

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)

**ATTORNEY GENERAL’S POST-HEARING REQUEST FOR INFORMATION TO
BIG SANDY RURAL ELECTRIC COOPERATIVE CORPORATION**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“Attorney General”), and submits the Post-Hearing Request for Information to Big Sandy Rural Electric Cooperative Corporation (hereinafter “Big Sandy RECC” or the “Company”) to be answered by February 28, 2025, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the

preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout, which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings;

calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

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 February 20, 2025, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 20th day of February, 2025,



Assistant Attorney General

Electronic Application of Big Sandy Rural Electric Cooperative Corporation
for a General Adjustment of Rates
Case No. 2024-00287
Attorney General's Post-Hearing Request for Information

1. Refer to Big Sandy RECC's response to the Attorney General's Second Request for Information ("Attorney General's Second Request"), Item 4, as well as to Mr. Prater's testimony at the February 18, 2025 evidentiary hearing.
 - a. Provide the current number of Big Sandy RECC Board of Directors' members.
 - b. Explain why Big Sandy RECC added one additional member to the Board of Directors in July 2020.
 - c. Explain why the per diem for the Board of Directors was increased in December 2022.
 - d. Provide the per diem for each Board of Director before December 2022.
 - e. Provide the per diem for each Board of Director after December 2022.
2. Refer to John Wolfram's Rebuttal Testimony, page 11, in which he indicates that Big Sandy RECC's revised rate increase has been reduced by \$597,077, from \$3,458,483 to \$2,861,406. Provide a reconciliation between the original \$3,458,483 rate increase request and the reduced, revised rate increase request of \$2,861,406. Include in the reconciliation a breakdown of the \$597,077 reduction by specific type of adjustment (*e.g.* depreciation, wages and salaries, etc.) and the corresponding adjustment amount.
3. Refer to John Wolfram's Rebuttal Testimony, Exhibit JW-9, page 2 of 5. Confirm that based upon the revised rate increase, the average residential customer will still have an increased total bill of \$18.07, or 12.9%, from a \$139.78 total bill per month to a \$157.85 total bill per month. If not confirmed, provide the correct increase of total bill for the average residential customer as well as the current monthly total bill and proposed monthly total bill for the average residential customer.

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4. Refer to Big Sandy RECC's response to the Attorney General's Second Request, Question 20(b), as well as the testimonies of Mr. Prater, Ms. Slone, and Mr. Wolfram at the February 18, 2025 evidentiary hearing.
 - a. Explain in detail whether all profits made by Big Sandy Forestry were provided to Big Sandy RECC in 2023. If not, explain what Big Sandy Forestry did with the profits.
 - b. Provide the monetary amount of profits made by Big Sandy Forestry in 2023.
 - c. Explain in detail whether all profits made by Big Sandy Forestry were provided to Big Sandy RECC in 2024. If not, explain what Big Sandy Forestry did with the profits.
 - d. Provide the monetary amount of profits made by Big Sandy Forestry in 2024.
 - e. Explain if there is a policy as to whether profits made by Big Sandy Forestry will be retained by Big Sandy Forestry or provided back to Big Sandy RECC. If there is a policy provide a copy of the same. If there is no policy, explain in detail why not.
 - f. If there is no policy as to whether profits made by Big Sandy Forestry will be retained by Big Sandy Forestry or provided back to Big Sandy RECC, explain who makes the decision as to which entity keeps the profits and how the decision is made.
 - g. If Big Sandy Forestry were to suffer a loss, explain which entity would have the loss on the books.

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- h. Provide a specific citation to Big Sandy RECC's application in the pending case, showing that the Big Sandy Forestry profits were included as an offset to the requested rate increase. If the Big Sandy Forestry profits were not included in the pending application, explain why not.
- i. For services provided by Big Sandy RECC to Big Sandy Forestry (*e.g.* administrative work, mechanic work on Big Sandy Forestry's trucks/equipment, etc.) identify the amount of services provided (hours and dollars) during the test year, as well as any reimbursements from Big Sandy Forestry paid to Big Sandy RECC for these services. Indicate if these reimbursements for services were included in the revenue requirement for Big Sandy RECC. Explain in detail.
- j. Explain in detail how Big Sandy RECC is in compliance with the affiliate transaction rules KRS 278.2201 to 278.2213 with regard to Big Sandy Forestry.