

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF)
FLEMING-MASON ENERGY COOPERATIVE,)
INC. FOR A GENERAL ADJUSTMENT OF RATES)

Case No. 2023-00223

RESPONSES TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO
FLEMING-MASON ENERGY COOPERATIVE, INC.
DATED JANUARY 9TH, 2024

This 19th day of January, 2024.

Respectfully submitted,

CAMPBELL ROGERS & STACY PLLC
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BY: 

EARL ROGERS III
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ENERGY COOPERATIVE, INC.

CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Kentucky Public Service Commission for filing on January 19th, 2024; 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 Order of July 22, 2021, in case number 2020-00085, no paper copies of this filing will be made.



EARL ROGERS III
ATTORNEY FOR
FLEMING-MASON ENERGY COOPERATIVE, INC.

**FLEMING-MASON ENERGY COOPERATIVE, INC.
PSC CASE NO. 2023-00223
FOURTH REQUEST FOR INFORMATION RESPONSE**

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION DATED 1/9/2024
REQUEST 4-1**

RESPONSIBLE PERSON: Lauren C. Fritz

COMPANY: Fleming-Mason Energy Cooperative, Inc.

Request 4-1. Refer to Fleming-Mason's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 3. Provide an itemized breakdown of total test-year expenses for the board of directors in Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible. The response should group expenses by director and category, such as per diems, industry association meetings, healthcare costs, etc.

Response 4-1. Please see the attached spreadsheet.

**ATTACHMENTS
ARE EXCEL
SPREADSHEETS
AND UPLOADED
SEPARATELY**

**FLEMING-MASON ENERGY COOPERATIVE, INC.
PSC CASE NO. 2023-00223
FOURTH REQUEST FOR INFORMATION RESPONSE**

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION DATED 1/9/2024
REQUEST 4-2**

RESPONSIBLE PERSON: Brandon Hunt

COMPANY: Fleming-Mason Energy Cooperative, Inc.

Request 4-2. Refer to Fleming-Mason's response to Staff's Third Request, Item 5. Provide supporting documentation for the pro forma right-of-way maintenance expenses, including but not limited to the contract for right-of-way maintenance.

Response 4-2. Please see attached. The attachment is being filed under seal pursuant to a Motion for Confidential Treatment.

**ATTACHMENT
FILED UNDER SEAL
PURSANT TO A
MOTION OFR
CONFIDENTIAL
TREATMENT**

**FLEMING-MASON ENERGY COOPERATIVE, INC.
PSC CASE NO. 2023-00223
FOURTH REQUEST FOR INFORMATION RESPONSE**

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION DATED 1/9/2024
REQUEST 4-3**

**RESPONSIBLE PERSON: Lauren C. Fritz
COMPANY: Fleming-Mason Energy Cooperative, Inc.**

Request 4-3. Refer to Fleming-Mason's response to Staff's Third Request, Item 6. Provide a breakdown of the pro form test-year wages and salaries, showing each employee's regular and overtime hours, wage rates, and total wages.

Response 4-3. Please see attached. The attachment is being filed under seal pursuant to a Motion for Confidential Treatment.

The adjustment proposed in Exhibit JW-2, Reference Schedule 1.10 for Wages & Salaries was developed "from the top down" not "from the bottom up." The amount was calculated on a rolled-up basis using a five-year average for employee overtime expenses. For this reason, it is not possible to provide the data for each employee broken down as cited in the request. However, Fleming-Mason provides the information for 2023 actual amounts broken down as requested, to serve as an illustrative example of the breakdown and in an effort to support the reasonableness of the adjustment to wages and salaries as proposed.

**ATTACHMENT
FILED UNDER SEAL
PURSANT TO A
MOTION FOR
CONFIDENTIAL
TREATMENT**