### COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In	the	Matter	of:

ELECTRONIC APPLICATION	)	
OF SHELBY ENERGY	)	CASE NO.
COOPERATIVE, INC.	)	2024-00351
FOR A GENERAL ADJUSTMENT	)	
OF RATES	)	

# SHELBY ENERGY COOPERATIVE, INC.'S VERIFIED RESPONSE TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION ENTERED FEBRUARY 13, 2025

Comes now Shelby Energy Cooperative, Inc. (Shelby Energy), by counsel, and does hereby tender its Verified Response to Commission Staff's Third Request for Information entered January 13, 2025.

Filed: February 27, 2025

### COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:						
THE ELECTRONIC APPLICATION OF SHELBY ENERGY COOPERATIVE INC. FOR A GENERAL ADJUSTMENT OF RATES	) ) )	Case No. 2024-00351				
VERIFICATION OF MICHAEL MORIARTY						
COMMONWEALTH OF KENTUCKY ) COUNTY OF SHELBY )						
Michael Moriarty, Chief Financial Officer of Shelby Energy Cooperative Inc, being duly sworn, states that he has supervised the preparation of responses to Commission Staff's Third Request for Information 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.						

The foregoing Verification was signed, acknowledged and sworn to before me this 24 m day of February 2025, by Michael Moriarty.

Michael Moriarty

Commission expiration: 12/13/2025

Shelby Energy Cooperative, Inc. Case No. 2024-00351 **Commission Staff's Second Request for Information** 

Request 1: Refer to Commission Staff's Second Request, Item 6, Attachment PSC 1-31.xlsx.

Provide the pro forma health insurance premiums using the current U.S. Bureau of Labor &

Statistics (BLS). Provide the contribution percentages for the health insurance premiums paid by

employer and employee for single and family coverage as of March 2024.

**Response 1:** Please see the Excel spreadsheet provided separately for pro forma health insurance

premiums using the BLS rates as of March 2024. The pro forma adjustment provided in the

Application, Exhibit 10, Direct Testimony of John Wolfram, Exhibit JW-2, Reference Schedule

1.15 used BLS percentages from 2022 which were slightly different than the percentages in the

most recent BLS report. Shelby Energy did not adjust the union employee health insurance

premiums in the Application because those contribution percentages are negotiated as part of the

collective bargaining agreement with IBEW Local 2100. The Excel spreadsheet to this response

includes union employees as part of the pro forma adjustment. Excluding union employees in the

attached pro forma adjustment would result in reducing the revenue requirement by \$53,416,

whereas the originally filed Reference Schedule 1.15 reduced the revenue requirement by \$56,629

using the 2022 BLS percentages.

As of March 2024, Shelby Energy contributed 90 percent of health insurance premiums for non-

union employees and 87 percent of health insurance premiums for union employees.

# ATTACHMENT IS AN EXCEL SPREADSHEET AND UPLOADED SEPARATELY