

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF )  
INTER-COUNTY ENERGY COOPERATIVE )  
CORPORATION FOR PASS-THROUGH OF EAST ) Case No. 2021-00111  
KENTUCKY POWER COOPERATIVE, INC.'S )  
WHOLESALE RATE ADJUSTMENT )

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INTER-COUNTY ENERGY COOPERATIVE CORPORATION RESPONSE TO  
COMMISSION STAFF'S REQUEST FOR INFORMATION  
ISSUED SEPTEMBER 10, 2021

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Filed: September 17, 2021

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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VERIFICATION OF JOHN WOLFRAM

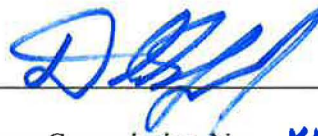
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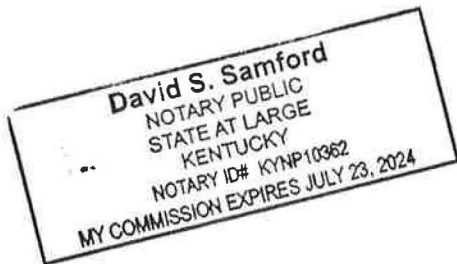
COMMONWEALTH OF KENTUCKY     )  
   )  
COUNTY OF JEFFERSON            )

John Wolfram, being duly sworn, states that he has supervised the preparation of his response to the instant request for information in this 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.

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

The foregoing Verification was signed, acknowledged and sworn to before me this 17<sup>th</sup> day of September, 2021, by John Wolfram.

  
\_\_\_\_\_  
Notary Commission No. KYNP 10362  
Commission expiration: 7/23/24



**Inter-County Energy Cooperative Corporation**  
**Case No. 2021-00111**  
**Commission Staff's Request for Information Issued September 10, 2021**

1. Refer to Inter-County Energy's July 30, 2021 filing of Revised Exhibits of the proposed rates for the pass-through of East Kentucky Power Cooperative, Inc.'s (EKPC) wholesale rate adjustment, Staff 1-5-Inter-County-Settle-v1.xlsx, Summary Tab. Also refer to Case No. 2021000103, EKPC's Responses to Staff's Post-Hearing Requests dated August 18, 2021, Item 10, PH\_DR Response 10 Settle Rate Design CONFIDENTIAL.xlsx, Summary by Rate by Member Tab.
  - a. Reconcile the total increase allocated to Inter-County Energy by EKPC, and the total increase Inter-County Energy applied in the billing analysis.
  - b. Provide supporting analysis for this difference in Excel spreadsheet format with all formulas, columns, and rows unprotected and accessible.

**Response:**

- a. Please see attached. The EKPC exhibit was compiled by wholesale rate class, not by member system, while the distribution cooperative pass-through exhibits were prepared by member system. In the attachment, the first two pages show both, with the rate class data in columns and the member system data in rows, and a reconciliation of each at the bottom. The last four pages replicate the EKPC exhibit, but with a table added at the end to show the totals, along with a comparison to the member system data used in the pass-through exhibits.

The negligible differences between the values in the EKPC settlement exhibit and the distribution cooperative pass-through exhibit are due to rounding and calculation of the FAC and environmental surcharge. The pass-through amounts are less than the EKPC amount by \$31,791 out of \$38,343,000 or 0.083%.
- b. This response is being provided in Excel format and is uploaded separately.

1 **EKPC Member Settlement Data**  
2 **By Rate Class & By Member**  
3  
4

5	Member	Rate B	Rate C	Rate E	Rate G	Contract	Steam	TGP	Total
6									
7	Big Sandy								
8	Settlement Revenues	\$350,505	\$0	\$15,976,556	\$0	\$0	\$0	\$0	\$16,327,061
9	Current Revenues	\$341,987	\$0	\$15,194,682	\$0	\$0	\$0	\$0	\$15,536,669
10	Total Increase	\$8,518	\$0	\$781,874	\$0	\$0	\$0	\$0	\$790,392
11									
12	Blue Grass								
13	Settlement Revenues	\$11,041,671	\$0	\$79,400,918	\$5,877,706	\$0	\$0	\$0	\$96,320,295
14	Current Revenues	\$10,757,845	\$0	\$75,472,253	\$5,730,294	\$0	\$0	\$0	\$91,960,392
15	Total Increase	\$283,826	\$0	\$3,928,665	\$147,412	\$0	\$0	\$0	\$4,359,903
16									
17	Clark								
18	Settlement Revenues	\$0	\$0	\$32,717,171	\$0	\$0	\$0	\$0	\$32,717,171
19	Current Revenues	\$0	\$0	\$31,113,089	\$0	\$0	\$0	\$0	\$31,113,089
20	Total Increase	\$0	\$0	\$1,604,082	\$0	\$0	\$0	\$0	\$1,604,082
21									
22	Cumberland Valley								
23	Settlement Revenues	\$0	\$0	\$31,512,747	\$0	\$0	\$0	\$0	\$31,512,747
24	Current Revenues	\$0	\$0	\$29,974,144	\$0	\$0	\$0	\$0	\$29,974,144
25	Total Increase	\$0	\$0	\$1,538,603	\$0	\$0	\$0	\$0	\$1,538,603
26									
27	Farmers								
28	Settlement Revenues	\$0	\$2,953,037	\$33,284,670	\$0	\$0	\$0	\$0	\$36,237,707
29	Current Revenues	\$0	\$2,875,951	\$31,649,009	\$0	\$0	\$0	\$0	\$34,524,960
30	Total Increase	\$0	\$77,086	\$1,635,661	\$0	\$0	\$0	\$0	\$1,712,747
31									
32	Fleming-Mason								
33	Settlement Revenues	\$0	\$7,327,351	\$32,309,544	\$13,965,828	\$0	\$10,994,937	\$3,422,394	\$68,020,054
34	Current Revenues	\$0	\$7,135,643	\$30,724,488	\$13,625,132	\$0	\$10,716,264	\$3,422,394	\$65,623,921
35	Total Increase	\$0	\$191,708	\$1,585,056	\$340,696	\$0	\$278,673	\$0	\$2,396,133
36									
37	Grayson								
38	Settlement Revenues	\$1,776,804	\$0	\$16,707,035	\$0	\$0	\$0	\$0	\$18,483,839
39	Current Revenues	\$1,733,635	\$0	\$15,892,923	\$0	\$0	\$0	\$0	\$17,626,558
40	Total Increase	\$43,169	\$0	\$814,112	\$0	\$0	\$0	\$0	\$857,281
41									
42	Inter-County								
43	Settlement Revenues	\$3,953,344	\$0	\$31,226,397	\$0	\$0	\$0	\$0	\$35,179,741
44	Current Revenues	\$3,853,087	\$0	\$29,674,742	\$0	\$0	\$0	\$0	\$33,527,829
45	Total Increase	\$100,257	\$0	\$1,551,655	\$0	\$0	\$0	\$0	\$1,651,912
46									
47	Jackson								
48	Settlement Revenues	\$3,345,809	\$1,026,606	\$61,292,784	\$0	\$0	\$0	\$0	\$65,665,199
49	Current Revenues	\$3,261,843	\$1,001,698	\$58,279,094	\$0	\$0	\$0	\$0	\$62,542,635
50	Total Increase	\$83,966	\$24,908	\$3,013,690	\$0	\$0	\$0	\$0	\$3,122,564

1 **EKPC Member Settlement Data**  
2 **By Rate Class & By Member**

Member	Rate B	Rate C	Rate E	Rate G	Contract	Steam	TGP	Total
Licking Valley								
Settlement Revenues	\$0	\$0	\$18,182,226	\$0	\$0	\$0	\$0	\$18,182,226
Current Revenues	\$0	\$0	\$17,298,143	\$0	\$0	\$0	\$0	\$17,298,143
Total Increase	\$0	\$0	\$884,083	\$0	\$0	\$0	\$0	\$884,083
Nolin								
Settlement Revenues	\$1,586,318	\$0	\$45,960,142	\$6,335,260	\$0	\$0	\$0	\$53,881,720
Current Revenues	\$1,546,266	\$0	\$43,686,325	\$6,160,848	\$0	\$0	\$0	\$51,393,439
Total Increase	\$40,052	\$0	\$2,273,817	\$174,412	\$0	\$0	\$0	\$2,488,281
Owen								
Settlement Revenues	\$16,110,405	\$0	\$78,730,730	\$0	\$42,843,443	\$0	\$0	\$137,684,578
Current Revenues	\$15,691,907	\$0	\$74,903,441	\$0	\$41,786,791	\$0	\$0	\$132,382,139
Total Increase	\$418,498	\$0	\$3,827,289	\$0	\$1,056,652	\$0	\$0	\$5,302,439
Salt River								
Settlement Revenues	\$8,047,315	\$0	\$79,407,544	\$0	\$0	\$0	\$0	\$87,454,859
Current Revenues	\$7,849,642	\$0	\$75,530,233	\$0	\$0	\$0	\$0	\$83,379,875
Total Increase	\$197,673	\$0	\$3,877,311	\$0	\$0	\$0	\$0	\$4,074,984
Shelby								
Settlement Revenues	\$10,206,097	\$0	\$24,416,179	\$0	\$0	\$0	\$0	\$34,622,276
Current Revenues	\$9,959,655	\$0	\$23,218,841	\$0	\$0	\$0	\$0	\$33,178,496
Total Increase	\$246,442	\$0	\$1,197,338	\$0	\$0	\$0	\$0	\$1,443,780
South Kentucky								
Settlement Revenues	\$4,089,161	\$5,838,007	\$83,854,942	\$0	\$0	\$0	\$0	\$93,782,110
Current Revenues	\$3,987,957	\$5,690,287	\$79,696,530	\$0	\$0	\$0	\$0	\$89,374,774
Total Increase	\$101,204	\$147,720	\$4,158,412	\$0	\$0	\$0	\$0	\$4,407,336
Taylor County								
Settlement Revenues	\$853,942	\$460,591	\$33,417,126	\$0	\$0	\$0	\$2,927,454	\$37,659,113
Current Revenues	\$831,893	\$449,732	\$31,773,345	\$0	\$0	\$0	\$2,927,454	\$35,982,424
Total Increase	\$22,049	\$10,859	\$1,643,781	\$0	\$0	\$0	\$0	\$1,676,689
Combined Totals								
Settlement Revenues	\$61,361,371	\$17,605,592	\$698,396,711	\$26,178,794	\$42,843,443	\$10,994,937	\$6,349,848	\$863,730,696
Current Revenues	\$59,815,717	\$17,153,311	\$664,081,282	\$25,516,274	\$41,786,791	\$10,716,264	\$6,349,848	\$825,419,487
Total Increase	\$1,545,654	\$452,281	\$34,315,429	\$662,520	\$1,056,652	\$278,673	\$0	\$38,311,209
Settlement Exhibit 3	\$1,548,673	\$452,238	\$34,314,065	\$663,320	\$1,086,030	\$278,674	\$0	\$38,343,000
Difference	(\$3,019)	\$43	\$1,364	(\$800)	(\$29,378)	(\$1)	\$0	(\$31,791)

-0.083%

Notes: Differences between calculated revenues and totals from Settlement Exhibit 3 are due to rounding and calculation of FAC and surcharge.  
Rate E reflects E2 option and includes proposed changes in meter point and substation charges; Salt River Rate E includes generator credit.  
TGP doesn't change due to the contract.

Rate B				
EKPC Member	Present	Settlement	Change	As Percent
Big Sandy	\$ 341,987	\$ 350,744	\$ 8,757	2.6%
Blue Grass	\$ 10,757,845	\$ 11,035,263	\$ 277,418	2.6%
Clark	\$ -	\$ -	\$ -	
Cumberland Valley	\$ -	\$ -	\$ -	
Farmers	\$ -	\$ -	\$ -	
Fleming-Mason	\$ -	\$ -	\$ -	
Grayson	\$ 1,733,635	\$ 1,778,438	\$ 44,803	2.6%
Inter-County	\$ 3,853,087	\$ 3,952,115	\$ 99,029	2.6%
Jackson	\$ 3,261,843	\$ 3,345,035	\$ 83,192	2.6%
Licking Valley	\$ -	\$ -	\$ -	
Nolin	\$ 1,546,266	\$ 1,587,786	\$ 41,520	2.7%
Owen	\$ 15,691,907	\$ 16,113,009	\$ 421,101	2.7%
Salt River	\$ 7,849,642	\$ 8,048,401	\$ 198,759	2.5%
Shelby	\$ 9,959,655	\$ 10,210,443	\$ 250,788	2.5%
South Ky	\$ 3,987,957	\$ 4,089,565	\$ 101,608	2.5%
Taylor	\$ 831,893	\$ 853,592	\$ 21,699	2.6%
<b>Total</b>	\$ 59,815,719	\$ 61,364,392	\$ 1,548,673	2.6%

Rate C				
EKPC Member	Present	Settlement	Change	As Percent
Big Sandy	\$ -	\$ -	\$ -	
Blue Grass	\$ -	\$ -	\$ -	
Clark	\$ -	\$ -	\$ -	
Cumberland Valley	\$ -	\$ -	\$ -	
Farmers	\$ 2,875,951	\$ 2,951,756	\$ 75,804	2.6%
Fleming-Mason	\$ 7,135,643	\$ 7,323,237	\$ 187,594	2.6%
Grayson	\$ -	\$ -	\$ -	
Inter-County	\$ -	\$ -	\$ -	
Jackson	\$ 1,001,698	\$ 1,027,537	\$ 25,839	2.6%
Licking Valley	\$ -	\$ -	\$ -	
Nolin	\$ -	\$ -	\$ -	
Owen	\$ -	\$ -	\$ -	
Salt River	\$ -	\$ -	\$ -	
Shelby	\$ -	\$ -	\$ -	
South Ky	\$ 5,690,287	\$ 5,841,773	\$ 151,486	2.7%
Taylor	\$ 449,732	\$ 461,248	\$ 11,516	2.6%
	\$ 17,153,311	\$ 17,605,550	\$ 452,238	2.6%

Rate E					
EKPC Member	Present	Settlement	Change	As Percent	
Big Sandy	\$ 15,194,682	\$ 15,975,151	\$ 780,469	5.1%	
Blue Grass	\$ 75,472,253	\$ 79,386,843	\$ 3,914,591	5.2%	
Clark	\$ 31,113,089	\$ 32,716,897	\$ 1,603,808	5.2%	
Cumberland Valley	\$ 29,974,144	\$ 31,510,531	\$ 1,536,387	5.1%	
Farmers	\$ 31,649,009	\$ 33,293,384	\$ 1,644,375	5.2%	
Fleming-Mason	\$ 30,724,488	\$ 32,298,923	\$ 1,574,435	5.1%	
Grayson	\$ 15,892,923	\$ 16,708,158	\$ 815,235	5.1%	
Inter-County	\$ 29,674,742	\$ 31,213,926	\$ 1,539,184	5.2%	
Jackson	\$ 58,279,094	\$ 61,279,815	\$ 3,000,721	5.1%	
Licking Valley	\$ 17,298,143	\$ 18,183,737	\$ 885,595	5.1%	
Nolin	\$ 43,686,325	\$ 45,954,243	\$ 2,267,918	5.2%	
Owen	\$ 74,903,441	\$ 78,763,857	\$ 3,860,416	5.2%	
Salt River	\$ 75,530,233	\$ 79,444,275	\$ 3,914,043	5.2%	
Shelby	\$ 23,218,841	\$ 24,414,042	\$ 1,195,202	5.1%	
South Ky	\$ 79,696,530	\$ 83,833,831	\$ 4,137,302	5.2%	
Taylor	\$ 31,773,345	\$ 33,417,730	\$ 1,644,385	5.2%	
	\$ 664,081,280	\$ 698,395,345	\$ 34,314,065	5.2%	

Rate G					
EKPC Member	Present	Settlement	Change	As Percent	
Big Sandy	\$ -	\$ -	\$ -		
Blue Grass	\$ 5,730,294	\$ 5,874,687	\$ 144,393	2.5%	
Clark	\$ -	\$ -	\$ -		
Cumberland Valley	\$ -	\$ -	\$ -		
Farmers	\$ -	\$ -	\$ -		
Fleming-Mason	\$ 13,625,132	\$ 13,976,173	\$ 351,041	2.6%	
Grayson	\$ -	\$ -	\$ -		
Inter-County	\$ -	\$ -	\$ -		
Jackson	\$ -	\$ -	\$ -		
Licking Valley	\$ -	\$ -	\$ -		
Nolin	\$ 6,160,848	\$ 6,328,734	\$ 167,886	2.7%	
Owen	\$ -	\$ -	\$ -		
Salt River	\$ -	\$ -	\$ -		
Shelby	\$ -	\$ -	\$ -		
South Ky	\$ -	\$ -	\$ -		
Taylor	\$ -	\$ -	\$ -		
	\$ 25,516,274	\$ 26,179,595	\$ 663,320	2.6%	

<b>Contract</b>					
<b>EKPC Member</b>	<b>Present</b>	<b>Settlement</b>	<b>Change</b>	<b>As Percent</b>	
Big Sandy	\$ -	\$ -	\$ -		
Blue Grass	\$ -	\$ -	\$ -		
Clark	\$ -	\$ -	\$ -		
Cumberland Valley	\$ -	\$ -	\$ -		
Farmers	\$ -	\$ -	\$ -		
Fleming-Mason	\$ -	\$ -	\$ -		
Grayson	\$ -	\$ -	\$ -		
Inter-County	\$ -	\$ -	\$ -		
Jackson	\$ -	\$ -	\$ -		
Licking Valley	\$ -	\$ -	\$ -		
Nolin	\$ -	\$ -	\$ -		
Owen	\$ 41,786,791	\$ 42,872,821	\$ 1,086,030		2.6%
Salt River	\$ -	\$ -	\$ -		
Shelby	\$ -	\$ -	\$ -		
South Ky	\$ -	\$ -	\$ -		
Taylor	\$ -	\$ -	\$ -		
	\$ 41,786,791	\$ 42,872,821	\$ 1,086,030		2.6%

<b>Steam</b>					
<b>EKPC Member</b>	<b>Present</b>	<b>Settlement</b>	<b>Change</b>	<b>As Percent</b>	
Big Sandy	\$ -	\$ -	\$ -		
Blue Grass	\$ -	\$ -	\$ -		
Clark	\$ -	\$ -	\$ -		
Cumberland Valley	\$ -	\$ -	\$ -		
Farmers	\$ -	\$ -	\$ -		
Fleming-Mason	\$ 10,716,264	\$ 10,994,937	\$ 278,674		2.6%
Grayson	\$ -	\$ -	\$ -		
Inter-County	\$ -	\$ -	\$ -		
Jackson	\$ -	\$ -	\$ -		
Licking Valley	\$ -	\$ -	\$ -		
Nolin	\$ -	\$ -	\$ -		
Owen	\$ -	\$ -	\$ -		
Salt River	\$ -	\$ -	\$ -		
Shelby	\$ -	\$ -	\$ -		
South Ky	\$ -	\$ -	\$ -		
Taylor	\$ -	\$ -	\$ -		
	\$ 10,716,264	\$ 10,994,937	\$ 278,674		2.6%



Rate TGP				
EKPC Member	Present	Settlement	Change	As Percent
Big Sandy	\$ -	\$ -	\$ -	
Blue Grass	\$ -	\$ -	\$ -	
Clark	\$ -	\$ -	\$ -	
Cumberland Valley	\$ -	\$ -	\$ -	
Farmers	\$ -	\$ -	\$ -	
Fleming-Mason	\$ 3,422,394	\$ 3,422,394	\$ -	0.0%
Grayson	\$ -	\$ -	\$ -	
Inter-County	\$ -	\$ -	\$ -	
Jackson	\$ -	\$ -	\$ -	
Licking Valley	\$ -	\$ -	\$ -	
Nolin	\$ -	\$ -	\$ -	
Owen	\$ -	\$ -	\$ -	
Salt River	\$ -	\$ -	\$ -	
Shelby	\$ -	\$ -	\$ -	
South Ky	\$ -	\$ -	\$ -	
Taylor	\$ 2,927,454	\$ 2,927,454	\$ -	0.0%
	\$ 6,349,849	\$ 6,349,849	\$ -	0.0%

EKPC TOTAL				
EKPC Member	Present	Settlement	Change	As Percent
Big Sandy	\$ 15,536,669	\$ 16,325,895	\$ 789,226	5.1%
Blue Grass	\$ 91,960,392	\$ 96,296,794	\$ 4,336,402	4.7%
Clark	\$ 31,113,089	\$ 32,716,897	\$ 1,603,808	5.2%
Cumberland Valley	\$ 29,974,144	\$ 31,510,531	\$ 1,536,387	5.1%
Farmers	\$ 34,524,960	\$ 36,245,140	\$ 1,720,180	5.0%
Fleming-Mason	\$ 65,623,921	\$ 68,015,665	\$ 2,391,744	3.6%
Grayson	\$ 17,626,559	\$ 18,486,596	\$ 860,038	4.9%
Inter-County	\$ 33,527,829	\$ 35,166,041	\$ 1,638,213	4.9%
Jackson	\$ 62,542,635	\$ 65,652,386	\$ 3,109,752	5.0%
Licking Valley	\$ 17,298,143	\$ 18,183,737	\$ 885,595	5.1%
Nolin	\$ 51,393,440	\$ 53,870,763	\$ 2,477,324	4.8%
Owen	\$ 132,382,139	\$ 137,749,686	\$ 5,367,547	4.1%
Salt River	\$ 83,379,874	\$ 87,492,676	\$ 4,112,802	4.9%
Shelby	\$ 33,178,496	\$ 34,624,486	\$ 1,445,990	4.4%
South Ky	\$ 89,374,774	\$ 93,765,169	\$ 4,390,395	4.9%
Taylor	\$ 35,982,424	\$ 37,660,024	\$ 1,677,600	4.7%
<b>Total</b>	<b>\$ 825,419,487</b>	<b>\$ 863,762,487</b>	<b>\$ 38,343,000</b>	<b>4.6%</b>

PASS THROUGH TOTALS		
Amount	Var	%
\$ 790,392	\$ 1,166	0.15%
\$ 4,359,903	\$ 23,501	0.54%
\$ 1,604,082	\$ 274	0.02%
\$ 1,538,603	\$ 2,216	0.14%
\$ 1,712,747	\$ (7,433)	-0.43%
\$ 2,396,133	\$ 4,389	0.18%
\$ 857,281	\$ (2,757)	-0.32%
\$ 1,651,912	\$ 13,699	0.84%
\$ 3,122,564	\$ 12,812	0.41%
\$ 884,083	\$ (1,512)	-0.17%
\$ 2,488,281	\$ 10,957	0.44%
\$ 5,302,439	\$ (65,108)	-1.21%
\$ 4,074,984	\$ (37,818)	-0.92%
\$ 1,443,780	\$ (2,210)	-0.15%
\$ 4,407,336	\$ 16,941	0.39%
\$ 1,676,689	\$ (911)	-0.05%
<b>\$ 38,311,209</b>	<b>\$ (31,791)</b>	<b>-0.08%</b>