# COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF TAYLOR COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION FOR PASS-THROUGH OF EAST KENTUCKY POWER COOPERATIVE, INC.'S WHOLESALE RATE ADJUSTMENT

) Case No. 2021-00119

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# TAYLOR COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSE TO COMMISSION STAFF'S REQUEST FOR INFORMATION **ISSUED SEPTEMBER 10, 2021**

Filed: September 17, 2021

## **COMMONWEALTH OF KENTUCKY**

### **BEFORE THE PUBLIC SERVICE COMMISSION**

### **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.

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John Wolfram

The foregoing Verification was signed, acknowledged and sworn to before me this *17*<sup>2</sup>/<sub>1</sub> day of September, 2021, by John Wolfram.

Notary Commission No. KYNP 10362

Commission expiration: 7/23/24



# Taylor County Rural Electric Cooperative Corporation Case No. 2021-00119 Commission Staff's Request for Information Issued September 10, 2021

- Refer to Taylor County RECC'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-Taylor-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 Taylor County RECC by EKPC, and the total increase Taylor County RECC 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

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Member	Rate B	Rate C	Rate E	Rate G	Contract	Steam	TGP	Total
Big Sandy								
Settlement Revenues	\$350,505	\$0	\$15,976,556	\$0	\$0	\$0	\$0	\$16,327,06
Current Revenues	\$341,987	\$0	\$15,194,682	\$0	\$0	\$0	\$0	\$15,536,66
Total Increase	\$8,518	\$0	\$781,874	\$0	\$0	\$0	\$0	\$790,39
Dhua Crass								
Blue Grass Settlement Revenues	\$11,041,671	\$0	\$79,400,918	\$5,877,706	\$0	\$0	\$0	\$96,320,29
Current Revenues	\$10,757,845	\$0	\$75,472,253	\$5,730,294	\$0	\$0	\$0 \$0	\$91,960,39
Total Increase	\$283,826	\$0	\$3,928,665	\$147,412	\$0	\$0	\$0	\$4,359,90
=								
Clark								
Settlement Revenues	\$0	\$0	\$32,717,171	\$0	\$0	\$0	\$0	\$32,717,17
Current Revenues	\$0	\$0	\$31,113,089	\$0	\$0	\$0	\$0	\$31,113,08
Total Increase	\$0	\$0	\$1,604,082	\$0	\$0	\$0	\$0	\$1,604,08
Overshanda (Vallav)								
Cumberland Valley Settlement Revenues	\$0	\$0	\$31,512,747	\$0	\$0	\$0	\$0	¢04 540 7/
Current Revenues	\$0 \$0	\$0 \$0	\$29,974,144	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$31,512,74 \$29,974,14
Total Increase	<u> </u>	<u>\$0</u> \$0	\$1,538,603	<u>\$0</u> \$0	<u>\$0</u> \$0	\$0 \$0	<u>\$0</u> \$0	\$29,974,12 \$1,538,60
=	<b>4</b> 0		\$1,000,000	φ0		φ0		\$1,000,00
Farmers								
Settlement Revenues	\$0	\$2,953,037	\$33,284,670	\$0	\$0	\$0	\$0	\$36,237,70
Current Revenues	\$0	\$2,875,951	\$31,649,009	\$0	\$0	\$0	\$0	\$34,524,96
Total Increase	\$0	\$77,086	\$1,635,661	\$0	\$0	\$0	\$0	\$1,712,74
Fleming-Mason	<b>\$</b> 0	<b>#</b> 7.007.054	<b>*</b> ~~~~~~~~~~	\$10 00F 000	<b>*</b> 0	<b>#</b> 40.004.007	<b>*</b> 0.400.004	<b>*</b> ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
Settlement Revenues	\$0 \$0	\$7,327,351	\$32,309,544	\$13,965,828	\$0 \$0	\$10,994,937	. , ,	\$68,020,05
Current Revenues	\$0 \$0	\$7,135,643 \$191,708	\$30,724,488 \$1.585.056	\$13,625,132 \$340.696	\$0 \$0	\$10,716,264 \$278.673	<u>\$3,422,394</u> \$0	\$65,623,92 \$2,396,13
=	<b>40</b>	<i><b></b></i>	\$1,000,000	<i>\\\</i> 010,000	ψυ	Q210,010	ψu	φ2,000,10
Grayson								
Settlement Revenues	\$1,776,804	\$0	\$16,707,035	\$0	\$0	\$0	\$0	\$18,483,83
Current Revenues	\$1,733,635	\$0	\$15,892,923	\$0	\$0	\$0	\$0	\$17,626,55
Total Increase	\$43,169	\$0	\$814,112	\$0	\$0	\$0	\$0	\$857,28
later County								
Inter-County Settlement Revenues	\$3,953,344	\$0	\$31,226,397	\$0	\$0	\$0	\$0	\$35,179,74
Current Revenues	\$3,853,087	\$0 \$0	\$29,674,742	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$33,527,82
Total Increase	\$100,257	<u>\$0</u> \$0	\$1,551,655	<u>\$0</u> \$0	\$0		<u>\$0</u> \$0	\$1,651,91
=		• -		**			· -	
Jackson								
Settlement Revenues	\$3,345,809	\$1,026,606	\$61,292,784	\$0	\$0	\$0	\$0	\$65,665,19
Current Revenues	\$3,261,843	\$1,001,698	\$58,279,094	\$0	\$0	\$0	\$0	\$62,542,63
Total Increase	\$83,966	\$24,908	\$3,013,690	\$0	\$0	\$0	\$0	\$3,122,56

#### 1 EKPC Member Settlement Data

2 By Rate Class & By Member

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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	<b>*</b> ***	A 100 55 -	<b>600</b> 447 455	<b>A</b>	<b>.</b>	<b>.</b>	<b>*</b> •••• <b>•</b> •• <b>•</b> ••••••••••••••••••••••••	
Settlement Revenues	\$853,942	\$460,591	\$33,417,126	\$0	\$0	\$0 \$0	\$2,927,454	\$37,659,113
Current Revenues	\$831,893	\$449,732	\$31,773,345	\$0 \$0	\$0 \$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 Tetals								
Combined Totals	<b><b><i><u>¢</u></i></b><u></u></b> <u></u>	¢17 605 500	\$c00 206 744	¢06 470 704	¢40.040.440	¢10.004.007	¢c 240 949	¢060 700 000
Settlement Revenues		\$17,605,592				\$10,994,937 \$10,716,264		\$863,730,696
Current Revenues Total Increase	\$59,815,717 \$1,545,654	\$17,153,311 \$452,281	\$664,081,282 \$34,315,429	\$25,516,274 \$662,520	\$41,786,791	\$10,716,264 \$278,673	<u>\$6,349,848</u> \$0	\$825,419,487 \$38,311,209
	φ1,040,054	φ <del>4</del> 02,201	JJ4,J15,429	φυσ2,520	φ1,000,002	φ∠10,013	ΦU	<b>Φ</b> 30,311,209
Sottlomont Exhibit 2	¢1 510 670	\$150 000	\$31 311 OFF	¢663 300	\$1 096 020	¢070 674	\$0	638 343 000
Settlement Exhibit 3	\$1,548,673	\$452,238	\$34,314,065	\$663,320	\$1,086,030	\$278,674	<b>Ф</b> О	\$38,343,000
Difference	(\$2.040)	¢ 40	¢1 064	(\$000)	(\$20.279)	/ውላ ነ	\$0	(001 704)
Difference	(\$3,019)	\$43	\$1,364	(\$800)	(\$29,378)	(\$1)	φU	(\$31,791) -0.083%

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%	
Total	\$ 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%

#### Item 1 Page 5 of 7 Witness: John Wolfram

			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%

		(	Contract			
EKPC Member	Present	1	Settlement	Change	As Percent	
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%	

		Steam			
EKPC Member	Present	Settlement	Change	As Percent	
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%	

		R	ate TGP		
EKPC Member	Present	S	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%

		EK	PC 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%
Total	\$ 825,419,487	\$	863,762,487	\$ 38,343,000	4.6%

	PASS THR	OUO	GH TOTAL	S
-	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%
\$	38,311,209	\$	(31,791)	-0.08%