

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

**ELECTRONIC APPLICATION OF)
SHELBY ENERGY COOPERATIVE, INC.) Case No. 2024-00351
FOR A GENERAL ADJUSTMENT OF RATES)**

INITIAL DATA REQUESTS OF THE ATTORNEY GENERAL

Comes now the Attorney General of the Commonwealth of Kentucky, by his Office of Rate Intervention (“Attorney General”), and submits these Data Requests to Shelby Energy Cooperative, Inc. (hereinafter “Shelby Energy,” or “company”) to be answered by January 30, 2025, 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 companies receive or generate 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.

(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 undersigned Counsel 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 accord with all other applicable law, Counsel certifies that, on January 16, 2025, an electronic copy of the foregoing was served via the Commission's electronic filing system.

this 16th day of January, 2025.

A handwritten signature in blue ink, appearing to read "J. Michael New". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Assistant Attorney General

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Data Requests

1. Provide copies of all confidential documents previously filed with the Commission in this proceeding.
2. Refer to the Application generally. Provide an organizational chart of Shelby Energy, including all positions. If a position is vacant, please designate as such.
3. Shelby Energy states that it provides electric power to approximately 14,150 members located primarily in the Kentucky counties of Anderson, Carroll, Franklin, Henry, Jefferson, Oldham, Owen, Shelby, Spencer, and Trimble.
 - a. Provide a detailed account of all economic issues that the Company's customers in the above-referenced counties are combating at the present time.
 - b. Provide Shelby Energy's actual number of customers for the years 2014 - 2024.
 - c. Explain in detail whether Shelby Energy projects a future gain or loss of electric customers, and provide copies of all projections concerning the same.
 - d. Provide Shelby Energy's total annual energy sales for the years 2014 - 2024.
 - e. Explain whether Shelby Energy expects annual energy sales to increase or decrease, and provide copies of all projections concerning the same.
 - f. Provide a map of Shelby Energy's electric service area.
 - g. Provide a list of all rural electric cooperatives and investor-owned electric utilities whose service territory is contiguous with Shelby Energy's service territory.
 - h. Explain whether Shelby Energy has ever worked, or plans on working, with any other rural electric cooperative or investor-owned electric utility on any joint ventures.
 - i. Based upon the most recent United States Census information, the poverty rates for Shelby Energy's electric service area are as follows:
 - Anderson County - 9 %
 - Carroll County - 16.2 %
 - Franklin County - 11.8 %
 - Henry County - 14.6 %
 - Jefferson County - 16.2 %
 - Oldham County - 5.8 %
 - Owen County - 15.4%
 - Shelby County - 11.6%
 - Spencer County - 7%

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Trimble County – 13.2 %¹

Confirm that Shelby Energy is aware of the above percentages of its electric customers who live at or below the poverty line.

4. Refer to the Application generally. Provide the following information for Shelby Energy Cooperative executive staff employees.
 - a. Provide the position title and salary for each executive staff employee for the years 2017-2024.
 - b. Provide the average raise that the executive staff employees received for the years 2017-2024. Ensure to explain whether the annual raise is directly connected to a performance review.
 - c. Provide the average bonus that each executive staff employee received for the years 2017-2024.
 - d. Provide all awards given to the executive staff employees for the years 2017-2024.
 - e. Provide all vehicle allowances given to the executive staff employees for the years 2017-2024.
 - f. Provide all incentive compensation given to the executive staff employees for the years 2017-2024.
 - g. Provide the average raise, if any, which will be given to executive staff employees for 2025.
 - h. Provide a detailed explanation of the insurance benefits provided to the Company's executive staff employees, including but not limited to health, dental, vision, life insurance, etc. Ensure to include all premiums paid by the Company's executive staff employees, premiums paid by the Company or parent company on the executive staff employees' behalf, as well as all copays, deductibles, and maximum out of pocket amounts.
 - i. Provide a detailed explanation of the retirement benefits provided to the Company's executive staff employees, including but not limited to, whether there is a defined benefit plan, 401(k) matching, etc.
 - j. Explain whether any of the executive staff employees are members of a union.

5. Refer to the Application generally. Provide the following information for Shelby Energy executive staff employees.

¹<https://www.census.gov/quickfacts/fact/table/owencountykentucky,oldhamcountykentucky,jeffersoncountykentucky,henrycountykentucky,carrollcountykentucky,andersoncountykentucky/PST045223>;
<https://www.census.gov/quickfacts/fact/table/trimblecountykentucky,spencercountykentucky,shelbycountykentucky,franklincountykentucky,owencountykentucky/PST045223>

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- a. Provide the position title and salary for each executive staff employee for the years 2014 - 2024.
 - b. Provide the average raise that the executive staff employees received for the years 2014 - 2024. Ensure to explain whether the annual raise is directly connected to a performance review.
 - c. Provide the average bonus that each executive staff employee received for the years 2014 - 2024.
 - d. Provide all awards given to the executive staff employees for the years 2014 - 2024.
 - e. Provide all vehicle allowances given to the executive staff employees for the years 2014 - 2024.
 - f. Provide all incentive compensation given to the executive staff employees for the years 2014 - 2024.
 - g. Provide the average raise, if any, which will be given to executive staff employees for 2024.
 - h. Provide the average raise, if any, which will be given to executive staff employees for 2025.
 - i. Provide a detailed explanation of the insurance benefits provided to the Company's executive staff employees, including but not limited to health, dental, vision, life insurance, etc. Ensure to include all premiums paid by the Company's executive staff employees, premiums paid by the Company or parent company on the executive staff employees' behalf, as well as all copays, deductibles, and maximum out of pocket amounts.
 - j. Provide a detailed explanation of the retirement benefits provided to the Company's executive staff employees, including but not limited to, whether there is a defined benefit plan, 401(k) matching, etc.
 - k. Explain whether any of the executive staff employees are members of a union.
6. Refer to the Application generally. Provide the following information for Shelby Energy employees.
- a. Provide the position title and salary for each salaried employee for the years 2014 - 2024.
 - b. Provide the average raise that the salaried employees received for the years 2014 - 2024. Ensure to explain whether the annual raise is directly connected to a performance review.
 - c. Provide the average bonus that each salaried employee received for the years 2014 - 2024.
 - d. Provide all awards given to the salaried employees for the years 2014 - 2024.
 - e. Provide all vehicle allowances given to the salaried employees for the years 2014 - 2024.

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- f. Provide all incentive compensation given to the salaried employees for the years 2014 – 2024.
 - g. Provide the average raise, if any, which will be given to salaried employees for 2024.
 - h. Provide the average raise, if any, which will be given to salaried employees for 2025.
 - i. Provide a detailed explanation of the insurance benefits provided to the Company’s salaried employees, including but not limited to health, dental, vision, life insurance, etc. Ensure to include all premiums paid by the Company’s salaried employees, premiums paid by the Company or parent company on the salaried employees’ behalf, as well as all copays, deductibles, and maximum out of pocket amounts.
 - j. Provide a detailed explanation of the retirement benefits provided to the Company’s salaried employees, including but not limited to, whether there is a defined benefit plan, 401(k) matching, etc.
 - k. Explain whether any of the salaried employees are members of a union.
7. Refer to the Application generally. Provide the following information for Shelby Energy employees.
- a. Provide the position title and wages for each non-salaried employee for the years 2014 – 2024.
 - b. Provide the average raise provided to the non-salaried employees for the years 2014 – 2024. Ensure to explain whether the annual raise is directly connected to a performance review.
 - c. Provide the average bonus provided to the non-salaried employees for the years 2014 – 2024.
 - d. Provide all awards given to the non-salaried employees for the years 2014 – 2024.
 - e. Provide all vehicle allowances given to the non-salaried employees for the years 2014 – 2024.
 - f. Provide all incentive compensation given to the non-salaried employees for the years 2014 – 2024.
 - g. Provide the average raise, if any, which will be given to non-salaried employees for 2024.
 - h. Provide the average raise, if any, which will be given to non-salaried employees for 2025.
 - i. Provide a detailed explanation of the insurance benefits provided to the Company’s non-salaried employees, including but not limited to health, dental, vision, life insurance, etc. Ensure to include all premiums paid by the Company’s non-salaried employees, premiums paid by the Company or parent company on the non-salaried employees’ behalf, as well as all copays, deductibles, and maximum out of pocket amounts.

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- j. Provide a detailed explanation of the retirement benefits provided to the Company's non-salaried employees, including but not limited to, whether there is a defined benefit plan, 401(k) matching, etc.
 - k. Explain whether any of the non-salaried employees are members of a union.
8. Refer to the Application generally.
- a. Provide a detailed explanation of all salary and benefits provided to the members of the Board of Directors during the years 2014 - 2024. Provide the salary amounts, and specific details regarding all benefit packages, including but not limited to health, dental, vision, accidental death and disability, life insurance, bonuses, awards, vehicle allowances, and the like.
 - b. Provide the total amount of the Board of Directors' fees for the test year.
 - c. Provide a breakdown of the total amount of the Board of Directors' fees for the test year.
 - d. Discuss if there will be any changes to the Board of Directors' salaries and/or benefit packages in 2025.
 - e. When setting the Board of Directors' fees and benefits did Shelby Energy review other Kentucky rural electric cooperative Board of Directors' fees and benefits? If so, explain in detail the findings. If not, explain in detail why not.
 - f. In light of the need for additional capital, has the board considered reducing its fees? If so, please provide copies of every board of directors meeting where this was discussed or voted on.
9. Refer to the Application generally. Provide a copy of all formal studies conducted that compare Shelby Energy's wage and benefit information to the local wage and benefit information for the geographic area in which Shelby Energy operates. If no such studies exist, explain why not.
10. Refer to the Application generally. Explain the current process of awarding wage/salary increases to salaried versus non-salaried and union versus non-union employees.
11. Refer to the Application generally. Explain in detail whether Shelby Energy has obtained and/or whether the Company is seeking any funds/grants from federal, state, or local sources which have been or will be made available. If so, identify the source and amount of those funds/grants. If not, and funds/grants are available for which the Company is eligible, explain why the Company is foregoing those opportunities.

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12. Refer to the Application generally. Provide a list that identifies all miscellaneous costs for the test year, including but not limited to dinners (including all holiday dinners), gifts, donations, membership dues, annual meeting costs, etc. For each cost indicate whether it was removed from or included in the requested revenue requirement.
13. Explain in detail whether there are any direct charges, allocated costs, surcharges, pass-through charges, etc., from East Kentucky Power Cooperative (“EKPC”), or any other entity, to Shelby Energy. If so, provide a detailed list of the same with explanations for each allocated charge.
14. Explain in detail whether Shelby Energy provides any assistance program(s) for customers experiencing difficulty paying their electric bills.
15. Refer to the Application generally.
 - a. Provide a detailed explanation of how Shelby Energy operates its capital credit program, and ensure to discuss how the Company accounts for capital credits that cannot be provided back to the member due to the member passing away, moving, etc.
 - b. Provide the monetary amount of capital credits that Shelby Energy currently has on the books, separated by year.
16. Refer to the Application generally.
 - a. Explain in detail whether Shelby Energy has participated in, or continues to participate in, the Rural Utilities Service’s (“RUS”) Cushion of Credit program.
 - b. Confirm that the RUS Cushion of Credit program allowed cooperatives utilities to deposit cash with RUS from funds available in excess of its debt service requirements and earn interest on those deposits at 5.0%. However, when changes were made to the RUS Cushion of Credit Program through the enactment of the 2018 Farm Bill, it modified the interest rate on those deposits from 5% to the 1-year variable treasury rate on October 1st of each year. The 2018 Farm Bill also allowed for cooperatives to apply the Cushion of Credit funds to outstanding RUS and Federal Financing Bank (“FFB”) loans by September 30, 2020, without prepayment penalties.² If not confirmed, explain why not.

²<https://www.federalregister.gov/documents/2019/06/07/2019-11924/announcement-of-new-cushion-of-credit-program-provisions>; <https://www.usda.gov/farmbill>; <https://www.electric.coop/farm-bill-advances-electric-co-op-interests-in-rural-development-broadband>.

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- c. Explain whether Shelby Energy is aware of any further updates to the RUS Cushion of Credit program since the 2018 Farm Bill was enacted.
 - d. If Shelby Energy received interest income from the RUS Cushion of Credit program for the test year, explain whether this amount was included in the revenue requirement. If not, explain why not.
 - e. When changes were made to the Federal Farm Bill in 2018, explain whether Shelby Energy used its Cushion of Credit deposit amounts to prepay its RUS/FFB loans without penalty from the period of December 20, 2018 – September 30, 2020. If not, explain in detail why not.
 - f. Provide a detailed account of Shelby Energy’s Cushion of Credit deposit amounts for the years 2014 – 2024.
 - g. Provide a detailed account of Shelby Energy’s RUS/FFB loans, with the corresponding principal and interest amounts, for the years 2014 – 2024.
17. Refer to the application generally.
- a. Provide Shelby Energy’s TIER for the years 2014 – 2024.
 - b. Provide Shelby Energy’s Operating Times Interest Earned Ratio (“OTIER”) for the years 2014 – 2024.
18. Refer to the Application, paragraph 4 and Exhibit JW-2. Please explain the difference in the application requested rate increase of \$2,332,517 versus the revenue requirement of \$2,672,251 as shown in Exhibit JW-2.
19. Shelby Energy states that it is requesting an increase in the monthly residential customer charge from \$19.00 to \$29.00.
- a. Explain how seeking to increase the monthly residential customer charge from \$19.00 to \$29.00, which is an increase of approximately 52.63%, is in line with the principle of gradualism.
 - b. Explain whether Shelby Energy contemplated proposing a lower increase to the monthly residential customer charge so as not to create rate shock for the customers.
 - c. Explain whether Shelby Energy contemplated implementing the proposed higher customer charge in two phases instead of a 52.63% increase at one time.
 - d. Provide a list of all electric utilities in Kentucky, with the corresponding monthly residential customer charge, residential volumetric charge, average bill, and rank the utilities from lowest to highest average bill. Include Shelby Energy’s proposed residential customer charge, residential volumetric charge, average bill, and rank based upon its proposed revenue requirement.

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- e. Explain whether an increase in the monthly customer charge (and a decrease in volumetric charge) is beneficial to residential ratepayers and if so, how.
20. Refer to Exhibit JW-2, Reference Schedule 1.10.
- a. Please explain all components of the formulas used in the “Other Pays/Allowances/Vaca Py Out” column by employee. The explanation should at a minimum cover what the hours associated with other pay were for, how the pay rate was determined, what the additional amounts added were for, how the additions were determined.
 - b. Please provide all board minutes approving any additions for Other Pays.
 - c. Please provide the number of regular and overtime hours by employee for each year 2017-2023 and 2024.
 - d. Please provide the regular and overtime wages paid by employee for each year 2018-2027 and 2024.
 - e. Do the wages and salaries include incentive compensation? If so, please provide a breakdown of incentive compensation paid by employee and provide all criteria used to award incentive compensation.
 - f. Has the Company included pro forma wages and salaries for an employee whose position is currently vacant? If so, please identify which employee listed represents a vacant position.
21. Refer to Exhibit JW-2, Reference Schedule 1.03.
- a. Please provide any and all workpapers supporting the amounts shown in this reference schedule.
 - b. For each rate class shown here, please provide the number of customers, usage, and demand (for classes B1 & B2 only) by month for each year 2017-2024.
22. Refer to Exhibit JW-2, Reference Schedule 1.07.
- a. Please detail the following related to the rate case expense related to Case No. 2023-00213:
 - i. When did the amortization begin?
 - ii. What is the term of the amortization currently and current date of expiration?
 - iii. What was the beginning balance of the amortization (at commencement)?
23. Please refer to the application generally. What is the highest TIER and OTIER required by the Company’s current debt covenants?

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24. Refer to the application generally.
- a. Provide the budgeted Right of Way (“ROW”) maintenance expense for each of the years 2017-2024.
 - b. Provide the actual ROW maintenance expense for each of the years 2017-2024.
 - c. Provide the budgeted miles trimmed and treated for each of the years 2017-2024.
25. Refer to the application generally. Provide a list that identifies all miscellaneous costs for the test year, including but not limited to dinners (including all holiday dinners), gifts, donations, membership dues, annual meeting costs, etc. For each cost indicate whether it was removed from or included in the requested revenue requirement.
26. Refer to the Application generally.
- a. Explain whether Shelby Energy Cooperative provides health savings account contributions to its employees, and if so, provide the monetary amount regarding the same.
 - b. Provide a copy of all formal studies conducted that compare Shelby Energy Cooperative’s health insurance premium and health savings account contributions to those of local employers for the geographic area in which the Company operates. If no formal study exists explain why not.
 - c. Discuss any informal studies that compare Shelby Energy Cooperative’s health insurance premium and health savings account contributions to those of local employers for the geographic area in which the Company operates. If no informal study exists explain why not.
 - d. Confirm that according to the most recent data from the Bureau of Labor Statistics, the average share of premiums paid by the employer for single coverage in private industry is 80%.³
 - e. Provide the average percentage share of premiums paid by Shelby Energy Cooperative for single coverage employee health insurance.
 - f. Indicate the total cost for Shelby Energy Cooperative to provide single coverage employee health insurance for those employees electing single coverage.
 - g. Confirm that according to the most recent data from the Bureau of Labor Statistics, the average share of premiums paid by the employer for family coverage in private industry is 68%.⁴

³ <https://www.bls.gov/news.release/ebs2.t03.htm>, Table 3.

⁴ <https://www.bls.gov/news.release/ebs2.t04.htm>, Table 4.

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- h. Provide the average percentage share of premiums paid by Shelby Energy Cooperative for family coverage employee health insurance.
 - i. Indicate the total cost for Shelby Energy Cooperative to provide family coverage employee health insurance for those employees electing family coverage.
27. Refer to the Commission's final Order in Case No. 2021-00407, page 9.⁵ Did Shelby Energy Cooperative make any adjustments to Health Benefits Expense based on health insurance benefit contributions in excess of the Bureau of Labor Statistics' average for single and family coverage? If not, explain why not and update the adjusted test year expense based on the most recent report available. Provide all supporting calculations and documents.
- a. Provide the contribution amounts to insurance costs that are paid by Shelby Energy Cooperative and the retirees.
 - b. Provide the contribution amounts to dental insurance costs that are paid by Shelby Energy Cooperative and the employees.
 - c. Provide the contribution amounts to vision insurance costs that are paid by Shelby Energy Cooperative and the employees.
 - d. Provide the contribution amounts to short-term disability insurance that are paid by Shelby Energy Cooperative and the employees.
 - e. Provide the contribution amounts to long-term disability insurance that are paid by Shelby Energy Cooperative and the employees.
28. Refer to the Application generally.
- a. Explain whether payment processing fees have risen in the past seven years.
 - b. Provide the monetary amount that Shelby Energy Cooperative has included in the revenue requirement for payment processing fees, with a breakdown between each payment type.
 - c. If Shelby Energy Cooperative includes credit card fees in the revenue requirement, then provide the Commission case number and Order that approved these specific fees to be included in rates.
 - d. Provide all payment processing fees that Shelby Energy Cooperative has paid for in the years 2017-2024 and provide a breakdown for each type of payment processing fee.
 - e. Identify the type of payments Shelby Energy Cooperative accepts from a customer without assessing a fee.

⁵ 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 Jun. 30, 2022), Order at 9.

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- f. Identify the type of payments Shelby Energy Cooperative accepts only with a fee assessment.
 - g. Provide the per transaction charge that Shelby Energy Cooperative is assessed by Visa, Mastercard, and Discover.
 - h. Explain in full detail whether Shelby Energy Cooperative requires a convenience fee to be added to all credit card transactions in order for other member customers to not subsidize the credit card payments. If not, explain in full detail why not.
 - i. Provide the type of credit cards that Shelby Energy Cooperative accepts as payment (e.g. Visa, MasterCard, American Express, etc.), the fee that the Company pays to process each type of credit card, and the associated fee to the member customer.
 - j. Provide all other forms of payment that Shelby Energy Cooperative accepts from member customers to pay the utility bill, the corresponding fees that the Company pays for each payment type, as well as all fees assessed to the member customers for each payment type.
29. Refer to the application generally. Provide copies of the Board of Director Meeting Minutes for 2023 and 2024 year-to-date. Consider this an ongoing request during the pendency of this case.
30. Refer to the application generally. Provide the total amount of contributions and donations included for recovery in the test year and the adjusted test year by separate payee, along with a description of and the purpose for each payee. Also identify the customer benefit associated with each cost.
31. Refer to the Wolfram Testimony, Exhibit JW-2, Reference Schedule 1.04.
- a. Provide a detailed breakdown of the donations, promotional advertising, and dues.
 - b. Confirm that even if some of the aforementioned expenses in (a) are excluded for ratemaking purposes, it does not change the fact that the expenses are still being paid with ratepayer funds.⁶
32. Refer to the application generally. Provide the amount of Supplemental Executive Retirement Plan (“SERP”) that the Company has provided to employees for each of the years 2017-2024.
33. Refer to the application generally.

⁶ See Case No. 2016-00077, Licking Valley RECC’s response to the Attorney General’s Second Request for Information, Item 5.

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- a. Does Shelby Energy Cooperative pay for the travel and meal expenses for Directors' spouses when the spouse accompanies the Director? If so, indicate by year, from 2022, 2023, and 2024 how much spousal travel expenses have been incurred by the Company.
 - b. Indicate how much spousal travel has been included in the adjusted test year revenue requirement.

34. Refer to the application generally. If the TIER required by Shelby Energy Cooperative's debt covenants is lower than the 2.0 TIER requested in the Cooperative's rate relief request, explain why it is necessary to have rates that provide TIER higher than required by debt covenants.

35. Refer to the application generally. Does Shelby Energy Cooperative offer its management employees incentive compensation? If so, provide the following:
 - a. How much incentive compensation was awarded in each of the last five calendar years?
 - b. How much incentive compensation is included in the test year revenue requirement?
 - c. Provide all documentation related to the criteria used for awarding incentive compensation.
 - d. Who is responsible for authorizing or granting incentive compensation?
 - e. What positions are eligible to be awarded incentive compensation?

36. Refer to the application generally. Provide copies of all approved capital plans covering the next five years.

37. Refer to the application generally. Provide the budgeted versus actual employees by month for the last five years.

38. Refer to Exhibit JW-2, Reference Schedule 1.08.
 - a. Please provide any and all workpapers and contracts supporting the amounts shown in this reference schedule.
 - b. Please also provide historical long term debt and Consumer Deposit levels from 2017 to 2022.

39. Refer to Exhibit JW-2, Reference Schedule 1.13. Please provide any and all workpapers and contracts supporting the amounts shown in this reference schedule.