COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

I	nt	he	NA	atter	of:
1	пι	110	LVI	latter	UI.

THE ELECTRONIC APPLICATION OF JACKSON)	
PURCHASE ENEGRY CORPORATION FOR A)	CASE NO.
GENERAL ADJUSTMENT OF RATES AND)	2024-00085
OTHER GENERAL RELIEF)	

JACKSON PURCHSE ENERGY CORPORATION'S NOTICE OF INTENT TO PLACE RATES INTO EFFECT PURSANT TO KRS 278.190(2) AND MOTION TO IMPLEMENT CORRECTED RATE

Comes now Jackson Purchase Energy Corporation ("Jackson Purchase"), by counsel, and does hereby provide its notice pursuant to KRS 278.190(2) and the Commission's May 14, 2024 Order. Jackson Purchase is requesting a decision on this motion by December 1, 2024. Jackson Purchase respectfully states as follows:

- 1. On May 1, 2024, Jackson Purchase filed an application requesting an adjustment of rates. On May 14, 2024, the Commission entered an order that suspended the effective date of Jackson Purchase's proposed rate increase and tariffs for five months, up to and including November 1, 2024. On August 23, 2024, the Commission entered an order setting a Formal Hearing in this matter on December 16, 2024.
- 2. Pursuant to KRS 278.190(2), this proceeding has not concluded nor an order made to date, therefore, Jackson Purchase hereby gives notice that it will be putting proposed rates into effect for bills rendered on, or after, January 1, 2025, if a final order has not been entered by the Commission. Jackson Purchase will maintain its records in a manner as will enable it, its

customers, or the Commission to determine the amounts to be refunded in the event a refund is awarded.

- 3. During the discovery process of this case an error in Jackson Purchase's original revenue requirement was discovered.¹ The adjustment for the test year expense of Donations, Promotional Advertisements, and Dues should have been decreased by \$455,666; however, Jackson Purchase mistakenly increased this adjustment by that amount. The result was an inclusion of \$911,331 in the revenue requirement.² The removal of this amount changes the requested revenue increase from \$5,586,197 to \$4,674,866.³
- 4. For customers taking service under Schedule R Residential the reduction of the revenue requirement changes the requested energy charge from \$0.118059 to \$0.116382 per kWh.⁴ Jackson Purchase requests the Commission to allow it to implement the \$0.116382 per kWh rate subject to refund.
- 5. Jackson Purchase will put rates into effect for bills rendered on, or after, January 1, 2025, pursuant to KRS 278.190(2) because Jackson Purchase will be placed into an undesirable financial position if it is unable to collect increased rates during the winter heating season. However, Jackson Purchase requests to place the most correct rates into effect to alleviate shock to customers during the winter heating season and to mitigate any refunds that may be necessary at the conclusion of these proceedings. Allowing Jackson Purchase to place the corrected energy

¹ Jackson Purchase's Response to the Attorney General's Second Request, Item 30; JPEC-2023-COS-REV 7-10-2024; JPEC-2023-Pres_Proposed_Rates-REV-07-10-2024; and JPEC-2023-RevReq-REV-07-10-2024 (filed July 10, 2024).

² Jackson Purchase's Response to the Attorney General's Second Request, Item 30.

³ JPEC-2023-RevReq-REV-07-10-2024.

⁴ Compare JPEC-2023-RevReq-REV-07-10-2024, Tab R to JPEC-2023-Pres-Proposed_Rates-FILED, Tab R (filed May 1, 2024).

rate, based upon the discovered error, will allow the most correct rates to be placed into effect for bills rendered on or after January 1, 2025.

WHEREFORE, Jackson Purchase respectfully provides notice pursuant to KRS 278.190(2) that it will place rates into effect for bills rendered on, or after, January 1, 2025. In addition, Jackson Purchase requests the Commission allow Jackson Purchase to place the corrected energy rates that result from the error discovered during the pendency of these proceedings into effect at that time instead of the rates that were filed in its Application on May 1, 2024.

This the 6th day of November, 2024.

Respectfully submitted,

Heather S. Temple
L. Allyson Honaker

Brittany Hayes Koenig

Heather S. Temple

HONAKER LAW OFFICE PLLC

1795 Alysheba Way, Suite 6202

Lexington, Kentucky 40509

(859) 368-8803

allyson@hloky.com

brittany@hloky.com

heather@hloky.com

Counsel for Jackson Purchase Energy Corporation

CERTIFICATE OF SERVICE

This is to certify that the electronic filing was transmitted to the Commission on November 6, 2024, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 no paper copies of this filing will be made.

Heather S. Temple

Counsel for Jackson Purchase Energy Corporation