## 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 9<sup>TH</sup>, 2024

This 19th day of January, 2024.

Respectfully submitted,

CAMPBELL ROGERS & STACY PLLC ATTORNEYS AT LAW 154 FLEMINGSBURG ROAD MOREHEAD, KY 40351 (606) 783-1012 (606) 784-8926 FAX earl@campbellrogers.com

BY:

EARL ROGERS III

ATTORNEY FOR FLEMING-MASON 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 19<sup>th</sup>, 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.

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

| In the Matter of:   |  |  |  |  |  |
|---|--|--|--|--|--|
| THE ELECTRONIC APPLICATION OF  FLEMING-MASON ENERGY COOPERATIVE, INC . ) CASE NO.  FOR A GENERAL ADJUSTMENT OF RATES ) 2023-00223   |  |  |  |  |  |
| VERIFICATION OF BRANDON HUNT  |  |  |  |  |  |
|   |  |  |  |  |  |
| COMMONWEALTH OF KENTUCKY )  |  |  |  |  |  |
| COUNTY OF FLEMING )   |  |  |  |  |  |
| Brandon Hunt, President and Chief Executive Officer of Fleming-Mason Energy Cooperative, Inc., being duly sworn, states that he has supervised the preparation of certain responses to Commission Staff's Fourth Request for Information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information, and belief, formed after reasonable inquiry. |  |  |  |  |  |
| Brandon Hunt  |  |  |  |  |  |

The foregoing Verification was signed, acknowledged, and sworn to before me this  $19^{th}$  day of January 2024, by Brandon Hunt.

Jennifer L. McRoberts
Commonwealth of Kentucky
Notary Public
Commission No. KYNP61556
My Commission Expires 12/22/2026

Commission Expiration: 12/22/21

### **COMMONWEALTH OF KENTUCKY**

### BEFORE THE PUBLIC SERVICE COMMISSION

| THE ELECTRONIC APPLICATION FLEMING-MASON ENERGY COO FOR A GENERAL ADJUSTMENT   | PERATIVE, INC                                       | ,   | CASE NO.<br>2023-00223   |           |  |
|--|---|---|--|-----------|--|
| VERIFICATION OF LAUREN C. FRITZ  |   |   |  |           |  |
|  |   |   |  |           |  |
| COMMONWEALTH OF KENTUCKY   | )   |   |  |           |  |
| COUNTY OF FLEMING  | Ś   |   |  |           |  |
| Lauren C. Fritz, Chief Financial O<br>being duly sworn, states that she has s<br>Commission Staff's Fourth Request for<br>the matters and things set forth therein a<br>information, and belief, formed after reas | supervised the<br>Information in<br>are true and ac | preparation of<br>the above-refer<br>curate to the be | certain responses<br>enced case and the<br>est of her knowledg | to<br>nat |  |
|  |   | Tauren  | C. F.  |           |  |
|  |   | Lauren C. Fritz                                       |  |           |  |

The foregoing Verification was signed, acknowledged, and sworn to before me this  $19^{th}$  day of January 2024, by Lauren C. Fritz.

Jennifer L. McRoberts
Commonwealth of Kentucky
Notary Public
Commission No. KYNP61556
My Commission Expires 12/22/2026

Commission Expiration: (2)22/26

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.

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

Request 4-2 Page 1 of 1 Witness: Hunt

## 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.

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

Witness: Fritz

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.

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