### COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENERGY CORP.	) (	Case No.
FOR A GENERAL ADJUSTMENT OF RATES	) 2	2023-00276

## KENERGY CORP.'S VERIFIED RESPONSE TO COMMISSION STAFF'S SECOND REHEARING REQUEST FOR INFORMATION

Kenergy Corp. (Kenergy), by counsel, hereby tenders its Verified Response to Commission Staff's Second Rehearing Request for Information entered October 16, 2024.

Respectfully Submitted,

/s/ Nicholas D. Kafer
Nicholas D. Kafer
Kenergy Corp.
General Counsel
PO Box 1389
Owensboro, KY 42302-1389
(270) 689-6103
nkafer@kenergycorp.com

#### Certification

I hereby certify that the foregoing electronic filing was transmitted to the Kentucky Public Service Commission for filing on October 28, 2024; there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and by virtue of the Commission's Order of 2020-00085, no paper copies of this filing will be made.

/s/ Nicholas D. Kafer Counsel for Kenergy Corp.

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In the Matter of:

ELECTRONIC APPLICATION OF KENERGY CORP.	)	Case No.
FOR A GENERAL ADJUSTMENT OF RATES	)	2023-00276

# <u>VERIFICATION OF KENERGY CORP.'S TRAVIS SIEWERT, VICE PRESIDENT – ACCOUNTING AND FINANCE</u>

Travis Siewert, Vice President of Accounting and Finance, of Kenergy Corp., being duly sworn, states that he has supervised the preparation of the following Responses to Commission Staff's Second Rehearing Request for Information on behalf of Kenergy Corp. 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.

Travis Siewert

Vice President – Accounting and Finance

STATE OF KENTUCKY
COUNTY OF Henderson

The foregoing was signed, acknowledged and sworn to before me by Travis Siewert, Vice President – Accounting and Finance, this the day of October, 2024.

Notary Public

Notary ID Number: KRUK

My Commission Expires: 4-20-25

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Kenergy Corp.

Case No. 2023-00276

Commission Staff's Second Rehearing Request for Information Witness: Travis Siewert

1. Refer to Kenergy's response to Commission Staff's Rehearing Request for Information,

Item 2.

a. Explain whether it is possible using Kenergy's billing software to have a settle-up month

for the fixed budget billing plan without also having a settle-up month for the levelized budget

billing plan.

b. If so, explain whether the billing software would be able to calculate the settle-up month

bill for the fixed budget billing plan as the budget bill amount plus or minus the amount that would

make the customer current at the end of the budget billing year.

c. If the billing software is able to have a settle-up month for the fixed budget billing plan

without affecting the administration of the levelized budget billing plan, but the settle-up month

bill amount cannot be calculated by the method set forth in Item 1b above, explain how the settle-

up month bill would be calculated.

Response 1.a. Yes. As stated in the approved Schedule 155 for Levelized Budget Billing,

levelized billing operates without a defined settle-up month. Both budget billing programs will

create an account receivable balance for the member (either as a credit or an arrearage) over time

that is resolved by the software. In the fixed budget billing, the settle-up month is the trigger to

calculate and invoice the account receivable balance that has accrued over the budget year. In

levelized billing, instead of using a settle-up month, the rolling account receivable balance is

recalculated monthly and a defined portion is added to the bill over time once those options are

enabled in the software.

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Response 1.b. Yes, but those parameters would by function of the software apply to both levelized and fixed budget billing programs, and the account receivable balance on a levelized account would continually accrue and not be billed as there is not a settle-up month in levelized billing.

Within NISC's budget billing, there are 2 User Defined Options ("UDO") that can be enabled to bill accrued account receivable balances over time. Exhibit A to this Response shows UDO 16 and UDO 18. By function of the software, they apply to both budget billing programs. Currently, these UDOs are not enabled. Enabling these UDOs is necessary to calculate and bill the account receivable balance in levelized billing. Enabling UDO 16 would average an accrued balance that the member owes to Kenergy over a defined number of months (which will be as set in UDO 28 at "12 months") and add the result to the next monthly bill. Enabling UDO 18 operates the same way for an amount Kenergy owes to the member. This is the levelized billing process described in Kenergy's new Schedule 155.

When enabled for purposes of levelized billing, UDOs 16 and 18 will also apply to fixed billing. At that point, instead of settling a member's account receivable balance in full with a single invoice or refund in the settle-up month, the balance will be spread over the defined number of months (which is 12). This is the reason Kenergy has requested to amend the fixed budget billing tariff to allow for the distribution of the accrued account receivable balance over the next 12-month billing year.

**Response 1.c.** No response based on the responses to 1.a. and 1.b.