

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|------------------------------------|---|---------------------|
| THE ELECTRONIC APPLICATION OF |) | |
| FARMERS RURAL ELECTRIC |) | |
| COOPERATIVE CORPORATION |) | |
| FOR A GENERAL ADJUSTMENT OF |) | Case No. 2023-00158 |
| RATES PURSUANT TO STREAMLINED |) | |
| PROCEDURE PILOT PROGRAM |) | |
| ESTABLISHED IN CASE NO. 2018-00407 |) | |

APPLICATION

Comes now Farmers Rural Electric Cooperative Corporation (“Farmers”), by counsel, pursuant to KRS 278.180, 807 KAR 5:001 Sections 8, 14 and 16, the Commission’s Orders entered December 11, 2018, March 26, 2019, and December 20, 2019 in Case No. 2018-00407, and other applicable law, and for its Application requesting a general adjustment of its existing rates, respectfully states as follows:

1. Farmers is a not-for-profit, member-owned, rural electric distribution cooperative organized under KRS Chapter 279. Farmers is engaged in the business of distributing retail electric power to approximately 26,452 members in the Kentucky counties of Adair, Barren, Edmonson, Grayson, Green, Hardin, Hart, Larue, Metcalfe, Monroe, Warren.

2. The name, post office address and phone number of the applicant is Farmers Rural Electric Cooperative Corporation, 504 South Broadway, P.O. Box 1298 Glasgow, KY 42142-1298, (270) 651-2191. Farmers' email address is farmersrecc-psc@farmersrecc.com. This Application, including the Exhibits attached hereto and incorporated herein, contains fully

the facts on which Farmers' request for relief is based, and an Order from the Commission granting the rate adjustment proposed herein is requested, consistent with KRS 278.180 and other applicable law. Farmers also requests that the following people be added to the service list:

Tobias Moss, Farmers' President & Chief Executive Officer:

tmos@farmersrecc.net

Jennie Phelps, Farmers' Vice-President Finance & Accounting:

jphelps@farmersrecc.net

L. Allyson Honaker and Brittany Hayes Koenig, Counsel for Farmers:

allyson@hloky.com

brittany@hloky.com

3. Pursuant to 807 KAR 5:001 Section 14(2), Farmers states that it incorporated in Kentucky on March 14, 1938, and attests that it presently is a Kentucky corporation in good standing.

4. Farmers' existing general rates went into effect on July 1, 2017, following their approval by the Commission in Case No. 2016-00365, *In the Matter of: Application of Farmers Rural Electric Cooperative Corporation for an Increase in Retail Rates*. Since that time, Farmers' energy sales have remained essentially the same while the costs of conducting business have increased. Despite close management supervision to minimize cost-escalation, overall expenses in several aspects of Farmers' operations have increased. As set forth in the testimony of Mr. Moss, the streamlined rate case procedure is appropriate for Farmers.

5. In order to improve vital financial metrics, Farmers' Board of Directors, in conjunction with its management, has determined that a general adjustment of retail rates is necessary and advisable. Consistent with KRS 278.030(1), Farmers seeks Commission approval

to demand, collect and receive fair, just and reasonable rates for the services it provides; specifically, Farmers seeks approval to increase its annual revenues by \$2,415,704 or 3.99%, to achieve an Operating Times Interest Earned Ratio (“OTIER”) of 1.51. Farmers bases its proposed rates on a twelve- month historical test period ending December 31, 2022, which is the same period covered by its most recent annual report filed with the Commission on March 18, 2023. These rates are appropriately adjusted for known and measurable changes, as well as the factors set forth in the Commission’s Orders of March 26, 2019 and December 20, 2019 in Case No. 2018-00407, and Farmers proposes that its revised tariff schedules become effective as of July 16, 2023.

6. Further support for Farmers’ requested relief is set forth throughout this Application and its Exhibits, particularly in the testimony of the following witnesses:

a. Mr. Tobias Moss, Farmers’ President and Chief Executive Officer, who offers testimony at Exhibit 7 describing, *inter alia*, Farmers’ business and existing retail electric distribution system, the events that preceded the filing of this case, and the need to revise existing rates to ensure that Farmers may continue to provide safe, reliable retail electric service to its owner-members. Mr. Moss may be contacted at tmoss@farmersrecc.net, 270-651-2191 ext 8300, or P.O. Box 1298 Glasgow, KY 42142-1298;

b. Ms. Jennie Phelps, Farmers’ Vice-President of Finance & Accounting, who offers testimony at Exhibit 8 discussing, *inter alia*, Farmers’ financial health, its expenses, and certain of its relevant practices and policies, as well as the necessity of the rate relief requested in this proceeding. Ms. Phelps may be contacted at jphelps@farmersrecc.net, 270-651-2191 ext 8250, or P.O. Box 1298 Glasgow, KY 42142-1298; and

c. Mr. John Wolfram, expert consultant with Catalyst Consulting LLC, who offers testimony at Exhibit 9 describing, *inter alia*, Farmers’ rate classes, the calculation of

Farmers' revenue requirement, the pro forma adjustments to the test period results, the results of a 2022 Cost of Service Study and its process, the proposed allocation of the revenue increase to the rate classes, and the rate design, proposed rates, and estimated billing impact by rate class. Mr. Wolfram may be contacted at johnwolfram@catalystllc.com, 502-599-1739, or Catalyst Consulting LLC, 3308 Haddon Road, Louisville, Kentucky 40241.

7. Farmers has initiated this proceeding because its existing retail rates do not provide sufficient revenue to ensure the requisite financial strength going forward. While it is Farmers' goal to keep rates as low as possible for its members, the reasonable and prudently incurred expense of providing safe and reliable service must be recovered through rates. In addition, prudent management and lender requirements demand that healthy financial benchmarks be maintained. Based on the facts and figures presented herein, Farmers respectfully requests that the rates and rate design it proposes in this case be approved by the Commission at the earliest possible date.

8. Farmers' request is limited to seeking adjustments in revenue requirements and rate design and does not include any request for a certificate of public convenience and necessity or changes in its tariff beyond those necessary to reflect changes in rates.

9. Farmers is submitting this Application electronically per the requirements of 807 KAR 5:001 Section 8 and has contemporaneously electronically submitted a copy to the Kentucky Attorney General, Office of Rate Intervention, at the following address: rateintervention@ag.ky.gov.

10. Members of Commission Staff may contact Farmers' witnesses directly, without counsel present, to seek clarification of certain factual information contained in the Application or in responses to requests for information.

11. As evidenced by this Application and the Exhibits attached hereto, Farmers satisfies all the prerequisites for use of the Commission's Streamlined Procedure Pilot Program and requests that the Commission so find and administer all aspects of the case under the procedures articulated in the Orders of December 11, 2018, March 26, 2019 and December 20, 2019 in Case No. 2018-00407.

WHEREFORE, Farmers respectfully requests an Order from the Commission:

- (1) Granting the procedural relief requested by entering an Order accepting Farmers' Application for filing under the Streamlined Procedure Pilot Program;
- (2) Granting the substantive rate relief requested herein; and
- (3) Granting Farmers any and all other relief to which it may appear entitled.

Done this 16th day of June, 2023.

Respectfully submitted,



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

Counsel for Farmers RECC

CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Commission for filing on June 16, 2023; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; by virtue of the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of this filing will be made. Furthermore, a true and accurate copy of the filing has been electronically transmitted to the Kentucky Attorney General's Office of Rate Intervention at: rateintervention@ag.ky.gov.



Counsel for Farmers RECC

FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION
Case No. 2023-00158

Table of Contents

Streamlined Rate Adjustment Procedure Pilot Program-Filing Requirements/Exhibit List
(Historical Test Period: Twelve Months Ending 12/31/2022)

| Exhibit No. | Filing Requirement | Description | Sponsoring Witness |
|--------------------|---------------------------------------|--|---------------------------|
| 1 | 807 KAR 5:001 § 16(1)(b)(1) | Statement of the reason the rate adjustment is required | Tobias Moss |
| – | 807 KAR 5:001 § 16(1)(b)(2) | <i>Waived - Certificate of assumed name or statement that one is not necessary</i> | |
| 2 | 807 KAR 5:001 § 16(1)(b)(3) | Proposed tariff sheets | Jennie Phelps |
| 3 | 807 KAR 5:001 § 16(1)(b)(4) | Proposed tariff sheets with proposed changes identified | Jennie Phelps |
| 4 | 807 KAR 5:001 § 16(1)(b)(5) | Statement that compliant notice to customers has been given, with a copy of the notice | Tobias Moss |
| – | 807 KAR 5:001 § 16(1)(b)(6) | <i>Not Applicable - Utility is not a water district</i> | |
| 5 | 807 KAR 5:001 § 16(2) and KRS 278.180 | Notice to the Kentucky Public Service Commission of intent to adjust rates | Tobias Moss |
| 6 | 807 KAR 5:001 § 16(4)(a) | Complete description and quantified explanation for all proposed adjustments with proper support for proposed changes in price or activity levels, if applicable, and other factors that may affect the adjustment | John Wolfram |
| 7 | 807 KAR 5:001 § 16(4)(b) | Written testimony of witnesses in support of Application (Mr. Moss) | Tobias Moss |
| 8 | 807 KAR 5:001 § 16(4)(b) | Written testimony of witnesses in support of Application (Ms. Phelps) | Jennie Phelps |
| 9 | 807 KAR 5:001 § 16(4)(b) | Written testimony of witnesses in support of Application (Mr. Wolfram) | John Wolfram |
| – | 807 KAR 5:001 § 16(4)(c) | <i>Not applicable - Utility has gross annual revenues greater than \$5 million</i> | |
| 10 | 807 KAR 5:001 § 16(4)(d) | Statement estimating the effect that each new rate will have upon the revenues of the utility, including the total amount of revenues resulting from the increase or decrease and percentage increase or decrease. | John Wolfram |

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| 11 | 807 KAR 5:001 § 16(4)(e) | Effect upon the average bill for each customer classification to which the proposed rate change will apply | John Wolfram |
| - | 807 KAR 5:001 § 16(4)(f) | <i>Not applicable - Utility is not an incumbent local exchange company</i> | |
| 12 | 807 KAR 5:001 § 16(4)(g) | Detailed analysis of customers' bills whereby revenues from the present and proposed rates can be readily determined for each customer class | John Wolfram |
| 13 | 807 KAR 5:001 § 16(4)(h) | Summary of the utility's determination of its revenue requirements | John Wolfram |
| 14 | 807 KAR 5:001 § 16(4)(i) | Reconciliation of the rate base and capital used to determine its revenue requirements | John Wolfram |
| - | 807 KAR 5:001 § 16(4)(j) | <i>Waived - Current chart of accounts if more detailed than the Uniform System of Accounts</i> | |
| - | 807 KAR 5:001 § 16(4)(k) | <i>Waived - Independent auditor's annual opinion report, with written communication from the independent auditor to the utility, if applicable, which indicates the existence of a material weakness in the utility's internal controls</i> | |
| - | 807 KAR 5:001 § 16(4)(l) | <i>Waived - Most recent Federal Energy Regulatory Commission audit report</i> | |
| - | 807 KAR 5:001 § 16(4)(m) | <i>Waived - Most recent FERC Financial Report FERC Form No.1, FERC Financial Report FERC Form No. 2, or Public Service Commission Form T (telephone)</i> | |
| | 807 KAR 5:001 § 16(4)(n) | <i>Waived if depreciation schedule on file with the Commission is the most recent version - see Exhibit 29</i> | |
| - | 807 KAR 5:001 § 16(4)(o) | <i>Waived - List of all commercially available or in-house developed computer software, programs, and models used in the development of the schedules and work papers associated with the filing of the utility's application</i> | |
| - | 807 KAR 5:001 § 16(4)(p) | <i>Waived / Not applicable - Utility has made no stock or bond offerings</i> | |
| - | 807 KAR 5:001 § 16(4)(q) | <i>Waived - Annual report to shareholders or members and statistical supplements covering the two (2) most recent years from the utility's application filing date</i> | |
| - | 807 KAR 5:001 § 16(4)(r) | <i>Waived - Monthly managerial reports providing financial results of operations for the twelve (12) months in the test period</i> | |
| - | 807 KAR 5:001 § 16(4)(s) | <i>Waived - Utility's annual report on Form 10-K (most recent two (2) years), any Form 8-K issued during the past two (2)</i> | |

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| | | <i>years, and any Form 10-Q issued during the past six (6) quarters updated as information becomes available</i> | |
| 15 | 807 KAR 5:001 § 16(4)(t) | Affiliate charges, allocations, and payments with description, explanation, and demonstration of reasonableness (including a detailed description of the method and amounts allocated or charged to the utility by the affiliate, an explanation of how the allocator for the test period was determined and all facts relied upon, including other regulatory approval, to demonstrate that each amount charged, allocated or paid during the test period was reasonable). | Jennie Phelps |
| 16 | 807 KAR 5:001 § 16(4)(u) | Cost of service study based on a methodology generally accepted within the industry and based on current and reliable data from a single time period (less than 5 years old) | John Wolfram |
| - | 807 KAR 5:001 § 16(4)(v) | <i>Not applicable - Utility is not a local exchange carrier</i> | |
| - | 807 KAR 5:001 § 16(4)(v) | <i>Not applicable - Utility is not a local exchange carrier</i> | |
| 17 | 807 KAR 5:001 § 16(5)(a) | Detailed income statement and balance sheet reflecting the impact of all proposed adjustments | John Wolfram |
| - | 807 KAR 5:001 § 16(5)(b) | <i>Waived - Most recent capital construction budget containing at least the period of time as proposed for any pro forma adjustment for plant additions</i> | |
| - | 807 KAR 5:001 § 16(5)(c) | <i>Waived - Detail regarding pro forma adjustments reflecting plant additions</i> | |
| - | 807 KAR 5:001 § 16(5)(d) | <i>Waived - Operating budget for each month of the period encompassing the pro forma adjustments</i> | |
| 18 | 807 KAR 5:001 § 16(5)(e) | Number of customers to be added to the test period end level of customers and the related revenue requirements impact for all pro forma adjustments with complete details and supporting work papers | John Wolfram |
| 19 | Case No. 2008-00408 July 24, 2012 Order | Consideration of cost-effective energy efficiency resources and impact of such resources on test year | Jennie Phelps |
| 20 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | Narrative statement discussing any changes that have occurred for the Distribution Cooperative since the effective date of its last general base rate adjustment | Tobias Moss |
| 21 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | The estimated dates for drawdowns of unadvanced loan funds at test-year-end and the proposed uses of these funds. | Jennie Phelps |

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| 22 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | A general statement identifying any electric property or plant held for future use | Jennie Phelps |
| 23 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | The calculation of normalized depreciation expense (test-year-end plant account-balance multiplied by depreciation rate) | John Wolfram |
| 24 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | Any changes that occurred during the test year to the Distribution Cooperative's written policies on the compensation of its attorneys, auditors, and all other professional service providers, indicating the effective date and reason for these changes | John Wolfram |
| 25 | Case No. 2018-00407, December 20, 2019 Order | A schedule of the Distribution Cooperative's standard directors' fees, per diems and other compensation in effect during the test year, including a description of the any charges that occurred during the test year to the Distribution Cooperatives' written polices specifying the compensation of directors, indicating the effective date and reason for any change | Jennie Phelps & John Wolfram |
| 26 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | A schedule reflecting the salaries and other compensation of each executive officer for the test year and two preceding calendar years. Include the percentage of annual increase and the effective date of each increase, the job title, duty and responsibility of each officer, the number of employees who report to each executive officer, and to whom each executive officer reports. Also, for employees elected to executive officer status during the test year, provide the salaries for the test year for those persons whom they replaced | Jennie Phelps |
| 27 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | An analysis of Account No. 930, Miscellaneous General Expenses, for the test year. Include a complete breakdown of this account by the following categories: industry association dues, debt-serving expenses, institutional advertising, conservation advertising, rate department load studies, director's fees and expenses, dues and subscriptions, and miscellaneous. Include all detailed supporting work papers. At a minimum, the work papers should show the date, vendor, reference (e.g., voucher number), dollar amount, and a brief description of each expenditure. Detailed analysis is not required for amounts of less than \$100 | Jennie Phelps & John Wolfram |
| 28 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | An analysis of Account No. 426, Other Income Deductions, for the test period. Include a complete breakdown of this account by the following categories: donations, civic activities, political activities, and other. Include detailed supporting work papers. At a minimum, the work papers should show the date, vendor, reference (e.g., voucher number), dollar amount, and brief description of each | Jennie Phelps & John Wolfram |

| | | | |
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| | | expenditure. Detailed analysis is not required for amounts of less than \$250 | |
| 29 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | A statement explaining whether the depreciation rates reflected in the filing are identical to those most recently approved by the Commission. If identical, identify the case in which they were approved. If not, provide the depreciation study that supports the rates reflected in the filing | Jennie Phelps & John Wolfram |
| 30 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | A copy of all exhibits and schedules that were prepared for the rate application in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible | John Wolfram |
| 31 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | The distribution cooperative's TIER, OTIER, and debt service coverage ratio, as calculated by the RUS, for the test year and the five most recent calendar years, including the data used to calculate each ratio | Jennie Phelps |
| 32 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | A trial balance as of the last day of the test year showing account number, subaccount number, account title, subaccount title, and amount. The trial balance shall include all asset, liability, capital, income, and expense accounts used by the distribution cooperative. All income statements accounts should show activity for 12 months. The application should show the balance in each control account and all underlying subaccounts per the company books | Jennie Phelps |
| 33 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | A schedule comparing balances for each balance sheet account or subaccount included in the Distribution Cooperative's chart of accounts for each month of the test year to the same month of the 12-month period immediately preceding the test year | Jennie Phelps |
| 34 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | A schedule comparing each income statement account or subaccount included in the Distribution Cooperative's chart of accounts for each month of the of the test year to the same month of the 12-month period immediately preceding the test year. The amounts should reflect the income or expense activity of each month, rather than the cumulative balances at the end of the particular month | Jennie Phelps |
| 35 | Case No. 2018-00407, Orders entered on December 11, 2018, March 26, 2019 and December 20, 2019 | A schedule showing employee health, dental, vision, and life insurance premium contributions by coverage type, including the cost split of each identified premium between the employee and the Distribution Cooperative | Jennie Phelps |
| 36 | Case No. 2018-00407, December 20, 2019 Order | A schedule showing anticipated and incurred rate case expenses, with supporting documentation. | Jennie Phelps |

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 1

807 KAR 5:001 Sec. 16(1)(b)(1)
Sponsoring Witness: Tobias Moss

Description of Filing Requirement:

A statement of the reason the adjustment is required.

Response:

The primary reason for the request is to continue to provide the necessary funds to properly maintain and operate the distribution system and in order to provide safe and reliable service to our members. Since Farmers' last general rate increase in 2016, Farmers' load growth has been low and inconsistent due to weather variation and slow economic growth. However, purchased power costs and other costs have increased significantly in most every portion of operations. This mismatch between revenues and costs could place Farmers at risk of not satisfying key financial metrics contained in its loan covenants with lenders.

Overall, the structure of Farmers' customer base has remained fairly consistent. At the end of the test year, residential customer made up 93% of the Cooperative's members and 65% of energy usage. Commercial and industrial members made up approximately 7% of Farmers' members and 35% of its energy usage. Farmers' customer counts have seen only modest increases. For example, Farmers added 1,194 members over a seven-year period, equating a levelized growth rate of approximately 0.74% each year.

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 2

807 KAR 5:001 Sec. 16(1)(b)(3)
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

New or revised tariff sheets, if applicable in a format that complies with 807 KAR 5:011 with an effective date not less than thirty (30) days from the date the application is filed.

Response:

Please see attached.

FOR ALL TERRITORY SERVED
Community, Town or City

P.S.C. KY. NO. 10

5th Revised SHEET NO. 12

CANCELLING P.S.C. KY. NO. 10

4th Revised SHEET NO. 12

**FARMERS RURAL ELECTRIC
COOPERATIVE CORPORATION**

RATES AND CHARGES

SCHEDULE R – RESIDENTIAL SERVICE

APPLICABLE: In all territory served by the seller.

AVAILABILITY: Available to residents for all uses in the home and on the farm and for other consumers using single-phase service below 50 kW for ordinary merchandising establishments, repair shops, garages and service stations, schools, churches and community buildings, all subject to the established rules and regulations of the seller. Three-phase service may be provided to consumers located within 1,000 feet of existing three-phase line.

TYPE OF SERVICE: Single-phase, or three-phase where available, 60 cycles, at available secondary voltages.

RATES PER MONTH:

| | | | |
|-----------------|---|--------------------|-----|
| Customer Charge | | \$19.50 | (I) |
| All kWh | @ | \$0.090673 per kWh | (I) |

FUEL ADJUSTMENT CLAUSE: All rates are applicable to the Fuel Adjustment Clause and may be increased or decreased by an amount per kWh equal to the fuel adjustment amount per kWh as billed by the Wholesale Power Supplier plus an allowance for line losses. The allowance for line losses will not exceed 10 percent and is based on a twelve-month moving average of such losses. This Fuel Clause is subject to all other applicable provisions as set out in 807 KAR 5:056.

DATE OF ISSUE: 06-16-2023

DATE EFFECTIVE: 07-16-2023

ISSUED BY: /s/ Tobias Moss

TITLE: President & Chief Executive Officer

Issued by authority of an Order of the Public Service Commission of KY
in Case No. _____ Dated: _____

FOR ALL TERRITORY SERVED
Community, Town or City

P.S.C. KY. NO. 10

5th Revised SHEET NO. 20.001

**FARMERS RURAL ELECTRIC
COOPERATIVE CORPORATION**

CANCELLING P.S.C. KY. NO. 10

4th Revised SHEET NO. 20.001

RATES AND CHARGES

SCHEDULE R- TIME-OF-DAY- RESIDENTIAL SERVICE

APPLICABLE: In all territory served by the Cooperative.

AVAILABILITY: Available to all members for residential use where the monthly demand is less than 50 kW and only single phase service is required.

MONTHLY RATE:

| | | |
|-----------------|---------------------|-----|
| Customer Charge | \$25.35 per Month | (I) |
| On-Peak Energy | \$ 0.103992 per kWh | |
| Off-Peak Energy | \$ 0.057892 per kWh | |

ON-PEAK HOURS

Central Prevailing Time

October through April

6:00 A.M. to 11:00 A.M. Central Time
4:00 P.M. to 9:00 P.M. Central Time

May through September

9:00 A.M. to 9:00 P.M. Central Time

All other hours are Off-Peak.

DATE OF ISSUE: 06-16-2023

DATE EFFECTIVE: 07-16-2023

ISSUED BY /s/ Tobias Moss

TITLE: President & Chief Executive Officer

Issued by authority of an Order of the Public Service Commission of KY
in Case No. _____ Dated: _____

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 3

807 KAR 5:001 Sec. 16(1)(b)(4)
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

New or revised tariff sheets, if applicable, identified in compliance with 807 KAR 5:011, shown either by providing: (a) the present and proposed tariffs in comparative form on the same sheet side by side or on facing sheets side by side; or (b) a copy of the present tariff indicating proposed additions by italicized inserts or underscoring and striking over proposed deletions.

Response:

Please see attached.

FOR ALL TERRITORY SERVED
Community, Town or City

P.S.C. KY. NO. 10

~~4th~~ 5th Revised SHEET NO. 12

CANCELLING P.S.C. KY. NO. 10

~~3rd~~ 4th Revised SHEET NO. 12

**FARMERS RURAL ELECTRIC
COOPERATIVE CORPORATION**

RATES AND CHARGES

SCHEDULE R – RESIDENTIAL SERVICE

APPLICABLE: In all territory served by the seller.

AVAILABILITY: Available to residents for all uses in the home and on the farm and for other consumers using single-phase service below 50 kW for ordinary merchandising establishments, repair shops, garages and service stations, schools, churches and community buildings, all subject to the established rules and regulations of the seller. Three-phase service may be provided to consumers located within 1,000 feet of existing three-phase line.

TYPE OF SERVICE: Single-phase, or three-phase where available, 60 cycles, at available secondary voltages.

RATES PER MONTH:

| | | | | |
|-----------------|---|------------|---------|-----|
| Customer Charge | | \$14.49 | \$19.50 | (I) |
| All kWh | @ | \$0.087687 | per kWh | (I) |
| | | \$0.090673 | | |

FUEL ADJUSTMENT CLAUSE: All rates are applicable to the Fuel Adjustment Clause and may be increased or decreased by an amount per kWh equal to the fuel adjustment amount per kWh as billed by the Wholesale Power Supplier plus an allowance for line losses. The allowance for line losses will not exceed 10 percent and is based on a twelve-month moving average of such losses. This Fuel Clause is subject to all other applicable provisions as set out in 807 KAR 5:056.

DATE OF ISSUE: ~~09-30-2021~~ 06-16-2023

DATE EFFECTIVE: ~~10-01-2021~~ 07-16-2023

ISSUED BY: /s/ Tobias Moss

TITLE: President & Chief Executive Officer

Issued by authority of an Order of the Public Service Commission of KY
in Case No. 2021-00108 Dated: 09-30-2021

FOR ALL TERRITORY SERVED
Community, Town or City

P.S.C. KY. NO. 10

~~4th~~-5th Revised SHEET NO. 20.001

CANCELLING P.S.C. KY. NO. 10

~~3rd~~ 4th Revised SHEET NO. 20.001

**FARMERS RURAL ELECTRIC
COOPERATIVE CORPORATION**

RATES AND CHARGES

SCHEDULE R- TIME-OF-DAY- RESIDENTIAL SERVICE

APPLICABLE: In all territory served by the Cooperative.

AVAILABILITY: Available to all members for residential use where the monthly demand is less than 50 kW and only single phase service is required.

MONTHLY RATE:

| | | |
|-----------------|---------------------------------------|-----|
| Customer Charge | \$ 20.34 \$25.35 per Month | (I) |
| On-Peak Energy | \$ 0.103992 per kWh | (E) |
| Off-Peak Energy | \$ 0.057892 per kWh | (E) |

ON-PEAK HOURS

Central Prevailing Time

October through April

6:00 A.M. to 11:00 A.M. Central Time
4:00 P.M. to 9:00 P.M. Central Time

May through September

9:00 A.M. to 9:00 P.M. Central Time

All other hours are Off-Peak.

DATE OF ISSUE: ~~09-30-2024~~ 06-16-2023

DATE EFFECTIVE: ~~10-01-2024~~ 07-16-2023

ISSUED BY /s/ Tobias Moss

TITLE: President & Chief Executive Officer

Issued by authority of an Order of the Public Service Commission of KY
in Case No. 2021-00108 Dated: 09-30-2024

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 4

807 KAR 5:001 Sec. 16(1)(b)(5)
Sponsoring Witness: Tobias Moss

Description of Filing Requirement:

A statement that notice has been given in compliance with Section 17 of 807 KAR 5:001 with a copy of the notice

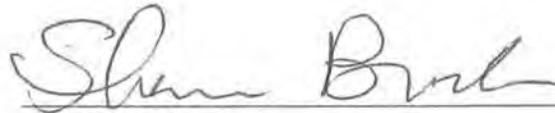
Response:

Farmers has given notice (and continues to give notice) in compliance with 807 KAR 5:001 Section 17, as well as in compliance with the Commission's Orders entered December 11, 2018, March 26, 2019 and December 20, 2019, in Case No. 2018-00407. Specifically, as of the date Farmers submitted this Application to the Commission, Farmers has: (i) posted at its place of business a copy of the full notice required by the relevant regulation; (ii) posted to its website a copy of the full notice required by the relevant regulation and a hyperlink to the location on the Commission's website where the case documents are available; (iii) posted to its social media accounts (Facebook and Twitter) a link to its website where a copy of the full notice required by the relevant regulation published may be found; (iv) published a copy of the abbreviated notice permitted by the Commission's December 20, 2019 Order in *Kentucky Living* magazine; and (v) mailed a copy of the abbreviated notice that appeared in *Kentucky Living* magazine to those Farmers members who do not receive the publication. Farmers attaches Proof of Notice as required by 807 KAR 5:001, Section 17(3). A copy of both the full notice and the abbreviated notice are attached.

Case No. 2023-00158
Application - Exhibit 4
Includes Attachment (9 pages)

AFFIDAVIT OF MAILING
OF FILING NOTICE

Notice is hereby given that the June 2023 issue of KENTUCKY LIVING, bearing official notice of filing PSC Case No. 2023-00158, for the purposes of proposing a general adjustment of existing rates of FARMERS RURAL ELECTRIC COOPERATIVE, was entered as direct mail on May 30, 2023.



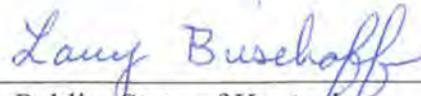
Shannon Brock
Editor
Kentucky Living

County of Jefferson
State of Kentucky

Sworn to and subscribed before me, a Notary Public,

This 30th day of May, 2023.

My commission expires April 23, 2027



Notary Public, State of Kentucky

KY NP 69243

Kentucky Electric Cooperatives Inc.
P.O. Box 32170 | Louisville, KY 40232
1630 Lyndon Farm Court | Louisville, KY 40223

(502) 451-2430
(800) KY-LIVING (800) 595-4846

www.kentuckyliving.com



A Touchstone Energy® Cooperative

NOTICE

Farmers Rural Electric Cooperative Corporation ("Farmers") intends to propose a general adjustment of its existing rates by filing an application with the Kentucky Public Service Commission ("KPSC") on or after June 14, 2023 in Case No. 2023-00158. The application will request that the proposed rates become effective on or after July 14, 2023.

Farmers intends to propose an adjustment only to certain rates. The present and proposed rates for each customer classification to which the proposed rates will apply are set forth below:

| | Rates | |
|---|------------|------------|
| | Present | Proposed |
| Rate Class | | |
| Schedule R: Residential Service | | |
| Customer Charge Per Month | \$14.49 | \$19.50 |
| Energy Charge Per kWh (all kWh) | \$0.087687 | \$0.090673 |
| Schedule R: TOD Residential | | |
| Customer Charge Per Month | \$20.34 | \$25.35 |
| Energy Charge OnPeak Per kWh (all kWh) | \$0.103992 | \$0.103992 |
| Energy Charge OffPeak Per kWh (all kWh) | \$0.057892 | \$0.057892 |
| Net Metering | | |
| Customer Charge Per Month | \$14.49 | \$19.50 |
| Energy Charge Per kWh (all kWh) | \$0.087687 | \$0.090673 |

No revisions are proposed to any other charges or Rate Schedules.

The amount of the change requested in both dollar amounts and percentage change for each customer classification to which the proposed rates will apply is set forth below:

| Rate Class | Avg KWH | Average Customer Bill Impact | Total Revenue Increase | |
|-----------------------------------|---------|------------------------------|------------------------|---------|
| | | | Dollars | Percent |
| Residential-Schedule R | 1,102 | \$8.30 | \$2,408,157 | 5.93% |
| TOD Residential-Schedule R | 1,036 | \$5.01 | \$90 | 3.92% |
| Net Metering | 1,524 | \$9.56 | \$7,456 | 5.63% |
| Total Impact to Farmers' Revenues | | | \$2,415,703 | 3.99% |

Additional information, links, and a copy of Farmers' full notice concerning its proposed rate adjustment can be found at Farmers' principal office (504 South Broadway, Glasgow, KY 42412), its website (<https://www.farmersrecc.com/>), and via social media (facebook.com/FarmersRECC; on Twitter @FarmersRECC, and Instagram @farmersrecccky). A person may submit a timely written request for intervention to the KPSC, 211 Sower Boulevard, Post Office Box 615, Frankfort, Kentucky 40602, establishing the grounds for the request including the status and interest of the party. The KPSC's phone number is (502) 564-3940 and its website is <http://psc.ky.gov>. The KPSC is required to take action on Farmers' application within 75 days of its filing. The rates contained in this notice are the rates proposed by Farmers but the KPSC may order rates to be charged that differ from the proposed rates contained in this notice.

Corporate Office

504 South Broadway
Glasgow, KY 42141
Phone (270) 651-2191
Fax (270) 651-7332
www.farmersrecc.com

Toby Moss, President and CEO
Woodford L. Gardner Jr., Attorney

Board of Directors

Randy London
C. F. Martin Jr.
Ronnie Smith
Randy Sexton
Paul C. Hawkins
Brandi Williams
Cornelius Faulkner

Main office: (270) 651-2191

Use Farmers RECC mobile app to:

- Manage your electric account
- Pay your electric bill
- View your electric usage
- Set up email/text notifications
- Report a power outage



www.farmersrecc.com

Farmers RECC provides reasonably priced, dependable electricity to more than 26,000 total services in place over 3,725 miles of line in Adair, Barren, Edmonson, Grayson, Green, Hardin, Hart, LaRue, Metcalfe, Monroe and Warren counties.

Caralyne Pennington, Editor

Follow us on social media:





Farmers Rural Electric Cooperative Corporation

504 S. Broadway, Glasgow, KY 42141 • P.O. Box 1298, Glasgow, KY 42142 • (270) 651-2191 • Fax (270) 651-7332

AFFIDAVIT

Comes now the Affiant, Caralyne Pennington, in her capacity as Director of Member and Public Communications for Farmers Rural Electric Cooperative Corporation ("Farmers RECC"), and after being duly sworn, does hereby affirm that a copy of the attached Notice, issued as part of the June 2023 issue of Kentucky Living in the Farmers RECC local section, page 30D, was mailed and entered USPS circulation on Wednesday, May 31, 2023 to the 141 members who did not receive the Notice because they had requested to be removed from the mailing list for Kentucky Living. A copy of the Notice that was mailed and the list of members it was mailed to are attached to this Affidavit. For privacy purposes, the mailing addresses of said members have been redacted on the attached excel sheet.

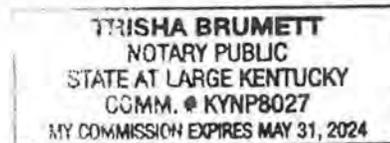
Caralyne Pennington
Caralyne Pennington

COMMONWEALTH OF KENTUCKY
COUNTY OF BARREN

I, Trisha Brumett, a Notary Public for the Commonwealth of Kentucky, County of Barren, do certify that Caralyne Pennington, whose name is signed to the writing above, bearing date on this 5th day of June, 2023, has acknowledged the same before me in my county aforesaid.

Given under my hand this 5th day of June, 2023.

My commission expires:



NOTARY PUBLIC/STATE AT LARGE

Farmers RECC is an equal opportunity employer.

www.farmersrecc.com

A Touchstone Energy Cooperative



NOTICE

Farmers Rural Electric Cooperative Corporation (“Farmers”) intends to propose a general adjustment of its existing rates by filing an application with the Kentucky Public Service Commission (“KPSC”) on or after June 14, 2023 in Case No. 2023-00158. The application will request that the proposed rates become effective on or after July 14, 2023.

Farmers intends to propose an adjustment only to certain rates. The present and proposed rates for each customer classification to which the proposed rates will apply are set forth below:

| Rate Class | Rates | |
|--|------------|------------|
| | Present | Proposed |
| Schedule R: Residential Service | | |
| Customer Charge Per Month | \$14.49 | \$19.50 |
| Energy Charge Per kWh (all kWh) | \$0.087687 | \$0.090673 |
| Schedule R: TOD Residential | | |
| Customer Charge Per Month | \$20.34 | \$25.35 |
| Energy Charge OnPeak Per kWh(all kWh) | \$0.103992 | \$0.103992 |
| Energy Charge OffPeak Per kWh(all kWh) | \$0.057892 | \$0.057892 |
| Net Metering | | |
| Customer Charge Per Month | \$14.49 | \$19.50 |
| Energy Charge Per kWh (all kWh) | \$0.087687 | \$0.090673 |

No revisions are proposed to any other charges or Rate Schedules.

The amount of the change requested in both dollar amounts and percentage change for each customer classification to which the proposed rates will apply is set forth below:

| Rate Class | Avg KWH | Avg Customer Bill Impact | Total Revenue Increase | |
|----------------------------------|---------|--------------------------|------------------------|---------|
| | | | Dollars | Percent |
| Residential-Schedule R | 1,102 | \$8.30 | \$ 2,408,157 | 5.93% |
| TOD Residential-Schedule R | 1,036 | \$5.01 | \$ 90 | 3.92% |
| Net Metering | 1,524 | \$9.56 | \$ 7,456 | 5.63% |
| Total Impact on Farmers' Revenue | | | \$ 2,415,703 | 3.99% |

Additional information, links, and a copy of Farmers’ full notice concerning its proposed rate adjustment can be found at Farmers’ principal office (504 South Broadway, Glasgow, KY 42142), its website (<https://www.farmersrecc.com/>), and via social media ([facebook.com/FarmersRECC](https://www.facebook.com/FarmersRECC); on Twitter @FarmersRECC, and Instagram @farmersreccy). A person may submit a timely written request for intervention to the KPSC, 211 Sower Boulevard, Post Office Box 615, Frankfort, Kentucky 40602, establishing the grounds for the request including the status and interest of the party. The KPSC’s phone number is (502) 564-3940 and its website is <http://psc.ky.gov>. The KPSC is required to take action on Farmers’ application within 75 days of its filing. The rates contained in this notice are the rates proposed by Farmers but the KPSC may order rates to be charged that differ from the proposed rates contained in this notice.

NOTICE

Farmers Rural Electric Cooperative Corporation (“Farmers”) intends to propose a general adjustment of its existing rates by filing an application with the Kentucky Public Service Commission (“KPSC”) on or after June 14, 2023 in Case No. 2023-00158. The application will request that the proposed rates become effective on or after July 14, 2023.

Farmers intends to propose an adjustment only to certain rates. The present and proposed rates for each customer classification to which the proposed rates will apply are set forth below:

| Rate | Item | Present | Proposed | Incr(Decr) |
|-------------|---|----------------|-----------------|-------------------|
| 1 | <u>Residential - Schedule R</u> | | | |
| | Customer Charge | \$ 14.49 | \$ 19.50 | \$ 5.01 |
| | Energy Charge per kWh | \$ 0.087687 | \$ 0.090673 | \$ 0.002986 |
| 3 | <u>TOD Residential - Schedule R</u> | | | |
| | Customer Charge | \$ 20.34 | \$ 25.35 | \$ 5.01 |
| | Energy Charge - On Peak per kWh | \$ 0.103992 | \$ 0.103992 | \$ - |
| | Energy Charge - Off Peak per kWh | \$ 0.057892 | \$ 0.057892 | \$ - |
| 20 | <u>Net Metering</u> | | | |
| | Customer Charge | \$ 14.49 | \$ 19.50 | \$ 5.01 |
| | Energy Charge per kWh | \$ 0.087687 | \$ 0.090673 | \$ 0.002986 |
| 7 | <u>ETS Residential - Schedule RM</u> | | | |
| | Energy Charge - Off Peak per kWh | \$ 0.050922 | \$ 0.050922 | \$ - |
| 4 | <u>Small Commercial - Schedule C</u> | | | |
| | Customer Charge | \$ 22.07 | \$ 22.07 | \$ - |
| | Energy Charge per kWh | \$ 0.082796 | \$ 0.082796 | \$ - |
| 8 | <u>EST Small Commercial - Schedule CM</u> | | | |
| | Energy Charge per kWh | \$ 0.047987 | \$ 0.047987 | \$ - |
| 5 | <u>Large Commercial - Schedule C</u> | | | |
| | Customer Charge | \$ 108.70 | \$ 108.70 | \$ - |
| | Energy Charge per kWh | \$ 0.063033 | \$ 0.063033 | \$ - |
| | Demand Charge per kW | \$ 8.17 | \$ 8.17 | \$ - |
| 10 | <u>Large Commercial - Schedule E</u> | | | |
| | Customer Charge | \$ 1,182.76 | \$ 1,182.76 | \$ - |
| | Demand Charge per kW | \$ 8.17 | \$ 8.17 | \$ - |
| | Energy Charge per kWh | \$ 0.049105 | \$ 0.049105 | \$ - |
| 14 | <u>Large Power - Schedule LPC2</u> | | | |
| | Customer Charge | \$ 1,333.43 | \$ 1,333.43 | \$ - |
| | Demand Charge per kW | \$ 8.04 | \$ 8.04 | \$ - |

| | | | | | | | | |
|----|----------------------------------|----------------------------------|----|----------|----|----------|----|---|
| 15 | <u>Large Commercial Optional</u> | Energy Charge per kWh | \$ | 0.053488 | \$ | 0.053488 | \$ | - |
| | | <u>TOD - Schedule D</u> | | | | | | |
| | | Customer Charge | | 108.70 | | 108.70 | | - |
| | | Demand Charge per kW | \$ | 8.17 | \$ | 8.17 | \$ | - |
| | | Energy Charge per kWh | \$ | 0.062945 | \$ | 0.062945 | \$ | - |
| 36 | <u>Large Power - Schedule</u> | | | | | | | |
| | <u>LPE4</u> | | | | | | | |
| | | Customer Charge | \$ | 3,328.40 | \$ | 3,328.40 | \$ | - |
| | | Demand Charge per kW | \$ | 6.85 | \$ | 6.85 | \$ | - |
| | | Energy Charge - On Peak per kWh | \$ | 0.059942 | \$ | 0.059942 | \$ | - |
| | | Energy Charge - Off Peak per kWh | \$ | 0.051219 | \$ | 0.051219 | \$ | - |
| 50 | <u>TOD Three Phase -</u> | | | | | | | |
| | <u>Schedule C</u> | | | | | | | |
| | | Customer Charge Single Phase | \$ | 22.07 | \$ | 22.07 | \$ | - |
| | | Customer Charge Three Phase | \$ | 108.70 | \$ | 108.70 | \$ | - |
| | | Energy Charge - On Peak per kWh | \$ | 0.117773 | \$ | 0.117773 | \$ | - |
| | | Energy Charge - Off Peak per kWh | \$ | 0.057892 | \$ | 0.057892 | \$ | - |
| | <u>Lighting</u> | | | | | | | |
| | | Mercury Vapor 175 Watt | \$ | 9.77 | \$ | 9.77 | \$ | - |
| | | Mercury Vapor 175 Watt (shared) | \$ | 3.26 | \$ | 3.26 | \$ | - |
| | | Mercury Vapor 250 Watt | \$ | 11.11 | \$ | 11.11 | \$ | - |
| | | Mercury Vapor 400 Watt | \$ | 16.87 | \$ | 16.87 | \$ | - |
| | | Mercury Vapor 1000 Watt | \$ | 29.59 | \$ | 29.59 | \$ | - |
| | | Sodium Vapor 100 Watt | \$ | 10.17 | \$ | 10.17 | \$ | - |
| | | Sodium Vapor 150 Watt | \$ | 11.84 | \$ | 11.84 | \$ | - |
| | | Sodium Vapor 250 Watt | \$ | 16.06 | \$ | 16.06 | \$ | - |
| | | Sodium Vapor 400 Watt | \$ | 20.63 | \$ | 20.63 | \$ | - |
| | | Sodium Vapor 1000 Watt | \$ | 44.63 | \$ | 44.63 | \$ | - |
| | | LED Light 70 Watt | \$ | 10.11 | \$ | 10.11 | \$ | - |
| | | LED Light 105 Watt | \$ | 15.53 | \$ | 15.53 | \$ | - |
| | | LED Light 145 Watt | \$ | 17.09 | \$ | 17.09 | \$ | - |
| | | LED Flood Light 199 Watt | \$ | 21.93 | \$ | 21.93 | \$ | - |

No changes to any other rate schedules are proposed.

The amount of the change requested in both dollar amounts and percentage change for each customer classification to which the proposed rates will apply is set forth below:

| Item | Code | Present Revenue | Proposed Revenue | Incr(Decr) | Incr(Decr) | Avg Bill | Incr per Mon |
|--|------|---------------------|---------------------|--------------------|--------------|----------|--------------|
| Residential - Schedule R | 1 | \$40,618,278 | \$43,026,435 | \$2,408,157 | 5.93% | \$ | 8.30 |
| TOD Residential - Schedule R | 3 | \$ 2,301 | \$2,391 | \$ 90 | 3.92% | \$ | 5.01 |
| Net Metering | 20 | \$ 132,392 | \$139,848 | \$7,456 | 5.63% | \$ | 9.56 |
| ETS Residential - Schedule RM | 7 | \$ 29,328 | \$29,328 | \$ - | 0.00% | \$ | - |
| Small Commercial - Schedule C | 4 | \$3,927,301 | \$3,927,301 | \$ - | 0.00% | \$ | - |
| EST Small Commercial - Schedule CM | 8 | \$ - | \$ - | \$ - | 0.00% | \$ | - |
| Large Commercial - Schedule C | 5 | \$6,223,071 | \$6,223,071 | \$ - | 0.00% | \$ | - |
| Large Commercial 10% Discount - Schedule C | 9 | \$2,539,007 | \$2,539,007 | \$ - | 0.00% | \$ | - |
| Large Commercial - Schedule E | 10 | \$ 3,141,330 | \$3,141,330 | \$ - | 0.00% | \$ | - |
| Large Power - Schedule LPC2 | 14 | \$742,949 | \$742,949 | \$ - | 0.00% | \$ | - |
| Large Commercial Optional TOD - Schedule D | 15 | \$124,551 | \$124,551 | \$ - | 0.00% | \$ | - |
| Large Power - Schedule LPE4 | 36 | \$1,964,275 | \$1,964,275 | \$ - | 0.00% | \$ | - |
| TOD Three Phase - Schedule C | 50 | \$35,299 | \$ 35,299 | \$ - | 0.00% | \$ | - |
| Lighting | | \$1,004,392 | \$1,004,392 | \$ - | 0.00% | \$ | - |
| TOTAL Base Rates | | \$60,484,474 | \$62,900,178 | \$2,415,704 | 3.99% | | |

| | |
|------------------------|-------------|
| Target Revenue | \$2,415,453 |
| Rate Rounding Variance | \$ (251) |
| Rate Rounding Variance | -0.01% |

Additional information, links, and a copy of Farmers' full notice concerning its proposed rate adjustment can be found at Farmers' principal office (504 South Broadway, Glasgow, KY 42142), its website (<https://www.farmersrecc.com/>), and via social media ([facebook.com/FarmersRECC](https://www.facebook.com/FarmersRECC); [on Twitter @FarmersRECC](https://twitter.com/FarmersRECC), and Instagram @farmersrecc). A person may submit a timely written request for intervention to the KPSC, 211 Sower Boulevard, Post Office Box 615, Frankfort, Kentucky 40602, establishing the grounds for the request including the status and interest of the party. The KPSC's phone number is (502) 564-3940 and its website is <http://psc.ky.gov>. The KPSC is required to take action on Farmers' application within 75 days of its filing. The rates contained in this notice are the rates proposed by Farmers but the KPSC may order rates to be charged that differ from the proposed rates contained in this notice.

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 5

807 KAR 5:001 Sec. 16(2) / KRS 278.180
Sponsoring Witness: Tobias Moss

Description of Filing Requirement:

Notice of intent. A utility with gross annual revenues greater than \$5,000,000 shall notify the commission in writing of its intent to file a rate application at least thirty (30) days, but not more than sixty (60) days, prior to filing its application.

(a) The notice of intent shall state if the rate application will be supported by a historical test period or a fully forecasted test period.

(b) Upon filing the notice of intent, an application may be made to the commission for permission to use an abbreviated form of newspaper notice of proposed rate increases provided the notice includes a coupon that may be used to obtain a copy from the applicant of the full schedule of increases or rate changes.

(c) Upon filing the notice of intent with the commission, the applicant shall mail to the Attorney General's Office of Rate Intervention a copy of the notice of intent or send by electronic mail in a portable document format, to rateintervention@ag.ky.gov.

Response:

Farmers, by counsel, notified the Commission in writing of its intent to file a rate application using a historical test year by letter dated May 15, 2023. A copy of this letter (in portable document format) was also sent by electronic mail to rateintervention@ag.ky.gov. Please see attached.

May 15, 2023

Ms. Linda C. Bridwell, P.E.
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40602

Re: *In re the Matter of: Electronic Application of Farmers Rural Electric Cooperative Corporation for a General Adjustment of Rates Pursuant to Streamlined Procedure Pilot Program Established in Case No. 2018-00407- Case No. 2023-00158*

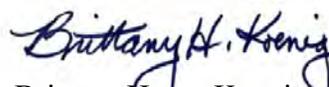
Dear Ms. Bridwell:

Enclosed, please find for filing, a Notice of Intent to file a streamlined rate application using a historical test year on behalf of Farmers Rural Electric Cooperative Corporation in the above-styled case.

This is to certify that the electronic filing has been transmitted to the Commission on May 15, 2023 and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means. A copy of the Notice will be sent to the Kentucky Attorney General Office of Rate Intervention. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 no paper copies of this filing will be made.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,


Brittany Hayes Koenig

Enclosure

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|-----------------------------------|---|------------|
| THE ELECTRONIC APPLICATION OF |) | |
| FARMERS RURAL ELECTRIC |) | CASE NO. |
| COOPERATIVE CORPORATION FOR A |) | 2023-00158 |
| GENERAL ADJUSTMENT OF RATES |) | |
| PURSUANT TO STREAMLINED PROCEDURE |) | |
| PILOT PROGRAM ESTABLISHED |) | |
| IN CASE NO. 2018-00407 |) | |

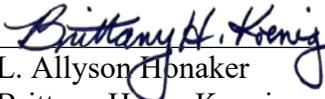
FARMERS RURAL ELECTRIC COOPERATIVE
CORPORATION’S NOTICE OF INTENT TO FILE RATE APPLICATION

Comes now Farmers Rural Electric Cooperative Corporation (“Farmers”), by counsel, and hereby gives notice to the Kentucky Public Service Commission (“Commission”), pursuant to 807 KAR 5:001, Section 16(2), of its intent to file a general rate adjustment application no sooner than thirty (30) days and no later than sixty (60) from your receipt of this letter. Farmers intends to file an application requesting a general adjustment of its existing rates pursuant to the streamlined procedure pilot program outlined in the Commission’s Orders entered December 11, 2018, March 26, 2019 and December 20, 2019 in Case No. 2018-00407. Consistent with those Orders and 807 KAR 5:001 Section 16(2)(a), Farmers states that its rate application will be supported by a historical test year ended December 31, 2022.

A copy of this Notice of Intent is being transmitted to the Kentucky Attorney General’s Office of Rate Intervention via email (rateintervention@ag.ky.gov) contemporaneously herewith.

This 15th day of May, 2023.

Respectfully submitted,



L. Allyson Honaker
Brittany Hayes Koenig
Honaker Law Office, PLLC
1795 Alysheba Way, Suite 6202
Lexington, KY 40509
Telephone (859) 368-8803
allyson@hloky.com
brittany@hloky.com

Counsel for Farmers RECC

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 6

807 KAR 5:001 Sec. 16(4)(a)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

A complete description and quantified explanation for all proposed adjustments with proper support for proposed changes in price or activity levels, if applicable, and other factors that may affect the adjustment

Response:

A complete description and qualified explanation for all proposed rate adjustments are contained in the Application and Exhibits filed by Farmers. Please also see the testimony of John Wolfram provided at Exhibit 9 and, in particular, Exhibit JW-2 thereof.

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 7

807 KAR 5:001 Sec. 16(4)(b)
Sponsoring Witness: Tobias Moss

Description of Filing Requirement:

If the utility has gross annual revenues greater than \$5,000,000, the written testimony of each witness the utility proposes to use to support its application.

Response:

In support of its Application, Farmers provides written testimony from three (3) witnesses:

- Mr. Tobias Moss, Farmers' President and Chief Executive Officer, whose testimony is included at Exhibit 7;
- Ms. Jennie Phelps, Farmers' Vice President of Finance, whose testimony is included at Exhibit 8; and
- Mr. John Wolfram, expert consultant with Catalyst Consulting LLC, whose testimony is included with this Exhibit 9.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|------------------------------------|---|---------------------|
| THE ELECTRONIC APPLICATION OF |) | |
| FARMERS RURAL ELECTRIC |) | |
| COOPERATIVE CORPORATION |) | |
| FOR A GENERAL ADJUSTMENT OF |) | Case No. 2023-00158 |
| RATES PURSUANT TO STREAMLINED |) | |
| PROCEDURE PILOT PROGRAM |) | |
| ESTABLISHED IN CASE NO. 2018-00407 |) | |

DIRECT TESTIMONY OF
TOBIAS MOSS, PRESIDENT AND CEO
OF FARMERS RURAL
ELECTRIC COOPERATIVE CORPORATION

Filed: June 16, 2023

**DIRECT TESTIMONY
OF
TOBIAS MOSS**

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.**

2 A. My name is Tobias Moss. My business address is Farmers Rural Electric
3 Cooperative Corporation (“Farmers”), 504 South Broadway, P.O. Box 1298,
4 Glasgow, Kentucky 42142-1208. I am President and CEO at Farmers.

5 **Q. HOW LONG HAVE YOU BEEN EMPLOYED AT FARMERS?**

6 A. I have been employed by Farmers, as President and CEO, since January 9, 2023.

7 **Q. BRIEFLY DESCRIBE YOUR EDUCATION AND WORK EXPERIENCE.**

8 A. After graduating high school, I spent 7 years in the United States Marine Corps. I
9 am a veteran of Desert Shield/Desert Storm and Operation Silver Wake. After my
10 honorable discharge I have been working in the utility space for nearly 30 years,
11 beginning in the telecommunications industry with MCI, AT&T and Deltacom.
12 After more than 14 years in telecommunications, I began working in the electrical
13 utility industry with Landis+Gyr and later ABB and Cyient. In 2016, I accepted a
14 position as the Director of IT with Clay Electric Cooperative in Keystone Heights,
15 Florida where I was ultimately promoted to CIO. In January 2023 I accepted my
16 current role as President and CEO at Farmers RECC in Glasgow, Kentucky.

17 I have a Bachelor’s Degree in Organizational Management from Oglethorpe
18 University in Atlanta, Georgia, A Master of Business Administration Degree from
19 Jacksonville University in Jacksonville, Florida, and I have and maintain my
20 Licensed Project Management Professional (PMP) credentials.

1 **Q. HAVE YOU EVER TESTIFIED BEFORE THE KENTUCKY PUBLIC**
2 **SERVICE COMMISSION (“COMMISSION”)?**

3 A. No.

4 **Q. WHEN DID FARMERS LAST SEEK A GENERAL ADJUSTMENT OF ITS**
5 **RATES?**

6 A. Farmers filed its last general rate case in 2016 (Case No. 2016-00365). The rates
7 in the proceeding became effective on July 1, 2017. Also, Farmers had a pass-
8 through rate proceeding in 2021 (Case No. 2021-00108) to pass-through the
9 wholesale rate increase of East Kentucky Power Cooperative (“EKPC”).

10 **Q. IN YOUR OPINION, WHY IS THE RATE CASE NECESSARY FOR**
11 **FARMERS?**

12 A. The adjusted rates requested in this case by Farmers are necessary to maintain the
13 financial integrity of the Cooperative, satisfy the loan covenants of our lenders, and
14 continue to provide safe and reliable service for our members. Since our last rate
15 case in 2016, Famers has experienced increases in almost all aspects of its business.
16 Some of the primary increases in cost have occurred in right-of-way maintenance,
17 interest rates, general labor costs, construction materials and system maintenance
18 costs. While Farmers has had several cost-saving initiatives, these cost-drivers,
19 along with inflation, have made it necessary to increase the rates in order to properly
20 maintain and operate the distribution system.

21 **Q. HOW AND WHEN DID THE COOPERATIVE’S BOARD OF DIRECTORS**
22 **DETERMINE THAT A RATE ADJUSTMENT WAS NECESSARY?**

1 A. Farmers' management closely monitors the Cooperative's financial condition on a
2 daily basis. On a monthly basis, key financial metrics are provided to and discussed
3 at length with the Board of Directors. Last year, my predecessor began discussions
4 with the Board of Directors on the trajectory of Farmers' financial condition. In
5 late 2022, he recommended to the Board of Directors to move forward with a cost
6 of service study, to facilitate a streamlined rate case in 2023. Therefore, on
7 December 15, 2022, the Board of Directors voted to hire Catalyst Consulting, LLC,
8 to prepare the cost of service study.

9 **Q. DID FARMERS BOARD OF DIRECTORS VOTE TO FILE THE**
10 **APPLICATION IN THIS PROCEEDING?**

11 A. Yes. After consideration of the results of the comprehensive cost of service study,
12 on May 11, 2023, Farmers' Board of Directors signed a Resolution authorizing
13 management to pursue this rate proceeding. A copy of the Board of Directors'
14 Resolution is attached to my testimony as Exhibit T-1. The Board resolution was
15 the culmination of an ongoing deliberative process involving expert guidance and
16 extensive examination of the Cooperative's financial condition, and I believe the
17 testimony and supporting documents filed in the Case strongly support the
18 necessary rate relief that Farmers now seeks.

19 **Q. WHY DID FARMERS CHOOSE TO FILE THIS RATE CASE UNDER THE**
20 **STREAMLINED RATE PROCEEDINGS ESTABLISHED IN CASE NO.**
21 **2018-00407 INSTEAD OF FILING A GENERAL RATE CASE**
22 **PROCEEDING?**

1 A. While Farmers, as a cooperative, has experienced sharp increases, Farmers also
2 understands that members are facing increased costs in many of their day-to-day
3 expenses. Since Farmers' last rate case, costs for other goods, including household
4 staples like milk, gasoline and eggs have increased up to 145%. Although Farmers'
5 request could have been greater, to reduce the burden to our members, Farmers
6 decided to file under the streamlined rate proceedings and hold our increase to the
7 streamlined guidelines.

8 **Q. WHAT ARE THE MAIN REASONS FOR FARMERS' REQUEST FOR AN**
9 **INCREASE IN RATES?**

10 A. The primary reason for the request is to continue to provide the necessary funds to
11 properly maintain and operate the distribution system and in order to provide safe
12 and reliable service to our members. Since Farmers' last general rate increase in
13 2016, Farmers' load growth has been low and inconsistent due to weather variation
14 and slow economic growth. However, purchased power costs and other costs have
15 increased significantly in most every portion of operations. This mismatch between
16 revenues and costs could place Farmers at risk of not satisfying key financial
17 metrics contained in its loan covenants with lenders.

18 Overall, the structure of Farmers' customer base has remained fairly consistent.
19 At the end of the test year, residential customers made up 93% of the Cooperative's
20 members and 65% of energy usage. Commercial and industrial members made up
21 approximately 7% of Farmers' members and 35% of its energy usage. Farmers'
22 customer counts have seen only modest increases. For example, Farmers added
23 1,194 members over a seven-year period, equating to a levelized growth rate of

1 approximately 0.74% each year.

2 **Q. WHAT EXPENSES HAVE INCREASED FOR FARMERS AND EXPLAIN**
3 **WHY?**

4 A. In recent years, operating costs have weathered increasing upward inflationary
5 pressure on everything we need to provide electricity for our members; from
6 transformers to bucket trucks. The cost of materials used for the distribution lines
7 have continued to increase. The recent shortages and demand have caused double
8 digit price increases in our necessary materials. Right-of-way maintenance is a
9 critical aspect of our operations. Like many other cooperatives, right-of-way
10 management has become a significant source of increased costs.

11 Farmers had always strived to find a balance between maximizing savings on
12 interest rates and maintaining stability to lessen the impact on electric rates. As
13 detailed in written testimony by our Vice President, Finance & Accounting, Jennie
14 Phelps, rising interest rates has significantly impacted the course of business for
15 Farmers.

16 **Q. WHAT STEPS HAS FARMERS TAKEN IN REGARD TO ITS CURRENT**
17 **FINANCIAL SITUATION?**

18 A. The vast majority of our costs are fixed, which gives us little latitude in reacting to
19 low sales growth and the resulting margins used for operations. In recent years,
20 Farmers has temporarily pared back our right-of-way maintenance to preserve
21 margins and try to meet lenders' financial requirements. This is only a temporary
22 fix and not one that could or should be maintained without causing a decline in
23 reliable service, decreased member satisfaction, and increased costs in other areas

1 such as outage restoration. Therefore, Farmers seeks to increase its test year right-
2 of-way maintenance expenditures.

3 **Q. DESCRIBE SOME SIGNIFICANT COST-CONTAINMENT MEASURES**
4 **THE COOPERATIVE HAS TAKEN TO AVOID OR MINIMIZE AN**
5 **INCREASE OF ITS RATES.**

6 A. Farmers has implemented a number of cost-saving measures and strategic planning
7 items. Cooperative management is always focused on cost containment and
8 improving efficiency and service. All program activities are scrutinized for a
9 positive benefit, and whether they remain necessary to providing the members with
10 value. Exhibit 20 illustrates, in more detail, the cost savings since our last 2016
11 rate case.

12 Also, it should also be noted that on April 15, 2020, Farmers obtained a Small
13 Business Administration Payroll Protection Program loan in the amount of
14 \$1,096,767.50 to help cover a portion of its labor costs during the 2020-2021
15 COVID pandemic. Forgiveness of the loan was awarded on February 2, 2021.
16 After receiving forgiveness, Farmers recognized the amount as miscellaneous non-
17 operating income. The use of these funds assisted in foregoing a draw of loan funds
18 for its RUS work plan.

19 **Q. SHOULD THE COMMISSION GRANT THE COOPERATIVE'S**
20 **REQUESTS IN THIS PROCEEDING AND WHY?**

21 A. Yes. Farmers has initiated this proceeding because its existing residential retail
22 rates do not provide sufficient revenue to ensure the financial strength of the
23 Cooperative. While it is Farmers' goal to keep rates as low as possible, the expense

1 of providing safe and reliable service must also be recovered. Farmers has
2 commissioned a detailed cost of service study to determine the amount of revenue
3 necessary to ensure the maintenance of a financially healthy cooperative. The study
4 forms the basis for the requested adjustment. Inflationary pressures and the other
5 reasons discussed above should be accepted by the Commission in granting the
6 relief requested herein.

7 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

8 A. Yes, it does.

EXHIBIT TM-1
BOARD RESOLUTION

**RESOLUTION OF THE BOARD OF DIRECTORS OF
FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION AUTHORIZING
THE FILING OF A RATE APPLICATION UNDER THE STREAMLINED
PROCEDURES WITH THE KENTUCKY PUBLIC SERVICE COMMISSION AND ALL
OTHER NECESSARY FILINGS IN RELATION TO THE RATE APPLICATION**

A meeting of the Board of Directors ("Board") of Farmers Rural Electric Cooperative Corporation ("Farmers") was held virtually, on May 11, 2023, after due and proper notice of such meeting was given, and after a quorum was declared, during which meeting the Board discussed and considered the fully allocated cost of service study ("COSS") presented by its consultant, John Wolfram.

Upon motion by Mr. Ronnie Smith and seconded by Mr. Cornelius Faulkner, and duly carried, the following RESOLUTION was unanimously adopted:

WHEREAS, Farmers is owned by the members it serves, and its purpose is to provide safe, efficient, and reliable electric service at rates and terms that are fair, just and reasonable; and,

WHEREAS, the leadership and management of Farmers have thoroughly reviewed the Cooperative's financial condition and it has become apparent to Farmers' Board that it is the prudent decision to request an increase in its revenues through its rates by filing an Application with the Kentucky Public Service Commission under the streamline procedures, for a rate proceeding; and,

WHEREAS, the Board has retained the services of a respected rate consultant, John Wolfram of Catalyst Consulting, LLC, who has completed a comprehensive COSS, which indicates that Farmers needs an increase in its annual revenue to maintain an adequate financial position for the company; and,

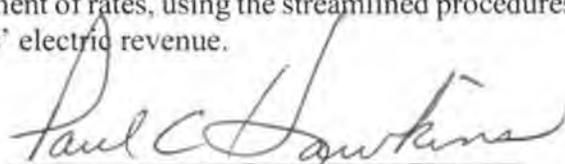
WHEREAS, Farmers intends to file a rate adjustment application with the Commission using a historical 12-month test period, under the streamlined rate procedure established by the Commission, beginning on January 1, 2022 and ending on December 31, 2022; and

NOW, THEREFORE BE IT RESOLVED by the Farmers Board of Directors that the Board of Directors hereby grants approval for the management of Farmers to take all necessary and advisable actions in connection with the Application for a rate adjustment to be filed using the streamline procedures, with the Kentucky Public Service Commission.

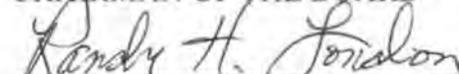
NOW, THEREFORE BE IT FURTHER RESOLVED by the Farmers Board of Directors that the Board of Directors grants approval for the Application to be filed with the Kentucky Public Service Commission for an adjustment of rates, using the streamlined procedures, will be for an increase not to exceed 4% of Farmers' electric revenue.

DATE: 05/11/2023

ATTEST:

CHAIRMAN OF THE BOARD



SECRETARY

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 8

807 KAR 5:001 Sec. 16(4)(b)
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

If the utility has gross annual revenues greater than \$5,000,000, the written testimony of each witness the utility proposes to use to support its application.

Response:

In support of its Application, Farmers provides written testimony from three (3) witnesses:

- Mr. Tobias Moss, Farmers' President and Chief Executive Officer, whose testimony is included at Exhibit 7;
- Ms. Jennie Phelps, Farmers' Vice President of Finance, whose testimony is included with this Exhibit 8; and
- Mr. John Wolfram, expert consultant with Catalyst Consulting LLC, whose testimony is included at Exhibit 9.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|------------------------------------|---|---------------------|
| THE ELECTRONIC APPLICATION OF |) | |
| FARMERS RURAL ELECTRIC |) | |
| COOPERATIVE CORPORATION |) | |
| FOR A GENERAL ADJUSTMENT OF |) | Case No. 2023-00158 |
| RATES PURSUANT TO STREAMLINED |) | |
| PROCEDURE PILOT PROGRAM |) | |
| ESTABLISHED IN CASE NO. 2018-00407 |) | |

DIRECT TESTIMONY OF
JENNIE GIBSON PHELPS
VICE PRESIDENT OF FINANCE AND ACCOUNTING
ON BEHALF OF FARMERS RURAL
ELECTRIC COOPERATIVE CORPORATION

Filed: June 16, 2023

**DIRECT TESTIMONY
OF
JENNIE GIBSON PHELPS**

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.**

2 A. My name is Jennie Gibson Phelps. My business address is Farmers Rural Electric
3 Cooperative Corporation (“Farmers”), 504 South Broadway, P.O. Box 1298,
4 Glasgow, Kentucky 42142-1208. I am Vice President, Finance and Accounting at
5 Farmers.

6 **Q. HOW LONG HAVE YOU BEEN EMPLOYED AT FARMERS AND WHAT
7 ARE YOUR RESPONSIBILITIES?**

8 A. I was employed by Farmers in October 2009. I am responsible for the management
9 and oversight of the finance and accounting activities of the Cooperative. I oversee
10 day-to-day accounting functions for the Cooperative, which includes the
11 preparation of all financial and accounting reports, payroll, accounts payable and
12 distribution plant. I monitor cash flow activities, invest funds, manage the debt
13 portfolio, and prepare the annual budget and the financial forecasting model to
14 ensure that Farmers maintains a healthy and strong financial position.

15 **Q. BRIEFLY DESCRIBE YOUR EDUCATION AND WORK EXPERIENCE.**

16 A. I received a Bachelor of Science degree in Accounting from the University of
17 Kentucky in December of 2002 and a Bachelor of Science degree in Business
18 Administration in May of 2003. Upon graduation, I worked as a staff accountant
19 for four years at a public accounting firm. My duties included multiple commercial
20 clients and completing several employee benefit plan audits. In April 2007, I
21 worked as the senior accountant for an automotive supplier of aluminum die

1 castings, until I was promoted to accounting manager where I performed general
2 ledger review, supervised all accounting functions, monitored cash flow
3 availability and administered the Company's retirement plan. In October of 2009,
4 I was hired as the Controller at Farmers and promoted to my current position as
5 Vice-President, Finance and Accounting in July 2012.

6 **Q. HAVE YOU EVER TESTIFIED BEFORE THE KENTUCKY PUBLIC**
7 **SERVICE COMMISSION ("COMMISSION")?**

8 A. Yes. I have provided written testimony and testified before the Commission in
9 Farmers' last general rate Case No. 2016-00365.

10 **Q. ARE YOU FAMILIAR WITH THE CONTENTS OF THE APPLICATION**
11 **AND THE EXHIBITS OF FARMERS WHICH HAVE BEEN FILED WITH**
12 **THE COMMISSION TO COMMENCE THIS CASE?**

13 A. Yes, I have worked with our rate consultant, John Wolfram of Catalyst Consulting,
14 LLC, in the preparation of this Application and its Exhibits.

15 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

16 A. Yes. I have prepared the following exhibit to support my testimony:

17 Exhibit JP-1 – Capital Structure

18 **Q. PLEASE GENERALLY DESCRIBE THE RELIEF SOUGHT BY**
19 **FARMERS IN THIS PROCEEDING.**

20 A. Farmers' Board of Directors, in conjunction with its management, have determined
21 that a general rate adjustment is necessary in order to account for cumulative
22 inflationary pressures since its last full rate case in 2016-2017, improve its overall
23 financial condition, and satisfy current and future loan covenants. Specifically,

1 Farmers seeks approval to increase its annual revenues by \$2,415,704 or 3.99%,
2 which will achieve an Operating Times Interest Earned Ratio (“OTIER”) of 1.51x.
3 Included in this request is an increase of the monthly residential member charge
4 from \$14.49 to \$19.50. Justification for this increase is principally based upon Mr.
5 Wolfram’s Cost of Service Study (“COSS”) and discussed in greater detail within
6 his testimony.

7 **Q. PLEASE GENERALLY DESCRIBE ANY NOTABLE TRENDS IN**
8 **FARMERS’ REVENUES AND MARGINS IN RECENT YEARS.**

9 A. In order to provide the Commission with adequate context regarding Farmers’
10 financial condition since its last general rate case in 2016-2017, a detailed summary
11 of certain relevant metrics is provided at Exhibit JP-1 to my testimony. As shown
12 in this summary, OTIER has been at sub-optimal levels in recent years as a result
13 of lower margins and a lack of load growth.

14 **Q. WHAT CONSIDERATIONS WERE GIVEN TO INCREASE THE RATES**
15 **AND CHARGES FOR FARMERS?**

16 A. The purpose of this Application filed under the procedures set forth in the
17 Commission’s Order dated December 20, 2019 in Case No. 2018-00407
18 (“Streamlined Rate Order”), is to provide support for the fact that Farmers needs
19 the requested rate relief proposed in the Application. Since the last general rate
20 case, the cost of doing business and providing safe and reliable electric service has
21 significantly increased. Farmers has experienced increases in most all aspects of
22 its business, with the primary increases in costs occurring in right-of-way

1 maintenance, interest rates, general labor costs, construction materials and system
2 maintenance costs.

3 **Q. DID FARMERS CONSIDER ITS LOW-INCOME CUSTOMER WHEN**
4 **DESIGNING ITS PROPOSED RATES?**

5 A. Yes. While Farmers' responsibility is to its membership as a whole, it certainly
6 considers how its proposed rates and rate design may impact various groups within
7 its membership, including low-income members.

8 **Q. WHY IS IT IMPORTANT THAT FARMERS MAINTAIN A STRONG**
9 **FINANCIAL CONDITION?**

10 A. As the Commission is aware, Farmers is owned by the Members it serves. While
11 it is always the Cooperative's goal to keep rates as low as possible, the expense of
12 providing safe and reliable service must be recovered; additionally, prudent
13 management and fairness demand that rates be designed in a way that better aligns
14 costs of the services provided to each rate class, which is what Farmers' proposed
15 rates seek to accomplish.

16 Also, Farmers has filed this Application due to its need to meet certain financial
17 ratios as required by its mortgage agreements with its lenders: the Rural Utilities
18 Service ("RUS") and the National Rural Utilities Cooperative Finance Corporation
19 ("CFC"). For the test year ending December 31, 2022, Farmers had an Operating
20 Times Interest Earned Ratio ("OTIER") of 1.01. Farmers is required in its mortgage
21 agreement to maintain at least a minimum OTIER of 1.10, based on an average of
22 two best out of the three most current years.

1 **Q. PLEASE DESCRIBE FINANCIAL IMPACTS SINCE FARMERS' LAST**
2 **RATE CASE.**

3 A. As illustrated in Exhibit JP-1, kWh sales to residential members have remained
4 relatively flat. In the test year, residential member usage resulted in 65% of our
5 total kWh energy sales. Flat load growth can significantly impact net margins since
6 costs in all aspects of our business are continuously increasing.

7 In the past few years, the costs of interest expense, right-of-way maintenance,
8 general labor and essential materials have increased tremendously to such a degree
9 that Farmers' Board of Directors and management realized that the filing of a
10 streamlined rate case was required. Like many other cooperatives, right-of-way
11 management, a critical aspect of our operations, has become a significant source of
12 increased costs. Recently, Farmers bid its circuit work for a two-year period and
13 contracts were much higher than past per circuit-mile rates.

14 A significant impact of the COVID-19 pandemic on Farmers has been the
15 tremendous cost increases in essential materials utilized each day for the provision
16 of reliable services to its members. These increases have occurred across virtually
17 every expense category.

18 **Q. WHAT HAS BEEN FARMERS' POLICY FOR LONG TERM FINANCING**
19 **AND INTEREST RATES?**

20 A. Farmers has always strived to find a balance between maximizing savings on
21 interest rates and maintaining stability to lessen the impact on electric rates. Since
22 our last rate case, Farmers refinanced its remaining RUS loans to further reduce its
23 interest expense [*PSC Case No. 2017-00357*]. In 2016, the debt ratio was 29%

1 variable and 72% fixed with a blended interest rate of 3.37%. For years, Farmers
2 took advantage of the historically low 3-month variable interest rates by Federal
3 Financing Bank (“FFB”). Between 2017 and 2021, this 3-month FFB interest
4 ranged from rates as high as 2.403% but as low as 0.020%. Due to refinancing and
5 maximizing savings, between 2017 and 2021, Farmers saw its overall blended
6 interest rate dropped from 3.29% to 2.60%. However, in 2022, the Feds ultimately
7 raised interest years seven times. The 90-day FFB rates jump from 0.0460% to
8 3.395% by the end of the year. Farmers decided to lock-in several loans bringing
9 its portfolio to 13% variable and 87% fixed by the end of the 2022 test year.

10 **Q. WHAT ADJUSTMENTS HAVE BEEN MADE BY FARMERS TO**
11 **PAYROLL-RELATED ITEMS?**

12 A. Farmers has consistently focused on lowering or controlling increases for payroll-
13 related items. Farmers introduced a new lower cost employee defined contribution
14 retirement plan, to replace the higher cost defined benefit plan, for all new hires
15 after January 1, 2012. As of December 31, 2022, 26 of its 60 full-time employees
16 are on the lower cost employee defined contribution retirement plan. In 2013,
17 Farmers participated in a voluntarily prepay option to fund obligations to the
18 National Rural Electric Cooperative Association (“NRECA”) Retirement &
19 Security (“RS”) Plan. While the prepayment occurred ten years ago, it has still
20 resulted in billing rate reductions and therefore, cost savings. For example, the
21 prepayment reduced the RS billing rate from 31.37% to 23.57% in the 2022 test
22 year.

1 **Q. WHAT ADJUSTMENTS HAVE BEEN MADE FOR INCREASES IN**
2 **VENDOR CONTRACTS?**

3 A. In December 2020, Farmers created a new position for a Purchasing Manager.
4 Focusing exclusively on materials and inventory, the Purchasing Manager has
5 implemented better strategies for competitively quoting bids, minimizing waste and
6 improving the utilization of material work flow. Examples are provided in Exhibit
7 20 to this Application.

8 **Q. WHEN WAS FARMERS LAST DEPRECIATION STUDY COMPLETED?**

9 A. In Farmers' last rate proceeding (Case No. 2016-00365) the Commission ordered
10 Farmers to complete a Depreciation Study before its next rate proceeding. Farmers
11 had this Depreciation Study completed in 2021 and it was filed in the post-case
12 reference in Case No. 2016-00365.

13 **Q. IS FARMERS REQUESTING ANY CHANGES IN ITS DEPRECIATION**
14 **RATES?**

15 A. No, Farmers is not requesting to make any changes to its depreciation rates in this
16 proceeding.

17 **Q. EXPLAIN WHY THE COMMISSION SHOULD GRANT THE RELIEF**
18 **REQUESTED BY FARMERS IN THIS CASE.**

19 A. As discussed throughout this filing, the rate relief sought by Farmers in this case is
20 critical to ensure that its financial integrity is maintained in order to provide its
21 members with reliable power at a reasonable retail cost. The rates requested in the
22 case are derived from the results of Mr. Wolfram's comprehensive COSS. The
23 COSS fully justifies a monthly residential customer charge \$25.50, but because of

1 gradualism, Farmers is only requesting a customer charge of \$19.50. Consistent
2 with KRS 278.030(1), Farmers seeks Commission approval to demand, collect and
3 receive fair, just and reasonable rates for the retail service it provides.

4 **Q. PLEASE DESCRIBE THE OTHER RELIEF FARMERS IS REQUESTING**
5 **IN THIS PROCEEDING?**

6 A. Farmers' Application requests that the Commission approve recovery of reasonable
7 rate case expenses in the approved rates amortized over a period of three years, or
8 such other period which the Commission finds reasonable. At this time, Farmers
9 is not requesting any other relief.

10 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

11 A. Yes, it does.

EXHIBIT JP-1
CAPITAL STRUCTURE

| | Interest of LTD | Net Margins | Operating Margins | TIER | OTIER | Equity to Assets | Modified DSC | Residential kWh Sales | %Change In Residential kWh Sales |
|------|-----------------|--------------|----------------------|------|-------|---------------------|-----------------|--------------------------|--|
| 2016 | \$ 1,761,080 | \$ 2,964,217 | \$ 280,470 | 2.68 | 1.17 | 40.11% | 1.25 | 310,078,127 | 1.7% |
| 2017 | \$ 1,793,685 | \$ 1,787,029 | \$ 442,852 | 2.00 | 1.25 | 40.06% | 1.31 | 292,436,901 | -5.7% |
| 2018 | \$ 1,969,012 | \$ 3,231,820 | \$ 1,162,571 | 2.64 | 1.59 | 41.46% | 1.45 | 325,968,651 | 11.5% |
| 2019 | \$ 2,049,358 | \$ 2,718,897 | \$ 289,816 | 2.33 | 1.23 | 41.19% | 1.48 | 312,724,528 | -4.1% |
| 2020 | \$ 1,712,580 | \$ 2,181,134 | \$ 586,456 | 2.27 | 1.64 | 41.98% | 1.63 | 307,902,110 | -1.5% |
| 2021 | \$ 1,555,037 | \$ 2,534,898 | \$ 730,147 | 2.63 | 1.49 | 42.41% | 1.54 | 314,258,509 | 2.1% |
| 2022 | \$ 1,800,708 | \$ 2,281,606 | \$ 59,725 | 2.27 | 1.01 | 42.16% | 1.60 | 327,572,840 | 4.2% |

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 9

807 KAR 5:001 Sec. 16(4)(b)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

If the utility has gross annual revenues greater than \$5,000,000, the written testimony of each witness the utility proposes to use to support its application.

Response:

In support of its Application, Farmers provides written testimony from three (3) witnesses:

- Mr. Tobias Moss, Farmers' President and Chief Executive Officer, whose testimony is included at Exhibit 7;
- Ms. Jennie Phelps, Farmers' Vice President of Finance, whose testimony is included at Exhibit 8; and
- Mr. John Wolfram, expert consultant with Catalyst Consulting LLC, whose testimony is included with this Exhibit 9.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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|------------------------------------|---|---------------------|
| THE ELECTRONIC APPLICATION OF |) | |
| FARMERS RURAL ELECTRIC |) | |
| COOPERATIVE CORPORATION |) | |
| FOR A GENERAL ADJUSTMENT OF |) | Case No. 2023-00158 |
| RATES PURSUANT TO STREAMLINED |) | |
| PROCEDURE PILOT PROGRAM |) | |
| ESTABLISHED IN CASE NO. 2018-00407 |) | |

DIRECT TESTIMONY OF
JOHN WOLFRAM
PRINCIPAL, CATALYST CONSULTING LLC
ON BEHALF OF FARMERS RURAL
ELECTRIC COOPERATIVE CORPORATION

Filed: June 16, 2023

**DIRECT TESTIMONY
OF
JOHN WOLFRAM**

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**DIRECT TESTIMONY
OF
JOHN WOLFRAM**

I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.**

2 A. My name is John Wolfram. I am the Principal of Catalyst Consulting LLC. My
3 business address is 3308 Haddon Road, Louisville, Kentucky, 40241.

4 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

5 A. I am testifying on behalf of Farmers Rural Electric Cooperative Corporation
6 (“Farmers”).

7 **Q. BRIEFLY DESCRIBE YOUR EDUCATION AND WORK EXPERIENCE.**

8 A. I received a Bachelor of Science degree in Electrical Engineering from the
9 University of Notre Dame in 1990 and a Master of Science degree in Electrical
10 Engineering from Drexel University in 1997. I founded Catalyst Consulting LLC
11 in June 2012. I have developed cost of service studies and rates for numerous
12 electric and gas utilities, including electric distribution cooperatives, generation and
13 transmission cooperatives, municipal utilities, and investor-owned utilities. I have
14 performed economic analyses, rate mechanism reviews, special rate designs, and
15 wholesale formula rate reviews. From March 2010 through May 2012, I was a
16 Senior Consultant with The Prime Group, LLC. I have also been employed by the
17 parent companies of Louisville Gas and Electric Company ("LG&E") and
18 Kentucky Utilities Company ("KU"), by the PJM Interconnection, and by the
19 Cincinnati Gas & Electric Company. A more detailed description of my
20 qualifications is included in Exhibit JW-1.

1 **Q. HAVE YOU EVER TESTIFIED BEFORE THE KENTUCKY PUBLIC**
2 **SERVICE COMMISSION (“COMMISSION”)?**

3 **A.** Yes. I have testified in numerous regulatory proceedings before this Commission
4 and have been involved in Commission matters nearly continuously since 1999. A
5 listing of my testimony in other proceedings is included in Exhibit JW-1.
6

7 **II. PURPOSE OF TESTIMONY**

8 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

9 **A.** The purpose of my testimony is to: (i) describe Farmers’ compliance with the
10 streamlined rate filing procedures; (ii) describe Farmers’ rate classes, (iii) describe
11 the calculation of Farmers’ revenue requirement; (iv) explain the pro forma
12 adjustments to the test period results; (v) describe the Cost of Service Study
13 (“COSS”) process and results; (vi) present the proposed allocation of the revenue
14 increase to the rate classes; (vii) describe the rate design, proposed rates, and
15 estimated billing impact by rate class, and (viii) support certain filing requirements
16 from 807 KAR 5:001.

17 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

18 **A.** Yes. I have prepared the following exhibits to support my testimony:

19 Exhibit JW-1 – Qualifications of John Wolfram

20 Exhibit JW-2 – Revenue Requirements & Pro Forma Adjustments

21 Exhibit JW-3 – COSS: Summary of Results

22 Exhibit JW-4 – COSS: Functionalization & Classification

23 Exhibit JW-5 – COSS: Allocation to Rate Classes & Returns

1
2
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Exhibit JW-6 – COSS: Billing Determinants

Exhibit JW-7 – COSS: Purchased Power, Meters, & Services

Exhibit JW-8 – COSS: Zero Intercept Analysis

Exhibit JW-9 – Present & Proposed Rates

III. RATE FILING PROCEDURE

Q. IS FARMERS FILING THIS CASE UNDER THE RATE CASE PROCEDURE FOR ELECTRIC DISTRIBUTION COOPERATIVES DESCRIBED IN CASE NO. 2018-00407?

A. Yes. As described in the Application, Farmers is filing this case under the procedures set forth in the Commission’s Order dated December 20, 2019 in Case No. 2018-00407 (“Streamlined Rate Order”). For convenience I will refer to this procedure as the “streamlined” rate filing procedure or process.

Q. DOES FARMERS COMPLY WITH ALL OF THE REQUIREMENTS SET FORTH IN THE COMMISSION’S ORDER ON THE STREAMLINED PROCEDURE?

A. Yes. Farmers meets all the elements of the streamlined process set forth in the Commission’s order. These requirements are discussed in the body of the order and are enumerated in Appendix A to the order.

Appendix A sets forth the Prerequisites for Use of the Streamlined Process. Farmers complies with each of these items. The requirements of the other parts of Appendix A are also met; I will describe how Farmers complies with the “Excluded Items for Ratemaking Purposes” in Part E later in my testimony.

IV. CLASSES OF SERVICE

Q. PLEASE DESCRIBE THE CUSTOMER CLASSES SERVED BY FARMERS.

A. Farmers currently has members taking service pursuant to several major rate classifications. These include Residential, Residential Time of Day (“TOD”), Small Commercial, Large Commercial, Large Power, TOD Three Phase, and Lighting, along with riders for Net Metering and Prepay. Farmers’ residential members comprise 65% of test year energy usage and 68% of test year revenues from energy sales, on an unadjusted basis, as shown in Table 1.

Table 1. Rate Class Data (2022)

| Rate Class | Members | kWh | % | Revenue | % |
|---|----------------|--------------------|---------------|---------------------|---------------|
| Schedule R - Residential Rate | 24,181 | 319,625,088 | 64.5% | \$40,346,229 | 67.3% |
| Schedule R - Residential Time of Day Rate | 2 | 18,646 | 0.0% | \$2,252 | 0.0% |
| Schedule C - Comm. & Indust. Service Rate < 50 kW | 1,716 | 32,075,927 | 6.5% | \$3,890,068 | 6.5% |
| Schedule C - Comm. & Indust. Service Rate > 50 kW | 98 | 52,519,152 | 10.6% | \$6,225,669 | 10.4% |
| Residential Off Peak Electric Thermal Storage Tariff | 112 | 403,834 | 0.1% | \$29,328 | 0.0% |
| Schedule C - Large Commercial 10% Discount | 4 | 23,868,610 | 4.8% | \$2,332,903 | 3.9% |
| Schedule E - Large Industrial Rate | 1 | 35,915,472 | 7.2% | \$3,141,240 | 5.2% |
| Schedule LPC-2 Large Power Rate Tariff | 1 | 7,958,400 | 1.6% | \$742,949 | 1.2% |
| Schedule D - Large Comm/Ind Optional Time of Day Rate | 4 | 876,204 | 0.2% | \$125,619 | 0.2% |
| Net Metering Tariff | 65 | 1,188,357 | 0.2% | \$80,720 | 0.1% |
| Schedule LPE-4 Large Power Time of Day Rate Tariff | 1 | 20,721,477 | 4.2% | \$1,938,132 | 3.2% |
| Schedule C - TOD Comm - Three Phase | 6 | 218,724 | 0.0% | \$35,757 | 0.1% |
| Lighting | 126 | 436,568 | 0.1% | \$1,064,782 | 1.8% |
| TOTAL | 26,323 | 495,826,459 | 100.0% | \$59,955,648 | 100.0% |

1 **Q. DOES THE DATA IN TABLE 1 RECONCILE PRECISELY WITH THE**
2 **DATA IN FARMERS' RUS FORM 7 AND THE ANNUAL FINANCIAL**
3 **REPORT FILED WITH THE COMMISSION?**

4 A. No; the data does not reconcile perfectly, but it is extremely close. The reason for
5 this is that the data in Table 1 represents my reproduction of Farmers' 2022 billing
6 data by rate class. I made certain adjustments to the cooperative's actual booked
7 amounts as needed to perform the cost of service study.

8

9 **V. REVENUE REQUIREMENT**

10 **Q. PLEASE DESCRIBE HOW FARMERS' PROPOSED REVENUE**
11 **INCREASE WAS DETERMINED.**

12 A. Farmers is proposing a general adjustment in rates using a historical test period.
13 The proposed revenue increase was determined first by analyzing the revenue
14 deficiency based on financial results for the test period after the application of
15 certain pro forma adjustments described herein. The revenue deficiency was
16 determined as the difference between (i) Farmers' net margins for the test period
17 without reflecting a general adjustment in rates and (ii) the cap of the lower of (a)
18 an OTIER of 1.85 and (b) the overall rate increase of 4.00 percent, pursuant to the
19 requirements of the Streamlined Rate Order. Based on the adjusted test year under
20 the OTIER cap, the revenue deficiency is \$3,116,333. However, pursuant to the
21 total revenue increase cap, the increase is limited to an overall increase of 4.00
22 percent, or \$2,415,453. Due to rate rounding, Farmers' request is for an increase
23 of \$2,415,704, which yields an OTIER of 1.51.

1 **Q. WHAT IS THE HISTORICAL TEST PERIOD FOR THE RATE CASE**
2 **APPLICATION?**

3 A. The historical test period for the filing is the 12 months ended December 31, 2022.

4 **Q. HAVE YOU PREPARED AN EXHIBIT THAT SHOWS HOW FARMERS'**
5 **REVENUE DEFICIENCY IS CALCULATED?**

6 A. Yes. Exhibit JW-2 shows the calculation of Farmers' revenue deficiency.

7 **Q. PLEASE EXPLAIN THE REVENUE DEFICIENCY CALCULATION IN**
8 **EXHIBIT JW-2 IN DETAIL.**

9 A. The purpose of Exhibit JW-2 is to calculate the difference between Farmers' net
10 margin for the adjusted test year and the margin necessary for Farmers to achieve the
11 lower of a 1.85 OTIER or the overall percentage increase, pursuant to the limits
12 established in the Streamlined Rate Order. Page 1 of the exhibit presents revenues and
13 expenses for Farmers for the actual test year, the proposed pro forma adjustments, the
14 adjusted test year at present rates, the adjusted test year at a 1.85 OTIER, and the
15 adjusted test year at the proposed rates capped at an increase of 4.00 percent. The
16 revenues include total sales of electric energy and other electric revenue.

17 Expenses are tabulated next. The Total Cost of Electric Service is shown on
18 line 22. Total Cost of Electric Service includes operation expenses, maintenance
19 expenses, depreciation and amortization expenses, taxes, interest expenses on long-
20 term debt, other interest expenses, and other deductions. Utility Operating Margins
21 are calculated by subtracting Total Cost of Electric Service from Total Operating
22 Revenue. Non-operating margins and capital credits are added to Utility Operating
23 Margins to determine Farmers' Net Margins.

1 The TIER, OTIER, Margins at Target OTIER, and Revenue Deficiency
2 amounts are calculated at the bottom of page 1 of Exhibit JW-2.

3 **Q. WHAT IS THE OTIER FOR FARMERS FOR THE UNADJUSTED TEST**
4 **YEAR AND THE ADJUSTED TEST YEAR?**

5 A. Exhibit JW-2 shows on Line 34 that the OTIER for the unadjusted test year is 1.02
6 and for the adjusted test year is 0.36, both of which are below the target OTIER of
7 1.85.

8 **Q. WHAT IS THE REVENUE DEFICIENCY CALCULATED IN EXHIBIT**
9 **JW-2?**

10 A. Based on an OTIER of 1.85, Farmers has a net margin requirement of \$2,495,404.
11 To achieve these net margins requires an increase of \$3,116,333 or 5.16 percent.

12 **Q. IS FARMERS REQUESTING THE FULL REVENUE DEFICIENCY AS AN**
13 **INCREASE IN MEMBER RATES?**

14 A. No. Farmers is required to limit the increase it seeks in this proceeding to 4.00
15 percent overall. This results in a total revenue increase of \$2,415,453. This is
16 calculated on the last two lines of Exhibit JW-2. This amount is used in the COSS
17 and in the design of new rates that I describe later in my testimony. Due to rate
18 rounding, Farmers is requesting an increase of \$2,415,704 (which differs from the
19 target by \$215).

20 Farmers believes Commission should approve the request as filed, but if the
21 Commission does make any downward adjustments, Farmers respectfully requests
22 that the Commission also consider the difference between the revenue requirement
23 at the 1.85 OTIER and the 4.00 percent cap. At the filed rates, a downward

1 adjustment of \$700,880 could be made (*i.e.* \$3,116,333 less \$2,415,453) without
2 impacting Farmers' overall requested rate increase or proposed rates.

3 **VI. PRO FORMA ADJUSTMENTS**

4 **Q. PLEASE BROADLY DESCRIBE THE NATURE OF THE PRO FORMA**
5 **ADJUSTMENTS MADE TO FARMERS' ELECTRIC OPERATIONS FOR**
6 **THE TEST YEAR SHOWN IN EXHIBIT JW-2.**

7 A. Farmers has made adjustments which remove revenues and expenses that are
8 addressed in other rate mechanisms, are ordinarily excluded from rates, or are non-
9 recurring on a prospective basis, consistent with standard Commission practices, or
10 are to be excluded at the direction of the Commission in Case No. 2018-00407. The
11 pro forma adjustments are included in Exhibit JW-2. The pro forma adjustments
12 are summarized below for convenience.

13 **Table 2. Pro Forma Adjustments**

| Reference Schedule | Pro Forma Adjustment Item |
|---------------------------|----------------------------------|
| 1.01 | Fuel Adjustment Clause |
| 1.02 | Environmental Surcharge |
| 1.03 | Interest Expense |
| 1.04 | Depreciation Normalization |
| 1.05 | Right of Way |
| 1.06 | Year End Customers |
| 1.07 | FEMA Credit |
| 1.08 | Donations, Promo Ads & Dues |
| 1.09 | Directors Expenses |
| 1.10 | Wages & Salaries |
| 1.11 | 401k Contributions |
| 1.12 | Life Insurance |
| 1.13 | Rate Case Costs |
| 1.14 | Outside Services |
| 1.15 | G&T Capital Credits |
| 1.16 | Payroll Taxes |

14

1 **Q. DID YOU PREPARE A DETAILED INCOME STATEMENT AND**
2 **BALANCE SHEET RELECTING THE IMPACT OF ALL PROPOSED**
3 **ADJUSTMENTS?**

4 A. Yes. These are included in Exhibit JW-2 pages 3 and 4.

5 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
6 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.01.**

7 A. This adjustment accounts for the fuel cost expenses and revenues included in the
8 FAC for the test period. Consistent with Commission practice, FAC expenses and
9 revenues included in the test year have been eliminated.

10 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
11 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.02.**

12 A. This adjustment removes Environmental Surcharge ("ES") revenues and expenses
13 because these are addressed by a separate rate mechanism. This is consistent with
14 the Commission's practice of eliminating the revenues and expenses associated with
15 full-recovery cost trackers.

16 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
17 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.03.**

18 A. This adjustment normalizes the interest on Long Term Debt and Other Interest
19 Expense from the test year to recent amounts, as described in the testimony of Ms.
20 Phelps.

21 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
22 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.04.**

1 A. This adjustment normalizes depreciation expenses by replacing test year actual
2 expenses with test year-end balances (less any fully depreciated items) at approved
3 depreciation rates, consistent with typical Commission practice.

4 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
5 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.05.**

6 A. This adjustment adds expense associated with vegetation management and right
7 of way maintenance. As described in the testimony of Ms. Phelps, costs for
8 prospective right of way maintenance exceed those incurred in the test year. The
9 adjustment replaces test year vegetation management expense with an annualized
10 prospective amount determined by the annual mileage to be cleared priced at the
11 current contractor pricing.

12 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
13 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.06.**

14 A. This adjustment adjusts the test year expenses and revenues to reflect the number
15 of customers at the end of the test year. The numbers of customers served at the end
16 of the test period for some rate classes differed from the average number of
17 customers for the test year. The change in revenue is calculated by applying the
18 average revenue per kWh for each rate class to the difference between average
19 customer count and test-year-end customer count (at average kWh/customer) for
20 each class. The change in operating expenses was calculated by applying an
21 operating ratio to the revenue adjustment, consistent with the approach accepted by
22 the Commission for other utilities in rate proceedings (*e.g.* Case Nos. 2019-00053,
23 2012-00221 & 2012-00222, and 2017-00374).

1 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
2 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.07.**

3 A. This adjustment adds a FEMA credit back to expense. This amount was a reserve
4 on the balance sheet, which was relieved in the test-year, creating a one-time credit
5 to expense. Therefore, it was adjusted out as a one-time item.

6 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
7 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.08.**

8 A. This adjustment eliminates donations, promotional advertising, and dues expenses
9 pursuant to 807 KAR 5:016, consistent with Commission practice. Also please see
10 Application Exhibit 28.

11 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
12 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.09.**

13 A. This adjustment removes certain Director expenses, including costs for directors
14 attending EKPC / KAEC / NRECA annual meeting(s), training, or tours when the
15 director is not the Farmers representative for the respective organization. Expenses
16 that may not be fully removed for rate-making purposes include the costs of
17 attending NRECA director training/education seminars (especially for new
18 directors). These seminars help directors to meet their fiduciary duties to the
19 membership by educating them on industry issues. Also please see Application
20 Exhibit 27.

21 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
22 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.10.**

1 A. This adjustment normalizes Farmers’ employee wages and salaries to account for
2 changes due to wage increases, departures, or new hires for a standard year of 2,080
3 hours. The exhibit shows adjustment data for employees based on regular time,
4 overtime, and other/vacation payout time adjusted from test year 2022.

5 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
6 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.11.**

7 A. This adjustment removes the employer retirement plan contributions for the least
8 generous of any multiple retirement packages, consistent with the requirements of
9 the streamlined rate order. Employees hired prior to January 1, 2012 may
10 participate in multiple retirement plans. Excluded for ratemaking purposes, per the
11 streamlined filing requirements, is the employer retirement contribution for the
12 least generous plan.

13 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
14 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.12.**

15 A. This adjustment removes life insurance premiums for coverage above the lesser of
16 an employee's annual salary or \$50,000 from the test period, pursuant to the
17 requirements of the Streamlined Rate Order.

18 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
19 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.13.**

20 A. This adjustment estimates the rate case costs amortized over a 3-year period for
21 inclusion in the revenue requirement, consistent with standard Commission
22 practice.

1 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
2 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.14.**

3 A. This adjustment removes certain non-recurring expenses (or normalizes others) for
4 outside services from the test period, consistent with standard Commission practice.

5 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
6 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.15.**

7 A. This adjustment removes the G&T Capital Credits from the test period, consistent
8 with standard Commission practice.

9 **Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES**
10 **OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.16.**

11 A. This adjustment normalizes Farmers' payroll taxes consistent with the employee
12 wage and salary adjustments set forth in Reference Schedule 1.10.

13 **Q. IS FARMERS REQUIRED TO INCLUDE AN ADJUSTMENT TO**
14 **OPERATING EXPENSES TO REFLECT EMPLOYEE CONTRIBUTIONS**
15 **FOR HEALTHCARE INSURANCE PREMIUMS BASED ON THE**
16 **NATIONAL AVERAGE FOR COVERAGE TYPE, CONSISTENT WITH**
17 **THE STREAMLINED RATE ORDER?**

18 A. No. The requirement to adjust to national average contribution levels pursuant to
19 the Streamlined Rate Order does not apply, because Farmers' employee health care
20 insurance premium contribution is not zero.

21

1 **VII. COST OF SERVICE STUDY**

2 **Q. DID YOU PREPARE A COSS FOR FARMERS BASED ON FINANCIAL**
3 **AND OPERATING RESULTS FOR THE TEST YEAR?**

4 A. Yes. I prepared a fully allocated, embedded COSS based on pro forma operating
5 results for the test year. The objective in performing the COSS is to assess Farmers’
6 overall rate of return on rate base and to determine the relative rates of return that
7 Farmers is earning from each rate class. Additionally, the COSS provides an
8 indication of whether each class is contributing its appropriate share towards
9 Farmers’ cost of providing service.

10 **Q. WHAT PROCEDURE WAS USED IN PERFORMING THE COSS?**

11 A. The three traditional steps of an embedded COSS – functionalization, classification,
12 and allocation – were utilized. The COSS was prepared using the following
13 procedure: (1) costs were functionalized to the major functional groups; (2) costs
14 were classified as energy-related, demand-related, or customer-related; and then (3)
15 costs were allocated to the rate classes.

16 **Q. IS THIS A STANDARD APPROACH USED IN THE ELECTRIC UTILITY**
17 **INDUSTRY AND ACCEPTED BY THIS COMMISSION?**

18 A. Yes. The same approach has been employed and accepted in several cases filed by
19 other utilities in Kentucky, including rate cases noted in Exhibit JW-1.

20 **Q. HOW ARE COSTS FUNCTIONALIZED AND CLASSIFIED IN THE COST**
21 **OF SERVICE MODEL?**

22 A. Farmers’ test-year costs are functionalized and classified according to the practices
23 specified in *The Electric Utility Cost Allocation Manual* published by the National

1 Association of Regulatory Utility Commissioners (“NARUC”) dated January 1992.
2 Costs are functionalized to the categories of power supply, transmission, station
3 equipment, primary and secondary distribution plant, customer services, meters,
4 lighting, meter reading and billing, and load management.

5 **Q. IS THE COSS UNBUNDLED?**

6 A. Yes. This unbundling distinguishes between the functionalized costs components,
7 i.e., purchased power demand, purchased power energy, distribution demand, and
8 distribution customer – which allows the development of rates based on these
9 separate cost components.

10 **Q. HOW WERE COSTS CLASSIFIED AS ENERGY-RELATED, DEMAND-
11 RELATED OR CUSTOMER-RELATED?**

12 A. Costs are classified in connection with how they vary. Costs classified as *energy-*
13 *related* vary with the amount of kilowatt-hours consumed. Costs classified as
14 *demand-related* vary with the capacity needs of customers, such as the amount of
15 transmission or distribution equipment necessary to meet a customer’s needs, or
16 other elements that are related to facility size. Transmission lines and distribution
17 substation transformers are examples of costs typically classified as demand costs.
18 Costs classified as *customer-related* include costs incurred to serve customers
19 regardless of the quantity of electric energy purchased or the peak requirements of
20 the customers and vary with the number of customers. A meter is one example of
21 a customer-related cost. Customer-related costs also include the cost of the
22 minimum system necessary to provide a customer with access to the electric grid.
23 Distribution costs related to overhead conductor, underground conductor, and line

1 transformers were split between demand-related and customer-related using the
2 “zero-intercept” method, which I explain further below. Customer Services,
3 Meters, Lighting, Meter Reading, Billing, Customer Account Service, and Load
4 Management costs were classified as customer-related.

5 **Q. PLEASE EXPLAIN THE APPLICATION OF THE ZERO INTERCEPT**
6 **METHOD TO THE CLASSIFICATION OF CERTAIN DISTRIBUTION**
7 **COSTS.**

8 A. In preparing this study, the zero-intercept method was used to determine the
9 customer components of overhead conductor, underground conductor, and line
10 transformers. The zero-intercept method uses linear regression to determine the
11 theoretical cost for connecting a customer of zero size to the grid. This method is
12 less subjective than other approaches and is preferred when the necessary data are
13 available. With the zero-intercept method, a zero-size conductor or line transformer
14 is the absolute minimum system. The zero-intercept analysis is included in Exhibit
15 JW-8.

16 **Q. IS THE ZERO-INTERCEPT METHOD A STANDARD APPROACH**
17 **GENERALLY ACCEPTED WITHIN THE ELECTRIC UTILITY**
18 **INDUSTRY?**

19 A. Yes. The NARUC *Electric Utility Cost Allocation Manual* identifies the zero-
20 intercept (or “minimum intercept”) as one of two standard methodologies for
21 classifying distribution fixed costs. The manual states on page 92 that the zero-
22 intercept method “requires considerably more data and calculation than the
23 minimum-size method. In most instances, it is more accurate, although the

1 differences may be relatively small.” The Commission has accepted the zero-
2 intercept method in many rate filings for many years. The Commission should do
3 so in this case also, because the zero intercept calculations shown in Exhibit JW-8
4 are reasonable.

5 **Q. HAVE YOU PREPARED AN EXHIBIT SHOWING THE RESULTS OF**
6 **THE FUNCTIONALIZATION AND CLASSIFICATION STEPS OF THE**
7 **COSS?**

8 A. Yes. Exhibit JW-4 shows the results of the first two steps of the COSS –
9 functionalization and classification.

10 **Q. IN THE COST OF SERVICE MODEL, ONCE COSTS ARE**
11 **FUNCTIONALIZED AND CLASSIFIED, HOW ARE THESE COSTS**
12 **ALLOCATED TO THE CUSTOMER CLASSES?**

13 A. Once costs for all of the major accounts are functionalized and classified, the
14 resultant cost matrix for the major groupings (e.g., Plant in Service, Rate Base,
15 Operation and Maintenance Expenses) is then transposed and allocated to the
16 customer classes using allocation vectors. The results of the class allocation step of
17 the COSS are included in Exhibit JW-5.

18 **Q. HOW ARE ENERGY-RELATED, CUSTOMER-RELATED AND**
19 **DEMAND-RELATED COSTS ALLOCATED TO THE RATE CLASSES IN**
20 **THE COSS?**

21 A. Power supply energy-related costs are allocated on the basis of total test year kWh
22 sales to each customer class. Power supply and transmission demand-related costs
23 are allocated using a 12CP methodology, to mirror the basis of cost allocation used

1 in the applicable EKPC wholesale tariff. With the 12CP methodology, these
2 demand-related costs are allocated on the basis of the demand for each rate class at
3 the time of the wholesale system peak (also known as “Coincident Peak” or “CP”)
4 for each of the twelve months. Customer-related costs are allocated on the basis of
5 the average number of customers served in each rate class during the test year.
6 Distribution demand-related costs are allocated on the basis of the relative demand
7 levels of each rate class. Specifically, the demand cost component is allocated by
8 the maximum class demands for primary and secondary voltage and by the sum of
9 individual customer demands for secondary voltage. The customer cost component
10 of customer services is allocated on the basis of the average number of customers
11 for the test year. Meter costs were specifically assigned by relating the costs
12 associated with various types of meters to the class of customers for whom these
13 meters were installed. The demand analysis is provided in Exhibit JW-6. The
14 purchased power, meter, and service analyses are provided in Exhibit JW-7.

15 **Q. HOW IS THE TARGET MARGIN INCORPORATED INTO THE COSS?**

16 A. The COSS first determines results on an actual or unadjusted basis. The COSS then
17 takes into account the pro forma adjustments and a target margin. The target margin
18 is based on the rate of return on rate base that will yield the target revenue from
19 electric rates. In this case a rate of return on rate base of 1.61 percent yields a total
20 revenue requirement equivalent to the target Total Sales of Electric Energy plus the
21 Other Electric Revenue noted on Page 1 of Exhibit JW-2, lines 1-4 in the Proposed
22 Rates column.

23 **Q. PLEASE SUMMARIZE THE RESULTS OF THE COSS.**

1 A. The results of the COSS are provided in Exhibit JW-3 on page 1. The following
2 table summarizes the rates of return for each customer class in the study. The Pro
3 Forma Rate of Return on Rate Base was calculated by dividing the net utility
4 operating margin (including the pro forma adjustments) by the net cost rate base
5 for each customer class. The Unitized Pro Forma Return on Rate Base is the
6 previous column normalized to a total return on rate base equal to one (1.00). Any
7 negative values for pro forma rate of return on rate base indicate that expenses
8 exceed revenues. Also, any rate class for which the rate of return is greater than the
9 total system rate of return is providing a subsidy to the other rate classes; any class
10 with a rate of return that is less than the total system rate of return (i.e. any class
11 with a unitized rate of return less than 1.00) is receiving a subsidy.

12 **Table 3. COSS Results: Rates of Return**

| # | Rate | Pro Forma Return on Rate Base | Unitized Pro Forma Return on Rate Base |
|----|--|-------------------------------|--|
| 1 | Schedule R - Residential Rate | (1.20%) | (1.72) |
| 2 | Schedule R - Residential Time of Day Rate | (3.37%) | (4.83) |
| 3 | Schedule C - Comm. & Indust. Service Rate < 50 kW | 6.58% | 9.44 |
| 4 | Schedule C - Comm. & Indust. Service Rate > 50 kW | 14.65% | 21.01 |
| 5 | Residential Off Peak Electric Thermal Storage Tariff | (10.04%) | (14.40) |
| 6 | Schedule C - Large Commercial 10% Discount | 3.76% | 5.40 |
| 7 | Schedule E - Large Industrial Rate | 11.29% | 16.19 |
| 8 | Schedule LPC-2 Large Power Rate Tariff | 4.83% | 6.93 |
| 9 | Schedule D - Large Comm/Ind Opt Time of Day Rate | 15.21% | 21.82 |
| 10 | Net Metering Tariff | (16.03%) | (22.98) |

| | | | |
|----|--|--------|-------|
| 11 | Schedule LPE-4 Large Power Time of Day Rate Tariff | 22.30% | 31.99 |
| 12 | Schedule C - TOD Comm - Three Phase | 10.38% | 14.89 |
| 13 | Lighting | 12.50% | 17.93 |
| 14 | TOTAL | 0.70% | 1.00 |

1

2 **Q. DOES THE COSS PROVIDE INFORMATION CONCERNING THE UNIT**
3 **COSTS INCURRED BY FARMERS TO PROVIDE SERVICE UNDER**
4 **EACH RATE SCHEDULE?**

5 A. Yes. Customer-related, demand-related, and energy-related costs for each rate class
6 are shown in Exhibit JW-3 page 2 and at the end of Exhibit JW-5. Customer-related
7 costs are stated as a cost per member per month. Energy-related costs are stated as
8 a cost per kWh. For rate classes with a demand charge, demand-related costs are
9 stated as a cost per kW per month. For rate classes without a demand charge, the
10 demand-related costs are incorporated into the per kWh charge.

11 **Q. BASED ON THE COSS, DO FARMERS' EXISTING RATES**
12 **APPROPRIATELY REFLECT THE COST OF PROVIDING SERVICE TO**
13 **EACH RATE CLASS?**

14 A. No. The wide range of rates of return for the rate classes indicates that existing rates
15 maintain a degree of subsidization between the rate classes. The unbundled costs
16 within each rate class indicate an imbalance within the current rate structure
17 between the recovery of fixed costs and variable costs, particularly within the
18 residential class. This is relatively common among electric utilities, at least to a
19 certain degree.

20 **Q. WHAT GUIDANCE DOES THE COSS PROVIDE FOR RATE DESIGN?**

1 A. First, the COSS indicates that rates for the residential classes are insufficient and
2 should be increased. The need to increase rates is limited to these residential rate
3 schedules (Residential Rate R, TOD Residential, Residential ETS, and Net
4 Metering) because they are the only rate classes being subsidized by the collective
5 other rate classes.

6 Second, the COSS supports a fixed monthly charge of \$25.50 for the
7 residential class. This is shown on Exhibit JW-3, page 2. Since the current charge
8 is \$14.49 per month, the fixed customer charge should be increased. This is a
9 significant issue for Farmers because the current charge is below cost-based rates.
10 This means that the current rate structure places too little recovery of fixed costs in
11 the fixed charge, which results in significant under-recovery of fixed costs,
12 particularly when members embrace conservation or energy efficiency or otherwise
13 reduce overall consumption. At bottom, this is a fundamental challenge facing
14 Farmers from a cost recovery standpoint, particularly because residential members
15 make up the vast majority of Farmers' membership, and it is essential for Farmers'
16 financial well-being to address this issue.

17

18 **VIII. ALLOCATION OF THE PROPOSED INCREASE**

19 **Q. PLEASE SUMMARIZE HOW FARMERS PROPOSES TO ALLOCATE**
20 **THE REVENUE INCREASE TO THE CLASSES OF SERVICE.**

21 A. Farmers relied on the results of the COSS as a guide to determine the allocation of
22 the proposed revenue increase to the classes of service. Generally, Farmers is
23 proposing to allocate the revenue increase in greater proportion to the rate classes

1 whose returns are more negative and in less proportion to those classes whose return
2 are less negative.

3 **Q. WHAT IS THE PROPOSED BASE RATE REVENUE INCREASE FOR**
4 **EACH RATE CLASS?**

5 A. Farmers is proposing the base rate revenue increases in the following table.

6 **Table 4. Proposed Base Rate Increases**

| Rate Class | Increase | |
|------------------------------|-----------------|----------------|
| | Dollars | Percent |
| Residential - Schedule R | \$2,408,157 | 5.93% |
| TOD Residential - Schedule R | \$90 | 3.92% |
| Net Metering | \$7,456 | 5.63% |
| TOTAL | \$2,415,704 | 3.99% |

7

8 **IX. PROPOSED RATES**

9 **Q. HAVE YOU PREPARED AN EXHIBIT SHOWING THE**
10 **RECONSTRUCTION OF FARMERS' TEST-YEAR BILLING**
11 **DETERMINANTS?**

12 A. Yes. The reconstruction of Farmers' billing determinants is shown on Exhibit JW-
13 9.

14 **Q. WHAT ARE THE PROPOSED CHARGES FOR FARMERS'**
15 **RESIDENTIAL RATE CLASS?**

16 A. Farmers is proposing to increase the Residential Rate A customer charge from
17 \$14.49 to \$19.50 per month, to increase the energy charge from \$0.087687 to
18 \$0.090673 per kWh. These changes also apply to the Net Metering rider. The
19 customer charge change also applies to the Residential PrePay Service Rider (with
20 no change to the prepay program monthly fee) and to the Time of Day Residential

1 rate. In other words, in all tariffs where the existing per unit charges match those
2 of Residential Rate A, Farmers is proposing the same change noted here.

3 **Q. HOW WERE THE PROPOSED RATES CALCULATED?**

4 A. The rates were calculated such that two constraints were met. The first constraint
5 was that the total incremental revenue resulting from the proposed rates must equal
6 the revenue deficiency (as close as possible with rounding). The second was that
7 the combination of revisions to the customer charge and the energy charge for each
8 rate class must achieve a reasonable overall revenue increase for the class,
9 consistent with the guidance from the COSS and with the principle of gradualism.

10 **Q. HOW WAS THE PROPOSED RESIDENTIAL CUSTOMER CHARGE**
11 **DETERMINED?**

12 A. Farmers' residential customer charge is currently \$14.49 per month. The cost of
13 service study shows that the actual cost per month per customer is \$25.50. The
14 gap is \$11.01 per month. Farmers determined the proposed residential customer
15 charge by increasing the \$14.49 incrementally so that the increase closes some but
16 not all the gap between current rates and cost-based rates. The proposed \$19.50
17 will close about 46 percent of the gap, while keeping the customer charge below
18 \$20. This movement of less than halfway across the gap between current and cost-
19 based rates is consistent with the ratemaking principle of gradualism.

20 **Q. DO THE PROPOSED RATES GENERATE THE EXACT TARGET**
21 **REVENUE INCREASE OF \$2,415,453?**

1 A. No, but it is extremely close. Due to rate rounding, the proposed rates generate
2 \$2,415,704 which varies by \$251 from the exact revenue deficiency for the test
3 period, based on test year consumption.

4 **Q. WHAT IS THE PROPOSED AVERAGE BILLING INCREASE FOR EACH**
5 **RATE CLASS?**

6 A. Farmers is proposing the average billing increases in the following table.

7 **Table 5. Proposed Average Billing Increases**

| Rate Class | Average Usage (kWh) | Increase | |
|------------------------------|---------------------|----------|---------|
| | | Dollars | Percent |
| Residential - Schedule R | 1,102 | \$8.30 | 5.93% |
| TOD Residential - Schedule R | 1,036 | \$5.01 | 3.92% |
| Net Metering | 1,524 | \$9.56 | 5.63% |
| TOTAL | NA | NA | 3.99% |

8

9 **Q. WILL THE RATES PROPOSED BY FARMERS IN THIS PROCEEDING**
10 **ELIMINATE ALL INTER-CLASS SUBSIDIZATION?**

11 A. No. The proposed rates move Farmers' rate structures in the direction of cost-based
12 rates without fully adopting those rates. See Exhibit JW-3, page 1 of 2. This is
13 consistent with the ratemaking principle of gradualism and will allow the avoidance
14 of rate shock while still making some movement to improve the price signal to
15 members consistent with how Farmers actually incurs costs.

16 **Q. IS FARMERS PROPOSING CHANGES TO THE MISCELLANEOUS**
17 **SERVICE CHARGES IN THIS CASE?**

18 A. No.

19 **Q. IS FARMERS PROPOSING CHANGES TO THE LIGHTING SCHEDULE**
20 **IN THIS CASE?**

1 A. No.

2 **Q. IS FARMERS PROPOSING CHANGES TO ANY RATE SCHEDULES**
3 **UNDER WHICH NO MEMBERS TOOK SERVICE IN THE TEST YEAR?**

4 A. No.

5

6 **X. FILING REQUIREMENTS**

7 **Q. HAVE YOU REVIEWED THE ANSWERS PROVIDED IN THE FILED**
8 **EXHIBITS WHICH ADDRESS FARMERS' COMPLIANCE WITH THE**
9 **HISTORICAL PERIOD FILING REQUIREMENTS UNDER 807 KAR 5:001**
10 **AND ITS VARIOUS SUBSECTIONS?**

11 A. Yes. I hereby incorporate and adopt those portions of exhibits for which I am
12 identified as the sponsoring witness as part of this Direct Testimony.

13

14 **XI. CONCLUSION**

15 **Q. DO YOU HAVE ANY CLOSING COMMENTS?**

16 A. Yes. Farmers' rates of return in the COSS clearly demonstrate that the proposed
17 increase in base rates is necessary for Farmers' financial health. Farmers' revenue
18 deficiency, based on a target OTIER of 1.85, is \$3,116,333 or an increase of 5.16
19 percent. By virtue of the Streamlined Rate Order, Farmers is capped at a 4.00
20 percent overall increase, which limits its request to \$2,415,453; with rate rounding,
21 Farmers is requesting an increase of \$ \$2,415,704, which yields an OTIER of 1.51.
22 (If any portion of the proposed revenue requirement is not accepted by the
23 Commission, a reduction less than or equal to \$700,880 would still achieve an

1 overall increase of 4.00 percent and would support the approval of the rates as
2 filed.) This increase is necessary to meet the financial obligations described in the
3 company witness testimony. The proposed rates are designed to produce revenues
4 that achieve the revenue requirement. In particular, the increase in customer charges
5 is needed to keep moving the rate structure towards cost-based rates, in order to
6 reduce the revenue erosion that results from having too great a portion of utility
7 fixed cost recovery embedded in the variable charge. The Commission has
8 recognized in recent orders that for an electric cooperative that is strictly a
9 distribution utility, there is a need for a means to guard against the revenue erosion
10 that often occurs due to the decrease in sales volumes that accompanies poor
11 regional economics, changes in weather patterns, and the implementation or
12 expansion of demand-side management and energy-efficiency programs. For
13 Farmers at this juncture, this is the case. The proposed rates are just and reasonable
14 and should be approved as filed.

15 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

16 A. Yes, it does.

EXHIBIT JW-1
QUALIFICATIONS

JOHN WOLFRAM

Summary of Qualifications

Provides consulting services to investor-owned utilities, rural electric cooperatives, and municipal utilities regarding utility rate and regulatory filings, cost of service studies, wholesale and retail rate designs, tariffs and special contracts, formula rates, and other analyses.

Employment

CATALYST CONSULTING LLC
Principal

June 2012 – Present

Provide consulting services in the areas of tariff development, formula rates, regulatory analysis, economic development, revenue requirements, cost of service, rate design, special rates, audits, rate filings, and other utility regulatory areas.

THE PRIME GROUP, LLC
Senior Consultant

March 2010 – May 2012

LG&E and KU, Louisville, KY

1997 - 2010

(Louisville Gas & Electric Company and Kentucky Utilities Company)
Director, Customer Service & Marketing (2006 - 2010)
Manager, Regulatory Affairs (2001 - 2006)
Lead Planning Engineer, Generation Planning (1998 - 2001)
Power Trader, LG&E Energy Marketing (1997 - 1998)

PJM INTERCONNECTION, LLC, Norristown, PA
Project Lead – PJM OASIS Project
Chair, Data Management Working Group

1990 - 1993; 1994 - 1997

CINCINNATI GAS & ELECTRIC COMPANY, Cincinnati, OH
Electrical Engineer - Energy Management System

1993 - 1994

Education

Bachelor of Science Degree in Electrical Engineering, University of Notre Dame, 1990
Master of Science Degree in Electrical Engineering, Drexel University, 1997
Leadership Louisville, 2006

Associations

Senior Member, Institute of Electrical and Electronics Engineers (“IEEE”) & Power Engineering Society

Articles

“FERC Formula Rate Resurgence” *Public Utilities Fortnightly*, Vol. 158, No. 9, July 2020, 34-37.

“Economic Development Rates: Public Service or Piracy?” *IAEE Energy Forum*, International Association for Energy Economics, 2016 Q1 (January 2016), 17-20.

Presentations

“New Developments in Kentucky Rate Filings” presented to Kentucky Electric Cooperatives Accountants' Association Summer Meeting, Jun. 2022.

“Avoiding Shock: Communicating Rate Changes” presented to APPA Business & Financial Conference, Sep. 2020.

“Revisiting Rate Design Strategies” presented to APPA Public Power Forward Summit, Nov. 2019.

“Utility Rates at the Crossroads” presented to APPA Business & Financial Conference, Sep. 2019.

“New Developments in Kentucky Rate Filings” presented to Kentucky Electric Cooperatives Accountants' Association Summer Meeting, Jun. 2019.

“Electric Rates: New Approaches to Ratemaking” presented to CFC Statewide Workshop for Directors, Jan. 2019.

“The Great Rate Debate: Residential Demand Rates” presented to CFC Forum, Jun. 2018.

“Benefits of Cost of Service Studies” presented to Tri-State Electric Cooperatives Accountants' Association Spring Meeting, Apr. 2017.

“Proper Design of Utility Rate Incentives” presented to APPA/Area Development's Public Power Consultants Forum, Mar. 2017.

“Utility Hot Topics and Economic Development” presented to APPA/Area Development's Public Power Consultants Forum, Mar. 2017.

“Emerging Rate Designs” presented to CFC Independent Borrowers Executive Summit, Nov. 2016.

“Optimizing Economic Development” presented to Grand River Dam Authority Municipal Customer Annual Meeting, Sept. 2016.

“Tomorrow's Electric Rate Designs, Today” presented to CFC Forum, Jun. 2016.

“Reviewing Rate Class Composition to Support Sound Rate Design” presented to EEI Rate and Regulatory Analysts Group Meeting, May 2016.

“Taking Public Power Economic Development to the Next Level” presented to APPA/Area Development's Public Power Consultants Forum, Mar. 2016.

“Ratemaking for Environmental Compliance Plans” presented to NARUC Staff Subcommittee on Accounting and Finance Fall Conference, Sep. 2015.

“Top Utility Strategies for Successful Attraction, Retention & Expansion” presented to APPA/Area Development's Public Power Consultants Forum, Mar. 2015.

“Economic Development and Load Retention Rates” presented to NARUC Staff Subcommittee on Accounting and Finance Fall Conference, Sep. 2013.

Expert Witness Testimony & Proceedings

FERC

Submitted direct testimony for Black Hills Colorado Electric, LLC in FERC Docket No. ER22-2185 regarding a proposed Transmission Formula Rate.

Submitted testimony for Evergy Kansas Central, Inc. and Evergy Generating, Inc. in FERC Docket Nos. ER22-1974-000, ER22-1975-000 and ER22-1976-000 regarding revised capital structures under transmission and generation formula rates.

Submitted affidavit for Constellation Mystic Power, LLC in FERC Docket No. ER18-1639-000 in response to arguments raised in formal challenges to an informational filing required for a cost-of-service rate for the operation of power plants in ISO New England.

Submitted direct testimony for El Paso Electric Company in FERC Docket No. ER22-282 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for TransCanyon Western Development, LLC in FERC Docket No. ER21-1065 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Cleco Power LLC in FERC Docket No. ER21-370 regarding a proposed rate schedule for Blackstart Service under Schedule 33 of the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff.

Submitted direct testimony for Constellation Mystic Power, LLC in FERC Docket No. ER18-1639-005 supporting a compliance filing for a cost-of-service rate for compensation for the continued operation of power plants in ISO New England.

Submitted direct testimony for DATC Path 15, LLC in FERC Docket No. ER20-1006 regarding a proposed wholesale transmission rate.

Submitted direct testimony for Tucson Electric Power Company in FERC Docket No. ER19-2019 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Cheyenne Light, Fuel & Power Company in FERC Docket No. ER19-697 regarding a proposed Transmission Formula Rate.

Supported Kansas City Power & Light in FERC Docket No. ER19-1861-000 regarding revisions to fixed depreciation rates in the KCP&L SPP Transmission Formula Rate.

Supported Westar Energy and Kansas Gas & Electric Company in FERC Docket No. ER19-269-000 regarding revisions to fixed depreciation rates in the Westar SPP Transmission Formula Rate.

Submitted direct testimony for Midwest Power Transmission Arkansas, LLC in FERC Docket No. ER15-2236 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Kanstar Transmission, LLC in FERC Docket No. ER15-2237 regarding a proposed Transmission Formula Rate.

Supported Westar Energy and Kansas Gas & Electric Company in FERC Docket Nos. FA15-9-000 and FA15-15-000 regarding an Audit of Compliance with Rates, Terms and Conditions of Westar's Open

Access Transmission Tariff and Formula Rates, Accounting Requirements of the Uniform System of Accounts, and Reporting Requirements of the FERC Form No. 1.

Submitted direct testimony for Westar Energy in FERC Docket Nos. ER14-804 and ER14-805 regarding proposed revisions to a Generation Formula Rate.

Supported Intermountain Rural Electric Association and Tri-State G&T in FERC Docket No. ER12-1589 regarding revisions to Public Service of Colorado's Transmission Formula Rate.

Supported Intermountain Rural Electric Association in FERC Docket No. ER11-2853 regarding revisions to Public Service of Colorado's Production Formula Rate.

Supported Kansas Gas & Electric Company in FERC Docket No. FA14-3-000 regarding an Audit of Compliance with Nuclear Plant Decommissioning Trust Fund Regulations and Accounting Practices.

Supported LG&E Energy LLC in FERC Docket No. PA05-9-000 regarding an Audit of Code of Conduct, Standards of Conduct, Market-Based Rate Tariff, and MISO's Open Access Transmission Tariff at LG&E Energy LLC.

Submitted remarks and served on expert panel in FERC Docket No. RM01-10-000 on May 21, 2002 in Standards of Conduct for Transmission Providers staff conference, regarding proposed rulemaking on the functional separation of wholesale transmission and bundled sales functions for electric utilities.

Kansas

Submitted direct testimony for Evergy Metro, Inc. in Docket No. 23-EKCE-775-RTS regarding a jurisdictional cost allocation in a retail rate case.

Submitted report for Westar Energy, Inc. in Docket No. 21-WCNE-103-GIE regarding plans and options for funding the decommissioning trust fund, depreciation expenses, and overall cost recovery in the event of premature closing of the Wolf Creek nuclear plant.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 18-WSEE-328-RTS regarding overall rate design, prior rate case settlement commitments, lighting tariffs, an Electric Transit rate schedule, Electric Vehicle charging tariffs, and tariff general terms and conditions.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 18-KG&E-303-CON regarding the Evaluation, Measurement and Verification ("EM&V") of an energy efficiency demand response program offered pursuant to a large industrial customer special contract.

Submitted report for Westar Energy, Inc. in Docket No. 18-WCNE-107-GIE regarding plans and options for funding the decommissioning trust fund, depreciation expenses, and overall cost recovery in the event of premature closing of the Wolf Creek nuclear plant.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 15-WSEE-115-RTS regarding rate designs for large customer classes, establishment of a balancing account related to new rate options, establishment of a tracking mechanism for costs related to compliance with mandated cyber and physical security standards, other rate design issues, and revenue allocation.

Kentucky

Submitted direct testimony on behalf of Taylor County RECC in Case No. 2023-00147 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. TFS 2023-00124 regarding a Qualifying Facilities tariff.

Prepared tariff worksheets on behalf of sixteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case No. 2023-00135 regarding rate design for the pass-through of an approved wholesale earning mechanism bill credit.

Submitted direct testimony on behalf of Big Rivers Electric Corporation and Kenergy Corp. in Case No. 2023-00045 regarding a marginal cost of service study in support of an economic development rate for a special contract.

Submitted direct and rebuttal testimony and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2021-00358 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2021-00289 regarding a Large Industrial Customer Standby Service Tariff.

Submitted direct testimony on behalf of Big Rivers Electric Corporation and Jackson Purchase Energy Corporation in Case No. 2021-00282 regarding a marginal cost of service study in support of an economic development rate for a special contract.

Submitted direct testimony, responses to data requests, and rebuttal testimony on behalf of sixteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case Nos. 2021-00104 through 2021-00119 regarding rate design for the pass-through of a proposed wholesale rate revision.

Submitted direct testimony and responses to data requests on behalf of Kenergy Corp. in Case No. 2021-00066 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony on behalf of Big Rivers Electric Corporation in Case No. 2021-00061 regarding two cost of service studies in a review of the Member Rate Stability Mechanism Charge for calendar year 2020.

Submitted direct testimony and responses to data requests on behalf of Licking Valley R.E.C.C. in Case No. 2020-00338 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Cumberland Valley Electric in Case No. 2020-00264 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Taylor County R.E.C.C. in Case No. 2020-00278 regarding the cost support and tariff changes for the implementation of a Prepay Metering Program.

Submitted direct testimony and responses to data requests on behalf of Meade County R.E.C.C. in Case No. 2020-00131 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Clark Energy Cooperative in Case No. 2020-00104 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2019-00435 regarding an Environmental Compliance Plan and Environmental Surcharge rate mechanism.

Submitted direct testimony and responses to data requests on behalf of Jackson Energy Cooperative in Case No. 2019-00066 regarding revenue requirements, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2019-00053 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and data request responses on behalf of Big Rivers Electric Corporation in Case No. 2018-00146 regarding ratemaking issues associated with the anticipated termination of contracts regarding the operation of an electric generating plant owned by the City of Henderson, Kentucky.

Submitted direct testimony on behalf of fifteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case No. 2018-00050 regarding the economic evaluation of and potential cost shift resulting from a proposed member purchased power agreement.

Submitted direct testimony on behalf of Big Sandy R.E.C.C. in Case No. 2017-00374 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony on behalf of Progress Metal Reclamation Company in Kentucky Power Company Case No. 2017-00179 regarding the potential implementation of a Load Retention Rate or revisions to an Economic Development Rate.

Submitted direct testimony on behalf of Kenergy Corp. and Big Rivers Electric Corporation in Case No. 2016-00117 regarding a marginal cost of service study in support of an economic development rate for a special contracts customer.

Submitted rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2014-00134 regarding ratemaking treatment of revenues associated with proposed wholesale market-based-rate purchased power agreements with entities in Nebraska.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2013-00199 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2012-00535 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2012-00063 regarding an Environmental Compliance Plan and Environmental Surcharge rate mechanism.

Submitted direct, rebuttal, and rehearing direct testimony on behalf of Big Rivers Electric Corporation in Case No. 2011-00036 regarding revenue requirements and pro forma adjustments in a base rate case.

Submitted direct testimony for Louisville Gas & Electric Company in Case No. 2009-00549 and for Kentucky Utilities Company in Case No. 2009-00548 for adjustment of electric and gas base rates, in support of a new service offering for Low Emission Vehicles, revised special charges, and company offerings aimed at assisting customers.

Submitted discovery responses for Kentucky Utilities and/or Louisville Gas & Electric Company in various customer inquiry matters, including Case Nos. 2009-00421, 2009-00312, and 2009-00364.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2008-00148 regarding the 2008 Joint Integrated Resource Plan.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Administrative Case No. 2007-00477 regarding an investigation of the energy and regulatory issues in Kentucky's 2007 Energy Act.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2007-00319 for the review, modification, and continuation of Energy Efficiency Programs and DSM Cost Recovery Mechanisms.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2007-00067 for approval of a proposed Green Energy program and associated tariff riders.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2005-00467 and 2005-00472 regarding a Certificate of Public Convenience and Necessity for the construction of transmission facilities.

Submitted discovery responses for Kentucky Utilities in Case No. 2005-00405 regarding the transfer of a utility hydroelectric power plant to a private developer.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2005-00162 for the 2005 Joint Integrated Resource Plan.

Presented company position for Louisville Gas & Electric Company and Kentucky Utilities Company at public meetings held in Case Nos. 2005-00142 and 2005-00154 regarding routes for proposed transmission lines.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in a Focused Management Audit of Fuel Procurement practices by Liberty Consulting in 2004.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in an Investigation into their Membership in the Midwest Independent Transmission System Operator, Inc. ("MISO") in Case No. 2003-00266.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in a Focused Management Audit of its Earning Sharing Mechanism by Barrington-Wellesley Group in 2002-2003.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2002-00381 regarding a Certificate of Public Convenience and Necessity for the acquisition of four combustion turbines.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2002-00029 regarding a Certificate of Public Convenience and Necessity for the acquisition of two combustion turbines.

Missouri

Submitted direct, rebuttal and surrebuttal testimony for Evergy Metro, Inc. in Case No. ER-2022-0130 regarding a jurisdictional cost allocation analysis in a retail rate case.

Virginia

Submitted direct testimony for Kentucky Utilities Company d/b/a Old Dominion Power in Case No. PUE-2002-00570 regarding a Certificate of Public Convenience and Necessity for the acquisition of four combustion turbines.

EXHIBIT JW-2
REVENUE REQUIREMENTS AND
PRO FORMA ADJUSTMENTS

FARMERS RECC
For the 12 Months Ended December 31, 2022

Depreciation Expense Normalization

Table with columns: Line #, Acct # (1), Description (2), Test Yr Ending Bal (3), Fully Depr Items (4), Rate (5), Normalized Expense (6), Test Year Expense (7), Pro Forma Adj (8). Rows include Intangible Plant, Distribution Plant (various equipment like SCADA, Poles, Conductors), General Plant (Land, Structures, Equipment), and Transportation Charged to Clearing.

FARMERS RECC
For the 12 Months Ended December 31, 2022

Depreciation Expense Normalization

53

This adjustment normalizes depreciation expenses by replacing test year actual expenses with test year end balances, less any fully depreciated items, at approved depreciation rates.

54

55

56

| <u>Allocation of Clearing to O&M</u> | | <u>Labor \$</u> | <u>Alloc</u> | <u>Depr \$</u> |
|--|----------------------------------|-----------------|--------------|----------------|
| 58 | 580-589 Operations | \$ 556,550 | 12.0% | \$ 7,491 |
| 59 | 590-598 Maintenance | \$ 980,612 | 21.1% | \$ 13,199 |
| 60 | 901-905 Consumer Accounts | \$ 478,454 | 10.3% | \$ 6,440 |
| 61 | 907-912 Customer Service | \$ 62,355 | 1.3% | \$ 839 |
| 62 | 920-935 Administrative & General | \$ 584,599 | 12.6% | \$ 7,868 |
| 63 | Subtotal | \$ 2,662,570 | 57.3% | \$ 35,837 |
| 64 | | | | |
| 65 | Capital Balance Sheet Accounts | \$ 1,982,924 | 42.7% | \$ 26,689 |
| 66 | Subtotal | | 42.7% | \$ 26,689 |
| 67 | | | | |
| 68 | Total | \$ 4,645,494 | 100.0% | \$ 62,527 |

This adjustment normalizes depreciation expenses by replacing test year actual expenses with test year end balances (less any fully depreciated items) at approved depreciation rates.

FARMERS RECC
For the 12 Months Ended December 31, 2022

Right of Way

| # | Account 593 Item | | Cost |
|---|--------------------------------|----|-----------|
| 1 | Test Year Right of Way expense | \$ | 1,015,237 |
| 2 | Pro Forma Right of Way expense | \$ | 2,300,000 |
| 3 | Adjustment | \$ | 1,284,763 |

This adjustment adds to expense for ROW management

FARMERS RECC
For the 12 Months Ended December 31, 2021

Year-End Customers

| Line # | Year (1) | Month (2) | Schedule R - Residential Rate (3) | Schedule C - Comm. & Indust. Service Rate < 50 kW (4) | Total (5) |
|--------|---------------------------------|--------------|---|---|--------------|
| 1 | 2022 | Jan | 22,518 | 1,703 | |
| 2 | 2022 | Feb | 22,539 | 1,702 | |
| 3 | 2022 | Mar | 22,603 | 1,763 | |
| 4 | 2022 | Apr | 22,542 | 1,700 | |
| 5 | 2022 | May | 22,558 | 1,708 | |
| 6 | 2022 | Jun | 22,656 | 1,718 | |
| 7 | 2022 | Jul | 22,641 | 1,717 | |
| 8 | 2022 | Aug | 22,668 | 1,729 | |
| 9 | 2022 | Sep | 22,702 | 1,741 | |
| 10 | 2022 | Oct | 22,671 | 1,701 | |
| 11 | 2022 | Nov | 22,686 | 1,704 | |
| 12 | 2022 | Dec | 22,777 | 1,705 | |
| 13 | Average | | 22,630 | 1,716 | |
| 14 | | | | | |
| 15 | End of Period Increase over Avg | | 147 | (11) | |
| 16 | | | | | |
| 17 | Total kWh | | 294,735,688 | 32,075,927 | |
| 18 | Average kWh | | 13,024 | 18,692 | |
| 19 | Year-End kWh Adjustment | | 1,914,545 | (205,615) | 1,708,930 |
| 20 | | | | | |
| 21 | Revenue Adjustment | | | | |
| 22 | Current Base Rate Revenue | | \$ 29,447,975 | \$ 3,072,969 | |
| 23 | Average Revenue per kWh | | \$ 0.09991 | \$ 0.09580 | |
| 24 | Year End Revenue Adj | | \$ 191,288 | \$ (19,699) | 171,590 |
| 25 | | | | | |
| 26 | Expense Adjustment | | | | |
| 27 | Avg Adj Purchase Exp per kWh | | 0.06360 | 0.06360 | |
| 28 | Year End Expense Adj | | \$ 121,774 | \$ (13,078) | 108,696 |
| 29 | | | | | |

FARMERS RECC
For the 12 Months Ended December 31, 2021

Year-End Customers

(continued)

| | Revenue | Expense |
|----|-------------------|-------------------|
| 30 | | |
| 31 | | |
| 32 | \$ - | \$ - |
| 33 | | |
| 34 | \$ 171,590 | \$ 108,696 |
| 35 | | |
| 36 | <u>\$ 171,590</u> | <u>\$ 108,696</u> |
| 37 | | |

| | Test Period Total |
|----|--------------------------|
| 38 | |
| 39 | |
| 40 | \$ 45,844,519 |
| 41 | \$ (6,746,655) |
| 42 | \$ (5,815,832) |
| 44 | \$ 33,282,032 |
| 45 | 523,264,251 |

This adjustment adjusts the test year expenses and revenues to reflect the number of customers at the end of the test year.

FARMERS RECC
For the 12 Months Ended December 31, 2022

Donations, Promotional Advertising & Dues

| Line # | Item (1) | Account (2) | Total Amount (3) | Exclusion (4) |
|-----------|-------------------|----------------|------------------------|------------------|
| 1 | Annual Meeting | 930.21 | \$16,607 | (\$16,607) |
| 2 | Donations | 426.10 | \$9,675 | (\$9,675) |
| 3 | KEC Dues | 930.10 | \$12,697 | (\$12,697) |
| 4 | KY Living | 930.10 | \$123,534 | (\$123,534) |
| 5 | NRECA Dues | 930.20 | \$71,395 | (\$71,395) |
| 6 | Community Support | 930.23 | \$51,024 | (\$51,024) |
| 7 | | | | |
| 8 | Total | | | (\$284,932) |

This adjustment removes charitable donations, promotional advertising expenses, and dues from the revenue requirement consistent with standard Commission practices.

Farmers RECC
For The 12 Months Ended December 31, 2022

Employer Contributions - 401k

| Line # | PSC Reference | Hired Before January 1, 2012 | | Hired After January 1, 2012 |
|--------|--------------------------------|-------------------------------|----------------------------|-----------------------------|
| | | Employer Contribution Pension | Employer Contribution 401k | Employer Contribution 401k |
| 60 | H51 | | | |
| 61 | H52 | | | |
| 62 | H53 | | | |
| 63 | PT1 | 984 | | |
| 64 | PT2 | 2,768 | | |
| 65 | R1 | 14,651 | 574 | |
| 66 | R2 | 4,243 | 183 | |
| 67 | R3 | 9,384 | 404 | |
| 68 | R4 | 7,493 | 323 | |
| 69 | R5 | 12,634 | 539 | |
| 70 | R6 | | | 553 |
| 71 | T1 | | | 4,125 |
| 72 | T2 | | | 4,003 |
| 73 | T3 | | | 1,430 |
| 74 | T4 | | | |
| 75 | | | | |
| 76 | | | | |
| 77 | GRAND TOTALS | 599,478 | 25,463 | 116,377 |
| 78 | | | | |
| 79 | Allocation to Accounts | <u>Alloc</u> | <u>Adjustment</u> | |
| 80 | 580-589 | 11.98% | \$ (3,051) | |
| 81 | 590-598 | 21.11% | \$ (5,375) | |
| 82 | 901-905 | 10.30% | \$ (2,623) | |
| 83 | 907-910 | 1.34% | \$ (342) | |
| 84 | 920-935 | 12.58% | \$ (3,204) | |
| 85 | Expense Adjustment > | 57.32% | \$ (14,594)* | |
| 86 | | | | |
| 87 | 101-120 | 29.81% | \$ (7,591) | |
| 88 | 231-283 | 12.87% | \$ (3,278) | |
| 89 | | 42.68% | \$ (10,869) | |
| 90 | | | | |
| 91 | | 100.0% | \$ (25,463) | |

FARMERS RECC
For the 12 Months Ended December 31, 2022

Rate Case Expenses

| Line # | Item (1) | Expense (2) |
|-----------|--------------------------------------|----------------|
| 1 | Legal - Honaker Law Office PLLC | \$ 50,000 |
| 2 | Consulting - Catalyst Consulting LLC | \$ 20,000 |
| 3 | Advertising / Notices | \$ - |
| 4 | Subtotal | \$ 70,000 |
| 5 | | |
| 6 | Total Amount | \$ 70,000 |
| 7 | Amortization Period (Years) | \$ 3 |
| 8 | Annual Amortization Amount | \$ 23,333 |
| 9 | | |
| 10 | Test Year Amount | \$ - |
| 11 | | |
| 12 | Pro Forma Year Amount | \$ 23,333 |
| 13 | | |
| 14 | Adjustment | \$ 23,333 |

This adjustment estimates the rate case costs amortized over a 3 year period, consistent with standard Commission practice.

FARMERS RECC
For the 12 Months Ended December 31, 2022

G&T Capital Credits

| # | Item | Account | Amount |
|---|----------------------|---------|-------------|
| 1 | G&T Capital Credits | \$ | 1,516,655 |
| 2 | | | |
| 3 | Pro Forma Amount | \$ | - |
| 4 | | | |
| 5 | Pro Forma Adjustment | \$ | (1,516,655) |

This adjustment removes G&T capital credits consistent with Commission practice.

EXHIBIT JW-3
COST OF SERVICE STUDY
SUMMARY OF RESULTS

FARMERS RECC
Summary of Cost-Based Rates

2022

| Classified Cost-Based Rates | | | | | |
|-----------------------------|--|-------------|-----------------------------|-------------------------|------------------------|
| # | Rate (1) | Code (2) | Customer \$/Month (3) | Energy \$/KWH (4) | Demand \$/KW (5) |
| 1 | Schedule R - Residential Rate | 1 | 25.50 | 0.09174 | - |
| 3 | Schedule R - Residential Time of Day Rate | 3 | 25.96 | 0.09084 | - |
| 4 | Schedule C - Comm. & Indust. Service Rate < 50 kW | 4 | 26.76 | 0.06028 | 8.93 |
| 5 | Schedule C - Comm. & Indust. Service Rate > 50 kW | 5 | 96.95 | 0.06069 | 4.94 |
| 6 | Residential Off Peak Electric Thermal Storage Tariff | 7 | 3.21 | 0.08330 | - |
| 8 | Schedule C - Large Commercial 10% Discount | 9 | 420.10 | 0.06069 | 5.07 |
| 9 | Schedule E - Large Industrial Rate | 10 | 2,156.75 | 0.03616 | 12.69 |
| 10 | Schedule LPC-2 Large Power Rate Tariff | 14 | 543.62 | 0.03616 | 5.14 |
| 11 | Schedule D - Large Comm/Ind Opt Time of Day Rate | 15 | 73.46 | 0.06103 | 4.62 |
| 12 | Net Metering Tariff | 20 | 28.26 | 0.09679 | - |
| 14 | Schedule LPE-4 Large Power Time of DayRate Tariff | 36 | 949.89 | 0.06103 | 2.94 |
| 15 | Schedule C - TOD Comm - Three Phase | 50 | 74.86 | 0.08678 | - |

EXHIBIT JW-4
COST OF SERVICE STUDY
FUNCTIONALIZATION AND
CAPITALIZATION

EXHIBIT JW-5
COST OF SERVICE STUDY
ALLOCATION TO RATE CLASSES
AND RETURNS

FARMERS R.E.C.C.
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2022

| <u>Description</u> | <u>Name</u> | <u>Allocation Vector</u> | Schedule E - Large Industrial Rate 10 | Schedule LPC-2 Large Power Rate Tariff 14 | Schedule D - Large Comm/Ind Opt Time of Day Rate 15 | Net Metering Tariff 20 | Schedule LPE-4 Large Power Time of DayRate Tariff 36 | Schedule C - TOD Comm - Three Phase 50 | Lighting |
|--|-------------|--------------------------|---------------------------------------|---|---|------------------------|--|--|----------|
| Unit Revenue Requirement @ Current Class Revenues | Various | | 11.29% | 4.83% | 15.21% | -16.03% | 22.30% | 10.38% | |
| Production & Purchased Power | | | | | | | | | |
| Production & Purchased Power Demand (Per KWH or KW) | | | 9.72 | 2.18 | 1.68 | 0.008411 | - | 0.008683 | |
| Production & Purchased Power Demand Margin (Per KWH or KW) | | | 0.000443 | 0.000080 | 0.000569 | (0.000535) | - | 0.000358 | |
| Production & Purchased Power Energy (Per KWH) | | | 0.036159 | 0.061035 | 0.061035 | 0.060690 | 0.061035 | 0.060690 | |
| Production & Purchased Power Energy Margin (Per KWH) | | | - | - | - | - | - | - | |
| Transmission Demand | | | | | | | | | |
| Transmission Demand (Per KWH or KW) | | | - | - | - | - | - | - | |
| Transmission Demand Margin (Per KWH or KW) | | | - | - | - | - | - | - | |
| Total Transmission Demand (Per KWH or KW) | | | - | - | - | - | - | - | |
| Distribution Demand | | | | | | | | | |
| Distribution Demand (Per KWH or KW) | | | 2.51 | 2.51 | 2.50 | 0.023564 | 2.51 | 0.014785 | |
| Distribution Demand Margin (Per KWH or KW) | | | 0.01 | 0.00 | 0.02 | (0.040435) | 0.01 | 0.016543 | |
| Total Distribution Demand (Per KWH or KW) | | | 2.51 | 2.51 | 2.53 | (0.016871) | 2.52 | 0.031327 | |
| Distribution Customer | | | | | | | | | |
| Distribution Customer (Per Customer Per Month) | | | 1,953.08 | 488.06 | 62.98 | 24.61 | 923.38 | 61.88 | |
| Distribution Customer Margin (Per Customer Per Month) | | | 1,425.86 | 166.51 | 98.93 | (36.35) | 366.84 | 83.61 | |
| Total Distribution Customer (Per Customer Per Month) | | | 3,378.94 | 654.57 | 161.91 | (11.74) | 1,290.22 | 145.48 | |

FARMERS R.E.C.C.
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2022

| Description | Name | Allocation Vector | Total System | Schedule C - | | | | Residential Off Peak Electric Thermal Storage Tariff 7 | Schedule C - Large Commercial 10% Discount 9 |
|---|-------|----------------------|-----------------|--|--|---|--|--|--|
| | | | | Schedule R - Residential Rate 1 | Schedule R - Residential Time of Day Rate 3 | Schedule C - Comm. & Indust. Service Rate < 50 kW 4 | Schedule C - Comm. & Indust. Service Rate > 50 kW 5 | | |
| Unit Revenue Requirement @ Total System Rate of Return | 0.70% | | | 0.70% | 0.70% | 0.70% | 0.70% | 0.70% | 0.70% |
| Production & Purchased Power | | | | | | | | | |
| Production & Purchased Power Demand (Per KWH or KW) | | | | 0.008284 | 0.007931 | 6.01 | 1.99 | - | 2.12 |
| Production & Purchased Power Demand Margin (Per KWH or KW) | | | | 0.000023 | 0.000022 | 0.02 | 0.01 | - | 0.01 |
| Production & Purchased Power Energy (Per KWH) | | | | 0.061071 | 0.060690 | 0.060282 | 0.060690 | 0.060690 | 0.060690 |
| Production & Purchased Power Energy Margin (Per KWH) | | | | - | - | - | - | - | - |
| Transmission Demand | | | | | | | | | |
| Transmission Demand (Per KWH or KW) | | | | - | - | - | - | - | - |
| Transmission Demand Margin (Per KWH or KW) | | | | - | - | - | - | - | - |
| Total Transmission Demand (Per KWH or KW) | | | | - | - | - | - | - | - |
| Distribution Demand | | | | | | | | | |
| Distribution Demand (Per KWH or KW) | | | | 0.019037 | 0.018891 | 2.44 | 2.51 | 0.019286 | 2.51 |
| Distribution Demand Margin (Per KWH or KW) | | | | 0.001424 | 0.001418 | 0.19 | 0.19 | 0.001438 | 0.19 |
| Total Distribution Demand (Per KWH or KW) | | | | 0.020461 | 0.020309 | 2.63 | 2.69 | 0.020724 | 2.69 |
| Distribution Customer | | | | | | | | | |
| Distribution Customer (Per Customer Per Month) | | | | 22.13 | 22.42 | 22.86 | 85.45 | 2.76 | 390.75 |
| Distribution Customer Margin (Per Customer Per Month) | | | | 1.46 | 1.53 | 1.69 | 4.97 | 0.20 | 12.70 |
| Total Distribution Customer (Per Customer Per Month) | | | | 23.59 | 23.95 | 24.55 | 90.42 | 2.95 | 403.44 |

FARMERS R.E.C.C.
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2022

| Description | Name | Allocation Vector | Schedule E - | Schedule | Schedule D - | Net Metering Tariff | Schedule LPE-4 | Schedule C - | Lighting | |
|--|-------|----------------------|-----------------------------------|------------------------------------|--|------------------------|--|---------------------------------|----------|--|
| | | | Large Industrial Rate 10 | LPC-2 Large Power Rate 14 | Large Comm/Ind Opt Time of Day Rate 15 | | Large Power Time of DayRate Tariff 36 | TOD Comm - Three Phase 50 | | |
| <u>Unit Revenue Requirement @ Total System Rate of Return</u> | 0.70% | | 0.70% | 0.70% | 0.70% | 0.70% | 0.70% | 0.70% | | |
| Production & Purchased Power | | | | | | | | | | |
| Production & Purchased Power Demand (Per KWH or KW) | | | 9.72 | 2.18 | 1.68 | 0.008411 | - | 0.008683 | | |
| Production & Purchased Power Demand Margin (Per KWH or KW) | | | 0.01 | 0.01 | 0.00 | 0.000023 | - | 0.000024 | | |
| Production & Purchased Power Energy (Per KWH) | | | 0.036159 | 0.061035 | 0.061035 | 0.060690 | 0.061035 | 0.060690 | | |
| Production & Purchased Power Energy Margin (Per KWH) | | | - | - | - | - | - | - | | |
| Transmission Demand | | | | | | | | | | |
| Transmission Demand (Per KWH or KW) | | | - | - | - | - | - | - | | |
| Transmission Demand Margin (Per KWH or KW) | | | - | - | - | - | - | - | | |
| Total Transmission Demand (Per KWH or KW) | | | - | - | - | - | - | - | | |
| Distribution Demand | | | | | | | | | | |
| Distribution Demand (Per KWH or KW) | | | 2.51 | 2.51 | 2.50 | 0.023564 | 2.51 | 0.014785 | | |
| Distribution Demand Margin (Per KWH or KW) | | | 0.19 | 0.19 | 0.19 | 0.001759 | 0.19 | 0.001111 | | |
| Total Distribution Demand (Per KWH or KW) | | | 2.69 | 2.69 | 2.69 | 0.025324 | 2.69 | 0.015895 | | |
| Distribution Customer | | | | | | | | | | |
| Distribution Customer (Per Customer Per Month) | | | 1,953.08 | 488.06 | 62.98 | 24.61 | 923.38 | 61.88 | | |
| Distribution Customer Margin (Per Customer Per Month) | | | 88.09 | 24.03 | 4.53 | 1.58 | 11.47 | 5.61 | | |
| Total Distribution Customer (Per Customer Per Month) | | | 2,041.17 | 512.09 | 67.51 | 26.19 | 934.84 | 67.49 | | |

FARMERS R.E.C.C.
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2022

| Description | Name | Allocation Vector | Total System | Schedule R - Residential Rate | Schedule R - Residential Time of Day Rate | Schedule C - Comm. & Indust. Service Rate < 50 kW | Schedule C - Comm. & Indust. Service Rate > 50 kW | Residential Off Peak Electric Thermal Storage Tariff | Schedule C - Large Commercial 10% Discount | |
|--|-------|-------------------|--------------|-------------------------------|---|---|---|--|--|--|
| | | | | 1 | 3 | 4 | 5 | 7 | 9 | |
| Unit Revenue Requirement @ Specified Rate of Return | 1.61% | | | 1.61% | 1.61% | 1.61% | 1.61% | 1.61% | 1.61% | |
| Production & Purchased Power | | | | | | | | | | |
| Production & Purchased Power Demand (Per KWH or KW) | | | | 0.008284 | 0.007931 | 6.01 | 1.99 | - | 2.12 | |
| Production & Purchased Power Demand Margin (Per KWH or KW) | | | | 0.000053 | 0.000051 | 0.04 | 0.01 | - | 0.01 | |
| Production & Purchased Power Energy (Per KWH) | | | | 0.061071 | 0.060690 | 0.060282 | 0.060690 | 0.060690 | 0.060690 | |
| Production & Purchased Power Energy Margin (Per KWH) | | | | - | - | - | - | - | - | |
| Transmission Demand | | | | | | | | | | |
| Transmission Demand (Per KWH or KW) | | | | - | - | - | - | - | - | |
| Transmission Demand Margin (Per KWH or KW) | | | | - | - | - | - | - | - | |
| Total Transmission Demand (Per KWH or KW) | | | | - | - | - | - | - | - | |
| Distribution Demand | | | | | | | | | | |
| Distribution Demand (Per KWH or KW) | | | | 0.019037 | 0.018891 | 2.44 | 2.51 | 0.019286 | 2.51 | |
| Distribution Demand Margin (Per KWH or KW) | | | | 0.003294 | 0.003278 | 0.43 | 0.43 | 0.003325 | 0.43 | |
| Total Distribution Demand (Per KWH or KW) | | | | 0.022330 | 0.022169 | 2.87 | 2.94 | 0.022611 | 2.94 | |
| Distribution Customer | | | | | | | | | | |
| Distribution Customer (Per Customer Per Month) | | | | 22.13 | 22.42 | 22.86 | 85.45 | 2.76 | 390.75 | |
| Distribution Customer Margin (Per Customer Per Month) | | | | 3.36 | 3.54 | 3.91 | 11.50 | 0.46 | 29.36 | |
| Total Distribution Customer (Per Customer Per Month) | | | | 25.50 | 25.96 | 26.76 | 96.95 | 3.21 | 420.10 | |

FARMERS R.E.C.C.
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2022

| Description | Name | Allocation Vector | Schedule E - | Schedule | Schedule D - | Net Metering | Schedule LPE-4 | Schedule C - | Lighting | |
|--|-------|-------------------|------------------|------------------------|-------------------------------------|--------------|------------------------------------|------------------------|----------|--|
| | | | Large Industrial | LPC-2 Large Power Rate | Large Comm/Ind Opt Time of Day Rate | Tariff | Large Power Time of DayRate Tariff | TOD Comm - Three Phase | | |
| | | | 10 | 14 | 15 | 20 | 36 | 50 | | |
| Unit Revenue Requirement @ Specified Rate of Return | 1.61% | | 1.61% | 1.61% | 1.61% | 1.61% | 1.61% | 1.61% | | |
| Production & Purchased Power | | | | | | | | | | |
| Production & Purchased Power Demand (Per KWH or KW) | | | 9.72 | 2.18 | 1.68 | 0.008411 | - | 0.008683 | | |
| Production & Purchased Power Demand Margin (Per KWH or KW) | | | 0.03 | 0.01 | 0.01 | 0.000054 | - | 0.000056 | | |
| Production & Purchased Power Energy (Per KWH) | | | 0.036159 | 0.061035 | 0.061035 | 0.060690 | 0.061035 | 0.060690 | | |
| Production & Purchased Power Energy Margin (Per KWH) | | | - | - | - | - | - | - | | |
| Transmission Demand | | | | | | | | | | |
| Transmission Demand (Per KWH or KW) | | | - | - | - | - | - | - | | |
| Transmission Demand Margin (Per KWH or KW) | | | - | - | - | - | - | - | | |
| Total Transmission Demand (Per KWH or KW) | | | - | - | - | - | - | - | | |
| Distribution Demand | | | | | | | | | | |
| Distribution Demand (Per KWH or KW) | | | 2.51 | 2.51 | 2.50 | 0.023564 | 2.51 | 0.014785 | | |
| Distribution Demand Margin (Per KWH or KW) | | | 0.43 | 0.43 | 0.43 | 0.004068 | 0.43 | 0.002568 | | |
| Total Distribution Demand (Per KWH or KW) | | | 2.94 | 2.94 | 2.94 | 0.027632 | 2.94 | 0.017353 | | |
| Distribution Customer | | | | | | | | | | |
| Distribution Customer (Per Customer Per Month) | | | 1,953.08 | 488.06 | 62.98 | 24.61 | 923.38 | 61.88 | | |
| Distribution Customer Margin (Per Customer Per Month) | | | 203.67 | 55.56 | 10.48 | 3.66 | 26.52 | 12.98 | | |
| Total Distribution Customer (Per Customer Per Month) | | | 2,156.75 | 543.62 | 73.46 | 28.26 | 949.89 | 74.86 | | |

**FARMERS R.E.C.C.
Cost of Service Study
Class Allocation**

12 Months Ended December 31, 2022

| Description | Name | Allocation Vector | Total System | Schedule R - Residential Rate 1 | Schedule R - Residential Time of Day Rate 3 | Schedule C - Comm. & Indust. Service Rate < 50 kW 4 | Schedule C - Comm. & Indust. Service Rate > 50 kW 5 | Schedule C - Residential Off Peak Electric Thermal Storage Tariff 7 | Schedule C - Large Commercial 10% Discount 9 |
|---|----------------------------|-------------------|--------------|---------------------------------|---|---|---|---|--|
| Summary of Cost-Based Charges | | | | | | | | | |
| At Current Class Rate of Return | | | 1.42% | -0.49% | -2.77% | 6.92% | 16.03% | -8.94% | 5.37% |
| | Customer Charge (\$/month) | | | 19.62 | 15.03 | 38.80 | 189.95 | (0.09) | 459.24 |
| | Energy Charge (\$/kWh) | | | 0.085898 | 0.080558 | 0.060282 | 0.060690 | 0.059264 | 0.060690 |
| | Demand Charge (\$/kW) | | | - | - | 8.46 | 4.51 | - | 4.63 |
| At Current Total System Rate of Return | | | 0.70% | 0.70% | 0.70% | 0.70% | 0.70% | 0.70% | 0.70% |
| | Customer Charge (\$/month) | | | 23.59 | 23.95 | 24.55 | 90.42 | 2.95 | 403.44 |
| | Energy Charge (\$/kWh) | | | 0.089838 | 0.088951 | 0.060282 | 0.060690 | 0.081414 | 0.060690 |
| | Demand Charge (\$/kW) | | | - | - | 8.66 | 4.69 | - | 4.82 |
| At Specified Total System Rate of Return | | | 1.61% | 1.61% | 1.61% | 1.61% | 1.61% | 1.61% | 0.00% |
| | Customer Charge (\$/month) | | | 25.50 | 25.96 | 26.76 | 96.95 | 3.21 | 420.10 |
| | Energy Charge (\$/kWh) | | | 0.091737 | 0.090840 | 0.060282 | 0.060690 | 0.083301 | 0.060690 |
| | Demand Charge (\$/kW) | | | - | - | 8.93 | 4.94 | - | 5.07 |

FARMERS R.E.C.C.
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2022

| Description | Name | Allocation Vector | Schedule E - | Schedule | Schedule D - | Net Metering | Schedule LPE-4 | Schedule C - | Lighting |
|---|------|-------------------|------------------|------------------------|-------------------------------------|---------------------|------------------------------------|------------------------|----------|
| | | | Large Industrial | LPC-2 Large Power Rate | Large Comm/Ind Opt Time of Day Rate | Net Metering Tariff | Large Power Time of DayRate Tariff | TOD Comm - Three Phase | |
| | | | Rate 10 | Tariff 14 | Rate 15 | Tariff 20 | Tariff 36 | Rate 50 | |
| Summary of Cost-Based Charges | | | | | | | | | |
| At Current Class Rate of Return | | | 12.85% | 6.43% | 16.46% | -15.07% | 24.16% | 10.92% | |
| Customer Charge (\$/month) | | | 3,378.94 | 654.57 | 161.91 | (11.74) | 1,290.22 | 145.48 | |
| Energy Charge (\$/kWh) | | | 0.036159 | 0.061035 | 0.061035 | 0.051695 | 0.061035 | 0.101057 | |
| Demand Charge (\$/kW) | | | 12.24 | 4.69 | 4.21 | - | 2.52 | - | |
| At Current Total System Rate of Return | | | 0.70% | 0.70% | 0.70% | 0.70% | 0.70% | 0.70% | |
| Customer Charge (\$/month) | | | 2,041.17 | 512.09 | 67.51 | 26.19 | 934.84 | 67.49 | |
| Energy Charge (\$/kWh) | | | 0.036159 | 0.061035 | 0.061035 | 0.094448 | 0.061035 | 0.085292 | |
| Demand Charge (\$/kW) | | | 12.43 | 4.88 | 4.37 | - | 2.69 | - | |
| At Specified Total System Rate of Return | | | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | |
| Customer Charge (\$/month) | | | 2,156.75 | 543.62 | 73.46 | 28.26 | 949.89 | 74.86 | |
| Energy Charge (\$/kWh) | | | 0.036159 | 0.061035 | 0.061035 | 0.096787 | 0.061035 | 0.086781 | |
| Demand Charge (\$/kW) | | | 12.69 | 5.14 | 4.62 | - | 2.94 | - | |

EXHIBIT JW-6
COST OF SERVICE STUDY
BILLING DETERMINANTS

FARMERS R.E.C.C.

Summary of Billing Determinants and Demand Analysis

| Rate Class | Code | Average Customers | kWh | Revenue | 12 - Month Individual Customer Demand | Sum of Individual Customer Max Demand | Class Demand During Peak Month | Sum of Coincident Demands | Summer Coincident Demands | Winter Coincident Demands |
|--|------|-------------------|--------------------|----------------------|---------------------------------------|---------------------------------------|--------------------------------|---------------------------|---------------------------|---------------------------|
| Schedule R - Residential Rate | 1 | 24,181 | 319,625,088 | \$ 40,346,229 | 2,440,118 | 313,369 | 133,334 | 872,979 | 223,713 | 649,266 |
| Schedule R - Residential Time of Day Rate | 3 | 2 | 18,646 | \$ 2,252 | 142 | 30 | 10 | 49 | 18 | 31 |
| Schedule C - Comm. & Indust. Service Rate < 50 kW | 4 | 1,716 | 32,075,927 | \$ 3,890,068 | 41,563 | 3,988 | 9,292 | 82,428 | 24,608 | 57,820 |
| Schedule C - Comm. & Indust. Service Rate > 50 kW | 5 | 98 | 52,519,152 | \$ 6,225,669 | 181,444 | 17,016 | 13,538 | 119,203 | 30,620 | 88,583 |
| Residential Off Peak Electric Thermal Storage Tariff | 7 | 112 | 403,834 | \$ 29,328 | 3,114 | 818 | 245 | - | - | - |
| Schedule C - Large Commercial 10% Discount | 9 | 4 | 23,868,610 | \$ 2,332,903 | 59,177 | 5,303 | 4,529 | 41,301 | 10,567 | 30,733 |
| Schedule E - Large Industrial Rate | 10 | 1 | 35,915,472 | \$ 3,141,240 | 70,387 | 6,581 | 5,733 | 50,509 | 11,627 | 38,882 |
| Schedule LPC-2 Large Power Rate Tariff | 14 | 1 | 7,958,400 | \$ 742,949 | 15,248 | 1,273 | 1,128 | 10,979 | 2,699 | 8,280 |
| Schedule D - Large Comm/Ind Opt Time of Day Rate | 15 | 4 | 876,204 | \$ 125,619 | 4,928 | 738 | 574 | 2,724 | 254 | 2,470 |
| Net Metering Tariff | 20 | 65 | 1,188,357 | \$ 80,720 | 11,206 | 1,503 | 505 | 3,296 | 844 | 2,452 |
| Schedule LPE-4 Large Power Time of DayRate Tariff | 36 | 1 | 20,721,477 | \$ 1,938,132 | 45,121 | 4,402 | 3,849 | - | - | - |
| Schedule C - TOD Comm - Three Phase | 50 | 6 | 218,724 | \$ 35,757 | 1,302 | 149 | 113 | 626 | 154 | 473 |
| Lighting | 0 | 126 | 436,568 | \$ 1,064,782 | 1,197 | 107 | 107 | 597 | - | 597 |
| | 0 | 0 | - | - | - | - | - | - | - | - |
| Total | | 26,323 | 495,826,459 | \$ 59,955,648 | 2,874,947 | 355,277 | 172,957 | 1,184,691 | 305,104 | 879,587 |
| Total w/o Lighting | | 26,211 | | | | | | | | |
| | | 26,316 | 502,691,503 | \$ 60,386,323 | < Reported | | | | | |
| | | 7 | (6,865,044) | (430,675) | < Variance | | | | | |
| | | 0.03% | -1.37% | -0.71% | < Variance | | | | | |

FARMERS R.E.C.C.

Summary of Billing Determinants and Demand Analysis

| Rate Class | Code | Rate Class | Average Customers | kWh | Revenue | % KWH | % Revenue |
|--|------|----------------------|-------------------|-------------|---------------|--------|-----------|
| Schedule R - Residential Rate | 1 | Schedule R - Reside | 24,181 | 319,625,088 | \$ 40,346,229 | 64.5% | 67.3% |
| Schedule R - Residential Time of Day Rate | 3 | Schedule R - Reside | 2 | 18,646 | \$ 2,252 | 0.0% | 0.0% |
| Schedule C - Comm. & Indust. Service Rate < 50 kW | 4 | Schedule C - Comm. | 1,716 | 32,075,927 | \$ 3,890,068 | 6.5% | 6.5% |
| Schedule C - Comm. & Indust. Service Rate > 50 kW | 5 | Schedule C - Comm. | 98 | 52,519,152 | \$ 6,225,669 | 10.6% | 10.4% |
| Residential Off Peak Electric Thermal Storage Tariff | 7 | Residential Off Peak | 112 | 403,834 | \$ 29,328 | 0.1% | 0.0% |
| Schedule C - Large Commercial 10% Discount | 9 | Schedule C - Large C | 4 | 23,868,610 | \$ 2,332,903 | 4.8% | 3.9% |
| Schedule E - Large Industrial Rate | 10 | Schedule E - Large I | 1 | 35,915,472 | \$ 3,141,240 | 7.2% | 5.2% |
| Schedule LPC-2 Large Power Rate Tariff | 14 | Schedule LPC-2 La | 1 | 7,958,400 | \$ 742,949 | 1.6% | 1.2% |
| Schedule D - Large Comm/Ind Opt Time of Day Rate | 15 | Schedule D - Large C | 4 | 876,204 | \$ 125,619 | 0.2% | 0.2% |
| Net Metering Tariff | 20 | Net Metering Tariff | 65 | 1,188,357 | \$ 80,720 | 0.2% | 0.1% |
| Schedule LPE-4 Large Power Time of DayRate Tariff | 36 | Schedule LPE-4 Lar | 1 | 20,721,477 | 1,938,132 | 4.2% | 3.2% |
| Schedule C - TOD Comm - Three Phase | 50 | Schedule C - TOD C | 6 | 218,724 | 35,757 | 0.0% | 0.1% |
| Lighting | 0 | Lighting | 126 | 436,568 | 1,064,782 | 0.1% | 1.8% |
| | 0 | 0 | - | - | - | 0.0% | 0.0% |
| Total | | Total | 26,323 | 495,826,459 | \$ 59,955,648 | 100.0% | 100.0% |
| Total w/o Lighting | | | 26,211 | | | | |

FARMERS R.E.C.C.

Summary of Billing Determinants and Demand Analysis

| | | Hours/Mon> | 744 | 720 | 744 | | | | | |
|---|-------------|------------|------------|------------|--------------|-------------------|-------------------|--------------------|--------------------|--------------------|
| <u>Rate Schedule</u> | <u>Code</u> | <u>Oct</u> | <u>Nov</u> | <u>Dec</u> | <u>Total</u> | <u>Max Demand</u> | <u>Peak Month</u> | <u>Coin Demand</u> | <u>Coin Demand</u> | <u>Coin Demand</u> |
| Schedule C - Large Commercial 10% Discount | 9 | 4 | 4 | 4 | 4 | | | | | |
| Energy Usage (kWh) | | 1,992,057 | 1,923,657 | 1,845,657 | 23,868,610 | | | | | |
| Average Demand | | 2,677 | 2,672 | 2,481 | 2,725 | | | | | |
| Diversified Load Factor | | 62.92% | 66.27% | 59.50% | | | | | | |
| Non-Coincident Demand | | 4,256 | 4,031 | 4,169 | 50,065 | | 4,529 | | | |
| Coincidence Factor | | 85.00% | 85.00% | 80.00% | | | | | | |
| Coincident Demand | | 3,617 | 3,427 | 3,335 | 41,301 | | | 41,301 | 10,567 | 30,733 |
| Individual Customer Load Factor | | 52.92% | 56.27% | 49.50% | | | | | | |
| Sum of Individual Customer Demands | | 5,060 | 4,748 | 5,011 | 59,177 | 5,303 | | | | |
| Schedule E - Large Industrial Rate | 10 | 1 | 1 | 1 | 1 | | | | | |
| Kwh's | | 3,304,956 | 3,204,156 | 2,800,956 | 35,915,472 | | | | | |
| Average Demand | | 4,442 | 4,450 | 3,765 | 4,100 | | | | | |
| Diversified Load Factor | | 77.50% | 77.62% | 67.21% | | | | | | |
| Non-Coincident Demand | | 5,732 | 5,733 | 5,602 | 61,477 | | 5,733 | | | |
| Coincidence Factor | | 85.00% | 85.00% | 80.00% | | | | | | |
| Coincident Demand | | 4,872 | 4,873 | 4,481 | 50,509 | | | 50,509 | 11,627 | 38,882 |
| Individual Customer Load Factor | | 67.50% | 67.62% | 57.21% | | | | | | |
| Sum of Individual Customer Demands | | 6,581 | 6,581 | 6,581 | 70,387 | 6,581 | | | | |
| Schedule LPC-2 Large Power Rate Tariff | 14 | 1 | 1 | 1 | 1 | | | | | |
| Kwh's | | 661,200 | 634,200 | 642,000 | 7,958,400 | | | | | |
| Average Demand | | 889 | 881 | 863 | 908 | | | | | |
| Diversified Load Factor | | 79.83% | 79.22% | 77.81% | | | | | | |
| Non-Coincident Demand | | 1,113 | 1,112 | 1,109 | 13,375 | | 1,128 | | | |
| Coincidence Factor | | 85.00% | 85.00% | 80.00% | | | | | | |
| Coincident Demand | | 946 | 945 | 887 | 10,979 | | | 10,979 | 2,699 | 8,280 |
| Individual Customer Load Factor | | 69.83% | 69.22% | 67.81% | | | | | | |
| Sum of Individual Customer Demands | | 1,273 | 1,273 | 1,273 | 15,248 | 1,273 | | | | |
| Schedule D - Large Comm/Ind Opt Time of Day Rate | 15 | 4 | 4 | 4 | 4 | | | | | |
| Kwh's | | 23,667 | 51,267 | 87,667 | 876,204 | | | | | |
| Average Demand | | 32 | 71 | 118 | 100 | | | | | |
| Diversified Load Factor | | 160.05% | 22.47% | 39.15% | | | | | | |
| Non-Coincident Demand | | 20 | 317 | 301 | 3,329 | | 574 | | | |
| Coincidence Factor | | 85.00% | 85.00% | 80.00% | | | | | | |
| Coincident Demand | | 17 | 269 | 241 | 2,724 | | | 2,724 | 254 | 2,470 |
| Individual Customer Load Factor | | 150.05% | 12.47% | 29.15% | | | | | | |
| Sum of Individual Customer Demands | | 21 | 571 | 404 | 4,928 | 738 | | | | |
| Net Metering Tariff | 20 | 71 | 73 | 72 | 65 | | | | | |
| Kwh's | | 95,352 | 95,105 | 114,530 | 1,188,357 | | | | | |
| Average Demand | | 128 | 132 | 154 | 136 | | | | | |
| Diversified Load Factor | | 49.08% | 33.90% | 30.49% | | | | | | |
| Non-Coincident Demand | | 261 | 390 | 505 | 3,533 | | 505 | | | |
| Coincidence Factor | | 93.00% | 90.00% | 90.00% | | | | | | |
| Coincident Demand | | 243 | 351 | 454 | 3,296 | | | 3,296 | 844 | 2,452 |
| Individual Customer Load Factor | | 18.00% | 18.00% | 18.00% | | | | | | |
| Sum of Individual Customer Demands | | 712 | 734 | 855 | 11,206 | 1,503 | | | | |

FARMERS R.E.C.C.

Summary of Billing Determinants and Demand Analysis

| | Hours/Mon> | 744 | 672 | 744 | 720 | 744 | 720 | 744 | 744 | 720 |
|--|-------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| Rate Schedule | Code | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep |
| Schedule LPE-4 Large Power Time of DayRate Tariff | 36 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| Kwh's | | 1,333,574 | 1,539,275 | 1,439,956 | 1,721,533 | 1,674,823 | 1,751,161 | 1,929,375 | 1,759,256 | 2,208,339 |
| Average Demand | | 1,792 | 2,291 | 1,935 | 2,391 | 2,251 | 2,432 | 2,593 | 2,365 | 3,067 |
| Diversified Load Factor | | 62.74% | 80.62% | 70.54% | 83.88% | 77.02% | 80.08% | 70.20% | 64.77% | 79.68% |
| Non-Coincident Demand | | 2,857 | 2,841 | 2,744 | 2,851 | 2,923 | 3,037 | 3,694 | 3,651 | 3,849 |
| Coincidence Factor | | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| Coincident Demand | | - | - | - | - | - | - | - | - | - |
| Individual Customer Load Factor | | 52.74% | 70.62% | 60.54% | 73.88% | 67.02% | 70.08% | 60.20% | 54.77% | 69.68% |
| Sum of Individual Customer Demands | | 3,398 | 3,244 | 3,197 | 3,236 | 3,359 | 3,470 | 4,307 | 4,317 | 4,402 |
| Schedule C - TOD Comm - Three Phase | 50 | 7 | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 6 |
| Kwh's | | 14,171 | 12,987 | 14,459 | 24,687 | 25,146 | 17,599 | 19,595 | 15,233 | 15,204 |
| Average Demand | | 19 | 19 | 19 | 34 | 34 | 24 | 26 | 20 | 21 |
| Diversified Load Factor | | 48.53% | 46.89% | 66.86% | 41.89% | 45.41% | 35.04% | 46.57% | 62.80% | 66.58% |
| Non-Coincident Demand | | 39 | 41 | 29 | 82 | 74 | 70 | 57 | 33 | 32 |
| Coincidence Factor | | 75.00% | 93.00% | 90.00% | 90.00% | 95.00% | 95.00% | 98.00% | 98.00% | 95.00% |
| Coincident Demand | | 29 | 38 | 26 | 74 | 71 | 66 | 55 | 32 | 30 |
| Individual Customer Load Factor | | 23.00% | 23.00% | 23.00% | 23.00% | 23.00% | 23.00% | 23.00% | 23.00% | 23.00% |
| Sum of Individual Customer Demands | | 83 | 84 | 84 | 149 | 147 | 106 | 115 | 89 | 92 |
| Lighting | | 125 | 127 | 128 | 126 | 127 | 129 | 126 | 122 | 125 |
| Kwh's | | 37,275 | 37,413 | 37,438 | 36,965 | 36,247 | 36,193 | 36,096 | 35,480 | 36,074 |
| Average Demand | | 50 | 51.96 | 50 | 51 | 49 | 48.65 | 53.71 | 48 | 50 |
| Diversified Load Factor | | 50.00% | 50.00% | 50.00% | 50.00% | 50.00% | 50.00% | 50.00% | 50.00% | 50.00% |
| Non-Coincident Demand | | 100 | 104 | 101 | 103 | 97 | 97 | 107 | 95 | 100 |
| Coincidence Factor | | 100.00% | 100.00% | 100.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| Coincident Demand | | 100 | 104 | 101 | - | - | - | - | - | - |
| Individual Customer Load Factor | | 50.00% | 50.00% | 50.00% | 50.00% | 50.00% | 50.00% | 50.00% | 50.00% | 50.00% |
| Sum of Individual Customer Demands | | 100 | 104 | 101 | 103 | 97 | 97 | 107 | 95 | 100 |
| Sales | | 45,487,975 | 52,097,145 | 40,116,559 | 37,924,964 | 32,919,731 | 38,311,441 | 47,264,652 | 45,597,986 | 41,975,224 |
| Metered CP | | 109,797 | 95,583 | 89,604 | 76,242 | 88,846 | 101,745 | 103,408 | 99,951 | 95,743 |
| Calculated CP | | 109,797 | 95,583 | 89,604 | 76,242 | 88,846 | 101,745 | 103,408 | 99,951 | 95,743 |
| Difference | | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | 0 |

FARMERS R.E.C.C.

Summary of Billing Determinants and Demand Analysis

| | Hours/Mon> | 744 | 720 | 744 | | | | | | |
|--|-------------|------------|------------|------------|--------------|-------------------|-------------------|--------------------|--------------------|--------------------|
| <u>Rate Schedule</u> | <u>Code</u> | <u>Oct</u> | <u>Nov</u> | <u>Dec</u> | <u>Total</u> | <u>Max Demand</u> | <u>Peak Month</u> | <u>Coin Demand</u> | <u>Coin Demand</u> | <u>Coin Demand</u> |
| Schedule LPE-4 Large Power Time of DayRate Tariff | 36 | 1 | 1 | 1 | 1 | | | | | |
| Kwh's | | 1,884,393 | 1,764,927 | 1,714,865 | 20,721,477 | | | | | |
| Average Demand | | 2,533 | 2,451 | 2,305 | 2,365 | | | | | |
| Diversified Load Factor | | 70.16% | 71.63% | 67.58% | | | | | | |
| Non-Coincident Demand | | 3,610 | 3,422 | 3,411 | 38,889 | | 3,849 | | | |
| Coincidence Factor | | 0.00% | 0.00% | 0.00% | | | | | | |
| Coincident Demand | | - | - | - | 0% | | | 0% | 0% | 0% |
| Individual Customer Load Factor | | 60.16% | 61.63% | 57.58% | | | | | | |
| Sum of Individual Customer Demands | | 4,210 | 3,977 | 4,003 | 45,121 | 4,402 | | | | |
| Schedule C - TOD Comm - Three Phase | 50 | 6 | 6 | 6 | 6 | | | | | |
| Kwh's | | 22,560 | 22,003 | 15,080 | 218,724 | | | | | |
| Average Demand | | 30 | 31 | 20 | 25 | | | | | |
| Diversified Load Factor | | 55.33% | 27.02% | 35.53% | | | | | | |
| Non-Coincident Demand | | 55 | 113 | 57 | 681 | | 113 | | | |
| Coincidence Factor | | 93.00% | 90.00% | 90.00% | | | | | | |
| Coincident Demand | | 51 | 102 | 51 | 626 | | | 626 | 154 | 473 |
| Individual Customer Load Factor | | 23.00% | 23.00% | 23.00% | | | | | | |
| Sum of Individual Customer Demands | | 132 | 133 | 88 | 1,302 | 149 | | | | |
| Lighting | | 123 | 123 | 125 | 126 | | | | | |
| Kwh's | | 36,004 | 35,484 | 35,899 | 436,568 | | | | | |
| Average Demand | | 48 | 49 | 48 | 50 | | | | | |
| Diversified Load Factor | | 50.00% | 50.00% | 50.00% | | | | | | |
| Non-Coincident Demand | | 97 | 99 | 97 | 1,197 | | 107 | | | |
| Coincidence Factor | | 100.00% | 100.00% | 100.00% | | | | | | |
| Coincident Demand | | 97 | 99 | 97 | 597 | | | 597 | - | 597 |
| Individual Customer Load Factor | | 50.00% | 50.00% | 50.00% | | | | | | |
| Sum of Individual Customer Demands | | 97 | 99 | 97 | 1,197 | 107 | | | | |
| Sales | | 34,893,353 | 34,923,370 | 43,877,491 | 495,389,891 | | | | | |
| Metered CP | | 76,380 | 101,248 | 146,144 | 1,184,691 | | | | | |
| Calculated CP | | 76,380 | 101,248 | 146,144 | 1,184,691 | | | | | |
| Difference | | 0 | (0) | (0) | 0 | | | | | |

EXHIBIT JW-7
COST OF SERVICE STUDY
PURCHASED POWER, METERS
AND SERVICES

FARMERS R.E.C.C.
Purchased Power

| # | Item | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | TOTAL |
|----|--------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-----------------------|--------------|-------------|
| 1 | RATE E2 TOTAL | | | | | | | | | | | | | |
| 2 | Billing Demand | 104,707 | 92,930 | 87,835 | 71,272 | 84,432 | 97,252 | 99,023 | 94,415 | 89,395 | 70,764 | 96,972 | 145,243 | 1,134,240 |
| 3 | KWH | 58,271,478 | 43,459,198 | 37,685,534 | 32,842,440 | 34,182,918 | 41,879,401 | 46,819,392 | 43,119,273 | 34,498,916 | 31,059,327 | 37,690,052 | 48,576,125 | 490,084,054 |
| 4 | Demand \$ | 609,171 | 605,905 | 572,662 | 460,094 | 543,678 | 634,082 | 646,159 | 616,200 | 582,855 | 462,508 | 633,228 | 946,981 | 7,313,523 |
| 5 | Energy \$ | 2,694,430 | 2,022,088 | 1,755,458 | 1,530,599 | 1,640,821 | 2,011,408 | 2,245,737 | 2,069,674 | 1,651,900 | 1,447,977 | 1,755,740 | 2,259,076 | 23,084,908 |
| 6 | Metering \$ | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 28,992 |
| 7 | Sub/Wheeling \$ | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 707,594 |
| 8 | FAC \$ | 436,521 | 431,984 | 377,232 | 244,019 | 241,673 | 384,453 | 771,585 | 640,751 | 679,284 | 660,944 | 573,264 | 745,156 | 6,186,866 |
| 9 | ES \$ | 521,783 | 425,751 | 290,201 | 353,088 | 404,773 | 567,567 | 657,811 | 489,566 | 341,276 | 358,590 | 456,566 | 648,032 | 5,515,004 |
| 10 | TOTAL \$ | 62,699,473 | 47,099,239 | 40,830,305 | 35,562,895 | 37,159,678 | 45,635,546 | 51,301,090 | 47,091,262 | 37,904,999 | 34,121,493 | 41,267,205 | 53,381,996 | 534,055,181 |
| 11 | RATE C TOTAL | | | | | | | | | | | | | |
| 12 | Billing Demand | 5,504 | 5,434 | 5,338 | 5,338 | 5,338 | 5,338 | 5,338 | 5,536 | 6,348 | 6,348 | 6,348 | 6,348 | 68,556 |
| 13 | KWH | 41,225 | 2,778,374 | 2,984,250 | 2,610,555 | 3,029,850 | 3,167,196 | 3,247,402 | 3,530,838 | 3,303,076 | 3,206,279 | 2,741,952 | 2,539,200 | 33,180,197 |
| 14 | Demand \$ | 110,703 | 40,701 | 39,982 | 39,982 | 39,982 | 39,982 | 39,982 | 41,465 | 47,547 | 47,547 | 47,547 | 47,547 | 582,967 |
| 15 | Energy \$ | 151 | 110,813 | 119,024 | 104,119 | 120,843 | 126,320 | 129,519 | 140,824 | 131,710 | 127,879 | 109,360 | 87,728 | 1,308,290 |
| 16 | FAC \$ | 21,816 | 27,617 | 29,872 | 19,396 | 21,421 | 29,075 | 53,517 | 52,468 | 65,038 | 68,230 | 41,705 | 31,033 | 461,188 |
| 17 | ES \$ | 24,116 | 24,433 | 19,813 | 25,146 | 29,761 | 35,871 | 39,385 | 33,922 | 28,024 | 33,186 | 29,990 | 33,186 | 350,506 |
| 18 | TOTAL \$ | 197,860 | 203,564 | 208,691 | 188,643 | 212,007 | 231,248 | 262,403 | 268,679 | 272,349 | 276,842 | 228,602 | 193,167 | 2,744,055 |
| 19 | TOTAL | | | | | | | | | | | | | |
| 20 | Billing Demand | 110,211 | 98,364 | 93,173 | 76,610 | 89,770 | 102,590 | 104,361 | 99,951 | 95,743 | 77,112 | 103,320 | 151,591 | 1,202,796 |
| 21 | KWH | 58,312,703 | 46,237,572 | 40,669,784 | 35,452,995 | 37,212,768 | 45,046,597 | 50,066,794 | 46,650,111 | 37,801,992 | 34,265,606 | 40,432,004 | 51,115,325 | 523,264,251 |
| 22 | Demand \$ | 719,874 | 646,606 | 612,644 | 500,076 | 583,660 | 674,064 | 686,141 | 657,665 | 630,402 | 510,055 | 680,775 | 994,528 | 7,896,490 |
| 23 | Energy \$ | 2,694,581 | 2,132,901 | 1,874,482 | 1,634,718 | 1,761,664 | 2,137,728 | 2,375,256 | 2,210,498 | 1,783,610 | 1,575,856 | 1,865,100 | 2,346,804 | 24,393,198 |
| 24 | Metering \$ | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 2,416 | 28,992 |
| 25 | Sub/Wheeling \$ | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 58,967 | 707,594 |
| 26 | FAC \$ | 458,337 | 459,601 | 407,104 | 263,415 | 263,094 | 413,528 | 825,102 | 693,219 | 744,322 | 729,174 | 614,969 | 776,189 | 6,648,054 |
| 27 | ES \$ | 545,899 | 450,184 | 310,014 | 378,234 | 434,534 | 603,438 | 697,196 | 523,488 | 369,300 | 391,776 | 486,556 | 674,891 | 5,865,510 |
| 28 | TOTAL \$ | 4,480,074 | 3,750,675 | 3,265,627 | 2,837,826 | 3,104,335 | 3,890,141 | 4,645,078 | 4,146,253 | 3,589,017 | 3,268,244 | 3,708,783 | 4,853,795 | 45,539,848 |
| 29 | DLC TOTAL | | | | | | | | | | | | | |
| 30 | DLC \$ | (3,935) | (1,808) | (3,939) | (3,958) | (3,967) | (261) | (3,970) | (271) | - | (3,971) | (3,978) | (3,983) | (34,041) |
| 31 | ES \$ | (546) | (247) | (413) | (609) | (648) | (48) | (701) | (39) | - | (541) | (601) | (643) | (5,036) |
| 32 | TOTAL \$ | (4,481) | (2,055) | (4,352) | (4,567) | (4,615) | (309) | (4,671) | (310) | - | (4,512) | (4,579) | (4,626) | (39,077) |
| 33 | GREEN POWER | | | | | | | | | | | | | |
| 34 | Green Power \$ | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 336 |
| 35 | PJM Auction Credit Demand Chg | (11,284) | (10,192) | (11,284) | (10,920) | (11,284) | (3,900) | (4,030) | (4,030) | (3,900) | (4,030) | (3,900) | (4,030) | (82,784) |
| 36 | Panel Production Credit | (40) | (40) | (55) | (67) | (77) | (112) | (157) | (111) | (148) | (109) | (77) | (52) | (1,045) |
| 37 | | | | | | | | | | | | | | |
| 38 | TOTAL EKPC \$ | 4,464,297 | 3,738,416 | 3,249,964 | 2,822,300 | 3,088,387 | 3,885,848 | 4,636,248 | 4,141,830 | 3,584,997 | 3,259,621 | 3,700,255 | 4,845,115 | 45,417,278 |
| 39 | TOTAL EKPC w/o Panel Credit \$ | 4,464,337 | 3,738,456 | 3,250,019 | 2,822,367 | 3,088,464 | 3,885,960 | 4,636,405 | 4,141,941 | 3,585,145 | 3,259,730 | 3,700,332 | 4,845,167 | 45,418,323 |
| 40 | | | | | | | | | | | | | | |
| 41 | Landfill KWH | 312,700 | 294,161 | - | 96,312 | 309,714 | 405,023 | 433,621 | 445,621 | 427,409 | 420,788 | 405,165 | 373,885 | 3,924,399 |
| 42 | Landfill \$ | 29,088 | 43,961 | 31,088 | 33,706 | 44,703 | 46,224 | 44,798 | 37,224 | 30,507 | 46,563 | 15,168 | 23,166 | 426,196 |
| 43 | | | | | | | | | | | | | | |
| 44 | TOTAL \$ | 4,493,385 | 3,782,377 | 3,281,052 | 2,856,006 | 3,133,090 | 3,932,072 | 4,681,046 | 4,179,054 | 3,615,504 | 3,306,184 | 3,715,423 | 4,868,281 | 45,843,474 |
| 45 | | | | | | | | | | | | | | |
| 46 | Total CP Demand | 109,797 | 95,583 | 89,604 | 76,242 | 88,846 | 101,745 | 103,408 | 99,951 | 95,743 | 76,380 | 101,248 | 146,144 | 1,184,691 |
| 47 | Total NCP Demand | 126,253 | 114,292 | 103,003 | 84,627 | 93,814 | 111,166 | 113,751 | 106,922 | 102,913 | 83,405 | 107,821 | 161,023 | 1,308,990 |
| 48 | | | | | | | | | | | | | | |
| 49 | SubTotal Demand \$ | \$ 781,257 | \$ 707,989 | \$ 674,027 | \$ 561,459 | \$ 645,043 | \$ 735,447 | \$ 747,524 | \$ 719,048 | \$ 691,775 | \$ 571,438 | \$ 742,158 | \$ 1,055,911 | 8,633,076 |
| 50 | SubTotal Energy \$ | \$ 3,152,918 | \$ 2,592,502 | \$ 2,281,586 | \$ 1,898,133 | \$ 2,024,758 | \$ 2,551,256 | \$ 3,200,358 | \$ 2,903,717 | \$ 2,527,932 | \$ 2,305,030 | \$ 2,480,069 | \$ 3,122,993 | 31,041,252 |
| 51 | SubTotal \$ | \$ 3,934,175 | \$ 3,300,491 | \$ 2,955,613 | \$ 2,459,592 | \$ 2,669,801 | \$ 3,286,703 | \$ 3,947,882 | \$ 3,622,765 | \$ 3,219,707 | \$ 2,876,468 | \$ 3,222,227 | \$ 4,178,904 | 39,674,328 |
| 52 | SubTotal Demand % | 0.20 | 0.21 | 0.23 | 0.23 | 0.24 | 0.22 | 0.19 | 0.20 | 0.21 | 0.20 | 0.23 | 0.25 | 0.22 |
| 53 | SubTotal Energy % | 0.80 | 0.79 | 0.77 | 0.77 | 0.76 | 0.78 | 0.81 | 0.80 | 0.79 | 0.80 | 0.77 | 0.75 | 0.78 |
| 54 | | | | | | | | | | | | | | |
| 55 | Reconciliation | | | | | | | | | | | Total Purchased Power | | 45,844,519 |
| 56 | | | | | | | | | | | | Acct 555 | | 45,844,519 |
| 57 | | | | | | | | | | | | Variance | | - |

FARMERS R.E.C.C.
Meter Costs

| # | Rate | Rate Code | Installed Meters | Avg Meter Cost | Total Cost | Allocation Factor |
|----|--|-----------|------------------|----------------|------------------|-------------------|
| 1 | Schedule R - Residential Rate | 1 | 24,181 | 225 | 5,440,725 | 85.23% |
| 3 | Schedule R - Residential Time of Day Rate | 3 | 2 | 321 | 642 | 0.01% |
| 4 | Schedule C - Comm. & Indust. Service Rate < 50 kW | 4 | 1,716 | 321 | 550,836 | 8.63% |
| 5 | Schedule C - Comm. & Indust. Service Rate > 50 kW | 5 | 98 | 2,330 | 228,340 | 3.58% |
| 6 | Residential Off Peak Electric Thermal Storage Tariff | 7 | 112 | 225 | 25,200 | 0.39% |
| 8 | Schedule C - Large Commercial 10% Discount | 9 | 4 | 13,430 | 53,720 | 0.84% |
| 9 | Schedule E - Large Industrial Rate | 10 | 1 | 13,430 | 13,430 | 0.21% |
| 10 | Schedule LPC-2 Large Power Rate Tariff | 14 | 1 | 13,430 | 13,430 | 0.21% |
| 11 | Schedule D - Large Comm/Ind Opt Time of Day Rate | 15 | 4 | 2,330 | 9,320 | 0.15% |
| 12 | Net Metering Tariff | 20 | 65 | 321 | 20,865 | 0.33% |
| 14 | Schedule LPE-4 Large Power Time of DayRate Tariff | 36 | 1 | 13,430 | 13,430 | 0.21% |
| 15 | Schedule C - TOD Comm - Three Phase | 50 | 6 | 2,330 | 13,980 | 0.22% |
| 16 | Lighting | 0 | 126 | - | - | 0.00% |
| 17 | Total | | 26,317 | | 6,383,918 | 100.00% |

FARMERS R.E.C.C.
Service Costs

| # | Rate | Rate Code | Average Number of Services | Average Service Cost | Total Cost | Allocation Factor |
|----------|--|------------------|-----------------------------------|-----------------------------|-------------------|--------------------------|
| 1 | Schedule R - Residential Rate | 1 | 24,181 | 2,390 | 57,792,590 | 86.42% |
| 3 | Schedule R - Residential Time of Day Rate | 3 | 2 | 2,390 | 4,780 | 0.01% |
| 4 | Schedule C - Comm. & Indust. Service Rate < 50 kW | 4 | 1,716 | 3,634 | 6,235,944 | 9.32% |
| 5 | Schedule C - Comm. & Indust. Service Rate > 50 kW | 5 | 98 | 17,000 | 1,666,000 | 2.49% |
| 6 | Residential Off Peak Electric Thermal Storage Tariff | 7 | 112 | - | - | 0.00% |
| 8 | Schedule C - Large Commercial 10% Discount | 9 | 4 | 17,000 | 68,000 | 0.10% |
| 9 | Schedule E - Large Industrial Rate | 10 | 1 | 605,120 | 605,120 | 0.90% |
| 10 | Schedule LPC-2 Large Power Rate Tariff | 14 | 1 | 105,400 | 105,400 | 0.16% |
| 11 | Schedule D - Large Comm/Ind Opt Time of Day Rate | 15 | 4 | 21,000 | 84,000 | 0.13% |
| 12 | Net Metering Tariff | 20 | 65 | 2,790 | 181,350 | 0.27% |
| 14 | Schedule LPE-4 Large Power Time of DayRate Tariff | 36 | 1 | - | - | 0.00% |
| 15 | Schedule C - TOD Comm - Three Phase | 50 | 6 | 22,000 | 132,000 | 0.20% |
| 16 | Lighting | 0 | 126 | - | - | 0.00% |
| 17 | Total | | 26,323 | | | 100.00% |

EXHIBIT JW-8
COST OF SERVICE STUDY
ZERO INTERCEPT ANALYSIS

FARMERS R.E.C.C.
 Zero Intercept & Minimum System Analyses

Account 365 - Overhead Conductors and Devices

| Description | Size | Cost | Quantity | Actual | Linear Regression Inputs | | |
|----------------------------------|--------|------------------|------------|----------------------------|--------------------------|----------|------------|
| | | | | Unit Cost (\$ per Unit) | y*n^0.5 | n^0.5 | xn^0.5 |
| CONDUCTOR,ACSR, #4 | 41.74 | \$ 2,029,115.38 | 20,655,323 | 0.10 | 446.47 | 4,544.81 | 189,700.48 |
| CONDUCTOR,ACSR, #2 | 66.37 | \$ 4,515,774.03 | 10,068,391 | 0.45 | 1,423.15 | 3,173.07 | 210,593.67 |
| CONDUCTOR,ACSR,1/0 | 105.53 | \$ 1,887,475.18 | 5,249,760 | 0.36 | 823.78 | 2,291.24 | 241,796.37 |
| CONDUCTOR,ACSR,2/0 | 133.07 | \$ 7,394.15 | 79,472 | 0.09 | 26.23 | 281.91 | 37,514.03 |
| CONDUCTOR,ACSR,3/0 | 167.80 | \$ 48,624.75 | 318,662 | 0.15 | 86.14 | 564.50 | 94,723.36 |
| CONDUCTOR,ACSR,4/0 | 211.59 | \$ 757,903.52 | 1,209,989 | 0.63 | 689.01 | 1,099.99 | 232,750.14 |
| CONDUCTOR,ACSR,12/7,PETREL ,101 | 249.82 | \$ 88,534.04 | 25,274 | 3.50 | 556.89 | 158.98 | 39,715.24 |
| CONDUCTOR,ACSR,397 | 397.00 | \$ 1,002,358.53 | 929,139 | 1.08 | 1,039.88 | 963.92 | 382,675.67 |
| CONDUCTOR,ALUMOWELD ,STRAND, 452 | 452.00 | \$ 16,077.89 | 75,969 | 0.21 | 58.33 | 275.62 | 124,582.38 |
| CONDUCTOR,AAC,37,ARBUTUS | 37.00 | \$ 15,945.00 | 8,265 | 1.93 | 175.39 | 90.91 | 3,363.75 |
| CONDUCTOR,COPPER, #6 | 26.25 | \$ 147.26 | 2,983 | 0.05 | 2.70 | 54.62 | 1,433.75 |
| CONDUCTOR,COPPER, #4 | 41.74 | \$ 232.85 | 3,318 | 0.07 | 4.04 | 57.60 | 2,404.31 |
| CONDUCTOR,COPPER, #2 | 66.37 | \$ 2,094.35 | 25,712 | 0.08 | 13.06 | 160.35 | 10,642.40 |
| CONDUCTOR,COPPER,1/0 | 105.53 | \$ 11,360.33 | 89,991 | 0.13 | 37.87 | 299.98 | 31,657.72 |
| CONDUCTOR,COPPER,2/0 | 133.07 | \$ 625.55 | 250 | 2.50 | 39.56 | 15.81 | 2,104.05 |
| CONDUCTOR,CWC ,#5A | 33.10 | \$ 25,699.85 | 796,292 | 0.03 | 28.80 | 892.35 | 29,537.74 |
| CONDUCTOR,CWC ,#6A | 26.25 | \$ 6,276.30 | 197,275 | 0.03 | 14.13 | 444.16 | 11,659.11 |
| CONDUCTOR,STEEL, #6 | 26.25 | \$ 102.78 | 7,111 | 0.01 | 1.22 | 84.33 | 2,213.58 |
| TOTAL | | \$ 10,415,741.74 | 39,743,176 | | | | |

Zero Intercept Linear Regression Results

| | |
|-------------------------------|---------|
| Size Coefficient (\$ per MCM) | 0.00266 |
| Zero Intercept (\$ per Unit) | 0.07108 |
| R-Square | 0.8065 |

LINEST Array

| | |
|---------|-----------|
| 0.00266 | 0.07108 |
| 0.00060 | 0.05750 |
| 0.80651 | 241.33038 |

Plant Classification

| | |
|---|---------------|
| Total Number of Units | 39,743,176 |
| Zero Intercept (\$/Unit) | \$ 0.07 |
| Minimum System (\$/Unit) | \$ 0.014 |
| Use Min System (M) or Zero Intercept (Z)? | Z |
| Zero Intercept or Min System Cost (\$) | \$ 2,825,038 |
| Total Cost of Sample | \$ 10,415,742 |
| Percentage of Total | 0.2712 |
| Percentage Classified as Customer-Related | 27.12% |
| Percentage Classified as Demand-Related | 72.88% |

FARMERS R.E.C.C.
Zero Intercept & Minimum System Analyses

Account 367 - Underground Conductors and Devices

| Description | Size | Cost | Quantity | Actual Unit Cost (\$ per Unit) | Linear Regression Inputs | | |
|----------------------------------|--------|------------------------|----------------|--------------------------------------|--------------------------|--------|-----------|
| | | | | | y*n^0.5 | n^0.5 | xn^0.5 |
| CABLE,URD,PRIMARY,ALUM, #2 | 66.37 | \$ 3,774.54 | 3,077 | 1.23 | 68.05 | 55.47 | 3,681.54 |
| CABLE,URD,PRIMARY,ALUM,25KV, #1 | 83.69 | \$ 28,087.47 | 8,440 | 3.33 | 305.73 | 91.87 | 7,688.56 |
| CABLE,URD,PRIMARY,ALUM,25KV, 1/0 | 105.53 | \$ 916,811.80 | 242,510 | 3.78 | 1,861.72 | 492.45 | 51,969.06 |
| CABLE,URD,PRIMARY,ALUM,15KV,4/0 | 211.59 | \$ 8,651.48 | 1,773 | 4.88 | 205.46 | 42.11 | 8,909.51 |
| CABLE,URD,PRIMARY,ALUM,25KV, 4/0 | 211.59 | \$ 131,046.72 | 19,530 | 6.71 | 937.72 | 139.75 | 29,569.93 |
| CABLE,URD,PRIMARY,25KV,500,ALUM | 500.00 | \$ 215,660.41 | 14,155 | 15.24 | 1,812.66 | 118.97 | 59,487.39 |
| CABLE,URD,PRIMARY,25KV,750,ALUM | 750.00 | \$ 149,092.41 | 10,214 | 14.60 | 1,475.22 | 101.06 | 75,798.25 |
| TOTAL | | \$ 1,453,124.83 | 299,699 | | | | |

Zero Intercept Linear Regression Results

| | |
|-------------------------------|---------|
| Size Coefficient (\$ per MCM) | 0.02103 |
| Zero Intercept (\$ per Unit) | 1.63899 |
| R-Square | 0.9762 |

LINEST Array

| | |
|---------|-----------|
| 0.02103 | 1.63899 |
| 0.00280 | 0.58433 |
| 0.97617 | 217.73319 |

Plant Classification

| | |
|---|--------------|
| Total Number of Units | 299,699 |
| Zero Intercept (\$/Unit) | \$ 1.64 |
| Minimum System (\$/Unit) | \$ 1.23 |
| Use Min System (M) or Zero Intercept (Z)? | Z |
| Zero Intercept or Min System Cost (\$) | \$ 491,204 |
| Total Cost of Sample | \$ 1,453,125 |
| Percentage of Total | 0.3380 |
| Percentage Classified as Customer-Related | 33.80% |
| Percentage Classified as Demand-Related | 66.20% |

FARMERS R.E.C.C.
Zero Intercept & Minimum System Analyses

Account 368 - Line Transformers

| Description | Size | Cost | Quantity | Actual | Linear Regression Inputs | | | NARUC CAM * | |
|------------------------------------|----------|-------------------------|---------------|----------------------------|--------------------------|-----------|------------|-------------|---------------|
| | | | | Unit Cost (\$ per Unit) | $y*n^{0.5}$ | $n^{0.5}$ | $xn^{0.5}$ | Incl? | Qty |
| TRANSFORMER 5KVA CONV | 5.00 | \$ 29,810.00 | 34 | 876.76 | 5,112.37 | 5.83 | 29.15 | 1 | 34 |
| TRANSFORMER 10KVA CONV | 10.00 | \$ 1,106,380.46 | 1,593 | 694.53 | 27,720.22 | 39.91 | 399.12 | 1 | 1,593 |
| TRANSFORMER 15KVA CONV | 15.00 | \$ 6,974,686.45 | 8,661 | 805.30 | 74,944.66 | 93.06 | 1,395.97 | 1 | 8,661 |
| TRANSFORMER 25KVA CONV | 25.00 | \$ 3,660,396.21 | 3,989 | 917.62 | 57,955.69 | 63.16 | 1,578.96 | 1 | 3,989 |
| TRANSFORMER 37 1/2KVA CONV | 37.50 | \$ 634,518.45 | 529 | 1,199.47 | 27,587.76 | 23.00 | 862.50 | 1 | 529 |
| TRANSFORMER 50KVA CONV | 50.00 | \$ 477,527.86 | 325 | 1,469.32 | 26,488.48 | 18.03 | 901.39 | 1 | 325 |
| TRANSFORMER 75KVA CONV | 75.00 | \$ 307,526.81 | 140 | 2,196.62 | 25,990.76 | 11.83 | 887.41 | 0 | - |
| TRANSFORMER 100KVA CONV | 100.00 | \$ 166,883.39 | 80 | 2,086.04 | 18,658.13 | 8.94 | 894.43 | 0 | - |
| TRANSFORMER 167KVA CONV | 167.00 | \$ 85,757.67 | 37 | 2,317.77 | 14,098.47 | 6.08 | 1,015.82 | 0 | - |
| TRANSFORMER 250KVA & 333KVA CONV | 333.00 | \$ 28,161.91 | 8 | 3,520.24 | 9,956.74 | 2.83 | 941.87 | 0 | - |
| TRANSFORMER 500KVA AUTO | 500.00 | \$ 623,033.29 | 121 | 5,149.04 | 56,639.39 | 11.00 | 5,500.00 | 0 | - |
| TRANSFORMER 1000KVA AUTO | 1,000.00 | \$ 51,274.84 | 6 | 8,545.81 | 20,932.87 | 2.45 | 2,449.49 | 0 | - |
| TRANSFORMER PAD MT 3P 75/300KVA | 300.00 | \$ 252,807.86 | 32 | 7,900.25 | 44,690.54 | 5.66 | 1,697.06 | 0 | - |
| TRANSFORMER PAD MT 3PHASE 500KVA | 500.00 | \$ 305,410.00 | 31 | 9,851.94 | 54,853.26 | 5.57 | 2,783.88 | 0 | - |
| TRANSFORMER PD MT 3P 750/1000KVA | 1,000.00 | \$ 111,676.00 | 8 | 13,959.50 | 39,483.43 | 2.83 | 2,828.43 | 0 | - |
| TRANSFORMER PAD MT 3PH 1500KVA | 1,500.00 | \$ 314,081.58 | 17 | 18,475.39 | 76,175.97 | 4.12 | 6,184.66 | 0 | - |
| TRANSFORMER PAD MT 3PH 2500KVA | 2,500.00 | \$ 321,139.68 | 13 | 24,703.05 | 89,068.12 | 3.61 | 9,013.88 | 0 | - |
| TRANSFORMER PAD MT 3PH 3000 KVA | 3,000.00 | \$ 151,778.00 | 5 | 30,355.60 | 67,877.19 | 2.24 | 6,708.20 | 0 | - |
| TRANSFORMER 15KVA PAD MOUNT IPH | 15.00 | \$ 2,195.00 | 2 | 1,097.50 | 1,552.10 | 1.41 | 21.21 | 1 | 2 |
| TRANSFORMER 25KVA P.J..D MOUNT IPH | 25.00 | \$ 519,356.82 | 349 | 1,488.13 | 27,800.53 | 18.68 | 467.04 | 1 | 349 |
| TRANSFORMER 50 & 75KVA PAD MT IP | 75.00 | \$ 100,082.00 | 58 | 1,725.55 | 13,141.41 | 7.62 | 571.18 | 0 | - |
| TRANSFORMER 100&167KVA PAD MT IP | 167.00 | \$ 213,958.63 | 59 | 3,626.42 | 27,855.04 | 7.68 | 1,282.75 | 0 | - |
| TRANSFORMER 250KVA PAD MT IP | 250.00 | \$ 19,392.00 | 4 | 4,848.00 | 9,696.00 | 2.00 | 500.00 | 0 | - |
| TRANSFORMER 500KVA AUTO PAD | 5,000.00 | \$ 75,411.63 | 1 | 75,411.63 | 75,411.63 | 1.00 | 5,000.00 | 0 | - |
| TOTAL | | \$ 16,533,246.54 | 16,102 | | | | | | 15,482 |

Zero Intercept Linear Regression Results

| | |
|-------------------------------|-----------|
| Size Coefficient (\$ per MCM) | 11.08905 |
| Zero Intercept (\$ per Unit) | 675.05614 |
| R-Square | 0.9570 |

LINEST Array

| | |
|----------|-------------|
| 11.08905 | 675.05614 |
| 0.62884 | 79.36580 |
| 0.95700 | 9,747.79035 |

Plant Classification

| | |
|---|---------------|
| Total Number of Units | 15,482 |
| Zero Intercept (\$/Unit) | \$ 675.06 |
| Minimum System (\$/Unit) | \$ 694.53 |
| Use Min System (M) or Zero Intercept (Z)? | Z |
| Zero Intercept or Min System Cost (\$) | \$ 10,451,219 |
| Total Cost of Sample | \$ 16,533,247 |
| Percentage of Total | 0.6321 |
| Percentage Classified as Customer-Related | 63.21% |
| Percentage Classified as Demand-Related | 36.79% |

* Only single-phase up to 50 KVA should be included in the Customer-related component per NARUC CAM under the Zero Intercept method.

EXHIBIT JW-9
PRESENT AND PROPOSED RATES

FARMERS RECC
Present & Proposed Rate Summary

| # | Item | Code | Present Revenue | Proposed Revenue | Incr(Decr) \$ | Incr(Decr) % | Avg Bill Incr per Mon |
|----|--|------|----------------------|----------------------|-----------------------|--------------|-----------------------|
| 1 | Residential - Schedule R | 1 | \$ 40,618,278 | \$ 43,026,435 | \$ 2,408,157 | 5.93% | \$ 8.30 |
| 2 | TOD Residential - Schedule R | 3 | \$ 2,301 | \$ 2,391 | \$ 90 | 3.92% | \$ 5.01 |
| 3 | Net Metering | 20 | \$ 132,392 | \$ 139,848 | \$ 7,456 | 5.63% | \$ 9.56 |
| 4 | ETS Residential - Schedule RM | 7 | \$ 29,328 | \$ 29,328 | \$ - | 0.00% | \$ - |
| 5 | Small Commercial - Schedule C | 4 | \$ 3,927,301 | \$ 3,927,301 | \$ - | 0.00% | \$ - |
| 7 | Large Commercial - Schedule C | 5 | \$ 6,223,071 | \$ 6,223,071 | \$ - | 0.00% | \$ - |
| 8 | Large Commercial 10% Disc- Schedule C | 9 | \$ 2,539,007 | \$ 2,539,007 | \$ - | 0.00% | \$ - |
| 9 | Large Commercial - Schedule E | 10 | \$ 3,141,330 | \$ 3,141,330 | \$ - | 0.00% | \$ - |
| 10 | Large Power - Schedule LPC2 | 14 | \$ 742,949 | \$ 742,949 | \$ - | 0.00% | \$ - |
| 11 | Large Commercial Optional TOD - Schedule D | 15 | \$ 124,551 | \$ 124,551 | \$ - | 0.00% | \$ - |
| 13 | Large Power - Schedule LPE4 | 36 | \$ 1,964,275 | \$ 1,964,275 | \$ - | 0.00% | \$ - |
| 14 | TOD Three Phase - Schedule C | 50 | \$ 35,299 | \$ 35,299 | \$ - | 0.00% | \$ - |
| 15 | Lighting | | \$ 1,004,392 | \$ 1,004,392 | \$ - | 0.00% | \$ - |
| 16 | TOTAL Base Rates | | \$ 60,484,474 | \$ 62,900,178 | \$ 2,415,703.6 | 3.99% | |
| 17 | | | | | | | |
| 18 | <u>Target Revenue</u> | | | | \$ 2,415,452.9 | | |
| 19 | Rate Rounding Variance | | | | \$ 251 | | |
| 20 | Rate Rounding Variance | | | | 0.01% | | |

FARMERS RECC
Present and Proposed Rate Detail

| # | Classification | Code | Billing Component | Billing Units | Present Rate | Present Revenue | Proposed Rate | Proposed Revenue | Increase \$ | % |
|----|------------------------------|------|----------------------------------|---------------|--------------|-----------------|---------------|------------------|--------------|--------|
| 1 | Residential - Schedule R | 1 | | | | | | | | |
| 2 | | | Customer Charge | 290,171 | 14.49 | \$ 4,204,578 | 19.50 | \$ 5,658,335 | \$ 1,453,757 | 34.58% |
| 3 | | | Energy Charge per kWh | 319,625,088 | 0.087687 | \$ 28,026,965 | 0.090673 | \$ 28,981,366 | \$ 954,401 | 3.41% |
| 4 | | | Total Base Rates | | | \$ 32,231,543 | | \$ 34,639,700 | \$ 2,408,157 | 7.47% |
| 5 | | | FAC | | | \$ 4,382,240 | | \$ 4,382,240 | \$ - | - |
| 6 | | | ES | | | \$ 4,004,495 | | \$ 4,004,495 | \$ - | - |
| 7 | | | Misc Adj | | | \$ - | | \$ - | \$ - | - |
| 8 | | | Other | | | \$ - | | \$ - | \$ - | - |
| 9 | | | Total Riders | | | \$ 8,386,735 | | \$ 8,386,735 | \$ - | - |
| 10 | | | TOTAL REVENUE | | | \$ 40,618,278 | | \$ 43,026,435 | \$ 2,408,157 | 5.93% |
| 11 | | | Average | 1,102 | | \$ 139.98 | | \$ 148.28 | \$ 8.30 | 5.93% |
| 12 | | | | | | | | | | |
| 13 | TOD Residential - Schedule R | 3 | | | | | | | | |
| 14 | | | Customer Charge | 18 | 20.34 | \$ 366 | 25.35 | \$ 456 | \$ 90 | 24.63% |
| 15 | | | Energy Charge - On Peak per kWh | 8,037 | 0.103992 | \$ 836 | 0.103992 | \$ 836 | \$ - | 0.00% |
| 16 | | | Energy Charge - Off Peak per kWh | 10,609 | 0.057892 | \$ 614 | 0.057892 | \$ 614 | \$ - | 0.00% |
| 17 | | | Total Base Rates | | | \$ 1,816 | | \$ 1,906 | \$ 90 | 4.97% |
| 18 | | | FAC | | | \$ 245 | | \$ 245 | \$ - | - |
| 19 | | | ES | | | \$ 240 | | \$ 240 | \$ - | - |
| 20 | | | Misc Adj | | | \$ - | | \$ - | \$ - | - |
| 21 | | | Other | | | \$ - | | \$ - | \$ - | - |
| 22 | | | Total Riders | | | \$ 485 | | \$ 485 | \$ - | - |
| 23 | | | TOTAL REVENUE | | | \$ 2,301 | | \$ 2,391 | \$ 90 | 3.92% |
| 24 | | | Average | 1,036 | | \$ 127.84 | | \$ 132.85 | \$ 5.01 | 3.92% |
| 25 | | | | | | | | | | |
| 26 | Net Metering | 20 | | | | | | | | |
| 27 | | | Customer Charge | 780 | 14.49 | \$ 11,302 | 19.50 | \$ 15,210 | \$ 3,908 | 34.58% |
| 28 | | | Energy Charge per kWh | 1,188,357 | 0.087687 | \$ 104,203 | 0.090673 | \$ 107,752 | \$ 3,548 | 3.41% |
| 29 | | | Total Base Rates | | | \$ 115,506 | | \$ 122,962 | \$ 7,456 | 6.46% |
| 30 | | | FAC | | | \$ 8,756 | | \$ 8,756 | \$ - | - |
| 31 | | | ES | | | \$ 8,130 | | \$ 8,130 | \$ - | - |
| 32 | | | Misc Adj | | | \$ - | | \$ - | \$ - | - |
| 33 | | | Other | | | \$ - | | \$ - | \$ - | - |
| 34 | | | Total Riders | | | \$ 16,886 | | \$ 16,886 | \$ - | - |
| 35 | | | TOTAL REVENUE | | | \$ 132,392 | | \$ 139,848 | \$ 7,456 | 5.63% |
| 36 | | | Average | 1,524 | | \$ 169.73 | | \$ 179.29 | \$ 9.56 | 5.63% |
| 37 | | | | | | | | | | |

FARMERS RECC
Present and Proposed Rate Detail

| # | Classification | Code | Billing Component | Billing Units | Present Rate | Present Revenue | Proposed Rate | Proposed Revenue | Increase \$ | % |
|----|-------------------------------|------|----------------------------------|---------------|--------------|-----------------|---------------|------------------|-------------|-------|
| 38 | ETS Residential - Schedule RM | 7 | | | | | | | | |
| 39 | | | Customer Charge | 1,343 | - | \$ - | - | \$ - | \$ - | 0.00% |
| 40 | | | Energy Charge - Off Peak per kWh | 403,834 | 0.050922 | \$ 20,564 | 0.050922 | \$ 20,564 | \$ - | 0.00% |
| 41 | | | Total Base Rates | | | \$ 20,564 | | \$ 20,564 | \$ - | 0.00% |
| 42 | | | FAC | | | \$ 5,993 | | \$ 5,993 | \$ - | - |
| 43 | | | ES | | | \$ 2,771 | | \$ 2,771 | \$ - | - |
| 44 | | | Misc Adj | | | \$ - | | \$ - | \$ - | - |
| 45 | | | Other | | | \$ - | | \$ - | \$ - | - |
| 46 | | | Total Riders | | | \$ 8,764 | | \$ 8,764 | \$ - | - |
| 47 | | | TOTAL REVENUE | | | \$ 29,328 | | \$ 29,328 | \$ - | 0.00% |
| 48 | | | Average | 301 | | \$ 21.84 | | \$ 21.84 | \$ - | 0.00% |
| 49 | | | | | | | | | | |
| 50 | Small Commercial - Schedule C | 4 | | | | | | | | |
| 51 | | | Customer Charge | 20,591 | 22.07 | \$ 454,443 | 22.07 | \$ 454,443 | \$ - | 0.00% |
| 52 | | | Energy Charge per kWh | 32,075,927 | 0.082796 | \$ 2,655,758 | 0.082796 | \$ 2,655,758 | \$ - | 0.00% |
| 53 | | | Total Base Rates | | | \$ 3,110,202 | | \$ 3,110,202 | \$ - | 0.00% |
| 54 | | | FAC | | | \$ 431,048 | | \$ 431,048 | \$ - | - |
| 55 | | | ES | | | \$ 386,051 | | \$ 386,051 | \$ - | - |
| 56 | | | Misc Adj | | | \$ - | | \$ - | \$ - | - |
| 57 | | | Other | | | \$ - | | \$ - | \$ - | - |
| 58 | | | Total Riders | | | \$ 817,099 | | \$ 817,099 | \$ - | - |
| 59 | | | TOTAL REVENUE | | | \$ 3,927,301 | | \$ 3,927,301 | \$ - | 0.00% |
| 60 | | | Average | 1,558 | | \$ 190.73 | | \$ 190.73 | \$ - | 0.00% |
| 61 | | | | | | | | | | |
| 74 | Large Commercial - Schedule C | 5 | | | | | | | | |
| 75 | | | Customer Charge | 1,175 | 108.70 | \$ 127,723 | 108.70 | \$ 127,723 | \$ - | 0.00% |
| 76 | | | Energy Charge per kWh | 52,519,152 | 0.063033 | \$ 3,310,440 | 0.063033 | \$ 3,310,440 | \$ - | 0.00% |
| 77 | | | Demand Charge per kW | 181,444 | 8.17 | \$ 1,482,397 | 8.17 | \$ 1,482,397 | \$ - | 0.00% |
| 78 | | | Total Base Rates | | | \$ 4,920,560 | | \$ 4,920,560 | \$ - | 0.00% |
| 79 | | | FAC | | | \$ 700,047 | | \$ 700,047 | \$ - | - |
| 80 | | | ES | | | \$ 602,464 | | \$ 602,464 | \$ - | - |
| 81 | | | Misc Adj | | | \$ - | | \$ - | \$ - | - |
| 82 | | | Other | | | \$ - | | \$ - | \$ - | - |
| 83 | | | Total Riders | | | \$ 1,302,511 | | \$ 1,302,511 | \$ - | - |
| 84 | | | TOTAL REVENUE | | | \$ 6,223,071 | | \$ 6,223,071 | \$ - | 0.00% |
| 85 | | | | 44,697 | | 5,296.23 | | 5,296.23 | - | |
| 86 | | | | | | | | | | |

FARMERS RECC
Present and Proposed Rate Detail

| # | Classification | Code | Billing Component | Billing Units | Present Rate | Present Revenue | Proposed Rate | Proposed Revenue | Increase \$ | % |
|-----|---------------------------------------|------|-----------------------|---------------|--------------|-----------------|---------------|------------------|-------------|-------|
| 87 | Large Commercial 10% Disc- Schedule C | 9 | | | | | | | | |
| 88 | | | Customer Charge | 48 | 108.70 \$ | 5,218 | 108.70 \$ | 5,218 | - | 0.00% |
| 89 | | | Demand Charge per kW | 59,177 | 8.17 \$ | 483,476 | 8.17 \$ | 483,476 | - | 0.00% |
| 90 | | | Energy Charge per kWh | 23,868,610 | 0.063033 \$ | 1,504,510 | 0.063033 \$ | 1,504,510 | - | 0.00% |
| 91 | | | Total Base Rates | | | \$ 1,993,204 | | \$ 1,993,204 | - | 0.00% |
| 92 | | | FAC | | | \$ 320,544 | | \$ 320,544 | - | - |
| 93 | | | ES | | | \$ 225,259 | | \$ 225,259 | - | - |
| 94 | | | Misc Adj | | | \$ - | | \$ - | - | - |
| 95 | | | Other | | | \$ - | | \$ - | - | - |
| 96 | | | Total Riders | | | \$ 545,803 | | \$ 545,803 | - | - |
| 97 | | | TOTAL REVENUE | | | \$ 2,539,007 | | \$ 2,539,007 | - | 0.00% |
| 98 | | | Average | 497,263 | | \$ 52,895.97 | | \$ 52,895.97 | - | 0.00% |
| 99 | | | | | | | | | | |
| 100 | Large Commercial - Schedule E | 10 | | | | | | | | |
| 101 | | | Customer Charge | 12 | 1,182.76 \$ | 14,193 | 1,182.76 \$ | 14,193 | - | 0.00% |
| 102 | | | Demand Charge per kW | 70,387 | 8.17 \$ | 575,062 | 8.17 \$ | 575,062 | - | 0.00% |
| 103 | | | Energy Charge per kWh | 35,915,472 | 0.049105 \$ | 1,763,629 | 0.049105 \$ | 1,763,629 | - | 0.00% |
| 104 | | | Total Base Rates | | | \$ 2,352,884 | | \$ 2,352,884 | - | 0.00% |
| 105 | | | FAC | | | \$ 487,202 | | \$ 487,202 | - | - |
| 106 | | | ES | | | \$ 301,244 | | \$ 301,244 | - | - |
| 107 | | | Misc Adj | | | \$ - | | \$ - | - | - |
| 108 | | | Other | | | \$ - | | \$ - | - | - |
| 109 | | | Total Riders | | | \$ 788,446 | | \$ 788,446 | - | - |
| 110 | | | TOTAL REVENUE | | | \$ 3,141,330 | | \$ 3,141,330 | - | 0.00% |
| 111 | | | | 5,866 | | 261,777.51 | | 261,777.51 | - | |
| 112 | | | | | | | | | | |
| 113 | Large Power - Schedule LPC2 | 14 | | | | | | | | |
| 114 | | | Customer Charge | 12 | 1,333.43 \$ | 16,001 | 1,333.43 \$ | 16,001 | - | 0.00% |
| 115 | | | Demand Charge per kW | 15,248 | 8.04 \$ | 122,592 | 8.04 \$ | 122,592 | - | 0.00% |
| 116 | | | Energy Charge per kWh | 7,958,400 | 0.053488 \$ | 425,679 | 0.053488 \$ | 425,679 | - | 0.00% |
| 117 | | | Total Base Rates | | | \$ 564,272 | | \$ 564,272 | - | 0.00% |
| 118 | | | FAC | | | \$ 106,967 | | \$ 106,967 | - | - |
| 119 | | | ES | | | \$ 71,710 | | \$ 71,710 | - | - |
| 120 | | | Prepay Daily Charges | | | \$ - | | \$ - | - | - |
| 121 | | | Other | | | \$ - | | \$ - | - | - |
| 122 | | | Total Riders | | | \$ 178,677 | | \$ 178,677 | - | - |
| 123 | | | TOTAL REVENUE | | | \$ 742,949 | | \$ 742,949 | - | 0.00% |
| 124 | | | Average | 663,200 | | \$ 61,912.45 | | \$ 61,912.45 | - | 0.00% |
| 125 | | | | | | | | | | |

**FARMERS RECC
Present and Proposed Rate Detail**

| # | Classification | Code | Billing Component | Billing Units | Present Rate | Present Revenue | Proposed Rate | Proposed Revenue | Increase \$ | % |
|-----|--|------|----------------------------------|---------------|--------------|-----------------|---------------|------------------|-------------|-------|
| 126 | Large Commercial Optional TOD - Schedule D | 15 | | | | | | | | |
| 127 | | | Customer Charge | 48 | 108.70 \$ | 5,218 | 108.70 \$ | 5,218 | - | 0.00% |
| 128 | | | Demand Charge per kW | 4,928 | 8.17 \$ | 40,258 | 8.17 \$ | 40,258 | - | 0.00% |
| 129 | | | Energy Charge per kWh | 876,204 | 0.062945 \$ | 55,153 | 0.062945 \$ | 55,153 | - | 0.00% |
| 130 | | | Total Base Rates | | \$ | 100,629 | \$ | 100,629 | - | 0.00% |
| 131 | | | FAC | | \$ | 12,044 | \$ | 12,044 | - | - |
| 132 | | | ES | | \$ | 11,878 | \$ | 11,878 | - | - |
| 133 | | | Misc Adj | | \$ | - | \$ | - | - | - |
| 134 | | | Other | | \$ | - | \$ | - | - | - |
| 135 | | | Total Riders | | \$ | 23,922 | \$ | 23,922 | - | - |
| 136 | | | TOTAL REVENUE | | \$ | 124,551 | \$ | 124,551 | - | 0.00% |
| 137 | | | Average | 18,254 | \$ | 2,594.81 | \$ | 2,594.81 | - | 0.00% |
| 138 | | | | | | | | | | |
| 139 | Large Power - Schedule LPE4 | 36 | | | | | | | | |
| 140 | | | Customer Charge | 12 | 3,328.40 \$ | 39,941 | 3,328.40 \$ | 39,941 | - | 0.00% |
| 141 | | | Demand Charge per kW | 45,121 | 6.85 \$ | 309,077 | 6.85 \$ | 309,077 | - | 0.00% |
| 142 | | | Energy Charge - On Peak per kWh | 9,730,645 | 0.059942 \$ | 583,274 | 0.059942 \$ | 583,274 | - | 0.00% |
| 143 | | | Energy Charge - Off Peak per kWh | 10,990,832 | 0.051219 \$ | 562,939 | 0.051219 \$ | 562,939 | - | 0.00% |
| 144 | | | Total Base Rates | | \$ | 1,495,232 | \$ | 1,495,232 | - | 0.00% |
| 145 | | | FAC | | \$ | 282,739 | \$ | 282,739 | - | - |
| 146 | | | ES | | \$ | 186,304 | \$ | 186,304 | - | - |
| 147 | | | Misc Adj | | \$ | - | \$ | - | - | - |
| 148 | | | Other | | \$ | - | \$ | - | - | - |
| 149 | | | Total Riders | | \$ | 469,043 | \$ | 469,043 | - | - |
| 150 | | | TOTAL REVENUE | | \$ | 1,964,275 | \$ | 1,964,275 | - | 0.00% |
| 151 | | | Average | 1,726,790 | \$ | 163,689.62 | \$ | 163,689.62 | - | 0.00% |
| 152 | | | | | | | | | | |
| 153 | TOD Three Phase - Schedule C | 50 | | | | | | | | |
| 154 | | | Customer Charge Single Phase | - | 22.07 \$ | - | 22.07 \$ | - | - | 0.00% |
| 155 | | | Customer Charge Three Phase | 73 | 108.70 \$ | 7,935 | 108.70 \$ | 7,935 | - | 0.00% |
| 156 | | | Energy Charge - On Peak per kWh | 139,768 | 0.117773 \$ | 16,461 | 0.117773 \$ | 16,461 | - | 0.00% |
| 157 | | | Energy Charge - Off Peak per kWh | 78,956 | 0.057892 \$ | 4,571 | 0.057892 \$ | 4,571 | - | 0.00% |
| 158 | | | Total Base Rates | | \$ | 28,967 | \$ | 28,967 | - | 0.00% |
| 159 | | | FAC | | \$ | 2,921 | \$ | 2,921 | - | - |
| 160 | | | ES | | \$ | 3,411 | \$ | 3,411 | - | - |
| 161 | | | Misc Adj | | \$ | - | \$ | - | - | - |
| 162 | | | Other | | \$ | - | \$ | - | - | - |
| 163 | | | Total Riders | | \$ | 6,332 | \$ | 6,332 | - | - |
| 164 | | | TOTAL REVENUE | | \$ | 35,299 | \$ | 35,299 | - | 0.00% |
| 165 | | | Average | 2,996 | \$ | 483.55 | \$ | 483.55 | - | 0.00% |
| 166 | | | | | | | | | | |

FARMERS RECC
Present and Proposed Rate Detail

| # | Classification | Code | Billing Component | Billing Units | Present Rate | Present Revenue | Proposed Rate | Proposed Revenue | Increase \$ | % |
|-----|----------------|------|---------------------------------|----------------|--------------|-------------------|---------------|-------------------|-----------------------|--------------|
| 167 | Lighting | | | | | | | | | |
| 168 | | | Mercury Vapor 175 Watt | 30,611 | 9.77 \$ | 299,069 | 9.77 \$ | 299,069 | \$ - | 0.00% |
| 169 | | | Mercury Vapor 175 Watt (shared) | 594 | 3.26 \$ | 1,936 | 3.26 \$ | 1,936 | \$ - | 0.00% |
| 170 | | | Mercury Vapor 250 Watt | 222 | 11.11 \$ | 2,466 | 11.11 \$ | 2,466 | \$ - | 0.00% |
| 171 | | | Mercury Vapor 400 Watt | 199 | 16.87 \$ | 3,357 | 16.87 \$ | 3,357 | \$ - | 0.00% |
| 172 | | | Mercury Vapor 1000 Watt | 36 | 29.59 \$ | 1,065 | 29.59 \$ | 1,065 | \$ - | 0.00% |
| 173 | | | Sodium Vapor 100 Watt | 3,641 | 10.17 \$ | 37,029 | 10.17 \$ | 37,029 | \$ - | 0.00% |
| 174 | | | Sodium Vapor 150 Watt | 21 | 11.84 \$ | 249 | 11.84 \$ | 249 | \$ - | 0.00% |
| 175 | | | Sodium Vapor 250 Watt | 258 | 16.06 \$ | 4,143 | 16.06 \$ | 4,143 | \$ - | 0.00% |
| 176 | | | Sodium Vapor 400 Watt | 1,349 | 20.63 \$ | 27,830 | 20.63 \$ | 27,830 | \$ - | 0.00% |
| 177 | | | Sodium Vapor 1000 Watt | - | 44.63 \$ | - | 44.63 \$ | - | \$ - | 0.00% |
| 178 | | | LED Light 70 Watt | 53,976 | 10.11 \$ | 545,697 | 10.11 \$ | 545,697 | \$ - | 0.00% |
| 179 | | | LED Light 105 Watt | 643 | 15.53 \$ | 9,986 | 15.53 \$ | 9,986 | \$ - | 0.00% |
| 180 | | | LED Light 145 Watt | 1,711 | 17.09 \$ | 29,241 | 17.09 \$ | 29,241 | \$ - | 0.00% |
| 181 | | | LED Flood Light 199 Watt | 1,119 | 21.93 \$ | 24,540 | 21.93 \$ | 24,540 | \$ - | 0.00% |
| 182 | | | Total Base Rates | 436,568 | \$ | 986,609 | \$ | 986,609 | \$ - | 0.00% |
| 183 | | | FAC | | \$ | 5,908 | \$ | 5,908 | \$ - | - |
| 184 | | | ES | | \$ | 11,875 | \$ | 11,875 | \$ - | - |
| 185 | | | Misc Adj | | | | \$ | - | \$ - | - |
| 186 | | | Other | | | | | | | |
| 187 | | | Total Riders | | \$ | 17,783 | \$ | 17,783 | \$ - | - |
| 188 | | | TOTAL REVENUE | | \$ | 1,004,392 | \$ | 1,004,392 | \$ - | 0.00% |
| 189 | | | | | | | | | | |
| 190 | | | | | | | | | | |
| 191 | | | | | | | | | | |
| 192 | TOTALS | | Total Base Rates | | \$ | 47,921,988 | \$ | 50,337,691 | \$ 2,415,703.6 | 5.04% |
| 193 | | | FAC | | \$ | 6,746,654 | \$ | 6,746,654 | \$ - | |
| 194 | | | ES | | \$ | 5,815,832 | \$ | 5,815,832 | \$ - | |
| 195 | | | Misc Adj | | \$ | - | \$ | - | \$ - | |
| 196 | | | Other | | \$ | - | \$ | - | \$ - | |
| 197 | | | Total Riders | | \$ | 12,562,486 | \$ | 12,562,486 | \$ - | |
| 198 | | | TOTAL REVENUE | | \$ | 60,484,474 | \$ | 62,900,178 | \$ 2,415,703.6 | 3.99% |
| 199 | | | | | | | | | | |
| 200 | | | | | | | Target | \$ 2,415,452.9 | | |
| 201 | | | | | | | Variance | \$ 251 | | |

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Filing Requirements / Exhibit List

Exhibit 10

807 KAR 5:001 Sec. 16(4)(d)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

A statement estimating the effect that each new rate will have upon the revenues of the utility including, at minimum, the total amount of revenues resulting from the increase or decrease and the percentage of the increase or decrease

Response:

Please see the table below. Please also see the testimony of John Wolfram provided at Exhibit 9 and, in particular, Exhibit JW-9 thereof.

| Rate Class | Increase | |
|--|--------------------|----------------|
| | Dollars | Percent |
| R Residential | \$2,408,157 | 5.93% |
| R TOD Residential | \$90 | 3.92% |
| Net Metering | \$7,456 | 5.63% |
| Total Impact to Farmers' Revenues | \$2,415,704 | 3.99% |

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Exhibit 11

807 KAR 5:001 Sec. 16(4)(e)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

If the utility provides electric, gas, water, or sewer service, the effect upon the average bill for each customer classification to which the proposed rate change will apply

Response:

Please see the table below. Please also see the testimony of John Wolfram provided at Exhibit 9 and, in particular, Exhibit JW-9 thereof.

| Rate Class | Average Usage (kwh) | Increase | |
|-----------------------------------|----------------------------|-----------------|----------------|
| | | Dollars | Percent |
| R Residential | 1,102 | \$2,408,157 | 5.93% |
| R TOD Residential | 1,036 | \$90 | 3.92% |
| Net Metering | 1,524 | \$7,456 | 5.63% |
| Total Impact to Farmers' Revenues | | \$2,415,704 | 3.99% |

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Exhibit 12

807 KAR 5:001 Sec. 16(4)(g)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

A detailed analysis of customers' bills whereby revenues from the present and proposed rates can be readily determined for each customer class

Response:

Please see the testimony of John Wolfram provided at Exhibit 9 and, in particular, Exhibit JW-9 thereof.

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Exhibit 13

807 KAR 5:001 Sec. 16(4)(h)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

A summary of the utility's determination of its revenue requirements based on return on net investment rate base, return on capitalization, interest coverage, debt service coverage, or operating ratio, with supporting schedules

Response:

The revenue requirement in this case is determined on the basis of achieving an Operating Times Interest Earned Ratio (“OTIER”) of 1.51. Please see the testimony of John Wolfram provided at Exhibit 9 and, in particular, Exhibit JW-2 thereof.

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Exhibit 14

807 KAR 5:001 Sec. 16(4)(i)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

A reconciliation of the rate base and capital used to determine its revenue requirements

Response:

Please see attached. The attachment is an Excel spreadsheet and is being uploaded into the Commission's electronic filing system separately. Revenue requirements were determined on the basis of achieving an OTIER of 1.51. Please see the testimony of John Wolfram provided at Exhibit 9 and, in particular, Exhibit JW-2 thereof. The rate base is calculated as part of the cost of service study (“COSS”); this is provided on pages 7 and 8 of Exhibit JW-4.

ATTACHMENTS
ARE EXCEL
SPREADSHEETS
AND UPLOADED
SEPARATELY

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Exhibit 15

807 KAR 5:001 Sec. 16(4)(t)
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

If the utility had amounts charged or allocated to it by an affiliate or general or home office or paid monies to an affiliate or general or home office during the test period or during the previous three (3) calendar years, the utility shall file:

- 1. A detailed description of the method and amounts allocated or charged to the utility by the affiliate or general or home office for each charge allocation or payment;*
- 2. An explanation of how the allocator for the test period was determined; and*
- 3. All facts relied upon, including other regulatory approval, to demonstrate that each amount charged, allocated, or paid during the test period was reasonable.*

Response:

Farmers Energy Propane Plus, LLC (“FEPP”) was formed as a Kentucky limited liability company in October 1998 under the Kentucky Limited Liability Act with Farmers as the sole member. FEPP is located in Glasgow, Kentucky ,with a district office in Munfordville, Kentucky and sells propane and related accessories to residential and commercial customers in the surrounding counties.

FEPP paid Farmers for rental expense that was booked in Farmers’ other electric revenues. Please see the table below for the rental expense from 2020-2022.

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| | Financial Year Ending: | | |
|------------------------|-------------------------------|------------------|------------------|
| | 2022 | 2021 | 2020 |
| Rent - Glasgow | \$ 9,600 | \$ 9,600 | \$ 9,600 |
| Rent - Hart County | 7,776 | 7,776 | 7,776 |
| Rent - Metcalfe County | 1,248 | 1,248 | 1,248 |
| TOTAL | \$ 18,624 | \$ 18,624 | \$ 18,624 |

Farmers charged FEPP for labor and associated taxes plus board meeting expenses based upon the costs for such services. The table below provides these costs for 2020-2022.

| | Financial Year Ending: | | |
|---------------------|-------------------------------|-------------|-------------|
| | 2022 | 2021 | 2020 |
| Qtrly Board Meeting | \$ 1,925 | \$ 2,333 | \$ 1,762 |

Farmers recorded the gains from FEPP on its income statement - income (loss) from equity investments. Please see the table below for this information.

| | Financial Year Ending: | | |
|----------------|-------------------------------|-------------|-------------|
| | 2022 | 2021 | 2020 |
| Propane Income | \$ 480,012 | \$ 207,272 | \$ 191,288 |

**Farmers Rural Electric Cooperative Corporation
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**Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List**

Exhibit 16

**807 KAR 5:001 Sec. 16(4)(u)
Sponsoring Witness: John Wolfram**

Description of Filing Requirement:

If the utility provides gas, electric, water, or sewage utility service and has annual gross revenues greater than \$5,000,000, a cost of service study based on a methodology generally accepted within the industry and based on current and reliable data from a single time period

Response:

Please see the testimony of John Wolfram provided at Exhibit 9 and, in particular, Exhibits JW-3 through JW-8 thereof.

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Exhibit 17

807 KAR 5:001 Sec. 16(5)(a)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

A detailed income statement and balance sheet reflecting the impact of all proposed adjustments.

Response:

Please see the testimony of John Wolfram provided at Exhibit 9 and, in particular, Exhibit JW-2 at pages 3 and 4 thereof.

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Exhibit 18

807 KAR 5:001 Sec. 16(5)(e)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

The number of customers to be added to the test period end level of customers and the related revenue requirements impact for all pro forma adjustments with complete details and supporting work papers

Response:

Please see the testimony of John Wolfram provided at Exhibit 9 and, in particular, Exhibit JW-2 (Reference Schedule 1.06) thereof.

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Exhibit 19

Case No. 2008-00408
Order entered July 24, 2012
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

“Each electric utility shall integrate energy efficiency resources into its plans and shall adopt policies establishing cost-effective energy efficiency resources with equal priority as other resource options. In each integrated resource plan, certificate case, and rate case, the subject electric utility shall fully explain its consideration of cost-effective energy efficiency resources as defined in the Commission’s IRP regulation (807 KAR 5:058).”

Response:

In coordination with East Kentucky Power Cooperative, Inc (“EKPC”), Farmers offered several Demand Side Management (“DSM”) programs. However, in Case No. 2019-00060, Farmers proposed to modify several of its DSM programs and to eliminate others in order to rebalance its DSM portfolio. In that docket, the Commission approved Farmers’ request to modify: (1) DSM, Touchstone Energy Home; (2) DSM, Button-Up Weatherization Program; (3) DSM, Heat Pump Retrofit Program; (4) DSM, Direct Load Control Program – Residential; and (5) DSM, Direct Load Control Program – Commercial. The Commission also approved Farmers’ request to eliminate the following DSM programs: (1) DSM, Commercial & Industrial Advanced Lighting Program; (2) DSM, Industrial Compressed Air Program; (3) DSM, Appliance Recycling Program; (4) DSM, Energy Star Appliance Program; and (5) DSM, HVAC Duct Sealing Program.

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Farmers continued to offer DSM/Energy Efficiency programs to its member during the test year with the assistance of EKPC. In the test year, Farmers paid out \$12,114 to its members for these programs, but was reimbursed in full by EKPC, and thus, there was no impact to the test year expenses. The payments were charged to account 143.00, accounts receivable and offset when payment was received from EKPC.

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Exhibit 20

Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20,
2019
Sponsoring Witness: Tobias Moss

Description of Filing Requirement:

A narrative statement discussing what changes have occurred for the Distribution Cooperative since the effective date of its last general rate adjustment.

Response:

Since Farmers' last general rate increase, the cost of doing business and providing safe and reliable electric service has increased due to extraordinary inflationary pressures. Farmers' customer counts have seen only modest increases. For example, Farmers added 1,194 members over a seven-year period, equating a levelized growth rate of approximately 0.74% each year.

The following is an abbreviated list of cost saving items for Farmers RECC since its last rate case:

On November 20, 2017, Farmers refinanced its remaining Rural Utilities Services (RUS) debt with National Rural Utilities Cooperative Finance Corporation (CFC). Principal transferred to CFC totaled \$2,886,430. The debt was locked-in for 13 years at a fixed rate of 3.50%. It is estimated that the refinance will save Farmers \$502,393 in interest expense over the life of the loan. The Kentucky Public Service Commission reviewed the refinance under Case No. 2017-00357. The Order was approved on October 17, 2017. While employee headcount has remained

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flat, Farmers has reorganized and created certain positions to more efficiently manage the cooperative.

In June 2019, Farmers began using a lockbox service via a local bank. By outsourcing this service, the cost/benefit analysis estimated an annual savings of \$7,100. On the other hand, In July 2019, Farmers moved away from a consulting service and hired a full-time employee to manage its right-of-way program. The cost/benefit analysis estimated an annual savings of \$13,200.

In December 2020, Farmers created a new position for a Purchasing Manager. Focusing exclusively on materials and inventory, the Purchasing Manager has implemented better strategies for competitively quoting bids, minimizing waste and improving the utilization of material work flow. A few examples include: A Kaizen & 5-S organization project for the warehouse allowed for min and max quantities to be established, saving the cooperative \$5,500 annually. A review process of ordering for work plan job trailers resulted in an annual cost savings of \$22,000. Recently, the Purchasing Manager utilized a national program to reduce the cost of tires purchased by roughly 60%.

Please also see generally the testimony of Mr. Moss and Ms. Phelps, provided as Exhibits 7 and 8 to the Application.

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Exhibit 21

Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

The estimated dates for drawdowns of unadvanced loan funds at test-year-end and the proposed uses of these funds.

Response:

As of December 31, 2022, Farmers had \$10,920,000 in unadvanced loan funds. A drawdown of \$1,000,000 occurred on February 16, 2023. Another drawdown of \$1,300,000 occurred on March 7, 2023. A third drawdown of \$1,500,000 was released on June 9, 2023. Farmers anticipates making the following drawdowns in 2023:

August - \$1,000,000

September - \$1,000,000

December - \$500,000

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Exhibit 22

Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

A general statement identifying any electric property or plant held for future use.

Response:

Farmers has no electric property or plant held for future use.

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 23

Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

The calculation of normalized depreciation expense (test-year end plant account balance multiplied by depreciation rate)

Response:

Please see the testimony of John Wolfram provided at Exhibit 9 and, in particular, Exhibit JW-2 (Reference Schedule 1.04) thereof.

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 24

Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

Any changes that occurred during the test year to the Distribution Cooperative's written policies on the compensation of its attorneys, auditors, and all other professional service providers, indicating the effective date and reason for these changes

Response:

There were no changes to any of these policies during the test year.

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 25

Case No. 2018-00407

Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: Jennie Phelps and John Wolfram

Description of Filing Requirement:

A schedule of the Distribution Cooperative's standard directors' fees, per diems, and other compensation in effect during the test year. Include a description of any changes that occurred during the test year to the Distribution Cooperative's written policies specifying the compensation of directors, indicating the effective date and reason for any change.

Response:

A schedule of Farmers' directors' fees, per diems, and other compensation in effect during the test year is included in the testimony of John Wolfram provided at Exhibit 9 and, in particular, Exhibit JW-2 (Schedule 1.09) thereof, also see the Excel spreadsheet that is being uploaded into the Commission's electronic filing system separately. A copy of the Farmers Board of Directors Compensation Policy (Board Policy 152) is attached. Board Policy 152 was last amended in November 2020 therefore there were no changes that occurred during the test year to Farmers' written policies specifying the compensation of its directors.

Case No. 2023-00158
Application - Exhibit 25
Includes Attachment (3 pages and Excel spreadsheet)

FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION

POLICY NO. 152

DIRECTOR'S COMPENSATION

I. POLICY

In order to encourage proper involvement in the governance of Farmers Rural Electric Cooperative Corporation ("Cooperative"), it shall be the practice of the Cooperative to adequately and fairly compensate directors for the time and effort they spend in considering and conducting the Cooperative's business.

II. PROVISIONS

A. Director's fees are set as follows for service on the board, attendance to the Cooperative's monthly board meetings and other board-authorized meetings specific to the organization:

1. The Chairman of the board shall receive a monthly stipend of \$1,100. All other directors shall receive a monthly stipend of \$800. plus:
2. \$300 per meeting for attendance at regular and special board meetings, committee meetings, training meetings, and all other authorized meetings. The Board of Directors, at its discretion, may reduce the amount of the fee paid for any meeting of shorter duration or limited agenda.
3. If a director is attending another authorized Cooperative meeting on the same day as the regular monthly board meeting (i.e. committee meeting), then the director shall be paid only one per diem fee for that day. The rate paid for that day shall be the normal board meeting per diem of \$300. Should other authorized meetings occur on a day different from the normal board meeting day, then the per diem of \$300 per day shall be paid.
4. In the event the board authorizes a director to participate in a normal, monthly board meeting by conference call or by virtual meeting via the internet, the per diem shall be \$300 unless otherwise determined by the board.

Should a director attend an authorized Cooperative meeting by conference call or by virtual meeting, and the duration is three (3) hours or less, then the meeting fee shall be \$150.00. If the meeting duration is one (1) hour or less, then attendance shall be covered under the regular monthly stipend with no additional meeting fee compensation. In both of these situations, it is assumed no travel is involved as they are virtual or conference call meetings.

FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION

POLICY NO. 152

DIRECTOR'S COMPENSATION

5. If the director misses a regular board meeting due to illness or death of an immediate family member, the per diem for that meeting shall be paid. Subsequent absences will be addressed by the Board on a case-by-case basis.
6. When a meeting is held at a distance requiring a Director to travel out of state on a day prior to and/or a day after the meeting, payment for such additional travel and expenses shall be limited to one additional day's compensation.

B. Compensation for Service on Associated Boards:

- a. Where directors serve on associated-organization boards, as board-designated and approved representatives for Farmers Rural Electric Cooperative, should the daily per diem paid for such representation from those organizations be less than \$300 per day, then the cooperative shall compensate the director for the difference to ensure that the normal daily per diem is received for service.

C. Expenses:

- a. Expenses shall be paid/reimbursed in accordance with Policy 102 – Travel and Expense Reimbursement – Directors.

D. Dental insurance coverage:

- a. Directors may elect to participate in the Cooperative's dental insurance program by paying the full cost of the monthly premium for either a single or family plan. Payment shall be made monthly.

E. Term and Travel Insurance:

- a. Directors may elect to participate in the Cooperative's NRECA Term Life and Travel insurance group policy by paying the full cost of the monthly premiums. Payment shall be made monthly. They will qualify for varying amounts of coverage based upon their age and any other terms as dictated by the Summary Plan Description.

FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION

POLICY NO. 152

DIRECTOR'S COMPENSATION

III. RESPONSIBILITY

The Board of Directors and the President and CEO shall be responsible for the administration of this policy.

ATTACHMENTS
ARE EXCEL
SPREADSHEETS
AND UPLOADED
SEPARATELY

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 26

Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

A schedule reflecting the salaries and other compensation of each executive officer for the test year and two preceding calendar years. Include the percentage of annual increase and the effective date of each increase, the job title, duty and responsibility of each officer, the number of employees who report to each executive officer, and to whom each executive officer reports. Also, for employees elected to executive officer status during the test year, provide the salaries for the test year for those persons whom they replaced.

Response:

Farmers' executive officer is its President & Chief Executive Officer ("CEO"). The principal responsibility of this position is to oversee all departments and ensure all cooperative activities are completed in accordance with good business practices and consistent with the direction provided by Farmers' Board of Directors (to whom the President & CEO reports). Each of Farmers' employees ultimately reports to the President & CEO, and the employees that directly report to the President & CEO include the Vice President of Finance & Accounting, Vice President of Operations, Vice President of Engineering, Vice President of Member & Corporate Services, Vice President of Technical Services, Director of Communications and Human Resources Coordinator.

Case No. 2023-00158
Application - Exhibit 26
No Attachment

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Compensation of Executive Officer
December 31, 2022

| | <----- <u>Salary</u> | Test Year Percent of <u>Increase</u> | -----> <u>Date</u> | Employees Who <u>Report</u> |
|-----------------|-------------------------|--|-----------------------|-----------------------------------|
| President & CEO | 220,859 | 4.0% | 11/1/2022 | all |

| | <u>First Preceding Year</u> Percent of <u>Salary</u> | <u>Increase</u> | <u>Date</u> | |
|-----------------|--|-----------------|-------------|--|
| President & CEO | 212,364 | 3.0% | 11/1/2021 | |

| | <u>Second Preceding Year</u> Percent of <u>Salary</u> | <u>Increase</u> | <u>Date</u> | |
|-----------------|---|-----------------|-------------|--|
| President & CEO | 206,178 | 2.5% | 11/1/2020 | |

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 27

Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witnesses: Jennie Phelps and John Wolfram

Description of Filing Requirement:

An analysis of Account No. 930, Miscellaneous General Expenses, for the test year. Include a complete breakdown of this account by the following categories: industry association dues, debt-serving expenses, institutional advertising, conservation advertising, rate department load studies, director's fees and expenses, dues and subscriptions, and miscellaneous. Include all detailed supporting workpapers. At a minimum, the workpapers should show the date, vendor, reference (e.g., voucher number), dollar amount, and a brief description of each expenditure. A detailed analysis is not required for amounts of less than \$100.

Response:

Please see the attached Excel Spreadsheet, which is being uploaded into the Commission's electronic filing system separately. Please also see the Direct Testimony of John Wolfram provided at Exhibit 9 to Farmers' Application and, in particular, Exhibit JW-2, Reference Schedules 1.08 and 1.09 thereof.

Case No. 2023-00158
Application - Exhibit 27
Includes Attachment (Excel spreadsheet)

ATTACHMENTS
ARE EXCEL
SPREADSHEETS
AND UPLOADED
SEPARATELY

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 28

Case No. 2018-00407

Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witnesses: Jennie Phelps and John Wolfram

Description of Filing Requirement:

An analysis of Account No. 426, Other Income Deductions, for the test period. Include a complete breakdown of this account by the following categories: donations, civic activities, political activities, and other. Include detailed supporting workpapers. At a minimum, the workpapers should show the date, vendor, reference (e.g., voucher number), dollar amount, and a brief description of each expenditure. A detailed analysis is not required for amounts of less than \$250.

Response:

Please see the Direct Testimony of John Wolfram provided at Exhibit 9 to Farmers' Application and, in particular, Exhibit JW-2, Reference Schedule 1.08 thereof. Also, please see attached. All of the listed amounts in Account 426.10 are donations and have been removed for ratemaking purposes.

| Summary of Account 426.10 - Other Donations For the 12 Months Ending December 31, 2022 | | |
|---|-------------------------|-----------------------|
| Line No. | Item (a) | Amount (b) |
| 1 | Fire Dues | 565.00 |
| 2 | Miscellaneous | 110.00 |
| 3 | School Backpack Program | 3,500.00 |
| 4 | NRECA International | 500.00 |
| 5 | Community Foundation | 5,000.00 |
| 6 | | |
| 7 | TOTAL | 9,675.00 |

Case No. 2023-00158
Application - Exhibit 28
No Attachment

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 29

Case No. 2018-00407

Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: Jennie Phelps and John Wolfram

Description of Filing Requirement:

A statement explaining whether the depreciation rates reflected in this filing are identical to those most recently approved by the Commission. If identical, identify the case in which they were approved. If not, provide the depreciation study that supports the rates reflected in this filing

Response:

The depreciation rates reflected in Farmers' filing are identical to those most recently approved by the Commission in Case No. 2016-00365, *In the Matter of the Application of Farmers Rural Electric Cooperative Corporation for an Increase in Retail Rates* (Ky. P.S.C. Dec. 5, 2019). In that case, Farmers was ordered to conduct a depreciation study before its next rate case. Farmers had a depreciation study completed and it was filed in the post-case files of Case No. 2016-00365 on December 16, 2021. Farmers is not requesting a change from its current depreciation rates in this matter. Please see the Direct Testimony of Jennie Phelps, provided at Exhibit 8 to Farmers' Application, as well as the Direct Testimony of John Wolfram provided at Exhibit 9 to Farmers' Application, and specifically Exhibit JW-2 (Reference Schedule 1.04) thereof.

Case No. 2023-00158
Application - Exhibit 29
No Attachment

**Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List**

Exhibit 30

**Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: John Wolfram**

Description of Filing Requirement:

A copy of all exhibits and schedules that were prepared for the rate application in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible

Response:

The requested information has been uploaded via the Commission's electronic filing system.

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 31

Case No. 2018-00407

Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

The Distribution Cooperative's TIER, OTIER, and debt service coverage ratio, as calculated by the RUS, for the test year and the five most recent calendar years, including the data used to calculate each ratio.

Response:

FARMERS RECC Ratios

TIER (Times Interest Earned Ratio)

| <u>TIER</u> | | <u>TIER (2 of 3 Yr Hi Avg)</u> | |
|-------------|------|--------------------------------|------|
| 2017 | 2.00 | 2017 | 2.55 |
| 2018 | 2.64 | 2018 | 2.66 |
| 2019 | 2.33 | 2019 | 2.48 |
| 2020 | 2.27 | 2020 | 2.48 |
| 2021 | 2.63 | 2021 | 2.48 |
| 2022 | 2.27 | 2022 | 2.45 |

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

OTIER (Operating Times Interest Earned Ratio)

| OTIER | | OTIER (2 of 3 Yr Hi Avg) | |
|-------|------|--------------------------|------|
| 2017 | 1.25 | 2017 | 1.21 |
| 2018 | 1.59 | 2018 | 1.59 |
| 2019 | 1.23 | 2019 | 1.42 |
| 2020 | 1.64 | 2020 | 1.62 |
| 2021 | 1.49 | 2021 | 1.56 |
| 2022 | 1.01 | 2022 | 1.56 |

MDSC (Modified Debt Service Coverage)

| Modified DSC | | MDSC (2 of 3 Yr Hi Avg) | |
|--------------|------|-------------------------|------|
| 2017 | 1.31 | 2017 | 1.28 |
| 2018 | 1.45 | 2018 | 1.38 |
| 2019 | 1.48 | 2019 | 1.47 |
| 2020 | 1.63 | 2020 | 1.56 |
| 2021 | 1.54 | 2021 | 1.59 |
| 2022 | 1.60 | 2022 | 1.62 |

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 32

Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

A trial balance as of the last day of the test year showing account number, subaccount number, account title, subaccount title, and amount. The trial balance shall include all asset, liability, capital, income, and expense accounts used by the Distribution Cooperative. All income statements accounts should show activity for 12 months. The application should show the balance in each control account and all underlying subaccounts per the company books

Response:

Please see attached Excel spreadsheet, which is being uploaded separately into the Commission's electronic filing system.

ATTACHMENTS
ARE EXCEL
SPREADSHEETS
AND UPLOADED
SEPARATELY

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 33

Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

A schedule comparing balances for each balance sheet account or subaccount included in the Distribution Cooperative's chart of accounts for each month of the test year to the same month of the 12-month period immediately preceding the test year.

Response:

Please see attached.

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-----|-----|-----|------|-----|------|------|-----|------|-----|------|------|------|
| 102.00 | ELECTRIC PLANT PURCH | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 102.10 | TEMP SERV RENTALS SU | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 107.11 | CONSTR W I P-MBLE RA | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 107.12 | CONSTR W I P-GIS FIE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 107.20 | CONSTRUCTION W I P - | 498 | 156 | 87 | -52 | 27 | -63 | -12 | -4 | -197 | 46 | -178 | -31 | 277 |
| | PRIOR YEAR | 443 | 4 | 27 | 76 | -25 | 76 | 230 | 47 | -33 | 24 | 30 | 69 | 968 |
| | NET CHANGE | 55 | 152 | 60 | -128 | 52 | -139 | -242 | -51 | -164 | 22 | -208 | -100 | -691 |
| 107.21 | CONST W.I.P.-OVERHEA | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 25 | -11 | -14 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | -25 | 11 | 14 | 0 | 0 | 0 | 0 | 0 | 0 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|------|------|-----|-----|-----|-----|-----|------|-----|-----|-----|-----|------|
| 108.75 | GP ACCUM DEPR-LABORA | -43 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -54 |
| | PRIOR YEAR | -36 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -47 |
| | NET CHANGE | -7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -7 |
| 108.76 | GP ACCUM DEPR-POWER | -139 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -150 |
| | PRIOR YEAR | -122 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -133 |
| | NET CHANGE | -17 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -17 |
| 108.77 | GP ACCUM DEPR-COMMUN | -215 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | 3 | -222 |
| | PRIOR YEAR | -636 | 425 | 0 | 0 | 0 | 0 | -1 | -1 | -1 | -1 | -1 | -1 | -217 |
| | NET CHANGE | 421 | -426 | -1 | -1 | -1 | -1 | 0 | 0 | 0 | 0 | 0 | 4 | -5 |
| 108.78 | GP ACCUM DEPR-MISC. | -145 | -2 | -2 | -2 | -2 | -1 | -1 | -1 | -1 | -1 | -1 | 0 | -159 |
| | PRIOR YEAR | -129 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -2 | -2 | -2 | -143 |
| | NET CHANGE | -16 | -1 | -1 | -1 | -1 | 0 | 0 | 0 | 0 | 1 | 1 | 2 | -16 |
| 108.79 | GP ACCUM DEPR-TEMPOR | -1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1 |
| | PRIOR YEAR | -1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 108.80 | RETIREMENT WORK IN P | 107 | 4 | 22 | -35 | 7 | -28 | 0 | -17 | -2 | -10 | -32 | 9 | 25 |
| | PRIOR YEAR | 50 | -11 | 15 | 11 | -7 | 19 | 16 | 96 | -18 | -15 | 46 | 17 | 219 |
| | NET CHANGE | 57 | 15 | 7 | -46 | 14 | -47 | -16 | -113 | 16 | 5 | -78 | -8 | -194 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-------|
| 123.23 | OTHER INVESTM'TS/ASS | 19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 13 | 0 | 32 |
| | PRIOR YEAR | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 9 | 0 | 19 |
| | NET CHANGE | 12 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -3 | 4 | 0 | 13 |
| 123.25 | OTHER INVESTMENTS/FE | 298 | 0 | 28 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 326 |
| | PRIOR YEAR | 283 | 0 | -11 | 0 | 0 | 0 | 0 | 34 | 0 | 0 | 0 | -8 | 298 |
| | NET CHANGE | 15 | 0 | 39 | 0 | 0 | 0 | 0 | -34 | 0 | 0 | 0 | 8 | 28 |
| 124.00 | OTHER INVESTMENTS - | 1,898 | -28 | -28 | -28 | -28 | -28 | -28 | -28 | -28 | -28 | -28 | -28 | 1,590 |
| | PRIOR YEAR | 2,231 | -28 | -28 | -28 | -28 | -28 | -28 | -28 | -28 | -28 | -28 | -28 | 1,923 |
| | NET CHANGE | -333 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -333 |
| 128.00 | OTHER SPECIAL FUNDS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 131.00 | CASH-CONSUMER REFUND | 10 | -1 | -1 | -1 | 0 | 0 | -1 | 1 | 1 | -3 | 3 | -1 | 7 |
| | PRIOR YEAR | 8 | 1 | -1 | 2 | -2 | 0 | 2 | -1 | -2 | 3 | 0 | -2 | 8 |
| | NET CHANGE | 2 | -2 | 0 | -3 | 2 | 0 | -3 | 2 | 3 | -6 | 3 | 1 | -1 |
| 131.01 | CASH-CAPTIAL CREDITS | 29 | 0 | 0 | 28 | -17 | -5 | -1 | -1 | 0 | 0 | 0 | -1 | 32 |
| | PRIOR YEAR | 15 | 0 | 0 | 42 | -22 | -3 | -2 | -1 | 0 | 0 | 0 | 0 | 29 |
| | NET CHANGE | 14 | 0 | 0 | -14 | 5 | -2 | 1 | 0 | 0 | 0 | 0 | -1 | 3 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-------|------|------|------|------|------|-----|------|------|------|------|------|------|
| 131.03 | CASH-MONEY MARKET/LI | 79 | 76 | -111 | -15 | -10 | 9 | -18 | 43 | -32 | -9 | -2 | 6 | 16 |
| | PRIOR YEAR | 29 | -4 | 61 | -51 | -17 | -2 | 7 | 7 | -7 | -12 | 11 | 6 | 28 |
| | NET CHANGE | 50 | 80 | -172 | 36 | 7 | 11 | -25 | 36 | -25 | 3 | -13 | 0 | -12 |
| 131.04 | CASH-HEALTH FUNDS/SC | 22 | 6 | -11 | 6 | -5 | 10 | -5 | -5 | 7 | -3 | -1 | -6 | 15 |
| | PRIOR YEAR | 22 | 11 | -11 | -10 | 12 | -3 | 5 | -3 | -7 | 13 | -2 | -3 | 24 |
| | NET CHANGE | 0 | -5 | 0 | 16 | -17 | 13 | -10 | -2 | 14 | -16 | 1 | -3 | -9 |
| 131.05 | CASH-MUNFORDVILLE/LI | 6 | 4 | -7 | 2 | 6 | -7 | 4 | 1 | 9 | -13 | 6 | -2 | 9 |
| | PRIOR YEAR | 3 | 0 | 1 | 0 | 0 | -3 | 3 | -1 | 0 | 10 | -6 | 2 | 9 |
| | NET CHANGE | 3 | 4 | -8 | 2 | 6 | -4 | 1 | 2 | 9 | -23 | 12 | -4 | 0 |
| 131.07 | CASH-GEN FUNDS/ESB | 2,777 | -513 | -191 | -822 | 22 | -176 | 878 | -529 | -401 | -370 | 487 | -303 | 859 |
| | PRIOR YEAR | 1,349 | -127 | 780 | -323 | -342 | -266 | 40 | 129 | 406 | 405 | -489 | -642 | 920 |
| | NET CHANGE | 1,428 | -386 | -971 | -499 | 364 | 90 | 838 | -658 | -807 | -775 | 976 | 339 | -61 |
| 131.09 | CASH-USDA REDLG LOAN | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 131.10 | CASH-PAYROLL/ESB | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1 | 1 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1 | 1 | 0 | 0 | 0 | 0 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-------|-----|--------|------|------|------|------|------|------|------|-----|-----|-------|
| 141.50 | NOTES REC/CONSUMER P | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 141.60 | NOTES REC/MISC CONTR | 60 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | 26 | -2 | 75 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 68 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | 61 |
| | NET CHANGE | 60 | -1 | -1 | -1 | -69 | 0 | 0 | 0 | 0 | 0 | 27 | -1 | 14 |
| 142.10 | CUSTOMER ACCTS RECEI | 2,236 | 533 | -955 | -246 | -96 | 196 | 466 | -191 | -100 | -532 | 300 | 813 | 2,424 |
| | PRIOR YEAR | 2,174 | 450 | -1,060 | -531 | 211 | -106 | 896 | -591 | -142 | -155 | 98 | 384 | 1,628 |
| | NET CHANGE | 62 | 83 | 105 | 285 | -307 | 302 | -430 | 400 | 42 | -377 | 202 | 429 | 796 |
| 142.14 | MEM ACCT REC/PLEDGE | 112 | 56 | 62 | -99 | -57 | -21 | 58 | -28 | -81 | 1 | 56 | 16 | 75 |
| | PRIOR YEAR | 100 | -33 | 32 | -75 | 25 | -6 | 44 | 63 | -48 | 10 | 0 | -30 | 82 |
| | NET CHANGE | 12 | 89 | 30 | -24 | -82 | -15 | 14 | -91 | -33 | -9 | 56 | 46 | -7 |
| 142.16 | MEM ACCT REC/COVID R | 19 | -3 | -2 | -2 | -2 | -2 | -2 | -2 | -2 | -1 | 0 | 0 | 1 |
| | PRIOR YEAR | 211 | -25 | -23 | -25 | -21 | -20 | -21 | -19 | -19 | -9 | -3 | -4 | 22 |
| | NET CHANGE | -192 | 22 | 21 | 23 | 19 | 18 | 19 | 17 | 17 | 8 | 3 | 4 | -21 |
| 142.20 | CUSTOMER ACCTS REC/U | 30 | -8 | -5 | -17 | 1 | 0 | -1 | 0 | 0 | 1 | 0 | 0 | 1 |
| | PRIOR YEAR | 7 | 71 | -66 | 1 | 0 | 0 | 1 | -1 | 0 | 0 | 1 | -1 | 13 |
| | NET CHANGE | 23 | -79 | 61 | -18 | 1 | 0 | -2 | 1 | 0 | 1 | -1 | 1 | -12 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-------|------|------|------|-----|-----|-----|------|------|------|------|------|-------|
| 163.10 | STORES/INVENTORY EXP | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 163.40 | STORES/MATERIAL INVE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | -4 | 0 | 4 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 4 | 0 | -4 | 0 | 0 | 0 | 0 |
| 165.10 | PREPAYMENTS - INSURA | 195 | -23 | -20 | -20 | -20 | -20 | -20 | -20 | -20 | -20 | 169 | -3 | 178 |
| | PRIOR YEAR | 190 | -20 | -12 | -21 | -21 | -21 | -21 | -21 | -21 | -21 | 163 | -21 | 153 |
| | NET CHANGE | 5 | -3 | -8 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 6 | 18 | 25 |
| 165.20 | OTHER PREPAYMENTS | 48 | 51 | -13 | -13 | -13 | 37 | -12 | -12 | -12 | 19 | -12 | -12 | 56 |
| | PRIOR YEAR | 49 | 50 | -13 | -13 | -13 | 48 | -13 | -13 | -13 | 17 | -13 | -13 | 60 |
| | NET CHANGE | -1 | 1 | 0 | 0 | 0 | -11 | 1 | 1 | 1 | 2 | 1 | 1 | -4 |
| 165.30 | GASOLINE PURCHASES | 12 | 10 | -5 | 9 | -8 | 8 | -11 | 1 | 3 | -2 | 6 | -7 | 16 |
| | PRIOR YEAR | 12 | -2 | -3 | 7 | -2 | 5 | -4 | 6 | -2 | -2 | -3 | 5 | 17 |
| | NET CHANGE | 0 | 12 | -2 | 2 | -6 | 3 | -7 | -5 | 5 | 0 | 9 | -12 | -1 |
| 173.00 | ACCRUED UTILITY REVE | 2,600 | -418 | -309 | -383 | 232 | 378 | 70 | -70 | -436 | -159 | 379 | 504 | 2,388 |
| | PRIOR YEAR | 2,080 | 28 | -555 | -119 | 125 | 427 | 159 | 31 | -527 | -190 | 479 | -149 | 1,789 |
| | NET CHANGE | 520 | -446 | 246 | -264 | 107 | -49 | -89 | -101 | 91 | 31 | -100 | 653 | 599 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|---------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|---------|
| 186.10 | DEFERRED DEBIT/VACAT | 251 | -23 | -23 | -23 | -23 | -23 | -23 | -23 | -23 | -23 | -23 | -23 | -2 |
| | PRIOR YEAR | 239 | -22 | -22 | -22 | -22 | -22 | -22 | -22 | -22 | -22 | -22 | -22 | -3 |
| | NET CHANGE | 12 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | 1 |
| 186.30 | CLEARING ACCOUNT/DEP | 0 | 0 | 0 | 0 | 2 | 0 | -1 | -1 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 2 | 0 | -1 | -1 | 0 | 0 | 0 | 0 | 0 |
| 186.40 | GIS-FIELD INVENTORY | 268 | -3 | -3 | -3 | -3 | -3 | -3 | -3 | -3 | -3 | -3 | -3 | 235 |
| | PRIOR YEAR | 303 | -3 | -3 | -3 | -3 | -3 | -3 | -3 | -3 | -3 | -3 | -3 | 270 |
| | NET CHANGE | -35 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -35 |
| 200.10 | MEMBERSHIPS ISSUED | -576 | 0 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -586 |
| | PRIOR YEAR | -570 | 0 | -1 | -1 | -1 | 0 | 0 | -1 | -1 | -1 | 0 | 0 | -576 |
| | NET CHANGE | -6 | 0 | 0 | 0 | 0 | -1 | -1 | 0 | 0 | 0 | -1 | -1 | -10 |
| 201.10 | PATRONS CAPITAL CRED | -48,323 | 0 | 31 | 528 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -47,764 |
| | PRIOR YEAR | -46,433 | 0 | 20 | 405 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -46,008 |
| | NET CHANGE | -1,890 | 0 | 11 | 123 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,756 |
| 209.00 | ACCUM OTHER COMP INC | 404 | -2 | -2 | -2 | -2 | -2 | -2 | -2 | -2 | -2 | -2 | -15 | 369 |
| | PRIOR YEAR | 491 | -2 | -2 | -2 | -2 | -2 | -2 | -2 | -2 | -2 | -2 | -65 | 406 |
| | NET CHANGE | -87 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 50 | -37 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|---------|--------|--------|-----|-----|--------|--------|-----|--------|-----|--------|--------|---------|
| 224.06 | ADV PAYM'TS UNAPPLIE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 96 | 0 | 0 | 0 | 0 | -1 | 0 | 0 | -97 | 0 | 0 | 0 | -2 |
| | NET CHANGE | -96 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 97 | 0 | 0 | 0 | 2 |
| 224.07 | LONG TERM DEBT OTHER | -57,321 | 0 | 490 | 0 | 0 | -1,514 | 0 | 0 | -549 | 0 | -2,000 | 426 | -60,468 |
| | PRIOR YEAR | -50,578 | 0 | -1,085 | 0 | 0 | 426 | -1,500 | 0 | -1,075 | 0 | 0 | -1,558 | -55,370 |
| | NET CHANGE | -6,743 | 0 | 1,575 | 0 | 0 | -1,940 | 1,500 | 0 | 526 | 0 | -2,000 | 1,984 | -5,098 |
| 224.12 | OTHER LONG-TERM DEBT | -3,905 | 148 | 0 | 0 | 149 | 0 | 0 | 153 | 0 | 0 | 154 | 0 | -3,301 |
| | PRIOR YEAR | -4,507 | 155 | 0 | 0 | 156 | 0 | 0 | 146 | 0 | 0 | 147 | 0 | -3,903 |
| | NET CHANGE | 602 | -7 | 0 | 0 | -7 | 0 | 0 | 7 | 0 | 0 | 7 | 0 | 602 |
| 224.14 | OTHER LONG TERM DEBT | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | -1,097 | 1,097 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 1,097 | -1,097 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 224.16 | LTD--RUS ECONOMIC DE | -1,898 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | -1,590 |
| | PRIOR YEAR | -2,231 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | 28 | -1,923 |
| | NET CHANGE | 333 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 333 |
| 228.30 | ACCUMULATED BENEFITS | -845 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 2 | 15 | -826 |
| | PRIOR YEAR | -911 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 63 | -848 |
| | NET CHANGE | 66 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 2 | -48 | 22 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|--------|-----|------|------|------|------|------|------|------|------|--------|--------|--------|
| 228.31 | HOMESTEAD 457B PLAN | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 231.10 | NOTES PAYABLE - SHOR | -1,650 | 100 | 0 | 200 | 100 | 400 | 100 | 100 | 0 | 50 | 600 | 0 | 0 |
| | PRIOR YEAR | -2,900 | 0 | 100 | 150 | 100 | 100 | 200 | 100 | 100 | 100 | 100 | 100 | -1,750 |
| | NET CHANGE | 1,250 | 100 | -100 | 50 | 0 | 300 | -100 | 0 | -100 | -50 | 500 | -100 | 1,750 |
| 232.03 | GENERAL FUNDS/ESB BA | -813 | 358 | -24 | 139 | -17 | -247 | 255 | -270 | 50 | -504 | 620 | 110 | -343 |
| | PRIOR YEAR | -343 | 136 | -82 | -115 | 40 | 65 | -121 | 84 | -8 | 0 | 104 | -240 | -480 |
| | NET CHANGE | -470 | 222 | 58 | 254 | -57 | -312 | 376 | -354 | 58 | -504 | 516 | 350 | 137 |
| 232.30 | ACCOUNTS PAYABLE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 232.31 | ACCOUNTS PAYABLE - O | -4,848 | 700 | 447 | 416 | -282 | -676 | -798 | 589 | 572 | 303 | -464 | -1,176 | -5,217 |
| | PRIOR YEAR | -4,715 | 373 | 888 | 516 | 56 | -825 | -66 | -46 | 747 | 79 | -1,370 | 107 | -4,256 |
| | NET CHANGE | -133 | 327 | -441 | -100 | -338 | 149 | -732 | 635 | -175 | 224 | 906 | -1,283 | -961 |
| 232.40 | ACCTS PAY/HOW\$MART | -55 | 1 | 1 | 0 | 1 | 1 | 1 | 6 | 1 | 0 | 1 | 1 | -41 |
| | PRIOR YEAR | -71 | 0 | 2 | 1 | 1 | 8 | 1 | 1 | 0 | 1 | 1 | 1 | -54 |
| | NET CHANGE | 16 | 1 | -1 | -1 | 0 | -7 | 0 | 5 | 1 | -1 | 0 | 0 | 13 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|------------------------|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|
| 236.30 | ACCRUED TAXES - F.I.I. | 0 | 0 | 0 | 0 | 0 | 27 | -27 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 27 | -27 | 0 | 0 | 0 | 0 | 0 | 0 |
| 236.40 | ACCRUED TAXES - KY U | -2 | -1 | 0 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | -3 | -2 | -1 | 0 | 2 | 0 | 0 | 5 | 0 | 0 | 0 | 0 | 1 |
| | NET CHANGE | 1 | 1 | 1 | 3 | -2 | 0 | 0 | -5 | 0 | 0 | 0 | 0 | -1 |
| 236.50 | ACCRUED TAXES - KY S | -51 | -6 | 24 | 3 | -14 | -6 | -7 | 6 | -3 | 11 | -7 | -6 | -56 |
| | PRIOR YEAR | -41 | -1 | 12 | 0 | -8 | 5 | -14 | 1 | 3 | 9 | -5 | -2 | -41 |
| | NET CHANGE | -10 | -5 | 12 | 3 | -6 | -11 | 7 | 5 | -6 | 2 | -2 | -4 | -15 |
| 237.10 | ACCRUED INT-REA CONS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 237.11 | ACCRUED INT-FFB | -119 | -119 | 237 | -109 | -109 | 218 | -153 | -153 | 305 | -163 | -163 | 325 | -3 |
| | PRIOR YEAR | -122 | -110 | 232 | -117 | -121 | 238 | -120 | -120 | 240 | -119 | -115 | 235 | 1 |
| | NET CHANGE | 3 | -9 | 5 | 8 | 12 | -20 | -33 | -33 | 65 | -44 | -48 | 90 | -4 |
| 237.30 | OTHER INTEREST ACCRU | -25 | 25 | -12 | -12 | 24 | -12 | -12 | 24 | -11 | -11 | 22 | -11 | -11 |
| | PRIOR YEAR | -31 | 31 | -15 | -15 | 29 | -14 | -15 | 29 | -14 | -15 | 29 | -13 | -14 |
| | NET CHANGE | 6 | -6 | 3 | 3 | -5 | 2 | 3 | -5 | 3 | 4 | -7 | 2 | 3 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|
| 237.40 | OTHER INTEREST ACCRU | -146 | 1 | 3 | 1 | 1 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | -138 |
| | PRIOR YEAR | -159 | 1 | 1 | 1 | 0 | 1 | 2 | 4 | 1 | 1 | 2 | 0 | -145 |
| | NET CHANGE | 13 | 0 | 2 | 0 | 1 | 0 | -2 | -3 | -1 | -1 | -2 | 0 | 7 |
| 237.50 | ACCRUED INTEREST - S | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 238.10 | PATRONAGE CAPITAL PA | 0 | 0 | 2 | -48 | 16 | 5 | 1 | 1 | 0 | 0 | 22 | 0 | -1 |
| | PRIOR YEAR | 0 | 0 | 2 | -45 | 22 | 3 | 1 | 1 | 0 | 0 | 0 | 16 | 0 |
| | NET CHANGE | 0 | 0 | 0 | -3 | -6 | 2 | 0 | 0 | 0 | 0 | 22 | -16 | -1 |
| 241.00 | INCOME TAX WITHHELD | 0 | 0 | 0 | 0 | 0 | 21 | -21 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 21 | -21 | 0 | 0 | 0 | 0 | 0 | 0 |
| 241.10 | INCOME TAX WITHHELD | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 241.20 | INCOME TAX WITHHELD | -1 | -3 | -2 | 5 | -2 | -2 | 4 | -2 | -2 | 6 | -2 | -3 | -4 |
| | PRIOR YEAR | -2 | -2 | -2 | 4 | -2 | -2 | 3 | -2 | -2 | 6 | -2 | -3 | -6 |
| | NET CHANGE | 1 | -1 | 0 | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 2 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|--------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|--------|
| 362.00 | DIST PLT-STATION EQU | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 362.01 | DIST PLT-SCADA/LOAD | 41 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 41 |
| | PRIOR YEAR | 41 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 41 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 364.00 | DIST PLT-POLES,TOWER | 30,821 | 46 | 92 | 128 | 80 | 117 | 100 | 162 | 180 | 111 | 190 | 141 | 32,168 |
| | PRIOR YEAR | 29,925 | 61 | 47 | 73 | 77 | 47 | 42 | 109 | 86 | 66 | 36 | 102 | 30,671 |
| | NET CHANGE | 896 | -15 | 45 | 55 | 3 | 70 | 58 | 53 | 94 | 45 | 154 | 39 | 1,497 |
| 365.00 | DIST PLT-O/H CONDUCT | 25,844 | 29 | 54 | 96 | 65 | 103 | 83 | 146 | 164 | 124 | 161 | 118 | 26,987 |
| | PRIOR YEAR | 24,738 | 85 | 82 | 99 | 98 | 47 | 26 | 97 | 75 | 81 | 27 | 91 | 25,546 |
| | NET CHANGE | 1,106 | -56 | -28 | -3 | -33 | 56 | 57 | 49 | 89 | 43 | 134 | 27 | 1,441 |
| 367.00 | DIST PLT-U/G CONDUCT | 2,578 | 26 | 0 | 2 | 12 | 20 | 14 | 6 | 41 | 19 | 61 | 37 | 2,816 |
| | PRIOR YEAR | 2,487 | 18 | 2 | 7 | 4 | -1 | 5 | 14 | 5 | 28 | 1 | 0 | 2,570 |
| | NET CHANGE | 91 | 8 | -2 | -5 | 8 | 21 | 9 | -8 | 36 | -9 | 60 | 37 | 246 |
| 368.00 | DIST PLT - LINE TRAN | 19,557 | 0 | 80 | 47 | 74 | 60 | 41 | 117 | 90 | 56 | 34 | 107 | 20,263 |
| | PRIOR YEAR | 18,592 | 79 | 49 | 58 | 86 | 88 | 88 | 67 | 88 | 97 | 95 | 53 | 19,440 |
| | NET CHANGE | 965 | -79 | 31 | -11 | -12 | -28 | -47 | 50 | 2 | -41 | -61 | 54 | 823 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|--------|--------|
| 423.00 | G & T CAPITAL CREDIT | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,517 | -1,517 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -457 | -457 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,060 | -1,060 |
| 424.00 | OTHER CAP CRS & PATR | 0 | 0 | -84 | 0 | 0 | 0 | 0 | -57 | -9 | 0 | -14 | 0 | -164 |
| | PRIOR YEAR | 0 | 0 | -34 | 0 | 0 | 0 | 0 | -34 | -49 | -4 | -9 | 0 | -130 |
| | NET CHANGE | 0 | 0 | -50 | 0 | 0 | 0 | 0 | -23 | 40 | 4 | -5 | 0 | -34 |
| 426.10 | DONATIONS | 1 | 0 | 0 | 0 | 0 | 1 | 4 | 0 | 0 | 0 | 5 | 0 | 11 |
| | PRIOR YEAR | 1 | 0 | 1 | 0 | 1 | 0 | 3 | 0 | 0 | 0 | 0 | 0 | 6 |
| | NET CHANGE | 0 | 0 | -1 | 0 | -1 | 1 | 1 | 0 | 0 | 0 | 5 | 0 | 5 |
| 426.20 | OPERATION WARM HEART | 0 | -1 | 1 | 0 | 0 | 0 | -1 | 1 | 0 | 0 | 0 | 1 | 1 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1 | 0 | 0 | 1 | 0 |
| | NET CHANGE | 0 | -1 | 1 | 0 | 0 | 0 | -1 | 1 | 1 | 0 | 0 | 0 | 1 |
| 426.30 | LOAD MANAGEMENT CRED | 0 | 9 | -10 | 0 | 0 | 5 | 5 | 5 | 5 | -21 | 0 | 0 | -2 |
| | PRIOR YEAR | 0 | 9 | -10 | 0 | 0 | 5 | 5 | 5 | 5 | -20 | 0 | 0 | -1 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1 | 0 | 0 | -1 |
| 426.40 | SIMPLE SAVER SIGN ON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | -1 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | -1 | 1 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 |
| | NET CHANGE | 0 | 0 | 0 | 1 | -1 | 0 | 0 | 1 | -1 | 0 | -1 | 0 | -1 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|---------|
| 431.00 | INTEREST EXP/CONSUME | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 431.10 | INTEREST EXPENSE - S | 4 | 3 | 4 | 4 | 4 | 4 | 4 | 3 | 3 | 4 | 2 | 0 | 39 |
| | PRIOR YEAR | 6 | 7 | 6 | 6 | 5 | 5 | 5 | 5 | 5 | 5 | 4 | 4 | 63 |
| | NET CHANGE | -2 | -4 | -2 | -2 | -1 | -1 | -1 | -2 | -2 | -1 | -2 | -4 | -24 |
| 440.10 | RESIDENTIAL SALES - | -4,778 | -4,059 | -2,830 | -2,545 | -2,660 | -3,410 | -4,221 | -3,671 | -2,902 | -2,688 | -3,251 | -4,679 | -41,694 |
| | PRIOR YEAR | -3,757 | -3,818 | -2,543 | -2,186 | -2,170 | -2,775 | -3,181 | -3,153 | -2,369 | -2,237 | -3,646 | -3,752 | -35,587 |
| | NET CHANGE | -1,021 | -241 | -287 | -359 | -490 | -635 | -1,040 | -518 | -533 | -451 | 395 | -927 | -6,107 |
| 442.10 | COMMERCIAL & INDUSTR | -710 | -651 | -702 | -656 | -736 | -845 | -985 | -906 | -830 | -793 | -757 | -713 | -9,284 |
| | PRIOR YEAR | -635 | -587 | -628 | -542 | -597 | -698 | -746 | -762 | -655 | -668 | -732 | -707 | -7,957 |
| | NET CHANGE | -75 | -64 | -74 | -114 | -139 | -147 | -239 | -144 | -175 | -125 | -25 | -6 | -1,327 |
| 442.20 | COMMERCIAL & INDUSTR | -678 | -674 | -744 | -705 | -769 | -821 | -830 | -846 | -885 | -847 | -792 | -721 | -9,312 |
| | PRIOR YEAR | -623 | -547 | -633 | -545 | -555 | -650 | -647 | -683 | -619 | -639 | -751 | -706 | -7,598 |
| | NET CHANGE | -55 | -127 | -111 | -160 | -214 | -171 | -183 | -163 | -266 | -208 | -41 | -15 | -1,714 |
| 444.00 | PUBLIC STREET & HIGH | -7 | -6 | -8 | -7 | -8 | -8 | -8 | -9 | -9 | -9 | -8 | -8 | -95 |
| | PRIOR YEAR | -7 | -7 | -7 | -7 | -6 | -7 | -7 | -7 | -7 | -7 | -8 | -8 | -85 |
| | NET CHANGE | 0 | 1 | -1 | 0 | -2 | -1 | -1 | -2 | -2 | -2 | 0 | 0 | -10 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|
| 450.00 | FORFEITED DISC-OTHER | -27 | -42 | -49 | -16 | -21 | -22 | -24 | -42 | -22 | -25 | -21 | -28 | -339 |
| | PRIOR YEAR | -8 | -35 | -44 | -14 | -15 | -17 | -19 | -32 | -19 | -21 | -19 | -22 | -265 |
| | NET CHANGE | -19 | -7 | -5 | -2 | -6 | -5 | -5 | -10 | -3 | -4 | -2 | -6 | -74 |
| 451.00 | MISCELLANEOUS SERVIC | 0 | 0 | 0 | 0 | 0 | -5 | 0 | 0 | 0 | 0 | 0 | 0 | -5 |
| | PRIOR YEAR | 0 | -1 | -3 | 0 | 0 | 0 | -3 | 0 | -3 | 0 | 0 | -1 | -11 |
| | NET CHANGE | 0 | 1 | 3 | 0 | 0 | -5 | 3 | 0 | 3 | 0 | 0 | 1 | 6 |
| 451.10 | MISC SERV REV/TRIP C | -1 | -1 | -2 | -2 | -1 | -1 | -1 | -1 | -1 | -1 | 0 | 0 | -12 |
| | PRIOR YEAR | -3 | -2 | -3 | -3 | -2 | -2 | -2 | -2 | -2 | -2 | -1 | -1 | -25 |
| | NET CHANGE | 2 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 13 |
| 451.20 | MISC SERV REV/CHECK | -1 | -1 | -1 | -1 | 0 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -11 |
| | PRIOR YEAR | -1 | -1 | 0 | 0 | 0 | 0 | 0 | -1 | -1 | -1 | -1 | -1 | -7 |
| | NET CHANGE | 0 | 0 | -1 | -1 | 0 | -1 | -1 | 0 | 0 | 0 | 0 | 0 | -4 |
| 451.30 | MISC SERVICE REVENUE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 451.40 | MISC SERV REV/RECONN | -5 | -6 | -7 | -10 | -7 | -4 | -7 | -11 | -8 | -8 | -4 | -5 | -82 |
| | PRIOR YEAR | -8 | -5 | -9 | -10 | -7 | -4 | -7 | -8 | -5 | -8 | -5 | -4 | -80 |
| | NET CHANGE | 3 | -1 | 2 | 0 | 0 | 0 | 0 | -3 | -3 | 0 | 1 | -1 | -2 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|
| 451.50 | MISC SERV REV/RECONN | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 451.60 | MISC SERV REV/METER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 451.70 | MISCL SERV REV/INSUL | -3 | -5 | 0 | 0 | 0 | -4 | -2 | 0 | -2 | -1 | -1 | -1 | -19 |
| | PRIOR YEAR | -1 | 0 | 0 | 0 | -1 | 0 | -5 | -2 | 0 | 0 | 0 | -7 | -16 |
| | NET CHANGE | -2 | -5 | 0 | 0 | 1 | -4 | 3 | 2 | -2 | -1 | -1 | 6 | -3 |
| 451.80 | MISC SERV REVENUE/IN | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 451.90 | EKPC MARKETING REBAT | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 454.00 | RENT FROM ELECTRIC P | -14 | -14 | -14 | -14 | -14 | -14 | -14 | -14 | -14 | -14 | -28 | -69 | -237 |
| | PRIOR YEAR | -20 | -20 | -20 | -20 | -20 | -20 | -20 | -20 | -20 | -20 | -20 | -20 | -240 |
| | NET CHANGE | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 6 | -8 | -49 | 3 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|--------|
| 456.00 | OTHER ELECTRIC REVEN | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -7 | 0 | 0 | -4 | 0 | -11 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | -11 | 0 | 0 | 0 | 0 | 0 | -11 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 11 | -7 | 0 | 0 | -4 | 0 | 0 |
| 456.03 | RENTAL INCOME - FTS | -3 | -2 | -2 | -3 | -2 | -2 | -3 | -2 | -2 | -3 | -2 | -2 | -28 |
| | PRIOR YEAR | -4 | -2 | -2 | -4 | -2 | -2 | -1 | -2 | -2 | -3 | -2 | -2 | -28 |
| | NET CHANGE | 1 | 0 | 0 | 1 | 0 | 0 | -2 | 0 | 0 | 0 | 0 | 0 | 0 |
| 456.10 | REVENUE/TEMPORARY SE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 555.00 | PURCHASED POWER | 4,493 | 3,782 | 3,281 | 2,856 | 3,133 | 3,932 | 4,681 | 4,179 | 3,616 | 3,306 | 3,715 | 4,869 | 45,843 |
| | PRIOR YEAR | 3,449 | 3,264 | 2,733 | 2,256 | 2,218 | 3,070 | 3,279 | 3,290 | 2,580 | 2,537 | 3,859 | 3,918 | 36,453 |
| | NET CHANGE | 1,044 | 518 | 548 | 600 | 915 | 862 | 1,402 | 889 | 1,036 | 769 | -144 | 951 | 9,390 |
| 580.00 | OPERATIONS, SUPERVIS | 3 | 3 | 2 | 3 | 3 | 3 | 3 | 3 | 3 | 2 | 3 | 2 | 33 |
| | PRIOR YEAR | 3 | 3 | 3 | 3 | 2 | 2 | 2 | 3 | 3 | 3 | 1 | 0 | 28 |
| | NET CHANGE | 0 | 0 | -1 | 0 | 1 | 1 | 1 | 0 | 0 | -1 | 2 | 2 | 5 |
| 583.00 | OVERHEAD LINE EXPENS | 58 | 16 | 8 | 22 | 7 | 31 | 16 | 50 | 19 | 16 | 41 | 28 | 312 |
| | PRIOR YEAR | 4 | 5 | 6 | 22 | 5 | 10 | -1 | 39 | 13 | 45 | 9 | 30 | 187 |
| | NET CHANGE | 54 | 11 | 2 | 0 | 2 | 21 | 17 | 11 | 6 | -29 | 32 | -2 | 125 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-------|
| 586.00 | METER EXPENSE | 9 | 18 | 19 | 11 | 45 | 10 | 20 | 19 | 29 | 22 | 16 | 17 | 235 |
| | PRIOR YEAR | 13 | 11 | 8 | 12 | 7 | 14 | 17 | 40 | 6 | 39 | 10 | 13 | 190 |
| | NET CHANGE | -4 | 7 | 11 | -1 | 38 | -4 | 3 | -21 | 23 | -17 | 6 | 4 | 45 |
| 587.00 | CONSUMER INSTALLATIO | 13 | 15 | 15 | 14 | 12 | 14 | 11 | 14 | 12 | 12 | 16 | 14 | 162 |
| | PRIOR YEAR | 10 | 12 | 10 | 11 | 10 | 11 | 11 | 10 | 11 | 9 | 12 | 12 | 129 |
| | NET CHANGE | 3 | 3 | 5 | 3 | 2 | 3 | 0 | 4 | 1 | 3 | 4 | 2 | 33 |
| 588.00 | MISCELLANEOUS DISTRI | 78 | 78 | 80 | 78 | 78 | 87 | 87 | 104 | 99 | 84 | 88 | 83 | 1,024 |
| | PRIOR YEAR | 76 | 78 | 82 | 76 | 73 | 73 | 84 | 71 | 77 | 78 | 98 | 83 | 949 |
| | NET CHANGE | 2 | 0 | -2 | 2 | 5 | 14 | 3 | 33 | 22 | 6 | -10 | 0 | 75 |
| 593.00 | MAINTENANCE OF OVERH | 146 | 107 | 166 | 145 | 89 | 138 | 183 | 126 | 120 | 145 | 133 | 228 | 1,726 |
| | PRIOR YEAR | 129 | 138 | 136 | 117 | 114 | 146 | 153 | 142 | 115 | 76 | 115 | 170 | 1,551 |
| | NET CHANGE | 17 | -31 | 30 | 28 | -25 | -8 | 30 | -16 | 5 | 69 | 18 | 58 | 175 |
| 593.01 | MAINTENANCE OF LINE/ | 22 | 17 | 17 | 16 | 15 | 17 | 20 | 18 | 17 | 14 | 23 | 56 | 252 |
| | PRIOR YEAR | 12 | 25 | 15 | 14 | 16 | 14 | 17 | 15 | 11 | 18 | 17 | 24 | 198 |
| | NET CHANGE | 10 | -8 | 2 | 2 | -1 | 3 | 3 | 3 | 6 | -4 | 6 | 32 | 54 |
| 593.03 | MAINTENANCE/ STORM D | -3 | 4 | 0 | 0 | -6 | 0 | 5 | 16 | 0 | 0 | 0 | -21 | -5 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6 | 6 |
| | NET CHANGE | -3 | 4 | 0 | 0 | -6 | 0 | 5 | 16 | 0 | 0 | 0 | -27 | -11 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-----|-----|-----|-----|-----|-----|-----|-----|------|-----|------|------|-------|
| 593.10 | MAINTENANCE OF RIGHT | 13 | 13 | 11 | 13 | 11 | 12 | 15 | 12 | 12 | 12 | 13 | 11 | 148 |
| | PRIOR YEAR | 13 | 12 | 15 | 13 | 12 | 12 | 10 | 10 | 12 | 11 | 6 | 9 | 135 |
| | NET CHANGE | 0 | 1 | -4 | 0 | -1 | 0 | 5 | 2 | 0 | 1 | 7 | 2 | 13 |
| 593.17 | R/W MAJOR EQUIPMENT | 0 | 0 | -1 | 0 | 0 | -1 | 0 | 0 | 0 | -1 | 0 | 0 | -3 |
| | PRIOR YEAR | 0 | 0 | 0 | -1 | 0 | -1 | 0 | 0 | -1 | 0 | 0 | -1 | -4 |
| | NET CHANGE | 0 | 0 | -1 | 1 | 0 | 0 | 0 | 0 | 1 | -1 | 0 | 1 | 1 |
| 593.18 | SMALL TOOL REPAIR & | 0 | 1 | 0 | 2 | 3 | 1 | 1 | 2 | 2 | 23 | 1 | 0 | 36 |
| | PRIOR YEAR | 0 | 0 | 1 | 3 | 3 | 0 | 1 | 1 | 0 | 18 | 4 | 22 | 53 |
| | NET CHANGE | 0 | 1 | -1 | -1 | 0 | 1 | 0 | 1 | 2 | 5 | -3 | -22 | -17 |
| 593.21 | CONTRACTORS ROW-TRIM | 80 | 100 | 92 | 116 | 97 | 83 | 78 | 41 | 0 | 39 | 57 | 56 | 839 |
| | PRIOR YEAR | 110 | 114 | 126 | 156 | 115 | 137 | 99 | 126 | 128 | 126 | 181 | 189 | 1,607 |
| | NET CHANGE | -30 | -14 | -34 | -40 | -18 | -54 | -21 | -85 | -128 | -87 | -124 | -133 | -768 |
| 593.28 | CONTACTORS ROW-CHEMI | 0 | 0 | 0 | 0 | 0 | 0 | 52 | 32 | 48 | 44 | 0 | 0 | 176 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 32 | 40 | 18 | 50 | 0 | 0 | 140 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 20 | -8 | 30 | -6 | 0 | 0 | 36 |
| 593.40 | MAINTENANCE OF LINE | 12 | 16 | 17 | 16 | 16 | 15 | 14 | 17 | 14 | 14 | 17 | 14 | 182 |
| | PRIOR YEAR | 16 | 15 | 16 | 16 | 15 | 15 | 17 | 13 | 13 | 12 | 14 | 15 | 177 |
| | NET CHANGE | -4 | 1 | 1 | 0 | 1 | 0 | -3 | 4 | 1 | 2 | 3 | -1 | 5 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|---------|----------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|
| 908.30 | ETS EXPENSE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 908.60 | ENRGY CONSERVATION/E | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 909.00 | PUBLIC SAFETY AWAREN | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 0 | 4 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 0 | 4 |
| 920.00 | ADMINISTRATIVE & GEN | 81 | 82 | 78 | 79 | 71 | 82 | 76 | 81 | 87 | 74 | 93 | 69 | 953 |
| | PRIOR YEAR | 66 | 73 | 78 | 79 | 69 | 65 | 65 | 70 | 70 | 56 | 79 | 72 | 842 |
| | NET CHANGE | 15 | 9 | 0 | 0 | 2 | 17 | 11 | 11 | 17 | 18 | 14 | -3 | 111 |
| 920.10 | CAPITAL CREDIT REFUN | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | PRIOR YEAR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | NET CHANGE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 921.00 | OFFICE SUPPLIES AND | 25 | 33 | 36 | 30 | 30 | 32 | 27 | 28 | 30 | 38 | 27 | 42 | 378 |
| | PRIOR YEAR | 18 | 28 | 31 | 26 | 28 | 24 | 28 | 27 | 27 | 30 | 30 | 35 | 332 |
| | NET CHANGE | 7 | 5 | 5 | 4 | 2 | 8 | -1 | 1 | 3 | 8 | -3 | 7 | 46 |

STARTING YEAR 2022

| ACCOUNT | ACCOUNT DESCRIPTION | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YEAR |
|-----------------|----------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|
| 932.00 | MAINTENANCE OF GENER | 5 | 7 | 14 | 8 | 8 | 7 | 6 | 8 | 9 | 11 | 6 | 8 | 97 |
| | PRIOR YEAR | 15 | 11 | 6 | 6 | 16 | 9 | 4 | 7 | 10 | 6 | 9 | 8 | 107 |
| | NET CHANGE | -10 | -4 | 8 | 2 | -8 | -2 | 2 | 1 | -1 | 5 | -3 | 0 | -10 |
| TOTAL ACCOUNTS: | | | | | | | | | | | | | | 271 |

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 34

Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

A schedule comparing each income statement account or subaccount included in the Distribution Cooperative's chart of accounts for each month of the of the test year to the same month of the 12-month period immediately preceding the test year. The amounts should reflect the income or expense activity of each month, rather than the cumulative balances at the end of the particular month.

Response:

Please see the Response to Exhibit 33.

Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List

Exhibit 35

Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: Jennie Phelps

Description of Filing Requirement:

A schedule showing employee health, dental, vision, and life insurance premium contributions by coverage type, including the cost split of each identified premium between the employee and the Distribution Cooperative.

Response:

Please see Excel Spreadsheet attached, which is being uploaded separately into the Commission's electronic filing system.

ATTACHMENTS
ARE EXCEL
SPREADSHEETS
AND UPLOADED
SEPARATELY

**Farmers Rural Electric Cooperative Corporation
Case No. 2023-00158
Streamlined Rate Adjustment Procedure Pilot Program
Filing Requirements / Exhibit List**

Exhibit 36

**Case No. 2018-00407
Orders entered December 11, 2018, March 26, 2019 and December 20, 2019
Sponsoring Witness: Jennie Phelps**

Description of Filing Requirement:

A schedule showing anticipated and incurred rate case expenses, with supporting documentation. This information should be updated during the proceeding.

Response:

Please see attached. One attachment is an Excel spreadsheet and is being uploaded into the Commission's electronic filing system separately.



V#14887

L. Allyson Honaker
allyson@hloky.com
(859) 368-8803 (office)
(859)396-3172 (mobile)

1795 Alysheba Way, Ste 6202
Lexington, KY 40509

February 08, 2023

Invoice No. 204

Farmers RECC
Mr. William T. Prather
504 S. Broadway
Glasgow, KY 42141



Client Number: 02020 Farmers RECC
Matter 02020-0002 Farmers RECC - 2023 Rate Case
For Services Rendered Through 1/31/2023.

Fees

| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-------------------|---|--------------|---------------|
| 1/10/2023 | LAH | Telephone conference with J. Wolfram re upcoming rate case. | 0.20 | \$53.00 |
| 1/10/2023 | LAH | Exchange emails with J. Phelps re timing of rate case filing. | 0.10 | \$26.50 |
| 1/10/2023 | LAH | Review and file new CEO confidential file provided by B. Prather. | 0.40 | \$106.00 * |
| 1/11/2023 | LAH | Exchange emails with J. Phelps re timeline for filing rate case. | 0.10 | \$26.50 |
| 1/15/2023 | LAH | Review emails from J. Wolfram, et. al. re rate case timeline. | 0.10 | \$26.50 |
| 1/22/2023 | LAH | Exchange emails with B. Koenig re drafting list of exhibits needed for streamlined rate filing. | 0.10 | \$26.50 |
| 1/23/2023 | BHK | Compiled draft list of exhibits for client to begin compiling information for the rate case. Sent to A. Honaker for review. | 0.70 | \$178.50 |
| 1/23/2023 | LAH | Review draft exhibit list provided by B. Koenig; email B. Koenig re same. | 0.20 | \$53.00 |

Continued On Next Page

| | | | | |
|-----------|-----|--|------|----------|
| 1/24/2023 | BHK | Revise list of exhibits re: witness coverage from John Wolfram. | 0.40 | \$102.00 |
| 1/24/2023 | LAH | Exchange emails with B. Koenig re emailing exhibit list to J. Phelps. | 0.10 | \$26.50 |
| 1/25/2023 | BHK | Revise table of exhibits and sent to Jennie Phelps and team to begin preparation for rate case exhibits and application. | 0.40 | \$102.00 |
| 1/25/2023 | LAH | Review emails from B. Koenig and J. Phelps re exhibit list. | 0.10 | \$26.50 |
| 1/26/2023 | LAH | Exchange texts with J. Wolfram re timing of filing rate case; update B. Koenig on status. | 0.20 | \$53.00 |
| 1/26/2023 | LAH | Exchange texts with A. Honaker re status. | 0.10 | \$26.50 |
| 1/27/2023 | LAH | Exchange emails with B. Koenig re drafting outlines for Application and Testimony; telephone conference with J. Wolfram re status. | 0.30 | \$79.50 |
| 1/29/2023 | BHK | Review of last rate case 2016-00365, and notes regarding preparation for new rate case. | 1.20 | \$306.00 |

Billable Hours / Fees: 4.70 \$1,218.50

Timekeeper Summary

Timekeeper LAH worked 2.00 hours at \$265.00 per hour, totaling \$530.00.
 Timekeeper BHK worked 2.70 hours at \$255.00 per hour, totaling \$688.50.

Current Invoice Summary

| | |
|------------------------------|--------------------------|
| Prior Balance: | \$0.00 |
| Payments Received: | \$0.00 |
| Unpaid Prior Balance: | <u>\$0.00</u> |
| Current Fees: | \$1,218.50 |
| Advanced Costs: | \$0.00 |
| TOTAL AMOUNT DUE: | <u><u>\$1,218.50</u></u> |

OK to pay
 GJP

Thank You for Letting Us Serve You.
 Payment Due Upon Receipt.

OSEM 05
 923.00

< 106.00 > → Post to Outside Services
 \$ 1112.50 → Post to Regulatory Comm Services
 928.00 OSEM 05



RECEIVED
MAR 08 2023
BY: _____

V#14887

L. Allyson Honaker
allyson@hloky.com
(859) 368-8803 (office)
(859)396-3172 (mobile)

1795 Alysheba Way, Ste 6202
Lexington, KY 40509

March 06, 2023

Invoice No. 226

Farmers RECC
Mr. William T. Prather
504 S. Broadway
Glasgow, KY 42141

Client Number: 02020 Farmers RECC
Matter 02020-0002 Farmers RECC - 2023 Rate Case
For Services Rendered Through 2/28/2023.

RATE CASE

Fees

| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-------------------|--|--------------|---------------|
| 2/13/2023 | LAH | Exchange emails with J. Phelps re scheduling conference call to discuss rate case. | 0.10 | \$26.50 |
| 2/14/2023 | LAH | Telephone conference with J. Phelps re questions on items needed for upcoming rate case filing. | 0.50 | \$132.50 |
| 2/15/2023 | LAH | Telephone conference with J. Phelps re questions on rate case and notice; review email from J. Phelps re same. | 0.70 | \$185.50 |
| 2/21/2023 | LAH | Exchange emails with J. Phelps, et. al. re scheduling kick off meeting. | 0.10 | \$26.50 |
| 2/21/2023 | BHK | Emails to coordinate rate case meeting. | 0.20 | \$51.00 |
| 2/21/2023 | BHK | Review rate case for streamlined process requirements and transfer materials to set up framework for materials needed when we start getting numbers and information from client. | 1.50 | \$382.50 |
| 2/25/2023 | LAH | Exchange emails with J. Phelps re upcoming rate case; review attachments provided by J. Phelps. | 0.30 | \$79.50 |

Continued On Next Page

Date _____ Rec. By. *JK*
 Approved By _____ Totals Checked _____
 Use Tax _____
 Item ID *0505* Amt. *928.00*



Client Number: 02020
Matter Number: 02020-0002

3/6/2023
Page: 2

| | | | | |
|-------------------------------|-----|--|--------------|-------------------|
| 2/25/2023 | BHK | Review rate case preparation and notes regarding preparation for rate case meeting with client on 2-28-23. | 0.50 | \$127.50 |
| 2/25/2023 | BHK | Attend and prepare notes for testimony for rate case meeting with client and J. Wolfram, J. Phelps, A. Honaker. | 1.40 | \$357.00 |
| 2/26/2023 | BHK | Prepare testimony templates and exhibit cover sheets, application templates. | 4.30 | \$1,096.50 |
| 2/28/2023 | BHK | Preparation for rate case meeting with client. Review past rate case and streamlined requirements; separate telephone conference with A. Honaker re drafts completed and timeline. | 1.50 | \$382.50 |
| 2/28/2023 | LAH | Review streamline orders to prepare for meeting with J. Phelps, et. al; participate in virtual meeting with J. Phelps, et. al. re issues and timeline for rate case; telephone conference with B. Koenig re items drafted. | 2.00 | \$530.00 |
| Billable Hours / Fees: | | | 13.10 | \$3,377.50 |

Timekeeper Summary

Timekeeper LAH worked 3.70 hours at \$265.00 per hour, totaling \$980.50.

Timekeeper BHK worked 9.40 hours at \$255.00 per hour, totaling \$2,397.00.

Payment Detail

| <u>Date</u> | <u>Description</u> | <u>Amount</u> |
|---------------------------------|-------------------------------------|---------------------|
| 2/16/2023 | Check Number 56376 against Inv# 204 | (\$1,218.50) |
| Total Payments Received: | | (\$1,218.50) |

Continued On Next Page

Client Number: 02020
Matter Number: 02020-0002

3/6/2023
Page: 3

Current Invoice Summary

| | |
|--------------------------|---------------------------------|
| Prior Balance: | \$1,218.50 |
| Payments Received: | (\$1,218.50) |
| Unpaid Prior Balance: | <u>\$0.00</u> |
| Current Fees: | \$3,377.50 |
| Advanced Costs: | \$0.00 |
| TOTAL AMOUNT DUE: | <u><u>\$3,377.50</u></u> |

Last Payment: 2/16/2023

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

OK
3/8/23
①

V#14889



L. Allyson Honaker
allyson@hloky.com
(859) 368-8803 (office)
(859)396-3172 (mobile)

OK to pay
JSP

1795 Alysheba Way, Ste 6202
Lexington, KY 40509

April 05, 2023

Invoice No. 271

Farmers RECC
Mr. Toby Moss
504 S. Broadway
Glasgow, KY 42141

Client Number: 02020 Farmers RECC
Matter 02020-0002 Farmers RECC - 2023 Rate Case
For Services Rendered Through 3/31/2023.

RATE CASE

Fees

| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-------------------|---|--------------|---------------|
| 3/3/2023 | BHK | Discussion with A. Honaker re: rate case preparation. | 0.20 | \$51.00 |
| 3/3/2023 | LAH | Conference with B. Koenig re items to begin preparing for rate case. | 0.20 | \$53.00 |
| 3/15/2023 | BHK | Preparation of materials to prepare testimony for rate case application for support and preparation for drafting application and supporting exhibits. | 0.50 | \$127.50 |
| 3/16/2023 | BHK | Review of application exhibit requirements and listing of progress and needed materials. | 0.50 | \$127.50 |
| 3/16/2023 | LAH | Exchange emails with J. Phelps re status of information needed. | 0.10 | \$26.50 |
| 3/16/2023 | BHK | Review emails from J. Phelps and A. Honaker re status of information | 0.10 | \$25.50 |
| 3/18/2023 | LAH | Review email from J. Phelps re annual reports filed. | 0.10 | \$26.50 |
| 3/18/2023 | BHK | Review email from J. Phelps regarding current annual reports filed | 0.10 | \$25.50 |

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JK



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| | | | | |
|-----------|-----|--|------|----------|
| 3/21/2023 | BHK | Review, preparation, organization of application materials and discussion with A. Honaker regarding progress of work tasks for rate application reports and exhibits. | 0.60 | \$153.00 |
| 3/21/2023 | LAH | Conference with B. Koenig re status of drafts to send to J. Phelps, et. al. for review. | 0.20 | \$53.00 |
| 3/24/2023 | BHK | Draft testimony preparation for Jennie Phelps, VP Finance and Accounting and T. Moss, CEO. Reference last rate case, annual report, website, PSC records. Sent to A. Honaker for review. | 3.80 | \$969.00 |
| 3/24/2023 | LAH | Review email from B. Koenig re draft testimony; telephone conference with B. Koenig re same. | 0.30 | \$79.50 |
| 3/28/2023 | LAH | Review and edit testimony of T. Moss and J. Phelps; review other documents drafted for rate filing; email edits to B. Koenig for review; telephone conference with B. Koenig re same. | 2.10 | \$556.50 |
| 3/28/2023 | BHK | Review of edits from A. Honaker and preparation of draft testimony for Jennie Phelps and Tobias Moses. Sent to clients to start completing information for application. | 0.60 | \$153.00 |
| 3/31/2023 | BHK | Email with J. Phelps regarding progress on rate application and timeline going forward, request to send exhibits from Table of Contents as they are prepared so that we can put them in format to file as we go. | 0.30 | \$76.50 |

Billable Hours / Fees: 9.70 \$2,503.50

Timekeeper Summary

Timekeeper BHK worked 6.70 hours at \$255.00 per hour, totaling \$1,708.50.

Timekeeper LAH worked 3.00 hours at \$265.00 per hour, totaling \$795.00.

Payment Detail

| <u>Date</u> | <u>Description</u> | <u>Amount</u> |
|---------------------------------|-------------------------------------|---------------------|
| 3/15/2023 | Check Number 56593 against Inv# 226 | (\$3,377.50) |
| Total Payments Received: | | <u>(\$3,377.50)</u> |

Continued On Next Page

Client Number: 02020
Matter Number: 02020-0002

4/5/2023
Page: 3

Current Invoice Summary

| | | |
|--------------------------|---------------------------------|-------------------------|
| Prior Balance: | \$3,377.50 | |
| Payments Received: | (\$3,377.50) | Last Payment: 3/15/2023 |
| Unpaid Prior Balance: | <u>\$0.00</u> | |
| Current Fees: | \$2,503.50 | |
| Advanced Costs: | <u>\$0.00</u> | |
| TOTAL AMOUNT DUE: | <u><u>\$2,503.50</u></u> | |

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.



V#14887

L. Allyson Honaker
allyson@hloky.com
(859) 368-8803 (office)
(859)396-3172 (mobile)

OK to pay
JHP

1795 Alysheba Way, Ste 6202
Lexington, KY 40509

May 07, 2023

Invoice No. 307

Farmers RECC
Mr. Toby Moss
504 S. Broadway
Glasgow, KY 42141

RATE CASE

Client Number: 02020 Farmers RECC
Matter 02020-0002 Farmers RECC - 2023 Rate Case
For Services Rendered Through 4/30/2023.

Fees

| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-------------------|--|--------------|---------------|
| 4/1/2023 | BHK | Review email from J. Wolfram and A. Honaker regarding work plan and progress for rate case. | 0.20 | \$51.00 |
| 4/1/2023 | LAH | Review emails from J. Wolfram and respond to same re status of COSS. | 0.20 | \$53.00 |
| 4/2/2023 | LAH | Review email and attachments from J. Wolfram re COSS and timing for pro forma adjustments; review attachments. | 0.40 | \$106.00 |
| 4/3/2023 | LAH | Office conference re status of rate case and possible board meeting dates. | 0.20 | \$53.00 |
| 4/3/2023 | BHK | Office conference with A. Honaker re status of rate case and board meeting. | 0.20 | \$51.00 |
| 4/5/2023 | BHK | Review email from J. Phelps regarding work progress and schedule for rate case. | 0.10 | \$25.50 |
| 4/5/2023 | LAH | Review emails from J. Phelps re status and schedule for filing rate case. | 0.10 | \$26.50 |

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928.00
LR

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| | | | | |
|-----------|-----|---|------|----------|
| 4/6/2023 | LAH | Exchange emails with J. Phelps re estimate to include in exhibit; exchange emails with J. Phelps re pro forma adjustment for ROW; review spreadsheets provided by J. Phelps re ROW. | 0.40 | \$106.00 |
| 4/11/2023 | LAH | Exchange emails with J. Phelps re timing of filing; telephone conference with J. Wolfram re same; telephone conference with J. Phelps re timeline and possible dates for board meeting; telephone conference with B. Koenig re same; review and respond to email from J. Phelps re dates and schedule for drafts. | 0.80 | \$212.00 |
| 4/11/2023 | BHK | Review of emails to try to determine whether presentation to Board will be ready for April 20 and to determine meetings to finalize application materials and financial documents. | 0.50 | \$127.50 |
| 4/19/2023 | LAH | Review rate case information and drafts to prepare for meeting with T. Moss, J. Phelps, et. al. | 1.20 | \$318.00 |
| 4/20/2023 | LAH | Office conference with B. Koenig re meeting with rate case team; participate in video conference with T. Moss, et. al. re COSS. | 1.10 | \$291.50 |
| 4/20/2023 | BHK | Meeting with J. Wolfram, J. Phelps, Corey, Toby, A. Honaker, regarding rate case and required materials, cost of service study and materials prepared by J. Wolfram. | 1.10 | \$280.50 |
| 4/20/2023 | BHK | Discussion with A. Honaker re: preparation for rate case materials and next steps for schedule to prepare application. | 0.40 | \$102.00 |
| 4/20/2023 | BHK | Discussion of issues remaining for rate case application with A. Honaker in preparation for rate case meeting with J. Phelps, T. Moss, J. Wolfram. | 1.10 | \$280.50 |
| 4/20/2023 | BHK | Review of materials sent my J. Phelps and J. Wolfram in preparation for meeting with J. Wolfram, T. Moss, J. Phelps, and A. Honaker. | 0.60 | \$153.00 |
| 4/20/2023 | LAH | Office conference with B. Koenig re status of drafts for rate case and next steps. | 0.40 | \$106.00 |
| 4/21/2023 | BHK | Review emails from J. Wolfram re: question about pole attachments and from A. Honaker responding. | 0.30 | \$76.50 |
| 4/21/2023 | LAH | Review email from J. Phelps re meeting scheduled and response from B. Koenig re same; review and respond to email from J. Wolfram re pole attachment tariffs. | 0.30 | \$79.50 |
| 4/21/2023 | BHK | Review and respond to email from J. Phelps re board meeting scheduled attachments and from A. Honaker responding. | 0.10 | \$25.50 |

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| | | | | |
|-------------------------------|-----|---|--------------|-------------------|
| 4/24/2023 | BHK | Review of emails from J. Phelps re: dates required for meeting re: rate case. | 0.20 | \$51.00 |
| 4/24/2023 | LAH | Review and respond to emails from J. Phelps re meeting scheduled. | 0.20 | \$53.00 |
| 4/28/2023 | BHK | Review of materials prepared for rate case and assessment of what more is required to prepare application for filing. Examine list of exhibits and revise documents for filing. | 1.20 | \$306.00 |
| 4/28/2023 | LAH | Review of current drafts and information for rate case filing to prepare for meeting. | 0.80 | \$212.00 |
| Billable Hours / Fees: | | | <u>12.10</u> | <u>\$3,146.50</u> |

Timekeeper Summary

Timekeeper BHK worked 6.00 hours at \$255.00 per hour, totaling \$1,530.00.

Timekeeper LAH worked 6.10 hours at \$265.00 per hour, totaling \$1,616.50.

Payment Detail

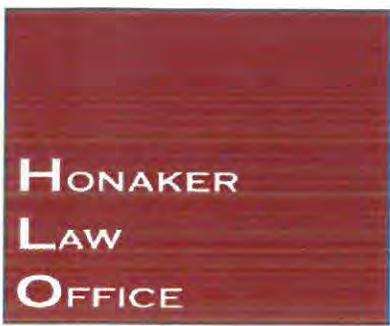
| <u>Date</u> | <u>Description</u> | <u>Amount</u> |
|---------------------------------|-------------------------------------|---------------------|
| 4/17/2023 | Check Number 56836 against Inv# 271 | (\$2,503.50) |
| Total Payments Received: | | <u>(\$2,503.50)</u> |

Current Invoice Summary

| | | |
|------------------------------|--------------------------|--------------------------------|
| Prior Balance: | \$2,503.50 | |
| Payments Received: | (\$2,503.50) | Last Payment: 4/17/2023 |
| Unpaid Prior Balance: | <u>\$0.00</u> | |
| Current Fees: | \$3,146.50 | |
| Advanced Costs: | \$0.00 | |
| TOTAL AMOUNT DUE: | <u><u>\$3,146.50</u></u> | |

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

V#14887



L. Allyson Honaker
allyson@hloky.com
(859) 368-8803 (office)
(859)396-3172 (mobile)

RATE CASE

1795 Alysheba Way, Ste 6202
Lexington, KY 40509

June 08, 2023

Invoice No. 347

Farmers RECC
Mr. Toby Moss
504 S. Broadway
Glasgow, KY 42141

Client Number: 02020 Farmers RECC
Matter 02020-0002 Farmers RECC - 2023 Rate Case
For Services Rendered Through 5/31/2023.

Fees

| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-------------------|--|--------------|---------------|
| 5/1/2023 | BHK | Drafting application for rate case and exhibits for filing. Examine list of exhibits and revise documents for filing format. | 1.80 | \$459.00 |
| 5/1/2023 | LAH | Review email from J. Phelps re meeting scheduled; review information provided by J. Wolfram re completed COSS. | 0.80 | \$212.00 |
| 5/2/2023 | BHK | Meeting to discuss revenue requirements and cost of service study and presentation of these matters to the Farmers RECC board. With J. Phelps, T. Moss, J. Wolfram, A. Honaker, C. Pennington. | 1.00 | \$255.00 |
| 5/2/2023 | BHK | Review of email regarding prepared exhibits from J. Phelps. | 0.20 | \$51.00 |
| 5/2/2023 | BHK | Revisions of draft of rate application and draft exhibits for rate application. | 1.50 | \$382.50 |

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|----------|-----|---|------|----------|
| 5/2/2023 | LAH | Pre-meeting telephone conference with J. Wolfram; telephone conference with B. Koenig re Commission's Orders on streamline procedure and not pursuing full amount shown in COSS; participate in video conference with T. Moss, et. al. re COSS and other rate case related matters; review Commission order on streamline procedures. | 1.50 | \$397.50 |
| 5/2/2023 | LAH | Review and respond to email from J. Phelps re exhibits for rate case. | 0.20 | \$53.00 |
| 5/2/2023 | BHK | Research re: streamlined rate cases and requirements for pilot program. | 0.70 | \$178.50 |
| 5/2/2023 | BHK | Review email from A. Honaker re: streamlined pilot program language for research re: whether there will be an issue with utility choosing to only seek 4% in order to use the streamlined rate case, despite the coss showing the utility could ask for more. | 0.30 | \$76.50 |
| 5/5/2023 | BHK | Emailing with J. Phelps, C. Pennington, A. Honaker re: draft of customer notice. | 0.30 | \$76.50 |
| 5/5/2023 | BHK | Prepare draft of customer Notice for J. Phelps, C. Pennington and sent to A. Honaker for review. | 0.80 | \$204.00 |
| 5/5/2023 | BHK | Review of client's social media addresses for Customer Notice. | 0.30 | \$76.50 |
| 5/5/2023 | LAH | Exchange emails with J. Phelps re customer notice for Kentucky Living; office conference with B. Koenig re same; review draft notice and edit same; review multiple emails from C. Pennington, et. al. re same. | 0.70 | \$185.50 |
| 5/7/2023 | LAH | Review email and attached COSS documents from J. Wolfram. | 0.80 | \$212.00 |
| 5/8/2023 | BHK | Emails back and forth regarding board resolution draft with A. Honaker and J. Phelps. | 0.40 | \$102.00 |
| 5/8/2023 | BHK | Drafting rate application. | 0.80 | \$204.00 |
| 5/8/2023 | LAH | Exchange emails with J. Phelps, et. al. re drafting board resolution; draft same; email draft to J. Phelps, et. al. for review; review edits from J. Phelps and respond to email re same. | 0.60 | \$159.00 |
| 5/8/2023 | BHK | Review materials sent from J. Wolfram in preparation for board meeting on 11th. | 0.80 | \$204.00 |
| 5/9/2023 | LAH | Review emails from J. Phelps, et. al. re exhibits 33 and 34. | 0.20 | \$53.00 |
| 5/9/2023 | BHK | Emails with J. Phelps and A. Honaker re: application preparation and exhibits 33-34. | 0.20 | \$51.00 |

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| | | | | |
|-----------|-----|---|------|----------|
| 5/10/2023 | LAH | Review multiple emails from J. Phelps with draft exhibits attached; begin review of draft attachments. | 1.20 | \$318.00 |
| 5/10/2023 | BHK | Review multiple emails with exhibits attached for use in rate application, 15, 19, 33, 34, 21,22, 25, 27, 28, 31, 32. | 0.50 | \$127.50 |
| 5/11/2023 | BHK | Meeting to discuss the rate filing and board approval of rate to seek. J. Wolfram, A. Honaker, J. Phelps, T. Moss, Farmers' Board of Directors. | 1.00 | \$255.00 |
| 5/11/2023 | BHK | Call with A. Honaker to discuss work plan next steps after board approval of rate to seek. | 0.30 | \$76.50 |
| 5/11/2023 | BHK | Call to A. Honaker to discuss Customer Notice abbreviated version requirements. | 0.30 | \$76.50 |
| 5/11/2023 | LAH | Review Q&A from J. Phelps re presentation for board; participate virtually in Farmers' Board meeting to discuss COSS and rate case filing; continue review of exhibits received from J. Phelps. | 1.80 | \$477.00 |
| 5/11/2023 | LAH | Review Notice to Use Electronic Procedures and Notice of Intent from B. Koenig; review draft Application from B. Koenig. | 0.60 | \$159.00 |
| 5/11/2023 | LAH | Multiple calls with B. Koenig re customer notice and next steps after board meeting. | 0.60 | \$159.00 |
| 5/12/2023 | LAH | Review multiple emails re customer notice; review and edit same; office conference with B. Koenig re same. | 0.50 | \$132.50 |
| 5/12/2023 | LAH | Review full notice draft and edit same; conference with B. Koenig re same. | 0.30 | \$79.50 |
| 5/12/2023 | LAH | Review new draft of customer notice; review spreadsheet provided by J. Wolfram; review multiple emails from J. Wolfram, et. al. re same. | 0.50 | \$132.50 |
| 5/12/2023 | LAH | Exchange multiple emails with J. Phelps re customer notice for Kentucky Living; telephone conference with J. Phelps re same. | 0.30 | \$79.50 |
| 5/12/2023 | LAH | Review acknowledgment letter from Commission assigning case number; email case number to team. | 0.10 | \$26.50 |
| 5/12/2023 | BHK | Emails back and forth with J. Phelps, C. Pennington, and A. Honaker revising Notice for Kentucky Living. | 0.80 | \$204.00 |

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| | | | | |
|-----------|-----|--|------|----------|
| 5/12/2023 | BHK | Drafting and revising drafts, emailing back and forth, compiling the numbers from J. Wolfram's excel sheets and confirming numbers with him with A. Honaker, J. Wolfram to prepare Abbreviated Customer Notice. | 1.20 | \$306.00 |
| 5/15/2023 | BHK | Draft cover letter and Notice of Intent to PSC to file rate application. | 0.60 | \$153.00 |
| 5/15/2023 | BHK | File Cover Letter and Notice of Intent to PSC Case No. 2023-00158. | 0.30 | \$76.50 |
| 5/15/2023 | BHK | Discussion with A. Honaker re: work plan and timeline for Application and exhibits preparation and filings dates for Notice of Intent and requirements for long customer notice. | 0.40 | \$102.00 |
| 5/15/2023 | LAH | Conference with B. Koenig re timeline for finalizing Application and Exhibits; review Notice of Intent and edit same; review multiple emails re same. | 0.40 | \$106.00 |
| 5/15/2023 | LAH | Review notice of intent as filed. | 0.10 | \$26.50 |
| 5/15/2023 | LAH | Review signed board resolution from J. Phelps. | 0.10 | \$26.50 |
| 5/16/2023 | BHK | Preparation of application exhibits for Farmers re: director pay, Otier ratios, etc. Email to client and consultant to confirm whether we need a reference to consultant's testimony or exhibits and whether there were any changes with board policies re: director pay during the test year. | 2.50 | \$637.50 |
| 5/16/2023 | LAH | Continue review of exhibits provided by J. Phelps; office conference with B. Koenig re same; review emails re questions on certain exhibits. | 1.10 | \$291.50 |
| 5/17/2023 | BHK | Drafting and revising application and exhibits for rate application. | 0.90 | \$229.50 |
| 5/17/2023 | BHK | Discussion with A. Honaker re: preparation of Farmers rate application and exhibits. | 0.20 | \$51.00 |
| 5/17/2023 | BHK | Drafting and revising excel sheets for exhibits and exhibit cover sheets for rate application and zipped file to send to client. | 3.10 | \$790.50 |
| 5/17/2023 | LAH | Review email and draft exhibits and cover sheets from B. Koenig; review email from J. Phelps re same; begin reviewing newest draft of exhibits. | 0.80 | \$212.00 |
| 5/18/2023 | BHK | Email with revisions for exhibit drafts from J. Phelps. | 0.30 | \$76.50 |

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| | | | | |
|-----------|-----|--|------|----------|
| 5/21/2023 | BHK | Review of customer notice for preparation of full customer notice of rates and comparison to abbreviated notice and changes made to notice by client and consultant before sending to Kentucky Living. | 0.70 | \$178.50 |
| 5/22/2023 | BHK | Drafting full version of customer notice, message to A. Honaker re: requesting confirmation from J. Wolfram for numbers and rates in tables for full version. | 1.90 | \$484.50 |
| 5/22/2023 | BHK | Revise five exhibits to address edits to attachments, excel spreadsheets, and exhibit cover pages and sent to client for review. | 2.70 | \$688.50 |
| 5/22/2023 | BHK | Emails with J. Phelps, A. Honaker, J. Wolfram re: any additional exhibits required from J. Phelps. | 0.30 | \$76.50 |
| 5/22/2023 | LAH | Review multiple emails from B. Koenig, J. Phelps, et. al. re questions on exhibits; review revised exhibits. | 0.70 | \$185.50 |
| 5/22/2023 | LAH | Review emails from J. Andrews, et. al. re data request responses. | 0.10 | \$26.50 |
| 5/23/2023 | BHK | Discussion with A. Honaker re: next steps re: testimony and exhibits from J. Wolfram. | 0.20 | \$51.00 |
| 5/23/2023 | BHK | Discussion with A. Honaker re: next steps and status of preparation of application. | 0.20 | \$51.00 |
| 5/23/2023 | LAH | Conference with B. Koenig re status and next steps. | 0.10 | \$26.50 |
| 5/23/2023 | LAH | Review emails from J. Wolfram, et. al. re full customer notice; review full customer notice. | 0.40 | \$106.00 |
| 5/24/2023 | BHK | Review of exhibits and draft testimony provided by J. Phelps for rate application. | 0.80 | \$204.00 |
| 5/24/2023 | LAH | Review and respond to emails from J. Phelps re mailing customer notice to customers that do not receive Kentucky Living; exchange emails with J. Phelps re testimony drafts. | 0.20 | \$53.00 |
| 5/25/2023 | LAH | Exchange emails with J. Phelps re scheduling zoom meeting to discuss status and questions. | 0.10 | \$26.50 |
| 5/25/2023 | LAH | Review email and affidavit from J. Phelps. | 0.20 | \$53.00 |
| 5/26/2023 | BHK | Review Attorney General intervention in rate case. | 0.10 | \$25.50 |
| 5/26/2023 | BHK | Review affidavit draft and emails re: members that do not receive Kentucky Living for verification for rate application from Jennie Phelps. | 0.40 | \$102.00 |
| 5/26/2023 | LAH | Review AG's motion to intervene. | 0.10 | \$26.50 |

Continued On Next Page

Client Number: 02020
Matter Number: 02020-0002

6/8/2023
Page: 6

Billable Hours / Fees: 43.90 \$11,345.50

Timekeeper Summary

Timekeeper BHK worked 28.80 hours at \$255.00 per hour, totaling \$7,344.00.
Timekeeper LAH worked 15.10 hours at \$265.00 per hour, totaling \$4,001.50.

Payment Detail

| <u>Date</u> | <u>Description</u> | <u>Amount</u> |
|---------------------------------|--------------------|---------------------|
| 5/15/2023 | Check 57019 | (\$3,146.50) |
| Total Payments Received: | | (\$3,146.50) |

Current Invoice Summary

| | | |
|--------------------------|--------------------|-------------------------|
| Prior Balance: | \$3,146.50 | |
| Payments Received: | (\$3,146.50) | Last Payment: 5/15/2023 |
| Unpaid Prior Balance: | \$0.00 | |
| Current Fees: | \$11,345.50 | |
| Advanced Costs: | \$0.00 | |
| TOTAL AMOUNT DUE: | \$11,345.50 | |

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

OK to pay
JSP



CATAYST
CONSULTING LLC

3308 Haddon Road
 Louisville, KY 40241
 (502) 599-1739
 johnwolfram@catalystllc.com

INVOICE

| | |
|---|--|
| Date: February 1, 2023 | Invoice #: 230107 |
| Client: Farmers R.E.C.C. 504 South Broadway Glasgow, Kentucky 42141 | Project: 2022 Rate Review Case No. _____ For Services Provided in January 2023 |

| | Item | Description | Qty | Rate | Amt |
|--------------|---------------------|---|-----------|----------|--------------------|
| 1 | Consulting Services | John Wolfram – consulting support. Begin revenue requirement, COS, and rate analysis. Begin processing data request responses. Calls and/or mails with staff on same. | 7.5 hours | \$225.00 | \$ 1,687.50 |
| TOTAL | | | | | \$ 1,687.50 |

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.

Date _____
 Approved By [Signature]
 Rec. By [Signature]
 Totals Checked _____
 Use Tax _____
05/05/23 Acct. 928.00 Amt. _____



CATAYST
CONSULTING LLC

3308 Haddon Road
 Louisville, KY 40241
 (502) 599-1739
 johnwolfram@catalystcllc.com

RECEIVED
 MAR 02 2023
 BY: _____

V#14470

INVOICE

| | |
|---|---|
| Date: March 1, 2023 | Invoice #: 230212 |
| Client: Farmers R.E.C.C. 504 South Broadway Glasgow, Kentucky 42141 | Project: 2022 Rate Review Case No. _____ For Services Provided in February 2023 |

| | Item | Description | Qty | Rate | Amt |
|--------------|---------------------|--|------------|----------|--------------------|
| 1 | Consulting Services | John Wolfram – consulting support. Continue revenue requirement, COS, and rate analysis. Populate COS models. Kickoff call with team. Calls and/or mails with staff on same. | 10.0 hours | \$225.00 | \$ 2,250.00 |
| TOTAL | | | | | \$ 2,250.00 |

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.

0sem 05
 928.00
 LR




V#14470



CATAYST
CONSULTING LLC

3308 Haddon Road
 Louisville, KY 40241
 (502) 599-1739
 johnwolfram@catalystcllc.com

INVOICE

| | |
|---|--|
| Date: April 1, 2023 | Invoice #: 230309 |
| Client: Farmers R.E.C.C. 504 South Broadway Glasgow, Kentucky 42141 | Project: 2022 Rate Review Case No. _____ For Services Provided in March 2023 |

| | Item | Description | Qty | Rate | Amt |
|--------------|---------------------|--|-----------|----------|--------------------|
| 1 | Consulting Services | John Wolfram – consulting support. Continue revenue requirement, COS, and rate analysis. Populate COS models. Calls and/or mails with staff on same. | 6.0 hours | \$225.00 | \$ 1,350.00 |
| TOTAL | | | | | \$ 1,350.00 |

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.

Rate Case

Ok to pay
[Signature]

0sem 05
928.00
JK



V#14470



CATAYST CONSULTING LLC

3308 Haddon Road
Louisville, KY 40241
(502) 599-1739
johnwolfram@catalystcllc.com

INVOICE

| | |
|---|--|
| Date: May 1, 2023 | Invoice #: 230407 |
| Client: Farmers R.E.C.C. 504 South Broadway Glasgow, Kentucky 42141 | Project: 2022 Rate Review Case No. _____ For Services Provided in April 2023 |

| | Item | Description | Qty | Rate | Amt |
|--------------|---------------------|---|------------|----------|--------------------|
| 1 | Consulting Services | John Wolfram – consulting support. Complete unadjusted revenue requirement, COS, and rate analysis. Complete near-final pro forma adjustments and rate recommendation. Calls and/or mails with staff on same. | 31.0 hours | \$225.00 | \$ 6,975.00 |
| TOTAL | | | | | \$ 6,975.00 |

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.

2023 Rate Case

Ok to pay
JSP



LR

0sem 05

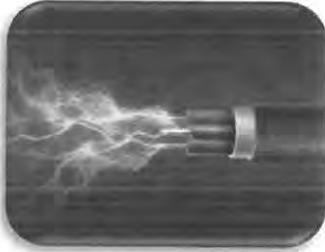
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LR



~230407

V#14470



CATAYST
CONSULTING LLC

3308 Haddon Road
 Louisville, KY 40241
 (502) 599-1739
 johnwolfram@catalystllc.com

INVOICE

| | |
|---|--|
| Date: June 1, 2023 | Invoice #: 230513 |
| Client: Farmers R.E.C.C. 504 South Broadway Glasgow, Kentucky 42141 | Project: 2022 Rate Review Case No. <u>2023-20158</u> For Services Provided in May 2023 |

| | Item | Description | Qty | Rate | Amt |
|--------------|---------------------|---|------------|----------|--------------------|
| 1 | Consulting Services | John Wolfram – consulting support. Complete analysis. Present results to BOD. Prepare notice, draft testimony, exhibits. Calls and/or mails with staff on same. | 12.0 hours | \$225.00 | \$ 2,700.00 |
| TOTAL | | | | | \$ 2,700.00 |

Please remit payment to Catalyst Consulting LLC at the address listed above. Thank you.

Osem 05
928.00
2023 Rate case

OK to pay
JWP



V#12981

Farmers RECC Travel and Expense Report

| | |
|---|-------------------|
| Employee Name: JENNIE PHELPS | Employee No.: 183 |
| Reason for Expenditures: Rate Case - Meeting w/ John Wolfram, Consultant, in Louisville | |

Employee Paid Expenses (to be reimbursed)

| Expense Type: | Date: | | | | | | Total: |
|-------------------------|-----------|--|--|--|--|--|--------|
| | 19-Apr | | | | | | |
| | Location: | | | | | | |
| Airfare | | | | | | | - |
| Car Rental | | | | | | | - |
| Taxi/Bus/Limo | | | | | | | - |
| Parking Tolls | | | | | | | - |
| Gasoline | | | | | | | - |
| Mileage ** | 132.31 | | | | | | 132.31 |
| Breakfast | | | | | | | - |
| Lunch | | | | | | | - |
| Dinner | | | | | | | - |
| Lodging/Room | | | | | | | - |
| Personal Phone Call | | | | | | | - |
| Seminar/Conference Fees | | | | | | | - |
| Miscellaneous *** | | | | | | | - |

Total Reimbursement Due To Employee: \$ **132.31**

admn 03 92800 flr

**** Mileage Log**

| Date | Description | Miles | Rate | Amount |
|-----------|-------------------------------------|-------|-------|-----------|
| 19-Apr-23 | Travel to/from KEC Statewide Office | 202 | 0.655 | \$ 132.31 |
| | | | 0.655 | \$ - |
| | | | 0.655 | \$ - |
| | | | 0.655 | \$ - |
| | | | 0.655 | \$ - |
| | | | | \$ - |

***** Miscellaneous Detailed Descriptions**

| Date | Expense | Description | Amount |
|------|---------|---|--------|
| | |  | |
| | | \$00012981 | |
| | |  | |
| | | ~SA0000000065118 | |

I certify that the information provided above is an accurate record of expenses incurred by me and all is reimbursable under the Cooperative Policy No. 217.

| | |
|-------------------------|---------|
| Employee Signature | Date |
| <i>Jennie Phelps</i> | 4/24/23 |
| Authorization Signature | Date |
| <i>Jinda Towshie</i> | 4/26/23 |
| Authorization Signature | Date |
| | |

This form is to be used for travel and expense reimbursements of all employees. Submit this form with detailed receipts indicating the amount, place and date the expenses were incurred. Incomplete documentation will not be reimbursed. Expenses deemed excessive and/or in poor judgment are subject to review and adjustment to reasonable levels by the President/CEO and/or the Board of Directors.

ATTACHMENTS
ARE EXCEL
SPREADSHEETS
AND UPLOADED
SEPARATELY