

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

In the Matter of:

ELECTRONIC APPLICATION OF JACKSON)	
PURCHASE ENERGY CORPORATION)	
FOR A GENERAL ADJUSTMENT OF)	Case No. 2021-00358
RATES AND OTHER GENERAL RELIEF)	

REHEARING REQUEST

Pursuant to KRS 278.400, the Attorney General, through his Office of Rate Intervention, requests that the Public Service Commission (“Commission”) grant a rehearing to correct an error in the Commission’s Final Order issued on April 8, 2022 related to the rate case of Jackson Purchase Energy Corporation (“JPEC”).

The Attorney General requests that the Commission correct a mathematical error in its revenue requirement adjustment related to Salaries and Wage Expense. JPEC based its payroll expense request on a historic test year. The amount of expense in the historic test year was \$3,475,649.¹ JPEC proposed *pro forma* adjustments to that amount of \$175,682.² The sum of those is \$3,651,331. That sum is the amount that JPEC requested related to payroll expense. The Commission did not approve that request. Instead, the Commission approved actual 2021 payroll expenses of \$3,389,173.³ The difference between what was requested, \$3,651,331, and what was approved, \$3,389,173, is \$262,158. However, the Commission’s Order only adjusted the revenue requirement by \$209,767.⁴ Thus, the revenue requirement is overstated by \$52,391 (\$262,158-

¹ JPEC’s Response to Commission Staff Post-Hearing Data Request 1.

² Application, Exhibit JW-2 at 17, Adjustment 1.12.

³ Final Order at 8; JPEC’s Response to Commission Staff Post-Hearing Data Request 1.

⁴ Final Order at 8.

\$209,767). The Attorney General believes this error was based on utilizing an incorrect recalculation of the test year amount as the starting point for the adjustment.

Wherefore, the Attorney General request that Commission grant its request for rehearing and adjust the revenue requirements in accordance with the reasons stated herein.

Respectfully submitted,

DANIEL J. CAMERON
ATTORNEY GENERAL



J. MICHAEL WEST
LAWRENCE W. COOK
ANGELA M. GOAD
JOHN G. HORNE II
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE SUITE 200
FRANKFORT, KY40601-8204
PHONE: (502) 696-5433
FAX: (502) 564-2698
Michael.West@ky.gov
Larry.Cook@ky.gov
Angela.Goad@ky.gov
John.Horne@ky.gov

Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on April 13, 2022, an electronic copy of the forgoing was served by e-mail to the following.

Mark David Goss
L. Allyson Honaker
mdgoss@gosssamfordlaw.com
allyson@gosssamfordlaw.com

this 13th day of April, 2022.

A handwritten signature in blue ink, appearing to read "J. Michael West". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Assistant Attorney General