

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BIG SANDY)
RURAL ELECTRIC COOPERATIVE CORPORATION) CASE NO. 2024-00287
FOR A GENERAL ADJUSTMENT OF RATES)

**THE ATTORNEY GENERAL’S RESPONSE TO BIG SANDY RURAL ELECTRIC
COOPERATIVE CORPORATION’S FIRST REQUEST FOR INFORMATION**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“Attorney General”), and submits the following response to Big Sandy Rural Electric Cooperative Corporation’s (hereinafter “Big Sandy RECC” or the “Company”) First Request for Information in the above-styled matter.

Respectfully submitted,

RUSSELL COLEMAN
ATTORNEY GENERAL



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Certificate of Service and Filing

Pursuant to the Commission's Orders and in accordance with all other applicable law, Counsel certifies that the foregoing electronic filing was transmitted to the Commission on January 31, 2025, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 31st day of January, 2025,



Assistant Attorney General

WITNESS RESPONSIBLE:
GREG R. MEYER

QUESTION NO. 1
Page 1 of 1

Refer to the Direct Testimony of Greg R. Meyer (Meyer Direct Testimony) at page 7, line 16. Please provide the replication of the year-end customer adjustment in electronic spreadsheet format with all formulas, calculations, links, and input data intact.

RESPONSE:

Please refer to the Excel spreadsheets and documents filed contemporaneously with this discovery response, specifically the workpaper entitled "Rate Revenue Adjustments.xlsx."

WITNESS RESPONSIBLE:
GREG R. MEYER

QUESTION NO. 2
Page 1 of 1

Refer to the Meyer Direct Testimony at page 21, line 18. Footnote 19 describes the derivation of the amount referenced. If a spreadsheet analysis or any other analysis beyond the text in the footnote was prepared, please provide it in electronic format with all formulas, calculations, links and input data intact.

RESPONSE:

Please refer to the Excel spreadsheets and documents filed contemporaneously with this discovery response, specifically the workpaper entitled "Healthcare Adjustment.xlsx."

WITNESS RESPONSIBLE:
GREG R. MEYER

QUESTION NO. 3
Page 1 of 1

Refer to the Meyer Direct Testimony. Provide any other workpapers used by Mr. Meyer to prepare his analysis and calculations. If such workpapers include spreadsheets, please provide in electronic format with all formulas, calculations, links and input data intact.

RESPONSE:

Please refer to the Excel spreadsheets and documents filed contemporaneously with this discovery response.

WITNESS RESPONSIBLE:
GREG R. MEYER

QUESTION NO. 4
Page 1 of 1

Refer to the Meyer Direct Testimony at page 25. Provide any orders of the Commission from 2014-2025 where the Commission authorized a Times Interest Earned Ratio (“TIER”) less than 2.0 for an electric cooperative.

RESPONSE:

Mr. Meyer is not aware of any such order. However, as noted in his direct testimony on page 25, lines 7-8, the Kentucky Public Service Commission held in Case No. 2021-00407, that the appropriate TIER should be decided “on a case by case basis...”²⁴

²⁴ Case No. 2021-00407, *Electronic Application of South Kentucky Rural Electric Cooperative Corporation for a General Adjustment of Rates, Approval of Depreciation Study, and Other General Relief* (Ky. PSC, June 30, 2022), Order at page 18.

WITNESS RESPONSIBLE:
GREG R. MEYER

QUESTION NO. 5
Page 1 of 1

Refer to the Meyer Direct Testimony at page 29. Provide any orders of the Commission from 2014-2025 where the Commission has required an electric cooperative to provide a reconciliation of spending for right-of-way (“ROW”) maintenance.

RESPONSE:

Mr. Meyer is not aware of any such order.

However, fair, just, and reasonable rates are not achieved by allocating away monies that are supposed to be dedicated to ROW maintenance cost and approved by the Commission as such, especially when the Commission has continuously expressed its concern with the increased spending for right-of-way maintenance.

It is Mr. Meyer’s belief that the recommended reconciliation report would provide the Commission (and member-owners) valuable information that would help to address concerns regarding ROW maintenance and related costs.

AFFIDAVIT

STATE OF MISSOURI)

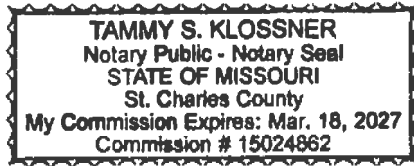
COUNTY OF ST. LOUIS)


GREG R. MEYER, being duly sworn, deposes and states that his responses to Big Sandy Rural Electric Cooperative Corporation’s First Request for Information to the KY Office of the Attorney General are true and correct to the best of his knowledge, information and belief.



Greg R. Meyer

Sworn to and subscribed before me on this 31st day of January, 2025.





Notary Public