

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

**In the Matter of:**

<b>AN ELECTRONIC EXAMINATION OF</b>	)	
<b>THE FUEL ADJUSTMENT CLAUSE OF</b>	)	<b>CASE NO.</b>
<b>EAST KENTUCKY POWER COOPERATIVE,</b>	)	<b>2023-00014</b>
<b>INC. COOPERATIVES FROM NOVEMBER 1,</b>	)	
<b>2020 THROUGH OCTOBER 31, 2022</b>	)	

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**MOTION FOR REHEARING AND/OR CLARIFICATION**

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Comes now, East Kentucky Power Cooperative, Inc., Cooperatives (“EKPC”) (“Cooperatives”), pursuant to KRS 278.400 and respectfully requests the Kentucky Public Service Commission (“Commission”) to grant rehearing/clarification on its May 6, 2024 Order in the above-styled case. These rates are scheduled to go into effect with service rendered on or after June 1, 2024, therefore the Cooperatives request a decision on the matter as soon as possible. In support of this motion, EKPC respectfully states as follows:

On May 6, 2024, the Commission issued an Order approving the charges and credits applied by each individual Cooperative through the Fuel Adjustment Clause (“FAC”) for the period from November 1, 2020 through October 31, 2022. The Commission also ordered each Cooperative to increase its base energy rates for service rendered on or after June 1, 2024, adjusted for line loss to reflect the increase of \$0.01125 per kWh by EKPC in Case No. 2023-00009. The Commission’s Order went on to list the amounts that each Cooperative should increase its base energy rates.

Each of the Cooperatives provided calculations to true up the increase in EKPC’s base rates with each Cooperative’s line loss. These calculations are provided in each FAC

review case. The Cooperatives have reviewed the amounts included in the Commission’s Order and these amounts do not reconcile with the calculations provided by each of the Cooperatives in their responses to data requests. The table below illustrates the calculations, and the discrepancies to the May 6<sup>th</sup>, 2024 Order.

Owner-Member	EKPC Base Fuel Rate (case 2023-00009)	Line Loss	Line Loss Ratio (1 - Line Loss)	Calculated FAC Base Fuel (Wholesale Rate/Line Loss Ratio)	Rate per Order (case 2023-00014)
Big Sandy RECC	0.01125	5.200%	0.94800	0.01187	0.01184
Blue Grass Energy	0.01125	4.726%	0.95274	0.01181	0.01178
Clark Energy	0.01125	4.940%	0.95060	0.01183	0.01178
Cumberland Valley Electric ^	0.01125	4.540%	0.95460	0.01179	0.01177
Farmers RECC	0.01125	5.030%	0.94970	0.01185	0.01180
Fleming-Mason	0.01125	4.100%	0.95900	0.01173	0.01162
Grayson RECC	0.01125	4.880%	0.95120	0.01183	0.01179
Inter-County Energy *	0.01125	4.880%	0.95120	0.01182	0.01157
Jackson Energy	0.01125	4.830%	0.95170	0.01182	0.01180
Licking Valley RECC	0.01125	6.320%	0.93680	0.01201	0.01187
Nolin RECC	0.01125	4.660%	0.95340	0.01180	0.01174
Owen Electric	0.01125	3.430%	0.96570	0.01165	0.01157
Salt River Electric	0.01125	3.830%	0.96170	0.01170	0.01168
Shelby Energy	0.01125	3.050%	0.96950	0.01160	0.01158
South Kentucky RECC	0.01125	4.758%	0.95242	0.01181	0.01180
Taylor County RECC	0.01125	5.800%	0.94200	0.01194	0.01190

^Calculation amended to divide by the Line Loss Ratio instead of multiplying by (1 + Line Loss)

\*Rounded Down

The Cooperatives believe that the calculations provided in response to data requests were correct, and should be the amounts charged by the Cooperatives beginning in coordination with EKPC’s rate implementation. The Cooperatives have been unable to determine the calculation used to yield the rates listed in the Commission’s Order.

The Cooperatives believe that each of them will be under-recovering for the FAC charges if the rates that were ordered by the Commission are placed into effect. The Commission’s Order provided all sixteen Cooperatives with a rate below what was proposed in response to data requests. By not appropriately grossing up the base fuel rate for line losses, the Cooperatives will be recovering less than the expenses they are incurring for purchased power.

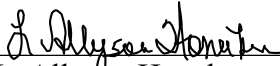
The Cooperative believe the rates detailed in the table above, should be added to the energy rates on all tariffs with members impacted by line loss. For tariffs and contracts that are designed for members who are not impacted by line loss, the energy rate should be increased by EKPC's approved rate of \$0.01125 per kWh.

WHEREFORE, EKPC's Cooperatives request the Commission for the following:

1. to grant rehearing and clarify its May 6, 2024 Order in this proceeding;
2. determine that the amounts included in the Cooperative's responses to data requests in this proceeding are the amounts that should be charged for service and implemented in coordination with EKPC; and,
3. for all other relief the Cooperatives may be entitled to.

This 28<sup>th</sup> day of May, 2024.

Respectfully submitted,

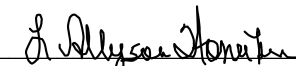


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L. Allyson Honaker  
HONAKER LAW OFFICE, PLLC  
1795 Alysheba Way, Suite, 6202  
Lexington, KY 40509  
(859) 368-8803  
allyson@hloky.com

*Counsel for East Kentucky Power Cooperative, Inc.*

### **CERTIFICATE OF SERVICE**

This is to certify that foregoing was submitted electronically to the Commission on May 28, 2024 and that there are no parties that have been excused from electronic filing. Pursuant to prior Commission orders, no paper copies of this filing will be submitted.



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*Counsel for East Kentucky Power Cooperative, Inc.*