

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

In the Matter of:

Electronic Application of Jackson Purchase)	
Energy Corporation for a General)	
Adjustment of Rates and Other General)	Case No. 2024-00085
Relief)	

JACKSON PURCHASE ENERGY CORPORATION'S VERIFIED RESPONSE TO
ATTORNEY GENERAL'S POST-HEARING REQUESTS FOR INFORMATION
ENTERED DECEMBER 19, 2024

Comes now Jackson Purchase Energy Corporation (Jackson Purchase), by counsel, and does hereby tender its Verified Response to the Attorney General's Post-Hearing Request for Information entered December 19, 2024.

Entered January 6, 2024

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF)
JACKSON PURCHASE ENERGY)
CORPORATION FOR A GENERAL) Case No. 2024-00085
ADJUSTMENT OF RATES)
)


VERIFICATION OF MEREDITH KENDALL

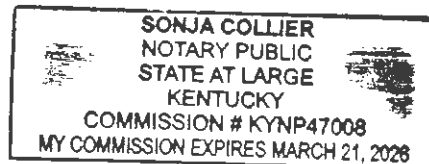
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF McCracken)

Meredith Kendall, Vice-President, and Chief Financial Officer of Jackson Purchase Energy Corporation, being duly sworn, states that she has supervised the preparation of certain responses to the Attorney General's Post-Hearing Request for Information in the above-referenced case on behalf of Jackson Purchase Energy Corporation, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.


Meredith Kendall

The foregoing Verification was signed, acknowledged and sworn to before me this the 6th day of January, 2025, by Meredith Kendall.


Commission expiration: 03/21/2026



Jackson Purchase Energy Corporation
Case No. 2024-00085
Attorney General's Post-Hearing Request for Information

Request 1: Refer to John Wolfram's Rebuttal Testimony, page 14, which indicates that Jackson Purchase Energy's revised rate increase request is \$4,641,647. Provide the current average monthly residential total bill and the proposed monthly residential total bill based upon the revised rebuttal rate increase request of \$4,641,647.

Response 1: At the rebuttal rate increase request of \$4,641,647, the estimated monthly residential bills are:

Present – \$172.50

Proposed – \$184.56

Please see the August 21, 2024 Rebuttal Testimony filing, "JPEC-2023-Pres Proposed Rates-REV-Rebuttal.xlsx" found in the last line of Tab R.

Jackson Purchase Energy Corporation
Case No. 2024-00085
Attorney General's Post-Hearing Request for Information

Request 2: Provide the average raise that Jackson Purchase Energy has provided or will provide for the years 2024 and 2025, broken down between executive staff, salaried employees, and non-salaried employees.

Response 2: Please reference the spreadsheet OAG_Item_-_2a_-_UPDATED_12-2024 included with the latest monthly rate case update filed on December 26, 2024, for information pertaining to 2024. Per Jackson Purchase's most recent Union contract, all bargaining employees will receive an 8% raise effective November 1, 2025. Non-bargaining employees typically receive raises in July each year based on performance; the average raise for non-bargaining employees in 2025 cannot be determined at this time.

Jackson Purchase Energy Corporation
Case No. 2024-00085
Attorney General's Post-Hearing Request for Information

Request 3: Refer to Jackson Purchase Energy's response to the Commission Staff's Second Request for Information, Item 17(a); Mr. Greg Meyer's Direct Testimony, page 23; and Mr. John Wolfram's Testimony at the December 16, 2024 evidentiary hearing at 1:37:40 – 1:38:15.

a. Provide an updated revenue requirement that includes the removal of the improperly booked \$57,964 expense, and the updated interest expense as discussed by Mr. Wolfram at the evidentiary hearing. Provide all workpapers.

b. Provide the current average monthly residential total bill and the proposed monthly residential total bill based upon the rate increase as provided in (a).

c. Provide the updated revenue requirement as requested in (a), but exclude the newly added adjustments as proposed by the Company in its December 10, 2024 filing (i.e. the updated labor raise expense and the alleged termination of a large commercial customer not to take place until February 1, 2025). Provide all workpapers.

d. Provide the current average monthly residential total bill and the proposed monthly residential total bill based upon the rate increase as provided in (c).

Response 3(a): The updated revenue deficiency is \$4,579,272. Please see the Excel spreadsheet provided separately, "JPEC-2023-RevReq-REV-Dec16.xlsx."

Response 3(b): The present average monthly residential bill would be \$172.50, and the proposed average residential bill would be \$183.85. This is at rates, due to rounding, yield a revenue

increase of \$4,579,272. Please see the Excel spreadsheet provided separately, “JPEC-2023-PresProposedRates-REV-Dec16.xlsx.”

Response 3(c): The updated revenue deficiency would be \$4,181,127. Please see the Excel spreadsheet provided separately, “JPEC-2023-RevReq-REV-Dec16-Excl-New.xlsx.”

Response 3(d): The present average monthly residential bill would be \$172.50 and the proposed average residential bill would be \$183.44. Please see the Excel spreadsheet provided separately, “JPEC-2023-PresProposedRates-REV-Dec16-Excel-New.xlsx.”

**ATTACHMENTS
ARE EXCEL
SPREADSHEETS
AND UPLOADED
SEPARATELY**

Jackson Purchase Energy Corporation
Case No. 2024-00085
Attorney General's Post-Hearing Request for Information

Request 4: Provide the base revenues recorded for Jackson Purchase Energy by quarter for 2023.

Response 4: Please see the Excel spreadsheet filed separately.

**ATTACHMENTS
ARE EXCEL
SPREADSHEETS
AND UPLOADED
SEPARATELY**

Jackson Purchase Energy Corporation
Case No. 2024-00085
Attorney General's Post-Hearing Request for Information

Request 5: Provide the base revenues recorded for Jackson Purchase Energy by quarter for 2024, with the most current quarters available.

Response 5: Please see the Excel spreadsheet filed separately.

**ATTACHMENTS
ARE EXCEL
SPREADSHEETS
AND UPLOADED
SEPARATELY**

Jackson Purchase Energy Corporation
Case No. 2024-00085
Attorney General's Post-Hearing Request for Information

Request 6: Refer to John Wolfram's Rebuttal Testimony, pages 6 – 7. Provide the most updated remaining balance for rate case expense from Jackson Purchase Energy's prior rate case.

Response 6: The balance of unamortized rate case expenses from the previous rate case as of December 31, 2024, is \$17,664.25.