERGY COOPERATIVE, INC.**

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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.

Respectfully submitted,

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## Requests for Information

1. Please see RJM-3 page 1 of 5 attached to Richard J. Mackie in his testimony in the Application of East Kentucky Power Cooperative Case No. 2021-00163. Because the power supplied to Fleming-Mason from EKPC for AppHarvest Morehead Farm is Rate B and the increase is 3.8%, shouldn't the increase be 3.8% for rate LIS 6B? If not, why not?
2. Please refer to the Direct Testimony of Mr. Wolfram:
  - a. On Page 5, Lines 10 – 11, Mr. Wolfram states that his analysis using the *Kenergy* Order “did not produce reasonable rates for all rate classes.” Please provide examples of results that were not “reasonable rates for all rate classes.”
  - b. On Page 5, Lines 15 – 17, Mr. Wolfram states that “[r]elying on the last rate order to allocate the total increase to the rate classes seems reasonable in theory, but has limitations based on how the customer mix within the rate classifications has changed over time.” Does relying on the present test year method overcome such limitations based on how the customer mix within the rate classifications has changed over time?
    - i. If yes, please explain how the present test year method overcomes such limitations.
    - ii. If no, please explain why the present test year method does not overcome such limitations.
  - c. On Page 9, beginning at Line 9 please refer to Mr. Wolfram’s Response.
    - i. Please confirm that the rates for vacant class LIS-6B were determined by comparison to the class 7 because the rates were identical. If not, please state why not?
    - ii. If the answer was “Yes” to i above, why are they identical when in fact class LIS-7 doesn’t have a demand change. Isn’t Fleming-Mason accordingly over earning due to that comparison?
  - d. On Page 9, Lines 12 – 14, Mr. Wolfram states that for vacant rate classes, he either “set the proposed vacant rate class per-unit charge equivalently” to identical per-unit charges of other, non-vacant rate classes or “increased the vacant rate class per-unit charges by the same percentage as the overall base rate increase for the utility.”
    - i. Is it true that the percentage rate increases for some rate classes are less than the overall base rate percentage increase for the utility?
    - ii. Can setting the percentage increase for a vacant rate class equal to the overall base rate percentage increase for the utility lead to a higher increase in that

class's rates than are justified by that class's costs? If not, please explain why not.

3. Please see Mr. Wolfram's answer to the first data request #3.
  - a. What specifically was adjusted with this member?
  - b. Was AppHarvest Morehead Farm the referred to customer?

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