

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>THE ELECTRONIC APPLICATION OF</b>	)	
<b>SOUTH KENTUCKY RURAL ELECTRIC</b>	)	
<b>COOPERATIVE CORPORATION FOR A</b>	)	<b>CASE NO. 2024-00402</b>
<b>GENERAL ADJUSTMENT OF RATES AND</b>	)	
<b>OTHER GENERAL RELIEF</b>	)	

**DIRECT TESTIMONY**  
**AND EXHIBITS**  
**OF**  
**RANDY A. FUTRAL**

**ON BEHALF OF THE**  
**KENTUCKY OFFICE OF THE ATTORNEY GENERAL**

**J. KENNEDY AND ASSOCIATES, INC.**  
**ROSWELL, GEORGIA**

**PUBLIC REDACTED VERSION**

**MAY 19, 2025**

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**DIRECT TESTIMONY OF RANDY A. FUTRAL**

**I. QUALIFICATIONS AND SUMMARY**

1   **Q.    Please state your name and business address.**

2    A.    My name is Randy A. Futral. My business address is J. Kennedy and Associates, Inc.  
3           (“Kennedy and Associates”), 570 Colonial Park Drive, Suite 305, Roswell, Georgia  
4           30075.

5   **Q.    What is your occupation and by whom are you employed?**

6    A.    I am a utility rate and planning consultant holding the position of Director of  
7           Consulting with the firm of Kennedy and Associates.

8   **Q.    Please describe your education and professional experience.**

9    A.    I earned a Bachelor of Business and Science degree in Business Administration with  
10          an emphasis in Accounting from Mississippi State University. I have held various  
11          positions in the field of accounting for a period of approximately 40 years, both as an  
12          employee and more recently as a consultant. My experience has been focused in the

1 areas of accounting, auditing, tax, budgeting, forecasting, financial reporting, and  
2 management.

3 Since 2003, I have been a consultant with Kennedy and Associates, providing  
4 services to state government agencies and large consumers of utility services in the  
5 ratemaking, financial, tax, accounting, and management areas.

6 From 1997 to 2003, I served both as the Corporate Controller and Assistant  
7 Controller of Telscape International, Inc., an international public company providing  
8 telecommunication and high-end internet access services. My tenure with Telscape  
9 included responsibilities in the areas of accounting, financial reporting, budgeting,  
10 forecasting, banking, and management.

11 From 1988 to 1997, I was employed by Comcast Communications, Inc., then  
12 the world's third largest cable television provider, in a series of positions including  
13 Regional Controller for their South Central regional office. My duties with Comcast  
14 encompassed various accounting, tax, budgeting, forecasting, and managerial  
15 functions.

16 From 1984 to 1988, I held various staff and senior level accounting positions  
17 for both public accounting and private concerns focusing in the areas of accounting,  
18 budgeting, tax and financial reporting.

19 I have testified as an expert on ratemaking, accounting, finance, tax, and other  
20 issues in proceedings before regulatory commissions at the federal and state levels on  
21 numerous occasions. I have testified in numerous proceedings regarding distribution  
22 cooperatives and participated in the drafting and finalization of numerous formula rate  
23 plans involving such. I have also acted as the lead expert in numerous proceedings



1 involving audits of Louisiana fuel adjustment clauses, environmental adjustment  
2 clauses, purchase gas adjustment clauses, energy efficiency rider filings, and formula  
3 rate plan filings resulting in written reports that were ultimately approved by the  
4 Louisiana Public Service Commission.

5 I previously appeared as a witness before the Kentucky Public Service  
6 Commission (“Commission”) in a Water Service Corporation of Kentucky base rate  
7 proceeding in Case No. 2022-00147, in a Duke Energy Kentucky, Inc. (“Duke  
8 Kentucky”) base rate proceeding in Case No. 2022-00372, in a Kentucky Power  
9 Company (“Kentucky Power”) consolidated fuel adjustment two-year review  
10 proceeding in Case No. 2023-00008, and in a Licking Valley Rural Electric  
11 Cooperative Corporation base rate proceeding in Case No. 2024-00211. I also filed  
12 Direct Testimony in a Kenergy Corporation base rate proceeding in Case No. 2023-  
13 00276 and in a Kentucky Power purchased power adjustment tariff update proceeding  
14 in Case No. 2023-00318, both of which were decided by the Commission in lieu of  
15 formal hearings. Finally, I filed Direct Testimony in a pending Atmos Energy  
16 Corporation (“Atmos”) base rate proceeding in Case No. 2024-00276 and in a pending  
17 Duke Kentucky base rate proceeding in Case No. 2024-00354. I have also assisted  
18 counsel for the Office of the Attorney General of the Commonwealth of Kentucky and  
19 Kentucky Industrial Utilities Customers, as well as other Kennedy and Associates’  
20 experts, in numerous other proceedings before the Commission, including base rate  
21 (electric, gas, and water), fuel adjustment clause, and acquisition proceedings  
22 involving South Kentucky Rural Electric Cooperative Corporation, Kentucky Power,  
23 Atmos Energy Corporation, Duke Kentucky, Columbia Gas of Kentucky, Inc.,

1 Kentucky Utilities Company, Louisville Gas and Electric Company, Big Rivers  
2 Electric Corporation, Jackson Purchase Energy Corporation (“Jackson Purchase”),  
3 East Kentucky Power Cooperative, and Kentucky-American Water Company.<sup>1</sup>

4 **Q. On whose behalf are you testifying?**

5 A. I am providing testimony on behalf of the Office of the Attorney General of the  
6 Commonwealth of Kentucky (“AG”).

7 **Q. What is the purpose of your testimony?**

8 A. The purpose of my testimony is to address and make recommendations on specific  
9 issues that affect South Kentucky Rural Electric Cooperative Corporation’s  
10 (“SKRECC” or “Company”) requested base revenue increase and to quantify and  
11 summarize the effects of those recommendations.

12 **Q. Please summarize your testimony.**

13 A. I recommend that the Commission authorize an increase in SKRECC’s base revenues  
14 of no more than \$5,223,318, a reduction of \$5,543,681 from the Company’s requested  
15 increase of \$10,766,999. On Table 1 below, I list each adjustment that I recommend  
16 and the effect of each adjustment on the Company’s requested increase.<sup>2</sup> I also provide  
17 a corrected proforma adjustment amount for annualized revenues and purchased power  
18 expenses to remove the effects of customer movement between rate classes should the  
19 Commission decide to correct SKRECC’s filing error pertaining to its year-end  
20 customer count adjustment. These adjustments were developed in consultation with

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<sup>1</sup> My qualifications are further detailed in Exhibit RAF-1.

<sup>2</sup> The quantifications shown on Table 1 are detailed in my electronic workpapers, which have been filed along with my testimony.

the AG, but I understand that the AG’s final adjustments may differ based upon discovery, testimony, and further evidence presented throughout the course of this proceeding.

<b>Table 1</b> <b>South Kentucky Rural Electric Cooperative Corporation</b> <b>Case Number 2024-00402</b> <b>Summary AG Revenue Requirement Recommendations</b> <b>Test Year Ended May 31, 2024</b> <b>(\$)</b>	
	<u><b>Adjustment Amount</b></u>
<b>Amount of Increase Requested by SKRECC - Original Filing</b>	10,766,999
<b>AG Adjustments to SKRECC's Calculated Revenue Requirement:</b>	
Reflect Base Rev. Req. on As-Filed COS Utilizing 2.0 TIER Instead of 1.85 OTIER	(1,581,608)
Reflect Base Rev. Req. on As-Filed COS Utilizing 1.85 TIER Instead of 2.0 TIER	(815,454)
Reduce ROW Maintenance Expense to Normalize Trimming Over a Six- Year Cycle	(2,170,683)
Reduce Amount of Net FEMA Reimbursement Expenses	(234,788)
Reduce Excessive Payroll Tax Expense	(31,361)
Increase Retirement Pension and 401(k) Expenses To Reflect SKRECC Revision	7,091
Reduce Retirement Pension and 401(k) Expenses to Reflect One- Year Eligibility Delay	(266,412)
Reduce Amortization Expense for Deferred Costs	(89,921)
Remove Non-Recurring Expenses in Station Expense - SCADA	(19,880)
Reduce Uncollectible Accounts Expense Due to Non-Recurring Events	(32,679)
Reduce Depreciation Expense to Reflect SKRECC Revision to Fully Depreciated Plant	(19,512)
Reduce Health Insurance Expense To Reflect SKRECC Revision	(9,256)
Reduce Health Insurance Expense Based Upon BLS Avg. Employee Contributions	(129,144)
Reflect the Correct Amount of Long-Term Debt Interest Expense	(150,073)
<b>Total AG Adjustments to SKRECC's Requested Increase</b>	<u>(5,543,681)</u>
<b>AG Recommended Maximum Base Rate Increase for SKRECC</b>	<u><u>5,223,318</u></u>

## II. TIER VS OTIER AND NONOPERATING INCOME

### A. Summary of SKRECC’s OTIER Request

**Q. Describe the Company’s Operating Times Interest Earned Ratio (“OTIER”) request and the effect on its base revenue requirement.**

1 A. The Company requested the use of a 1.85 OTIER in its application in order to set its  
2 base revenue requirement, requesting a base rate increase of \$10,766,999.<sup>3</sup>  
3 SKRECC's application included a computation of a revenue deficiency of  
4 \$10,768,623 utilizing the 1.85 OTIER.<sup>4</sup> The slightly lower base rate increase request  
5 is due to rate rounding.<sup>5</sup> SKRECC's 1.85 OTIER calculation produced a Times  
6 Interest Earned Ratio of 2.29,<sup>6</sup> which is much higher than the 2.0 TIER that the  
7 Commission has authorized in multiple full base rate proceedings such as this one.  
8 The 1.85 OTIER Commission authorizations are normally limited to "streamlined"  
9 rate filings before the Commission.

10 **Q. Did the Company's application, including testimony, explain in detail all reasons**  
11 **why it chose to utilize the OTIER calculation in its request rather than the TIER**  
12 **calculation?**

13 A. No, not really. Although very generalized, the best explanation for this choice is found  
14 in the Direct Testimony of John Wolfram, which I have excerpted below:<sup>7</sup>

15 South Kentucky calculated target margins at an OTIER of 1.85 because the  
16 Commission has authorized rates based on that level in its recently  
17 promulgated regulation for "streamlined" rate filings and because South  
18 Kentucky considers this metric to be a more meaningful measure of the  
19 financial condition of the cooperative's electric operations. South Kentucky  
20 accordingly considers the OTIER threshold to be a reasonable minimum (even  
21 though this proceeding is not a streamlined case filed pursuant to that  
22 regulation). The Commission has approved an OTIER of 1.85 in other recent  
23 distribution cooperative rate filings.

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<sup>3</sup> Application at paragraph 4.

<sup>4</sup> Application at Mr. Wolfram's Exhibit JW-2 at the Statement of Operations & Revenue Requirement (page 1 of 51) at lines 35,42, and 44.

<sup>5</sup> Direct Testimony of John Wolfram ("Wolfram Testimony") at 6.

<sup>6</sup> Application at Mr. Wolfram's Exhibit JW-2 at the Statement of Operations & Revenue Requirement (page 1 of 51) at line 36.

<sup>7</sup> Wolfram Testimony at 7-8.

1 Even though it is stated that SKRECC considers the OTIER to be a more “meaningful  
2 measure” of its financial condition, there is no further explanation provided.

3 **B. By Using OTIER In Lieu of TIER, the Company Ignored Interest Income, Other**  
4 **Income And Expense, and Other Capital Credits Income In Its Revenue**  
5 **Requirement Calculation**

6 **Q. What are the main differences in the calculation of OTIER and TIER?**

7 A. The OTIER calculation uses operating margin and cash receipts from lenders in the  
8 numerator, while the TIER definition uses net margin in the numerator.<sup>8</sup> The net  
9 margin used in the TIER reflects the additional nonoperating income and expense line  
10 items that are not included in the operating margin used in the OTIER. In addition,  
11 the Commission has consistently removed the East Kentucky Power Cooperative  
12 Generation and Transmission (“G&T”) Capital Credits income from the calculation of  
13 TIER for ratemaking purposes and SKRECC removed those credits, summing to  
14 \$2,018,096,<sup>9</sup> in order to calculate the TIER of 2.29 in its request. The G&T capital  
15 credits income is included in the calculation of the net margin for financial reporting  
16 purposes and in the calculation of TIER for its Rural Utilities Service (“RUS”),  
17 Treasury and Federal Financing Bank (“FFB”), National Rural Utilities Cooperative  
18 Finance Corporation (“CFC”), and CoBank loan agreement credit metrics for each  
19 applicable year.

20 **Q. What effect does calculating the base revenue deficiency on OTIER instead of**

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<sup>8</sup> The differences between operating margins and net margins can be seen in the Application at Mr. Wolfram’s Exhibit JW-2 at the Statement of Operations & Revenue Requirement (page 1 of 51) at lines 24 through 32.

<sup>9</sup> Application at Mr. Wolfram’s Exhibit JW-2 at the Statement of Operations & Revenue Requirement (page 1 of 51) at line 29.

1       **TIER, less G&T Capital Credits, actually have?**

2       A.     It results in the loss of three substantial income items that otherwise would reduce the  
3             Company's requested base rate increase. More specifically, the Company's OTIER  
4             request ignores nonoperating margins - interest income; nonoperating margins – other;  
5             and other capital credits income that are included in the RUS definition of TIER and  
6             historically have been reflected in the base revenue requirement and in the net margin  
7             for financial reporting purposes and in the calculation of TIER for its RUS/FFB loan  
8             agreement requirements in the test year.<sup>10</sup>

9       **Q.     Describe the first income item that was excluded from the Company's calculation**  
10       **of its requested base rate increase.**

11       A.     The Company's request ignores and excludes the \$1,695,485 in interest income for the  
12             test year, consisting of the RUS Cushion of Credit and other investment interest  
13             income, included in the net margin, and not in the operating margin.<sup>11</sup> The amount of  
14             RUS Cushion of Credit interest income during the test year was \$880,387, while  
15             interest income received from the CFC and applicable to other investments summed  
16             to \$815,098.<sup>12</sup>

17       **Q.     Describe the RUS Cushion of Credit program and the related interest income**  
18       **recorded on the books of SKRECC.**

19       A.     The RUS Cushion of Credit program originally allowed cooperative utilities, such as

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<sup>10</sup> The definition of TIER set forth in the Company's RUS/FFB loan agreements specifies that "patronage capital or margins of the Mortgagor" be used in the numerator. This is the net margin as shown on Mr. Wolfram's Exhibit JW-2 at the Statement of Operations & Revenue Requirement (page 1 of 51) at line 32.

<sup>11</sup> Application at Mr. Wolfram's Exhibit JW-2 at the Statement of Operations & Revenue Requirement (page 1 of 51) at line 26.

<sup>12</sup> SKRECC's response to AG 1-44, a copy of which is attached as my Exhibit RAF-2.

1 the Company, to deposit cash with the RUS from funds available in excess of its debt  
2 service requirements and earn interest on those deposits at 5.0%, a rate greater than  
3 the Company's cost of long-term debt. The Company, along with many other  
4 cooperatives nationwide, maintained long-term debt that was far greater than required  
5 for their utility plant investments in order to take advantage of this opportunity to  
6 bolster their net margins at no risk. Changes in the RUS Cushion of Credit Program  
7 were enacted via the 2018 Federal Farm Bill. This Bill prohibited any future deposits  
8 of funds into the program effective December 31, 2018 and also allowed cooperatives  
9 to repay RUS/FFB loans through September 2020 using the accumulated RUS  
10 Cushion of Credit funds without any prepayment penalties. While many cooperatives  
11 took advantage of this opportunity to repay some of its RUS/FFB loans and lower its  
12 long-term debt interest expense, SKRECC decided in the 2019 through September  
13 2020 timeframe to maintain much of its RUS Cushion of Credit funds to continue to  
14 earn interest income and use to fund RUS/FFB loan service payments when needed  
15 for cash flow purposes. The 2018 Federal Farm Bill changed the interest rate  
16 applicable to these funds to be 4.0% for the period October 1, 2020 through September  
17 30, 2021, and it also established an annual setting of the interest rates applicable to  
18 these funds based on the 1-year variable treasury rate on October 1 of each year starting  
19 in 2021.

20 **Q. Describe the interrelationship between the cash on deposit with the RUS though**  
21 **the Cushion of Credit program and the amount of outstanding RUS and other**  
22 **debt.**

23 **A.** The Company had \$171,006,047 in outstanding long-term debt at the end of the test

1 year.<sup>13</sup> The Company had \$14,648,361 in funds on deposit with the RUS at the end  
2 of the test year,<sup>14</sup> which represented 8.6% of the Company's long-term debt  
3 outstanding at the end of the test year. In other words, absent the funds on deposit  
4 with the RUS and all else equal, the Company would have had only \$156,357,686 in  
5 long-term debt outstanding and only the interest expense on that lesser debt  
6 outstanding and the related TIER/OTIER included in its claimed revenue requirement.

7 In its audited financial statements, the Company nets the funds on deposit with  
8 the RUS as a reduction to the long-term debt outstanding (shown as "Advance  
9 Payment").<sup>15</sup> This financial statement presentation provides a helpful perspective to  
10 understand this issue and the effects on the long-term debt outstanding, interest  
11 expense, and the related TIER/OTIER included in the claimed revenue requirement in  
12 this proceeding.

13 **Q. What is your recommendation on the interest income?**

14 A. I recommend that the Commission include the interest income of \$1,695,485 in the net  
15 margin that should be used to calculate the base revenue deficiency. This interest  
16 income is included in the actual definition of the TIER used to determine the revenue  
17 requirement. The Company offered no justification to exclude it.

18 **Q. Describe the second income item that was incorrectly excluded from the**

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<sup>13</sup> Application at Mr. Wolfram's Exhibit JW-2 at Reference Schedule 1.14 Interest on Long-Term Debt (pages 37-38 of 51) at line 52 shows total debt of \$171,006,047. This balance includes a \$5,000,000 issuance in August 2024, FFB 6-3, which was issued after the end of the test year ended June 30, 2024.

<sup>14</sup> SKRECC's response to AG 1-41, which is the monthly trial balance account balances for numerous months. I have attached a copy of the applicable page showing the RUS Cushion of Credit balance in account 224.6 as of May 31, 2024 as my Exhibit RAF-3.

<sup>15</sup> Application at Exhibit 17 (Audited Financial Statements at December 31, 2023 and December 31, 2022 at 13).



1       **Company's calculation of its requested base rate increase.**

2       A.     The Company's request ignores and excludes the \$280,191 in nonoperating margins –  
3       other income in the test year.<sup>16</sup>

4       **Q.     What is your recommendation on the nonoperating margins – other income?**

5       A.     I recommend that the Commission include the other income of \$280,191 in the net  
6       margin that should be used to calculate the base revenue deficiency. This other income  
7       is included in the actual definition of the TIER used to determine the revenue  
8       requirement.

9       **Q.     Describe the third income item that was excluded from the Company's**  
10       **calculation of its requested base rate increase.**

11      A.     The Company's request ignores and excludes the \$427,397 in other capital credits and  
12      dividends income from the Company's investment in the CFC.<sup>17</sup>

13      **Q.     What is your recommendation on the other capital credits and dividends?**

14      A.     I recommend that the Commission include the other income of \$427,397 in the net  
15      margin that should be used to calculate the base revenue deficiency. The other capital  
16      credits and dividends income from the Company's investment in CFC is included in  
17      the actual definition of the TIER used to determine the revenue requirement.

18      **Q.     What is your overall recommendation regarding the use of TIER vs OTIER to**  
19      **set the revenue requirement?**

20      A.     I recommend that the Commission reject SKRECC's request to set base rates upon a

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<sup>16</sup> Application at Mr. Wolfram's Exhibit JW-2 at the Statement of Operations & Revenue Requirement (page 1 of 51) at line 28.

<sup>17</sup> *Id.* at line 30.

1 1.85 OTIER and set base rates in this proceeding using a TIER calculation. I will  
2 discuss the appropriate level of TIER below. The OTIER standard completely ignores  
3 the RUS Cushion of Credit interest income and other amounts used in the TIER  
4 calculation. The Company's calculation to set base rates on a 1.85 OTIER is  
5 equivalent to a TIER of 2.29, based upon its own calculations. This TIER level is  
6 unreasonably high and would place an unwarranted burden on SKRECC's member  
7 ratepayers. This recommendation is consistent with the Commission's Order in the last  
8 SKRECC base rate proceeding, in which SKRECC attempted to compute the revenue  
9 requirement on the level of OTIER.<sup>18</sup>

10 **Q. What is the effect of your recommendation if the Commission were to set base**  
11 **rates upon a TIER of 2.0, similar to what it has done in other base rate**  
12 **proceedings?**

13 A. As noted above, the Commission has set new base rates in multiple full base rate cases  
14 upon a 2.0 TIER. For this reason, I first computed the effect of setting the base rate  
15 increase upon a 2.0 TIER instead of the 1.85 OTIER as requested by the Company.  
16 The use of a 2.0 TIER, based upon all other as-filed cost of service parameters, results  
17 in a \$1,581,608 reduction in the base revenue requirement and requested base rate  
18 increase. I have listed this amount as the first adjustment on Table 1 above. A TIER  
19 of 2.0 is equivalent to an OTIER of 1.56 using the Company's as-filed cost of service  
20 parameters.

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<sup>18</sup> 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 11-15 and 17-18.

1 **C. TIER Should Be Set to 1.85**

2 **Q. Has the Commission held in prior cases that the TIER ratio has to be set to 2.0 in**  
3 **all cooperative base rate cases?**

4 A. No. While the Commission has historically set new cooperative base rates in full base  
5 rate cases upon a 2.0 TIER, it has also held that the appropriate TIER should be  
6 decided “on a case by case basis...”<sup>19</sup>

7 **Q. Is a 2.0 TIER necessary for SKRECC to meet its loan coverage ratios?**

8 A. No. SKRECC must attain at least a 1.25 TIER, a 1.25 Debt Service Coverage Ratio  
9 (“DSCR”), and a 1.10 OTIER to meet the requirements of its RUS/FFB loan  
10 agreements. These ratios are measured as the average of the best two out of three  
11 years. The Company also must have an average DSCR of not less than 1.35 for its  
12 CFC loans and meet a DSCR of 1.25 for its CoBank loans.<sup>20</sup> The Company has only  
13 expressed concerns with its ability to hit the TIER and OTIER targets.

14 **Q. What was the actual members’ equity to total capitalization ratio at the end of**  
15 **2024?**

16 A. The average members’ equity to total capitalization ratio was 52.5% at the end of  
17 2024.<sup>21</sup>

18 **Q. Is a 2.0 TIER necessary for the Company to increase members’ equity from**  
19 **present levels?**

---

<sup>19</sup> *Id.* at 18.

<sup>20</sup> SKRECC’s response to Staff 1-54, a copy of which is attached as my Exhibit RAF-4.

<sup>21</sup> SKRECC’s response to Staff 1-2, a copy of which is attached as my Exhibit RAF-5.

1 A. No. The Company does not need additional revenues to increase its members' equity  
2 ratios beyond present levels. Increasing equity would impose unnecessary costs on its  
3 customers. 52.5% is already a high level of members' equity in my experience.

4 **Q. Does SKRECC's RUS Cushion of Credit uniquely impact its TIER calculation?**

5 A. Yes. SKRECC's RUS Cushion of Credit interest income is reported as non-operating  
6 income on its RUS financial statements and is not reported as a reduction to the amount  
7 of long-term debt interest expense, which is the primary component of the TIER  
8 calculation. If SKRECC had paid down larger portions of its RUS/FFB long-term debt  
9 when it had the opportunity several years ago, the long-term debt interest expense  
10 would be substantially lower. The associated authorized margin based on a 2.0 TIER  
11 would be correspondingly lower. As noted earlier, SKRECC's RUS Cushion of Credit  
12 balance as of the end of the test year amounted to \$14,648,361. If that amount had  
13 been used to repay long-term debt, the reduction in long-term debt interest expense  
14 would be \$439,451 using an average long-term debt rate of 3%.<sup>22</sup> That equates to an  
15 additional net margin requirement of \$878,902 using a 2.0 TIER.

16 **Q. What is a more appropriate TIER ratio to use to set the revenue requirement?**

17 A. I recommend that the Commission use a TIER of 1.85 to determine SKRECC's  
18 revenue requirement in this proceeding. This level of TIER is sufficient for SKRECC  
19 to meet its minimum debt ratio obligations as well as provide for a more reasonable  
20 additional cushion to guard against unforeseen revenue reductions and non-rider

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<sup>22</sup> The average long-term debt interest rate for all issuances as of the end of the test year was 3.132% as reflected in Application at Mr. Wolfram's Exhibit JW-2 at Reference Schedule 1.14 Interest on Long-Term Debt (pages 37-38 of 51) at line 54. It was slightly lower for just the RUS/FFB issuances.

1 expense increases in any given calendar year period.<sup>23</sup> I provide the additional cushion  
2 amounts that will be available to SKRECC below. The authorization of an excessive  
3 TIER is a fundamental disincentive for distribution cooperatives like SKRECC to  
4 control discretionary expenses.

5 **Q. What is the effect of your recommendation for the Commission set base rates**  
6 **upon a TIER of 1.85?**

7 A. The use of a 1.85 TIER instead of a 2.0 TIER, based upon all other as-filed cost of  
8 service parameters, results in a \$815,454 reduction in the base revenue requirement  
9 and requested base rate increase. I have listed this amount as the second adjustment  
10 on Table 1 above. A TIER of 1.85 is equivalent to an OTIER of 1.41 using the  
11 Company's as-filed cost of service parameters and an OTIER of 1.40 after all my other  
12 recommended adjustments. These levels are far in excess of the minimum credit  
13 metric TIER level of 1.25 and OTIER level of 1.10 required by SKRECC's loan  
14 covenants. The 1.85 TIER level provides a cushion of over \$3.2 million in net margin  
15 over the 1.25 TIER minimum required by the RUS/FFB loans. The 1.40 OTIER level  
16 provides a cushion of over \$1.6 million in net margin over the 1.10 OTIER minimum  
17 required by the RUS/FFB loans.

18 The adjustment that I make below regarding long-term debt interest expense is  
19 based upon using the 1.85 TIER to compute the amount. All other adjustments that I  
20 recommend below have the same revenue requirement impact, whether using the 1.85  
21 OTIER, a 2.0 TIER, or a 1.85 TIER.

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<sup>23</sup> SKRECC recovers its purchased power expenses through its Fuel Adjustment Clause and its environmental expenses through its Environmental Surcharge Rider.

II. OPERATING EXPENSES

A. **Reduce ROW Maintenance Expense to Normalize Planned Trimming Over a Six-Year Cycle**

Q. Describe the amount of right-of-way (“ROW”) maintenance expenses included in the revenue requirement.

A. The Company incurred actual ROW maintenance expense of \$11,604,593 during the test year as recorded in account 593.50, *Maintenance of Overhead Lines-R/W*. SKRECC made no proforma adjustment to adjust that expense amount to a more normal recurring level of expense. SKRECC’s failure to adjust the actual test year amount is problematic because the level of expense for circuit mile trimming ROW maintenance was higher than normal during the test year. Table 2 below shows the expense amounts by year for recent years that are recorded in account 593.50.<sup>24</sup> Table 2 also provides a breakdown between contractor-related ROW maintenance to fulfill the Company’s circuit mile ROW maintenance goals and all other ROW maintenance expenses for each year in account 593.50.

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<sup>24</sup> The data included in Table 2 was provided in SKRECC’s attachment response to AG 1-53. I have attached the pertinent public portions of the response to AG 1-53 as my Exhibit RAF-6.

<p>Table 2  South Kentucky Rural Electric Cooperative Corporation  ROW Maintenance in Account 593.50  Test Year Ended May 31, 2024  \$</p>			
Year	Total ROW Maintenance in Account 593.50	Circuit Mile Contractor Trimming ROW Maintenance in Account 593.50	All Other ROW Maintenance in Account 593.50
2021	3,832,900	3,166,838	666,062
2022	3,739,771	2,970,780	768,991
2023	8,260,070	6,043,354	2,216,716
2024	9,554,931	7,304,060	2,250,871
Test Year	11,604,593	9,235,766	2,368,827
Average 2023 and 2024 Expense	<u>8,907,501</u>	<u>6,673,707</u>	<u>2,233,794</u>
Total TY Over 2023 and 2024 Avg	<u>2,697,092</u>	<u>2,562,059</u>	<u>135,033</u>

SKRECC witness Newton described the new vegetation management plan that began to be implemented in 2023, trimming approximately 800 per year in order to complete a six-year trimming cycle and increasing the ROW maintenance budget by “nearly \$6 million annually.”<sup>25</sup> 2021 and 2022 ROW maintenance expenses in account 593.50 averaged \$3,786,335, increasing to an average of \$8,907,501 during years 2023 and 2024. That is an increase of \$5,121,166 comparing average amounts from the two sets of years and in line with Mr. Newton’s nearly \$6 million increase statement. Both the average expense amounts for 2023 and 2024 of \$8,907,501 and the expense amount for 2024 alone of \$9,554,931 are much lower than the test year

<sup>25</sup> Direct Testimony of Kevin Newton (“Newton Testimony”) at 5-6.

1 amount of \$11,604,593.

2 As can be seen in Table 2, the largest increases in ROW maintenance expenses  
3 in account 593.50 relate to the Company's contractor-performed circuit mile ROW  
4 trimming activities.<sup>26</sup> While it is a known fact that such expenses have increased  
5 considerably in Kentucky over the last several years, the test year expenses are  
6 especially elevated and need to be normalized.

7 Table 2 also highlights a larger than normal increase in the level of non-  
8 contractor performed circuit mile ROW trimming activities in account 593.50 starting  
9 in 2023 compared to 2022 and 2021. SKRECC indicated in response to discovery that  
10 hourly contractor row maintenance costs were reflected as part of the circuit mile  
11 trimming costs in 2021 and 2022 and they were categorized differently starting in 2023  
12 as non-circuit mile trimming costs.<sup>27</sup> These hourly costs amounted to approximately  
13 \$1.4 million per year in 2023, 2024, and the test year.<sup>28</sup> The recent expense levels are  
14 considered to be recurring in nature and do not warrant a normalization adjustment.

15 **Q. What does the monthly data in account 593.50 reveal about the pattern of**  
16 **expenses during 2023, 2024, and the test year?**

17 A. Table 3 below provides the total ROW maintenance expense amounts recorded in  
18 593.50 for each month during 2023 and 2024.<sup>29</sup> It also provides the ROW maintenance  
19 expense amounts for each of the same months associated with only the contractor

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<sup>26</sup> SKRECC's response to AG 2-5(a). I have attached a copy of the full response to AG 2-5 as my Exhibit RAF-7.

<sup>27</sup> SKRECC's response to AG 2-5(c). See Exhibit RAF-7.

<sup>28</sup> SKRECC's response to AG 2-5(b). See Exhibit RAF-7.

<sup>29</sup> SKRECC's response to AG 1-53(d). See Exhibit RAF-6.



1 circuit mile trimming activities.<sup>30</sup>

<p style="text-align: center;">Table 3 South Kentucky Rural Electric Cooperative Corporation ROW Maintenance in Account 593.50 by Month For Each Month During 2023 and 2024 \$</p>				
	2023	2024	2023	2024
	Total	Total	Contractor	Contractor
	ROW	ROW	Circuit Mile	Circuit Mile
	Maintenance in	Maintenance in	Trimming in	Trimming in
	Account	Account	Account	Account
Year	593.50	593.50	593.50	593.50
Jan	337,345	265,136	165,221	123,095
Feb	364,067	269,343	237,259	116,742
Mar	379,285	1,213,151	143,143	1,059,426
Apr	569,415	2,129,467	413,386	1,957,403
May	328,044	1,445,581	137,939	1,032,693
Jun	887,445	552,271	735,913	351,471
Jul	457,550	1,492,528	194,221	103,239
Aug	1,537,426	1,047,279	1,251,386	670,637
Sep	239,705	158,446	78,630	11,000
Oct	474,052	1,372,991	319,866	1,272,819
Nov	1,295,971	365,361	1,146,842	357,939
Dec	1,389,765	(756,624)	1,219,548	247,594
Total	<u>8,260,070</u>	<u>9,554,931</u>	<u>6,043,354</u>	<u>7,304,060</u>
Average 2023 and 2024 Expense		<u>8,907,501</u>		<u>6,673,707</u>
Total TY June 2023 Through May 2024		<u>11,604,593</u>		<u>9,235,766</u>
Total TY Over 2023 and 2024 Avg		<u>2,697,092</u>		<u>2,562,059</u>
Note: The negative expense in Dec 2004 corrected over-expensed amounts in Oct 2024.				

2

3 This monthly expense data reveals the higher than average expense amounts being

4 recorded in account 593.50 within the months during the test year, June 2023 through

5 May 2024, than those recorded on average during those two years. This applies to

6 both the overall ROW maintenance expenses in account 593.5 overall and the

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<sup>30</sup> SKRECC's response to AG 2-6. I have attached a copy of this response as my Exhibit RAF-8.

1 expenses applicable to just the contractor circuit mile trimming.

2 **Q. How many circuit miles does SKRECC seek to keep trimmed as part of its**  
3 **current vegetation management plan?**

4 A. SKRECC stated in discovery that it currently has 5,017.54 total line miles that it seeks  
5 to trim over a six-year cycle, which averages 836.26 miles annually.<sup>31</sup>

6 **Q. What was the number of actual circuit miles trimmed over each of the last several**  
7 **years and during the test year?**

8 A. SKRECC provided the circuit miles trimmed each year for the last several years and  
9 in the test year in response to discovery, which are summarized in Table 4 below.<sup>32</sup>

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<sup>31</sup> SKRECC's response to AG 1-53(i). See Exhibit RAF-6.

<sup>32</sup> SKRECC's response to AG 1-53(g) and (h). See Exhibit RAF-6.

Table 4 South Kentucky Rural Electric Cooperative Corporation Actual Circuit Miles Trimmed & 6 Yr Average Trim Amounts			
Year	Circuit Miles Trimmed	Trimming Expenses	Expense Per Mile
2019	426.94	\$2,563,778	\$6,005
2020	469.48	\$2,424,225	\$5,164
2021	576.78	\$3,166,838	\$5,491
2022	304.90	\$2,970,780	\$9,743
2023	903.68	\$6,043,354	\$6,688
2024	787.66	\$7,304,060	\$9,273
TY	1,093.19	\$9,235,766	\$8,448
Total Miles to be Trimmed			5,017.54
6- Year Trim Cycle			6
Average Miles to be Trimmed Per Year			836.26
TY Trimming Expense Per Mile			\$8,448
6- Year Average Expenses Based on TY Expense per Mile			\$7,065,083
AG Recommended Reduction in TY Expenses			<u>(\$2,170,683)</u>

Table 4 shows that the average number of circuit miles trimmed and expected to be trimmed increased dramatically starting in 2023 coinciding with the Commission's instructions to do so in SKRECC's last rate case Order.<sup>33</sup> The data shows that there were 903.68 and 787.66 miles trimmed in 2023 and 2024, respectively. Both were far less than the 1,093.19 miles trimmed during the test year. The test year miles trimmed were 256.93 above the 836.26 average needed to complete a six-year trimming cycle, an overage of 30.7%. This is yet another indicator highlighting the need for a normalization adjustment.

<sup>33</sup> 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 29-30.

1           Table 4 also shows that average expense amounts per mile fluctuated during  
2           2023, 2024, and the test year. The average expenses per mile in 2023 and 2024 were  
3           \$6,688 and \$9,273, respectively, while the test year average expense per mile was  
4           \$8,448.

5   **Q.   Is the average ROW trimming expense per mile expected to increase or decrease**  
6   **in 2025 compared to the test year average trimming expense per mile?**

7   A.   The average 2025 ROW trimming expense per mile is actually set to decrease  
8       somewhat compared to similar average expense amounts in 2024 and in the test year.  
9       The Company bid out its 2025 circuit mile trimming needs by circuit in the later part  
10      of 2024. The winning bids for each individual circuit were selected and the Company  
11      entered into contracts with four separate contracting companies to complete the circuit  
12      mile trimming in 2025.<sup>34</sup> The Company received bids to complete [REDACTED]  
13      [REDACTED] during 2025.<sup>35</sup> The [REDACTED]  
14      [REDACTED]  
15      [REDACTED] for 2025. The average expenses per mile for each individual  
16      circuit can vary widely due to such things as vegetation growth levels and topography  
17      associated with each individual circuit.

18   **Q.   What are your recommendations?**

19   A.   I recommend that the Commission authorize the amount of contractor circuit mile  
20      trimming ROW maintenance expense be based on the Company's actual average cost

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<sup>34</sup> SKRECC's response to AG 1-53(m). See Exhibit RAF-6. I have not attached copies of the contracts.

<sup>35</sup> SKRECC's Confidential response to AG 1-53(k). I summarized the 2025 circuit miles and expenses per mile from the Company's bid results as part of my Confidential electronic workpapers, which are being supplied to only the appropriate parties along with my testimony.

1 of \$8,448 per circuit mile in the test year and an assumption that the Company actually  
2 will trim 836.26 miles per year in order to maintain a six-year cycle for its total  
3 5,017.54 circuit miles to be trimmed. Compared to the \$9,235,766 in contractor  
4 trimming ROW maintenance expense included in the test year, my recommendations  
5 yield a recommended expense of only \$7,065,083. These calculations are reflected at  
6 the bottom of Table 4 above. This recommendation is consistent with the  
7 Commission's Order in a recent Farmers Rural Electric Cooperative Corporation rate  
8 proceeding.<sup>36</sup> My calculations are based on the test year average trimming costs in the  
9 test year of \$8,448 per mile as opposed to the [REDACTED]  
10 [REDACTED] per mile. I utilized a more conservative pricing estimate  
11 more in line with recent history. The difference will allow a small cushion to cover  
12 unanticipated expenses in 2025 and the possibility of higher per mile circuit trimming  
13 expenses for years after 2025.

14 **Q. What is the effect of your recommendation?**

15 A. The effect is a reduction of \$2,170,683 in contractor trimming ROW maintenance  
16 expenses included in the claimed base revenue deficiency. This amounts to a reduction  
17 of \$2,170,683 in the base revenue requirement and requested base rate increase.

18 **B. Reduce Amount of Net FEMA Reimbursement Expenses**

19 **Q. Describe the amount of net Federal Emergency Management Agency ("FEMA")**  
20 **declared storm expenses and reimbursements that were removed from the**

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<sup>36</sup> Case No. 2023-00158, *Electronic Application of Farmers Rural Electric Cooperative Corporation for a General Adjustment of Rates Pursuant to Streamlined Procedure Pilot Program Established in Case No. 2018-00407* (Ky. PSC October 3, 2023), Order at 12.

1        **revenue requirement in the application since they were deemed to be non-**  
2        **recurring.**

3        A.     SKRECC removed \$420,685 in FEMA declared storm expenses and \$1,416,873 in  
4        FEMA declared storm expense reimbursements, both deemed to be non-recurring, in  
5        its application.<sup>37</sup> The net of these two amounts, \$996,188, was reflected as an increase  
6        to the revenue requirement in the application. SKRECC recorded all FEMA declared  
7        storm costs to account 593.10, *Storm Damage Expense*, and all FEMA declared storms  
8        reimbursements to account 593.11, *Storm Damage Reimbursement*.<sup>38</sup> Since the  
9        FEMA related expenses and reimbursements are recorded to expense accounts instead  
10       of a balance sheet deferral account, the timing of reimbursements does not always  
11       coincide with the timing of the recording of storm expenses within the parameters of  
12       a single test year. The Company's adjustment was intended to remove that timing  
13       inconsistency in the test year and to reflect the net of these two amounts as zero in the  
14       test year. The Company confirmed in response to discovery that it will start using the  
15       balance sheet deferral approach in the future, which will alleviate some of the concerns  
16       going forward in meeting TIER and OTIER due to the timing of the FEMA  
17       reimbursements.<sup>39</sup>

18       **Q.     Did SKRECC misreport one of the balances used in the proforma adjustment?**

19       A.     Yes. SKRECC actually recorded \$655,473 in FEMA declared storm expenses in

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<sup>37</sup> Direct Testimony of John Wolfram at 11 and his Exhibit JW-2 at Reference Schedule 1.07 FEMA Costs and Reimbursements (page 17 of 51).

<sup>38</sup> SKRECC's response to AG 1-50. I have attached the narrative portion of this response as my Exhibit RAF-9.

<sup>39</sup> *Id.*

1 account 593.10 during the test year instead of the \$420,685 used in its proforma  
2 adjustment, which is a difference of \$234,788.<sup>40</sup> SKRECC described this as an “entry  
3 error.”<sup>41</sup>

4 **Q. What is your recommendation?**

5 A. I recommend that the Commission correct the reporting error and reduce SKRECC’s  
6 net FEMA reimbursement expense proforma by \$234,788, from \$996,188 in the  
7 application to \$761,400.

8 **Q. What is the effect of your recommendation?**

9 A. The effect is a reduction of \$234,788 in the base revenue requirement and requested  
10 base rate increase.

11 **C. Reduce Excessive Payroll Tax Expenses**

12 **Q. Describe the amount of payroll tax expenses included in the revenue requirement.**

13 A. The Company reported that it had incurred actual payroll taxes of \$893,857 during the  
14 test year.<sup>42</sup> SKRECC also reported that it allocated 55.87% of its payroll taxes in the  
15 test year, \$499,438, to payroll tax expenses and the remaining 44.13% to capital and  
16 other accounts.<sup>43</sup> The Company also calculated a proforma annualized amount of  
17 overall payroll taxes of \$1,020,716, based on the sum of the various components of  
18 payroll taxes applicable to each employee.<sup>44</sup> The Company compared the reported test  
19 year payroll taxes amount of \$893,857 to the calculated proforma payroll taxes amount

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<sup>40</sup> *Id.*

<sup>41</sup> *Id.*

<sup>42</sup> Wolfram Testimony at 11 and his Exhibit JW-2 at Reference Schedule 1.13 Payroll Taxes (pages 34-36 of 51) at line 174.

<sup>43</sup> *Id.* at line 191.

<sup>44</sup> *Id.* at line 176.

1 of \$1,020,716 to determine that overall payroll taxes would be \$108,771 higher on an  
2 annualized basis than the amount actually incurred during the test year.<sup>45</sup> Utilizing the  
3 same 55.87% ratio of payroll tax expenses to total payroll taxes, SKRECC calculated  
4 the proforma increase to payroll tax expenses to be \$60,775.<sup>46</sup> Since the TIER and  
5 OTIER are both based on the levels of the Company's long term debt interest expense  
6 and various forms of net margins, which incorporate applicable expenses but not  
7 capital amounts, the \$60,775 was used to increase payroll tax expenses as part of the  
8 Company's revenue requirement determination.

9 **Q. Did the reported proforma payroll taxes amount represent a large increase over**  
10 **the originally reported test year actual payroll taxes amount?**

11 A. Yes. The increase in the Company's proforma payroll taxes amount was 11.9%  
12 (\$108,771/\$911,945) higher than the actual test year payroll taxes amount,  
13 representing an unusually large increase. In contrast, SKRECC separately calculated  
14 a proforma increase in total expensed and capitalized wages and salaries for the test  
15 year amounting to only 5.8% (\$723,619/\$12,535,208).<sup>47</sup>

16 **Q. Did the Company indicate that its proforma calculation for payroll taxes did not**  
17 **incorporate all of the components that are incorporated into the recording of**  
18 **actual payroll taxes?**

19 A. Yes. SKRECC responded to discovery on the matter by stating the following:<sup>48</sup>

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<sup>45</sup> *Id.* at line 178.

<sup>46</sup> *Id.* at line 191.

<sup>47</sup> Direct Testimony of John Wolfram at 11 and his Exhibit JW-2 at Reference Schedule 1.10 Wages and Salaries (pages 23-27 of 51) at line 171.

<sup>48</sup> SKRECC's response to AG 1-47 (d)-(e). I have attached a copy of the entire response as my Exhibit RAF-10.



1           The proforma tax calculation does not reduce total wages by the nontaxable  
2           portion. The tax amount reported for the test year was calculated on taxable  
3           wages which removes certain pre-tax deductions and adds in taxable benefits  
4           to arrive at the taxable wages.  
5

6           This is problematic as it serves to overstate the proforma amount of payroll taxes above  
7           the amount that will actually be incurred. Non-taxable deductions from wages and  
8           salaries amounts are made for such things as health savings account contributions as  
9           well as premiums paid for medical, dental, vision, and disability benefits. The non-  
10          taxable portion of the wages and salaries should be considered as part of the proforma  
11          adjustment since it was considered in the actual test year payroll tax amounts. Actual  
12          test year data from the Companies accounting records reveals that there were salaries  
13          and wages paid of \$12,535,208, matching the test year actual amount reported on  
14          Reference Schedule 1.10.<sup>49</sup> The actual test year data also reveals that the taxable  
15          amount for each type of payroll tax paid was lower than the salaries and wages paid.  
16          The overall payroll tax percentage of total salaries and wages was only 7.28% in the  
17          test year, while the overall payroll tax percentage of total salaries and wages in the  
18          Company's application amounted to 7.70% in the proforma test year.

19   **Q.   What is your recommendation?**

20   A.   I recommend that the Commission correct the proforma increase amount of payroll tax  
21          expenses based on the same average effective payroll tax rate experienced during the  
22          test year that included the incorporation of non-taxable wages data. The difference in  
23          the effective tax rates of 0.42% should be multiplied by the proforma total wages and

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<sup>49</sup> SKRECC's attachment response to AG 1-47 (a). See Exhibit RAF-10.

1 salaries of \$13,258,827 and the O&M ratio of 55.87% to determine the reduction in  
2 expenses.

3 **Q. What is the effect of your recommendation?**

4 A. The effect is a reduction of \$31,361 in payroll tax expenses and in the base revenue  
5 requirement and requested base rate increase. This change reduces the proforma  
6 payroll tax increase percentage to 5.8%, the same as that associated with the increase  
7 for salaries and wages in the application.

8 **D. Reduce Retirement Expense to Account for Delay in Eligibility For New**  
9 **Employees**

10 **Q. Please describe the two forms of retirement expense that were included in the test**  
11 **year.**

12 A. SKRECC participates in two different kinds of retirement plans for its employees, a  
13 National Rural Electric Cooperative Association (“NRECA”) Retirement & Security  
14 Program (“RSP”) and a NRECA Savings Plan 401(k). SKRECC performed a proforma  
15 adjustment in its application on its Reference Schedule 1.09 in order to attempt to  
16 normalize what it deemed to be recoverable expenses based on current contribution  
17 rates.<sup>50</sup> The RSP rate used in the Company’s proforma was 28.86% and the 401(k)  
18 match was 2.0%. The RSP rate is determined by the NRECA and invoiced to each  
19 cooperative on a monthly basis. The proforma adjustment excluded the 401(k)  
20 matching costs that it incurs for those employees that also participate in the RSP in  
21 accordance with Commission precedent. The proforma adjustment normalized

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<sup>50</sup> Application at Mr. Wolfram’s Exhibit JW-2 at Reference Schedule 1.09 Retirement Plan & 401(k), (pages 19-22 of 51).

1 amount of total retirement costs was computed to be \$3,174,034.<sup>51</sup> The Company  
2 compared that amount to test year actual amounts and multiplied the increase in costs  
3 by the O&M expense factor of 55.87% to determine a proforma increase in expense  
4 of \$360,833.

5 **Q. Did SKRECC revise its proforma adjustment calculations subsequent to the**  
6 **filing of its application?**

7 A. Yes. SKRECC provided a number of updated Reference Schedules along with its  
8 responses to the AG's First Set of Data Requests on April 11, 2025. Revisions were  
9 made to Reference Schedule 1.09 to the projected test year costs and to the projected  
10 proforma expense amount. The revisions to Reference Schedule 1.09 were minor and  
11 had the effect of increasing the projected total normalized costs to \$3,186,724 and the  
12 proforma expense increase up to \$367,924, an increase of \$7,091 from the amount  
13 included in the application. SKRECC explained in response to discovery that the  
14 changes resulted from the correction of a summation formula that was in error<sup>52</sup>. I  
15 recommend acceptance of the Company's revised Reference Schedule 1.09 as a  
16 starting point.

17 **Q. How were the revised total normalized costs of \$3,186,724 split between RSP and**  
18 **401(k) costs?**

19 A. SKRECC's revised calculation was made up of \$3,169,882 in RSP costs and \$16,842  
20 in 401(k) matching costs. Only five employees received the 2% 401(k) match, while  
21 all others were calculated using the 28.86% RSP rate. SKRECC explained in response

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<sup>51</sup> *Id.* at line 171.

<sup>52</sup> SKRECC's response to AG 2-11, a copy of which is attached as my Exhibit RAF-11.

1 to discovery that these employees were not eligible for the RSP “because they have  
2 already reached the 30-year maximum for contributions into the plan.”<sup>53</sup> The 28.86%  
3 RSP rate was applied to all other employees, regardless of potential eligibility.

4 **Q. Does the \$3,169,882 in total forecast RSP costs represent an excessive increase in**  
5 **costs over historical costs?**

6 A. Yes. The original and revised Reference Schedule 1.09s on line 171 both indicate that  
7 the actual test year total RSP costs amounted to only \$2,346,302. The forecast RSP  
8 costs are \$823,580 more than those recorded in the test year, an increase of 35.1%.  
9 SKRECC’s response to discovery also indicated that the actual total RSP costs for  
10 2022, 2023, and 2024 were only \$2,385,419, \$2,370,950, and \$2,453,759,  
11 respectively.<sup>54</sup>

12 **Q. Is the large increase due to an unusually large change in the total rate being**  
13 **charged per employee by the NRECA?**

14 A. No. In fact, the total effective rates charged by the NRECA have only slightly  
15 increased during those years. The total effective rates charged to SKRECC based upon  
16 salary amounts for each eligible employee for 2022, 2023, and 2024 were 27.74%,  
17 28.57%, and 28.86%, respectively.<sup>55</sup> The proforma adjustment was calculated by the  
18 Company using the 28.86% cost rate, which is the same rate as actual for 2024 and  
19 only slightly higher than the 2023 rate.

20 **Q. What do you think is the primary reason for the excessive increase in costs as**

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<sup>53</sup> SKRECC’s response to AG 2-14, a copy of which is attached as my Exhibit RAF-12.

<sup>54</sup> SKRECC’s response to AG 1-59(k). I have attached the entire narrative portion of that response and one applicable Attachment set of pages as my Exhibit RAF-13.

<sup>55</sup> SKRECC’s response to AG 1-59(j). See Exhibit RAF-13.

1        **presented by the Company?**

2        A.     The primary reason for the excessive increase in costs is most certainly the eligibility  
3               status of each of the employees. As described by SKRECC witness Bessinger,  
4               eligibility in the RSP begins “the first day of the month following the one-year  
5               anniversary of hiring.”<sup>56</sup> Thus, there is a one-year waiting period for each new  
6               employee until such costs are incurred. The Company’s proforma does not factor in  
7               that one-year waiting period for new employees.

8        **Q.     Does SKRECC typically have a large number of newly-hired employees each**  
9               **year?**

10       A.     Yes. In response to discovery, the Company indicated that it had 12 new hires in 2022,  
11               25 new hires in 2023, and 19 new hires in 2024.<sup>57</sup> That is an average of 19 new hires  
12               each year.

13       **Q.     What is the impact of these new-hires based on the use of an average eligible**  
14               **wages per employee?**

15       A.     The total normalized eligible wages amount provided on the revised Reference  
16               Schedule 1.09 is \$11,825,759 on line 171. The proforma number of employees used  
17               in the Company’s application is 136.<sup>58</sup> That amounts to an average eligible wage  
18               amount of \$86,954 per employee. That amount multiplied by the average 19 new hires  
19               per year and the RSC rate of 28.86 equates to a reduction in RSC costs of \$476,804.  
20               That amount multiplied by the O&M expense ratio equates to a reduction in RSC

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<sup>56</sup> Direct Testimony of Carrie Bessinger (“Bessinger Testimony”) at 10.

<sup>57</sup> SKRECC’s response to AG 1-60(c). I have attached the entire narrative portion of that response as my Exhibit RAF-14.

<sup>58</sup> SKRECC’s response to Staff 2-3, a copy of which is attached as my Exhibit RAF-15.

1 expenses of \$266,412.

2 **Q. What is the effect on the proforma RSC costs of a reduction of \$476,804?**

3 A. The RSC costs would be reduced from \$3,186,724 to \$2,709,920.

4 **Q. How does the total reduced RSC cost you compute of \$2,709,920 compare to the**  
5 **annualized amount of the December 2024 RSC monthly billing?**

6 A. The December 2024 RSC billing to SKRECC was \$221,495.<sup>59</sup> That amount  
7 multiplied by twelve months equates to \$2,657,940. That amount is slightly less than  
8 the amount that I compute, indicating that my computation is reasonable.

9 **Q. What is your recommendation?**

10 A. I recommend that the Commission reduce the retirement expense applicable to 19  
11 average new employees deemed not be eligible for contributions due to the RSC one-  
12 year waiting requirement.

13 **Q. What are the effects of your recommendation?**

14 A. The total effect is a reduction of \$266,412 in retirement plan expense and in the base  
15 revenue requirement and requested base rate increase.

16 **E. Reduce Amortization Expense for Deferred Costs That Will Be Fully Amortized**  
17 **Before Rates Are Next Reset**

18 **Q. Please describe the amortization expense for deferred costs included in the test**  
19 **year.**

20 A. SKRECC provided a description of each deferred cost and the annual amortization  
21 expense in response to discovery in this proceeding.<sup>60</sup> For two of these deferred costs,

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<sup>59</sup> SKRECC's response to AG 1-59(k). See Exhibit RAF-13, in which I attached the NRECA billing for the RSC for December 2024.

<sup>60</sup> SKRECC's response to AG 1-90, a copy of which is attached as my Exhibit RAF-16.

1 the amortization will be completed shortly after rates from this proceeding become  
2 effective and most certainly before the next rate case.

3 More specifically, SKRECC's base rate case expenses from Case No. 2021-  
4 00407 will be fully amortized in June 2027, 19 months after rates are expected to go  
5 into effect resulting from this proceeding.<sup>61</sup> The unamortized balance at the end of  
6 May 2024 was \$213,592 and is being amortized at the rate of \$5,773 each month.  
7 Thus, the test year amortization expense is \$69,273. The unamortized balance will be  
8 \$109,682 at the end of November 2025, just before new base rates from this  
9 proceeding go into effect. If the Commission includes the current \$69,273  
10 amortization expense in the revenue requirement and SKRECC's base rates are not  
11 reset again until December 2028, assuming three years between rate cases, then  
12 SKRECC will over-recover costs of \$98,141 (\$5,773 x 17 additional months from July  
13 2027 through November 2028). The over-recovery would be even higher if the time  
14 between rate cases exceeds three years. Such an over-recovery is inappropriate.

15 In addition, SKRECC has been amortizing since 2013 the loss from the  
16 retirement of its old mechanical meters resulting from the system change out to the  
17 current AMI meters as authorized in Case No. 2011-00096. The original deferred  
18 costs amounted to \$2,808,434 and the Commission authorized a 15-year amortization  
19 period in Case No. 2011-00096 (Order at 25). Thus, the test year amortization expense

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<sup>61</sup> The Commission's February 19, 2025 rate suspension Order in this proceeding specified the rate effective date for any changes to rates subject to refund as August 5, 2025. However, the hearing is not scheduled until July 17, 2025. My understanding is that there is 10-month statutory deadline based on KRS 278.190(3) that requires Commission action on SKRECC's February 3, 2025 request prior to December 2, 2025. Based upon this deadline, I have assumed current amortization of the deferred cost balances through November 30, 2025 with a new rate effective date of December 1, 2025. The unamortized deferral balances can be adjusted when the final authorized effective date is more certain.

1 is \$187,229 (\$2,808,434/15 years). These costs will be fully amortized in December  
2 2027, 25 months after rates are expected to go into effect resulting from this  
3 proceeding. The unamortized balance at the end of May 2024 was \$670,904 and is  
4 being amortized at the rate of \$15,602 each month. The unamortized balance will be  
5 \$390,060 at the end of November 2025, just before new base rates from this  
6 proceeding go into effect. If the Commission includes the \$187,229 amortization  
7 expense in the revenue requirement and SKRECC's base rates are not reset again until  
8 December 2028, assuming three years between rate cases, then SKRECC will over-  
9 recover costs of \$171,622 (\$15,602 x 11 additional months from January 2028 through  
10 November 2028). The over-recovery would be even higher if the time between rate  
11 cases exceeds three years. This too is inappropriate.

12 **Q. What is your recommendation?**

13 A. I recommend that the Commission reset the amortization period to three years for the  
14 unamortized deferred costs that I identified. This amortization period matches the  
15 requested amortization period for rate case expenses in this proceeding. Further, the  
16 new amortization expense should be based on the unamortized balances of each cost  
17 deferral as of the end of November 2025, assuming a rate increase effective date of  
18 December 1, 2025. This modified amortization will reduce the likelihood that the  
19 Companies will over-recover, but it still provides the Companies full recovery of the  
20 deferred costs. This recommendation is akin to Commission precedent in a recent  
21 Jackson Purchase proceeding regarding the handling of unamortized rate case



expenses in a prior proceeding.<sup>62</sup>

**Q. What are the effects of your recommendation?**

A. SKRECC's amortization expense will be reduced by \$32,712 for the prior rate case deferred costs and by \$57,209 for the old meter retirement loss deferred costs. The total effect is a reduction of \$89,921 in amortization expense and in the base revenue requirement and requested base rate increase.

**F. Reduce Station Expense – SCADA to Remove Non-Recurring Items**

**Q. Describe the Company's request for recovery of Station Expense - SCADA.**

A. The Company incurred \$47,716 in account 582.10, *Station Expense – SCADA*, during the test year and that amount was included in the test year revenue requirement without adjustment. Listed below are the expense amounts recorded in this account over the last several years.<sup>63</sup>

2021	\$10,140
2022	\$7,681
2023	\$13,639
2024	\$78,440
Test Year	\$47,716

As reflected in this data, the expense grew exponentially starting in 2024. The test year expenses, which included the first five months of 2024 expenses, more than tripled compared to any of the years 2021 through 2023. SKRECC explained in discovery that the large increase in expense related to equipment upgrades to prepare

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<sup>62</sup> Case No. 2024-00085, *Electronic Application of Jackson Purchase Energy Corporation for a General Adjustment of Rates and Other General Relief* (Ky. PSC February 28, 2025), Order at 16-18.

<sup>63</sup> This data was provided in the response to Staff 1-1 (revised) as part of the expense listing for every account.

1 for the increased fiber demand on the system.<sup>64</sup>

2 **Q. Did the Company identify certain of these test year expenses as being non-**  
3 **recurring?**

4 A. Yes.<sup>65</sup> The Company provided in discovery the general ledger data for this account  
5 during the test year and identified four specific expenses in yellow highlighting that  
6 represented non-recurring items.<sup>66</sup> Those four amounts summed to \$19,880.<sup>67</sup>

7 **Q. What is your recommendation?**

8 A. I recommend that the Commission reduce the Station Expense – SCADA expenses to  
9 remove the expense items that are not recurring in nature. Members should not be  
10 held responsible for expenses in the future that the Company likely will not incur.

11 **Q. What are the effects of your recommendations?**

12 A. The effect is a reduction of \$19,880 in Station Expense – SCADA expenses and in the  
13 base revenue requirement and requested base rate increase.

14 **G. Reduce Uncollectible Accounts Expense to Remove Non-Recurring Events**

15 **Q. Describe the Company's request for recovery of Uncollectible Accounts Expense.**

16 A. The Company incurred \$137,103 in account 904.00, *Uncollectible Accounts*, during  
17 the test year and that amount was included in the test year revenue requirement without  
18 adjustment. Listed below are the expense amounts recorded in this account over the

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<sup>64</sup> SKRECC's response to AG 1-80(a). I have attached a copy of the entire response as my Exhibit RAF-17.

<sup>65</sup> SKRECC's response to AG 1-80(c). See Exhibit RAF-17.

<sup>66</sup> *Id.*

<sup>67</sup> *Id.* I summed the four items in my electronic workpapers, which have been filed along with my testimony.

last several years.<sup>68</sup>

2021	\$111,392
2022	\$73,318
2023	\$149,026
2024	\$109,895
Test Year	\$137,103

As reflected in this data, the expense grew substantially in 2023 and returned to a lower and more normal level in 2024. The test year expenses, which included the last seven months of 2023 expenses, were much higher than the expenses in 2021, 2022, or 2024.

**Q. Did the Company identify the reasons for the increased expenses in 2023 and the return to a lower and more normal level starting in the latter part of 2023 and throughout 2024?**

A. Yes. The Company provided in discovery the general ledger data for this account for each month over the last several years and provided explanations for some of the increases in expense in 2023 and for the return to a more normal level in 2024.<sup>69</sup>

SKRECC provided the following explanations:<sup>70</sup>

In 2023, there was no general retirement processed to apply capital credit refunds to bad debt and a software conversion caused accounts to not be written off between March and August 2023. These two factors caused the monthly bad debt accrual entry to be inflated.

The accrual for A/R bad debt is recorded in this account. In 2022 and the first quarter of 2023, the accrual was calculated as 40% of A/R over 60 days plus 60% of A/R over 90 days plus 30% of A/C 142.15 Prepay balance. This total was divided by 12 to get a monthly accrual amount. From April 2023 to present the accrual amount is based on 40% of A/R over 60 days plus 60% of A/R over 90 days because account 142.15 is no longer needed with our new software. In

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<sup>68</sup> This data was provided in the response to Staff 1-1 (revised) as part of the expense listing for every account.

<sup>69</sup> SKRECC's response to AG 1-83, a copy of which is attached as my Exhibit RAF-18.

<sup>70</sup> *Id.*

1           the year of conversion, 2023, for 6 months accounts were not written off. This  
2           increased the amount in the over 90 days totals which was multiplied by 60%.

3  
4           Monthly amounts recorded as bad debt from September 2023 through current  
5           should be considered normal and a fair representation of balances from the 60  
6           days and longer receivables expected to be uncollected.  
7

8           Table 5 below shows the monthly expenses for all months during 2023 and  
9           2024 in account 904. It also shows the elevation of expenses in March through August  
10          of 2023 that is referenced in the SKRECC's response to discovery. This elevation of  
11          expense should not be considered recurring due to the effects of the non-application  
12          of capital credit refunds during the period as well as the software conversion that  
13          interrupted the normal bad debt write-off and collection process.

Table 5		
South Kentucky Rural Electric Cooperative Corporation		
Uncollectible Account in Account 904.00 by Month		
For Each Month During 2023 and 2024		
\$		
	2023	2024
	Uncollectible Accounts Expense in Account 904.00	Uncollectible Accounts Expense in Account 904.00
Year		
Jan	6,417	6,310
Feb	7,247	11,146
Mar	11,704	10,013
Apr	18,427	11,005
May	19,103	12,503
Jun	19,898	7,781
Jul	18,918	7,925
Aug	17,974	6,174
Sep	8,670	7,028
Oct	6,446	6,903
Nov	7,866	11,719
Dec	6,356	11,390
Total	<u>149,026</u>	<u>109,895</u>
Average Sept 2023 Through 2024 Expense		<u>8,702</u>
Normalized Expense (Current Avg x 12 Months)		104,424
Total TY June 2023 Through May 2024		<u>137,103</u>
AG Recommended Expense Reduction		<u>(32,679)</u>

1

2 **Q. What is your recommendation?**

3 A. I recommend that the Commission reduce the Uncollectible Accounts Expense to a  
4 more normal recurring level based on the Company's identification of a more normal  
5 level of expense, the expense from September 2023 through December 2024. The

1 average monthly expense from September 2023 through the end of 2024 as reflected  
2 in Table 5 above is \$8,702, which amounts to \$104,424 on an annualized basis. This  
3 amount is \$32,679 less than the actual test year amount of \$137,103 included in the  
4 test year. I recommend reducing the test year amount of expense by \$32,679.

5 **Q. What are the effects of your recommendations?**

6 A. The effect is a reduction of \$32,679 in Uncollectible Accounts Expense and in the base  
7 revenue requirement and requested base rate increase.

8 **H. Reduce Depreciation Expense To Reflect SKRECC Revisions to Fully**  
9 **Depreciated Plant**

10 **Q. Describe the amount of the depreciation expense proforma adjustment included**  
11 **in the revenue requirement in the application.**

12 A. The Company originally calculated a proforma adjustment to increase depreciation  
13 expense during the test year by \$810,903 above what was actually incurred in the test  
14 year.<sup>71</sup> The majority of this increase resulted from updated depreciations rates, for  
15 which I recommend no changes.

16 **Q. Did SKRECC revise its proforma adjustment calculations subsequent to the**  
17 **filing of its application?**

18 A. Yes. SKRECC provided a number of updated Reference Schedules along with its  
19 responses to the AG's First Set of Data Requests on April 11, 2025. Revisions were  
20 made to Reference Schedule 1.05 to the projected test year amounts of depreciation  
21 expense. These revisions had the effect of decreasing the proforma expense increase

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<sup>71</sup> Application at Mr. Wolfram's Exhibit JW-2 at Reference Schedule 1.05 Depreciation (page 9 of 51) at line 37.

1 down to \$791,391, a reduction of \$19,512 from the amount included in the application.

2 SKRECC explained in response to discovery that the changes resulted from the  
3 discovery that “some fully depreciated items were inadvertently omitted from the  
4 original schedule” and that the “schedule was revised to correct the omission and  
5 provide accurate information.”<sup>72</sup>

6 **Q. What is your recommendation?**

7 A. I recommend that the Commission revise the proforma increase amount of  
8 depreciation expense to incorporate the revisions provided by the Company to better  
9 reflect the correct depreciable plant.

10 **Q. What is the effect of your recommendation?**

11 A. The effect is a reduction of \$19,512 in depreciation expense and in the base revenue  
12 requirement and requested base rate increase.

13 **I. Reduce Health Insurance Expense To Reflect SKRECC Revisions**

14 **Q. Describe the amount of the health and dental insurance expense proforma**  
15 **adjustment included in the revenue requirement in the application.**

16 A. The Company originally calculated a proforma adjustment to increase health and  
17 dental expense during the test year by \$106,899 above what was actually incurred in  
18 the test year.<sup>73</sup>

19 **Q. Did SKRECC revise its proforma adjustment calculations subsequent to the**  
20 **filing of its application?**

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<sup>72</sup> SKRECC’s response to AG 2-12, a copy of which is attached as my Exhibit RAF-19.

<sup>73</sup> Application at Mr. Wolfram’s Exhibit JW-2 at Reference Schedule 1.16 Health and Dental Insurance (page 46 of 51) at line 72.

1 A. Yes. SKRECC provided a number of updated Reference Schedules along with its  
2 responses to the AG's First Set of Data Requests on April 11, 2025. Revisions were  
3 made to Reference Schedule 1.16 to the actual test year and projected test year amounts  
4 associated with various retiree health insurance benefits. There were no revisions to  
5 active employee health insurance costs and no changes to dental insurance costs.  
6 These revisions had the effect of decreasing the proforma expense increase down to  
7 \$97,643, a reduction of \$9,256 from the amount included in the application. SKRECC  
8 explained in response to discovery that the changes resulted from the inadvertent  
9 misstatement of retiree benefits.<sup>74</sup>

10 **Q. What is your recommendation?**

11 A. I recommend that the Commission revise the proforma increase amount of health and  
12 dental insurance expense to incorporate the revisions provided by the Company.

13 **Q. What is the effect of your recommendation?**

14 A. The effect is a reduction of \$9,256 in health insurance expense and in the base revenue  
15 requirement and requested base rate increase.

16 **J. Reduce SKRECC's Company-Paid Portion of Health Insurance Expense Based**  
17 **on BLS Averages**

18 **Q. What percentages of the employee health insurance premiums were paid by the**  
19 **Company during the test year for both single and family coverage options?**

20 A. During the test year, the Company paid 78% of the employees' health insurance  
21 premiums for single-only coverage and an average of 70% of the health insurance  
22 premiums for all family coverage options. The Company provided this data in

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<sup>74</sup> SKRECC's response to AG 2-9, a copy of which is attached as my Exhibit RAF-20.



1 Reference Schedule 1.16 along with the various premium amounts for different  
2 coverages and the portions paid by the Company and by employees during the test  
3 year as well as adjusted for changes occurring after the test year.<sup>75</sup>

4 **Q. What percentages of the health insurance premiums are paid by the Company**  
5 **for both single and family coverage options due to changes that occurred after**  
6 **the end of the test year?**

7 A. Starting in 2025, the Company began paying 80% of the health insurance premiums  
8 for single-only coverage and 80% of the health insurance premiums for all family  
9 coverage options. SKRECC included a proforma adjustment on Reference Schedule  
10 1.16 to reflect the change in these percentages and application of them to its projected  
11 going-forward health insurance benefit costs.<sup>76</sup>

12 **Q. Has the Commission limited the recoverable amount of employer-paid health**  
13 **insurance premiums based on Bureau of Labor Statistics (“BLS”) averages?**

14 A. Yes. The Commission has historically made it a practice to limit the recoverable  
15 portion of employer-paid health insurance premiums to the most current BLS averages  
16 for single and family coverage. In the last SKRECC rate case, the Commission  
17 authorized a reduction of premium costs corresponding with the BLS 2021 averages  
18 for single and family coverages of 78% and 66%, respectively.<sup>77</sup>

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<sup>75</sup> Application at Mr. Wolfram’s Exhibit JW-2 at Reference Schedule 1.16 HDHP Health Insurance Premiums (page 46 of 51). The Company revised this schedule and supplied the revision along with the responses to the AG’s First Set of Requests on April 11, 2024. However, amounts related to the active employees did not change from that filed in the application.

<sup>76</sup> *Id.*

<sup>77</sup> 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.

1 **Q. What are the most recent BLS averages for single and family coverages?**

2 A. The most recent 2024 BLS employer-paid averages for single and family coverages  
3 are 80% and 68%, respectively.<sup>78</sup> SKRECC's percentage of employer-paid health  
4 insurance premiums for single coverage matches the BLS average, while the  
5 employer-paid percentage for family coverage is 12% higher than the most recent BLS  
6 average.

7 **Q. What is your recommendation?**

8 A. I recommend that the Commission reduce the recoverable health insurance expense  
9 for family coverage to a more reasonable level based on the 2024 BLS average for  
10 family coverage of 68% to be consistent with Commission precedent.

11 **Q. What are the effects of your recommendations?**

12 A. The effect is a reduction of health insurance expense of \$129,144 and a reduction in  
13 the claimed base revenue requirement and base rate increase of \$129,144.

14 **IV. LONG-TERM DEBT INTEREST EXPENSE ERROR**

15 **Q. Describe the Company's calculation of long-term debt interest.**

16 A. The Company based its OTIER and TIER calculations upon \$5,436,361 in long-term  
17 debt interest expense, consisting of the \$5,370,206 million in per books test year long-  
18 term debt interest expense plus a proforma adjustment for \$66,155 in annualized  
19 interest for debt issuances as of June 30, 2024, along with a new issuance of  
20 \$5,000,000 that occurred after the end of the test year in August 2024.<sup>79</sup>

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<sup>78</sup><https://www.bls.gov/news.release/ebs2.t03.htm>, Table 3 and  
<https://www.bls.gov/news.release/ebs2.t04.htm>, Table 4.

<sup>79</sup> Application at Mr. Wolfram's Exhibit JW-2 at the Statement of Operations & Revenue Requirement

1 **Q. Is there an evident error in the Company's depiction of long-term debt interest?**

2 A. Yes. The proforma amount of long-term debt interest expense calculated in  
3 SKRECC's application on Reference Schedule 1.14 amounted to \$5,355,240.<sup>80</sup> That  
4 number was compared to a test year long-term debt interest expense amount of  
5 \$5,289,085 to derive a proforma adjustment needed of an increase of \$66,155.<sup>81</sup>  
6 However, the \$5,289,085 reflected as test year expense on Reference Schedule 1.14  
7 was \$81,121 lower than the actual expense during the test year of \$5,370,206 as  
8 reflected in the Company's revenue requirement calculation as noted in my previous  
9 response.

10 **Q. Did SKRECC provide a revised Reference Schedule 1.14 to properly report the**  
11 **actual test year long-term debt interest expense and quantify the correct**  
12 **proforma adjustment?**

13 A. Yes. The Company provided a revised Reference Schedule 1.14 to correctly state  
14 these amounts in response to discovery.<sup>82</sup> Instead of the proforma increase in long-  
15 term debt expense of \$66,155 quantified in the original Reference Schedule 1.14, the  
16 proforma change should be a decrease of \$14,966, a reduction of \$81,121.

17 **Q. What is your recommendation?**

18 A. I recommend that the Commission correct the error in the reporting of the actual test  
19 year long-term debt interest expense leading to a miscalculated proforma adjustment

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(page 1 of 51) at line 18.

<sup>80</sup> Application at Mr. Wolfram's Exhibit JW-2 at Reference Schedule 1.14 Interest on Long-Term Debt (pages 37-38 of 51) at line 52.

<sup>81</sup> *Id.*

<sup>82</sup> SKRECC's response to AG 1-51, a copy of which is attached as my Exhibit RAF-21.

amount on Reference Schedule 1.14.

**Q. What are the effects of your recommendations?**

A. The correction of the error reduces the long-term debt interest expense by \$81,121 million and the revenue requirement by \$150,073 to reflect the application of the 1.85 TIER that I recommend. Assuming a 2.0 TIER, the revenue requirement reduction would be \$162,242.

**V. ANNUALIZATION OF YEAR END CUSTOMER REVENUES AND  
PURCHASED POWER EXPENSES**

**Q. Describe the impacts of the Company's annualization of year end customers on it revenues and expenses in the application.**

A. The Company calculated a proforma adjustment to increase revenues by \$1,427,711 to reflect year end customers by customer rate tariff.<sup>83</sup> The Company first attempted to calculate the change in the number of customers at test year end compared to the average number of customers in the test year, then multiplied the increase or reduction in customers times the average kilowatt-hour ("kWh") usage per customer times the average revenue per kWh for each of its customer rate tariffs.<sup>84</sup>

The Company also calculated a proforma adjustment to increase base rate purchased power expenses by \$929,273 to reflect additional costs associated with the increase in kWh that was computed for the additional customers in the additional revenue determination.<sup>85</sup>

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<sup>83</sup> Application at Mr. Wolfram's Exhibit JW-2 at Reference Schedule 1.04 Year-End Customers (page 8 of 51) at line 24.

<sup>84</sup> *Id.* at lines 1-24.

<sup>85</sup> *Id.* at line 30.

1           The net adjustment in the application amounted to an increase in net revenues  
2           and a reduction of the revenue requirement by \$498,438.<sup>86</sup>

3   **Q.   Did the Company’s application calculation contain a large error on its face?**

4   A.   Yes. The Company’s original calculation was intended to start by comparing the  
5           customer counts for each class at the end of the test year, May 31, 2024, to the average  
6           customer count for each rate tariff class during the test year. However, SKRECC’s  
7           application on Reference Schedule 1.04, at line 15, compared in error the customer  
8           counts for each class at the end of December 2023 to the average customer count for  
9           each class during the test year. This error in the Excel cell formulas was first  
10          communicated by the Commission Staff (“Staff”) to the Company during a February  
11          26, 2025 rate case overview presentation made by SKRECC to Staff and intervenors.  
12          A simple change of these comparison formulas results in a revenue decrease of  
13          \$3,808,723 and a base rate purchased power expense decrease of \$2,510,214,  
14          representing an overall net revenue decrease and an increase in the revenue  
15          requirement of \$1,298,509. This amounts to an increase in the revenue requirement  
16          of \$1,796,947, all else equal, compared to the revenue requirement reduction of  
17          \$498,438 presented in the original application.

18   **Q.   Did SKRECC communicate another change to these calculations in its responses**  
19          **to Staff discovery?**

20   A.   Yes. SKRECC provided in response to Staff discovery another computation with the  
21          changes outlined above and a change to the current base rate revenues that are found

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<sup>86</sup> *Id.* at line 36.

1 on line 22 in the revised Reference Schedule 1.04 calculation.<sup>87</sup> This additional change  
2 results in a revenue decrease of \$3,283,425 and a base rate purchased power expense  
3 decrease of \$2,502,722, representing an overall net revenue decrease and an increase  
4 in the revenue requirement of \$780,703.<sup>88</sup> This amounts to an increase in the revenue  
5 requirement of \$1,279,141, all else equal, compared to the revenue requirement  
6 reduction of \$498,438 presented in the original application.

7 **Q. Did SKRECC communicate that it was seeking an adjustment to its rate increase**  
8 **request in order to correct the errors reported above?**

9 A. No. SKRECC stated in response to that same discovery response, “At this time South  
10 Kentucky is maintaining its request for the proposed rates and overall increase as filed  
11 in its Application.”<sup>89</sup>

12 **Q. Do you continue to have a concern about the adoption of the so-called error**  
13 **correction discussed above?**

14 A. Yes. I am concerned that SKRECC might change its position concerning adjusting its  
15 rate increase request during the pendency of this proceeding or that the Commission  
16 or its Staff will apply the same so-called correction without further consideration of  
17 other alarming problems with the adjustment.

18 **Q. Is the wide swing in net revenues attributable to this so-called error correction**  
19 **reasonable?**

20 A. No. Due to SKRECC’s large switches of customers during the test year between rate

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<sup>87</sup> SKRECC’s response to Staff 2-13. I have attached a copy of the pertinent portions of this response as my Exhibit RAF-22.

<sup>88</sup> *Id.* Revised Reference Schedule 1.04 at lines 24, 28, and 36.

<sup>89</sup> *Id.*

tariff classes, the so-called customer averages used in the comparison are considerably distorted. This distortion was present in the original filing and remains a huge problem in the so-called error correction version. This switch in customers was first communicated by SKRECC witness Newton in the February 26, 2025 rate case overview presentation noted above. According to Mr. Newton, SKRECC decided to switch a group of customers in its Large Power (“LP”) and Optional Power Service (“OPS”) rate classes to its Small Commercial (“B”) rate class starting in March 2024. I have duplicated portions of the customer and kWh data from the so-called corrected Reference Schedule 1.04 in Table 6 below to illustrate the distortion.

<p style="text-align: center;">Table 6 South Kentucky Rural Electric Cooperative Corporation Customer and kWh Data from So-Called Corrected Reference Schedule 1.04 (Response to Staff 2-13) Test Year Ended May 31, 2024</p>					
Month	Rate 1 A	Rate 2 B	Rate 3 LP	Rate 4 OPS	Total
Jun-23	64,841	4,801	474	160	70,276
Jul-23	64,922	4,827	477	160	70,386
Aug-23	65,002	4,844	479	160	70,485
Sep-23	65,067	4,843	478	160	70,548
Oct-23	65,051	4,822	480	160	70,513
Nov-23	65,007	4,818	482	160	70,467
Dec-23	65,097	4,815	481	159	70,552
Jan-24	65,156	4,810	486	157	70,609
Feb-24	65,238	4,802	484	157	70,681
Mar-24	65,337	5,032	341	90	70,800
Apr-24	65,349	5,042	341	89	70,821
May-24	65,479	5,047	345	89	70,960
Average	65,129	4,875	446	142	70,592
End of Period Incr Over Avg	350	172	(101)	(53)	368
Total kWh	766,561,470	69,966,370	183,071,000	11,928,714	1,031,527,554
Average kWh	11,770	14,351	410,780	84,153	
Year End kWh Adjustment	4,121,435	2,464,843	(41,351,864)	(4,439,081)	(39,204,666)

The data indicates that starting in March 2024, the customer class reporting for

1 a large group of commercial customers was switched. In March 2024 compared to  
2 February 2024, customers in the B rate class increased by 230 (5,032 - 4,802). In the  
3 same months, customers in the LP rate class decreased by 143 (484-341), while  
4 customers in the OPS rate class decreased by 67 (157-90). The total change in  
5 customers for these rate classes between the two months summed to an increase in  
6 customers of 20. SKRECC reported in response to discovery that the number of  
7 customer accounts that switched to the rate class in March 2024 was 212.<sup>90</sup> As can be  
8 seen in the data above, the average kWhs per customer for the LP and OPS rate classes  
9 are much higher than that for the B rate class. The average kWh per customer reported  
10 for the LP rate class was reported to be 410,780 and the average kWh per customer  
11 reported for the OPS rate class was reported to be 84,153. Those are both much higher  
12 than the average kWh per customer reported for the B rate class of only 14,351. The  
13 data further indicates that the proforma adjustment amount of kWhs for all rate classes  
14 combined should reflect a decrease by 39,204,666 kWhs, even though the ending test  
15 year total customers actually increased by 368 over the test year average. This is a  
16 highly unjust and unreasonable result, as it creates the appearance of a very large net  
17 revenue decrease without any basis for it. That is because the customer count  
18 comparisons for each rate class are not apples-to-apples. The Company has not  
19 indicated that it did or will experience a loss of this many kWh sales due to changes  
20 in customer counts after the end of the test year.

21 **Q. Should the Commission decide to update the customer count net revenue**

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<sup>90</sup> SKRECC's response to AG 1-42, a copy of which is attached as my Exhibit RAF-23.



1        **projections from what was originally filed, should it utilize the so-called**  
2        **correction that SKRECC provided to Staff in response to discovery?**

3    A.    No. Any update to the customer count net revenue projections should be based on an  
4        apples-to-apples comparison to remove the unintended negative effects from the  
5        switch of customers between rate classes just before the end of the test year.

6    **Q.    Have you recomputed the adjustment to more properly reflect the impact of the**  
7        **customers being switched between rate classes?**

8    A.    Yes. The Company supplied in response to discovery the monthly test year kWh data  
9        and revenue data for each of the 147 customers that switched from the LP rate class to  
10       the B rate class and for the 65 customers that switched from the OPS rate class to the  
11       B rate class.<sup>91</sup> The data indicates that these 212 customers were invoiced for a total of  
12       only 11,499,607 kWhs and \$1,504,599 for the entire year. The data also indicates that  
13       these 212 customers were invoiced for a total of only 2,602,995 kWhs and \$339,811  
14       for the three months in question, March through May 2024. Both of these sets of totals  
15       are far less than those changes resulting from the so-called correction provided in  
16       response to Staff 2-13.

17                With this data, I reversed the impact of the kWh and revenue switches between  
18        classes for the three months involved, March through May of 2024, for a true apples-  
19        to-apples comparison. I have duplicated portions of the resulting customer and kWh  
20        data from the so-called corrected Reference Schedule 1.04 in Table 7 below to

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<sup>91</sup> *Id.* at SKRECC's response to AG 1-42(b). SKRECC confirmed in response to AG 2-8 that the first 147 B rate class customers listed in the response to AG 1-42(b) were formerly LP rate class customers, while the remaining 65 customers now in the B rate class were formerly OPS rate class customers. I have attached a copy of SKRECC's response to AG 2-8 as my Exhibit RAF-24.

illustrate the changes that I made to compare with the data illustrated in Table 6 above.

<p style="text-align: center;">Table 7 South Kentucky Rural Electric Cooperative Corporation Customer and kWh Data from AG Corrected Reference Schedule 1.04 Test Year Ended May 31, 2024</p>					
Month	Rate 1 A	Rate 2 B	Rate 3 LP	Rate 4 OPS	Total
Jun-23	64,841	4,801	474	160	70,276
Jul-23	64,922	4,827	477	160	70,386
Aug-23	65,002	4,844	479	160	70,485
Sep-23	65,067	4,843	478	160	70,548
Oct-23	65,051	4,822	480	160	70,513
Nov-23	65,007	4,818	482	160	70,467
Dec-23	65,097	4,815	481	159	70,552
Jan-24	65,156	4,810	486	157	70,609
Feb-24	65,238	4,802	484	157	70,681
Mar-24	65,337	4,820	488	155	70,800
Apr-24	65,349	4,830	488	154	70,821
May-24	65,479	4,835	492	154	70,960
Average	65,129	4,822	482	158	70,592
End of Period Incr Over Avg	350	13	10	(4)	368
Total kWh	766,561,470	67,363,375	185,119,766	12,482,943	1,031,527,554
Average kWh	11,770	13,969	383,734	79,006	
Year End kWh Adjustment	4,121,435	178,108	3,677,453	(316,024)	7,660,972

The resulting data after the adjustments I performed are much more representative of the results one would expect. The large driver of the overall 7,660,972 increase in kWhs is the 4,121,435 kWh increase related to the increase in residential customers of 350. The remaining combined commercial class increase of 3,539,537 kWhs overall is driven by the commercial class customer count increases summing to 18, which is also reasonable.

**Q. What is your recommendation?**

A. I recommend that should the Commission decide to adjust the Company's

1 annualization of year end customers on its revenues and expenses in the application,  
2 that it do so based on the true apples-to-apples comparison I have performed and reject  
3 the effects of the so-called correction presented in response to Staff 2-13.

4 **Q. What would be the effect of using your apples-to-apples comparison to project**  
5 **revenue and expenses and the revenue requirement?**

6 A. The effect of my apples-to-apples comparison yields a projected increase in revenues  
7 of \$780,863 and a projected increase of purchased power expense of \$489,056,  
8 resulting in a net revenues increase of \$291,807.<sup>92</sup> This increase amount is \$206,631  
9 less than the amount of the net revenues increase of \$498,438 included in Reference  
10 Schedule 1.04 in the Company's application. This change would equate to an increase  
11 in SKRECC's revenue requirement of \$212,137. This is far less than the change in  
12 the revenue requirement of \$1,279,141 as computed in the Company's so-called  
13 correction presented in response to Staff 2-13. I have not included this adjustment  
14 amount on my summary Table 1 above.

15 **Q. Does this complete your testimony?**

16 A. Yes.

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<sup>92</sup> The quantifications reflected in this section of my testimony are detailed in my electronic workpapers, which have been filed along with my testimony.

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>THE ELECTRONIC APPLICATION OF</b>	)	
<b>SOUTH KENTUCKY RURAL ELECTRIC</b>	)	
<b>COOPERATIVE CORPORATION FOR A</b>	)	<b>CASE NO. 2024-00402</b>
<b>GENERAL ADJUSTMENT OF RATES AND</b>	)	
<b>OTHER GENERAL RELIEF</b>	)	

**EXHIBITS**

**OF**

**RANDY A. FUTRAL**

**ON BEHALF OF THE**

**KENTUCKY OFFICE OF THE ATTORNEY GENERAL**

**J. KENNEDY AND ASSOCIATES, INC.  
ROSWELL, GEORGIA**

**PUBLIC REDACTED VERSION**

**MAY 19, 2025**

**EXHIBIT RAF-1**

## **RESUME OF RANDY A. FUTRAL – DIRECTOR OF CONSULTING**

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### **EDUCATION**

**Mississippi State University, BBS in Business Administration**  
Accounting

### **EXPERIENCE**

**J. Kennedy and Associates, Inc.**  
**Director of Consulting**

**2003 - Present**

Responsible for utility revenue requirements analysis, affiliate transaction auditing and analysis, fuel adjustment clause auditing and research involving tax and public reporting matters. Clients served include the Georgia Public Service Commission (“GPSC”) Staff, the Louisiana Public Service Commission (“LPSC”) and its Staff, the Florida Office of Public Counsel (“OPC”), the Office of the Attorney General of the Commonwealth of Kentucky (“KY AG”), the South Carolina Office of Regulatory Staff (“ORS”), the Houston Council for Health and Education, the Gulf Coast Coalition of Cities, Cities Served by Texas Gas Service Company, the Alliance for Valley Healthcare, the Ohio Energy Group, Inc. (“OEG”), the Kentucky Industrial Utility Customers (“KIUC”), the Municipalities of Alda, Grand Island, Kearney and North Platte, Nebraska, the City of Clinton, and the Wisconsin Industrial Energy Group, Inc.

Direct and Responsive Testimonies filed on behalf of Louisiana Public Service Commission or its Staff:

LPSC Docket No. U-23327      Southwestern Electric Power Company, Revenue Requirement Review, October 2004.

LPSC Docket No. U-21453, U-20925, U-22092      Entergy Gulf States, Inc., Jurisdictional Separation Plan, March 2006.

LPSC Docket No. U-25116      Entergy Louisiana, Inc., 2002-2004 Audit of Fuel Adjustment Clause, April 2006.

LPSC Docket No. U-23327      Southwestern Electric Power Company, Revenue Requirement Review, July 2006.

LPSC Docket No. U-21453, U-20925, U-22092      Entergy Gulf States, Inc., Jurisdictional Separation Plan, August 2006.

FERC Docket No. ER07-682      Entergy Services, Inc., Company’s Section 205 Changes to Rough Production Cost Equalization Computation, November 2007.

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**J. KENNEDY AND ASSOCIATES, INC.**

FERC Docket No. ER07-956 Entergy Services, Inc., Company's 2007 Filing to be in Compliance with FERC Opinions' 480 and 480-A, March 2008.

FERC Docket No. ER08-51 Entergy Services, Inc., LPSC Section 206 Filing Related to Spindletop Regulatory Asset in Rough Production Cost Equalization Computation, November 2008.

FERC Docket No. ER08-1056 Entergy Services, Inc., Company's 2008 Filing to be in Compliance with FERC Opinions' 480 and 480-A, January 2009.

LPSC Docket No. U-31066 Dixie Electric Membership Corporation, Company's Application to Implement a Storm Recovery Rate Rider, September 2009.

LPSC Docket No. U-30893 Dixie Electric Membership Corporation, Company's Application to Implement a Formula Rate Plan, September 2009.

FERC Docket No. EL09-61 (Phase I) Entergy Services, Inc., LPSC Complaint Regarding Single Operating Company Opportunity Sales, April 2010.

LPSC Docket No. U-31066 Dixie Electric Membership Corporation, Company's Application to Implement a Storm Recovery Rate Rider, May 2010.

FERC Docket No. EL10-55 Entergy Services, Inc.

LPSC Complaint Regarding Depreciation Rates, September 2010.

LPSC Docket No. U-23327, Subdocket E Southwestern Electric Power Company, 2003-2004 Fuel Audit, September 2010.

LPSC Docket No. U-23327, Subdocket F Southwestern Electric Power Company, 2009 Test Year Formula Rate Plan Filing, October 2010.

LPSC Docket No. U-23327, Subdocket C Southwestern Electric Power Company, 2007 Test Year Formula Rate Plan Filing, February 2011.

LPSC Docket No. U-23327, Subdocket D Southwestern Electric Power Company, 2008 Test Year Formula Rate Plan Filing, February 2011.

FERC Docket No. ER10-2001 Entergy Arkansas, Inc., Company's 2010 Filing to Request Approval of Changed Depreciation Rates, March 2011.

FERC Docket No. ER11-2161 Entergy Texas, Inc., Company's 2010 Filing to Request Approval of Changed Depreciation Rates, July 2011.

LPSC Docket No. U-31835 South Louisiana Electric Cooperative Association, Company's Application to Implement a Formula Rate Plan and Initial Revenue Adjustment, August 2011.

FERC Docket No. ER12-1384 Entergy Services, Inc., Company's Section 205 Filing Related to Little Gypsy 3 Cancellation Costs, September 2012.

LPSC Docket No. U-32315 Claiborne Electric Cooperative, Inc.'s Application to Implement a Formula Rate Plan and Initial Revenue Adjustment, September 2012.

FERC Docket No. ER10-1350 Entergy Services, Inc., Company's 2010 Filing to be in Compliance with FERC Opinions' 480 and 480-A, January 2014.

FERC Docket No. EL-01-88-015 Entergy Services, Inc., Company's 2005 Remand Filing to be in Compliance with FERC Opinions' 480 and 480-A, March 2016.

LPSC Docket No. U-33984 Claiborne Electric Cooperative, Inc., Formula Rate Plan Extension, October 2016.

FERC Docket No. EL09-61(Phase III) Entergy Services, Inc., LPSC Complaint Regarding Single Operating Company Opportunity Sales, November 2016.

LPSC Docket No. U-33323 Entergy Louisiana LLC, 2010-2013 Fuel Audit, July 2019.  
LPSC Docket No. U-33324 Entergy Gulf States Louisiana LLC, 2010-2013 Fuel Audit, July 2019.  
LPSC Docket No. U-35441 Southwestern Electric Power Company, Rate Case, July 2021 Direct, October 2021 Surrebuttal.

Direct Testimony filed on behalf of the Florida OPC:  
FPSC Docket Nos. 20200241-EI, 202100178-EI, and 202100179-EI Florida Power and Light Company and Gulf Power Company, Storm Cost Audit, May 2022.

Direct Testimony filed on behalf of the KY AG:  
KPSC Case No. 2022-00372 Duke Energy Kentucky, Inc. (Electric Division), Rate Case, March 2023.  
KPSC Case No. 2023-00276 Kenergy Corp., Rate Case, January 2024.  
KPSC Case No. 2024-00211 Licking Valley Rural Electric Cooperative Corporation, Rate Case, October 2024.  
KPSC Case No. 2024-00276 Atmos Energy Corporation, Rate Case, January 2025.  
KPSC Case No. 2024-00354 Duke Energy Kentucky, Inc. (Electric Division), Rate Case, March 2025.

Direct Testimony filed on behalf of the KY AG and the City of Clinton:  
KPSC Case No. 2022-00147 Water Service Corporation of Kentucky, Rate Case, October 2022.

Direct Testimony filed on behalf of the KY AG and KIUC:  
KPSC Case No. 2022-00263 Kentucky Power Company, Fuel Adjustment Clause – Six-Month Review, December 2022.  
KPSC Case No. 2023-00318 Kentucky Power Company, Tariff PPA Modification, November 2023.  
KPSC Case No. 2023-00008 Kentucky Power Company, Fuel Adjustment Clause – Two-Year Review, December 2023.

Direct Testimony filed on behalf of the South Carolina ORS:  
SCPSC Docket No. 2022-256-E Duke Energy Progress, LLC, Cost Recovery for 8 Named Storms Since 2014, January 2023.

Direct Testimony filed on behalf of the OEG in Ohio:  
PUCO Case No. 23-301-EL-SSO FirstEnergy Utilities, Standard Service Offer in the Form of an Electric Security Plan, October 2023.

Direct Testimony filed on behalf of Georgia Public Service Commission Staff:  
GPSC Docket No. U-43830 Atlanta Gas Light Company, Affiliate Audit, May 2024.



Direct Testimony filed on behalf of Cities Served by Texas Gas Service Company:  
Texas Railroad Commission Case No. OS-24-00017471 Texas Gas Service Company,  
Rate Case, August 2024.

<b>Telscape International, Inc.</b>	<b>1997 - 2003</b>
<b>Corporate Controller</b>	<b>1999 - 2003</b>
<b>Assistant Controller</b>	<b>1997 - 1999</b>

Complete responsibility and accountability for the accounting and financial functions of a \$160 million newly public company providing telecommunication and high-end internet access services. Telscape served as a telephony carrier of services domestically and to Latin and Central America targeting other service carriers as well as individuals. Reported directly to CFO and managed a staff of eleven.

- Managed the day to day processes required to produce timely and accurate financial statements, including general ledger, account reconciliations, AP, AR, fixed assets, payroll, treasury, tax, internal and external reporting.
- Worked with attorneys and auditors on mergers and acquisitions including due diligence, audits, tax and integrating the accounting functions of eleven acquisitions.
- Grew the accounting department from four to eleven employees while developing and implementing company policies and procedures.
- Instituted capital investment policy and accounts payable management for twenty-one separate entities and twenty-four bank accounts to facilitate effective use of cash flow.
- Created capital and operating budgeting and variance analysis package for five separate business lines.
- Developed the consolidations and inter-company billings process across all entities including six in Latin and Central America.
- Worked with CFO to develop financial models and business plans in raising over \$240 million over a three-year period through private preferred placements, debenture offerings and asset based credit facilities.
- Responsible for relationship management with external auditors, attorneys, and the banking community while reviewing and approving all SEC filings, including quarterly and annual reports, proxies and informational filings.

- Developed line cost accounting for revenues and carrier invoices saving thousands monthly and providing the justification for invoice reductions.

<b>Comcast Communications, Inc.</b>	<b>1988 - 1997</b>
<b>Regional Controller</b>	<b>1993 - 1997</b>
<b>Regional Assistant Controller</b>	<b>1991 - 1992</b>
<b>Regional Senior Financial Analyst</b>	<b>1988 - 1991</b>

Complete responsibility and accountability for the accounting functions of a \$2.1 billion regional division of the world's third largest cable television provider serving approximately 490,000 subscribers. Reported to the Regional VP of Finance and managed a staff of twelve.

- Managed the day to day processes required to produce timely and accurate financial statements, including general ledger, account reconciliations, AP, AR, fixed assets and internal reporting.
- Controlled extensive budgeting, forecasting, and variance reporting for eighteen separate entities covering eight states, training employees and management throughout the region.
- Performed due diligence related to the acquisition of seven cable system entities and coordinated the integration of all accounting functions with the corporate office.
- Instituted all FCC informational and rate increase filings throughout the region based on the Cable Act of 1992.
- Responsible for the coordination of all subscriber reporting, sales and property tax filings, franchise fee and copyright filings.
- Grew the accounting department from seven to thirteen before its move to Atlanta, restaffing ninety percent of the department after the move.
- Directed all efforts throughout the region to implement Oracle as the new financial package and a new Access database for the budgeting and forecasting processes.

**Storer Cable Communications, Inc**  
**Senior Accountant for Operations**

**1987 - 1988**

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**J. KENNEDY AND ASSOCIATES, INC.**

Responsibility for the accounting, budgeting, and forecasting activities of this 82,000 subscriber area for this cable television concern that was acquired by Comcast listed above. Reported to the Area VP and General Manager and managed three employees.

- Implemented new Lotus based model for budgeting and forecasting, training all management on its use.
- Transitioned financial statement preparation from the regional office level to this area office.
- Managed the day to day processes required to produce timely and accurate financial statements for six separate entities including general ledger, AP, AR, fixed assets, subscriber reporting and other internal reporting.
- Developed and maintained tracking mechanism to track progress of cable plant rebuild and the associated competitor overbuild in the area's largest cable system.

**Tracey-Luckey Pecan & Storage, Inc.**  
**Senior Accountant**

**1986 - 1987**

Responsibility for the accounting, budgeting, and office management for a divisional office of this pecan production, processing, and storage entity annually grossing approximately \$22 million. Financial statements were produced for three entities. Reported directly to the president of the division and managed three employees.

**Tarpley & Underwood, CPA's**  
**Staff Accountant**

**1984 - 1986**

Responsibility for the completion of monthly and quarterly client write-up for twenty-three small businesses for this regional CPA firm that is now one of the top twenty-five firms in Atlanta. Performed all payroll tax, sales tax, property tax, and income tax filings for these and other clients as well as approximately eighty individual returns per year. Reported directly to both partners with dotted line responsibility to all managers.

**EXHIBIT RAF-2**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 44:** Refer to Mr. Wolfram's Exhibit JW-2 at the Statement of Operations & Revenue Requirement (page 1 of 51) and further to line 26 which lists the Non-Operating Margins – Interest of \$1,695,485 recorded in the test year. Provide the amount of each form of interest income reflected in this amount, including, but not limited to, RUS Cushion of Credit. If there were other forms of interest income besides RUS Cushion of Credit interest, identify and describe each one.

**Response 44:**

Descripton		Sum of Amount
Cushion of Credit Interest	\$	880,387
OFC Investment Interest	\$	738,294
Interest on OFC Capital Term Certificates	\$	69,973
Bank Account Interest	\$	6,684
941 Refund	\$	135
Central Service Assoc Interest	\$	12
<b>Grand Total</b>	<b>\$</b>	<b>1,695,485</b>

**EXHIBIT RAF-3**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 41:** Provide a trial balance with all balance sheet and income statement accounts and subaccounts for each month from January 2022 through December 2024 and each month thereafter for which actual information is available and as actual information for each subsequent month is available throughout the pendency of this proceeding.

**Response 41:** Please see Attachment AG 1-41 provided separately due to size.

03/18/2025 9:35:29 am

# General Ledger Summary Trial Balance

Page 4

## Period Ending: MAY 2024

				----- Current Month Balance -----		----- Year-To-Date Balance -----		
Div	Account	Description	Balance Forward	YTD Trans	Debit	Credit	Debit	Credit
0	224.33	CURRENT MATURITIES-LTD-FFB	-3,782,677.78	0.00	0.00	0.00	0.00	3,782,677.78
0	224.6	ADV PAYMENTS UNAPPLIED-LTD-	16,277,099.08	-1,628,738.22	39,989.79	0.00	14,648,360.86	0.00
0	228.3	ACC PROV FOR PENSIONS & BENE	-7,387,318.00	102,224.28	18,132.53	0.00	0.00	7,285,093.72
0	232.0	ACCOUNTS PAYABLE - GENERAL	-2,817,499.37	-559,256.76	0.00	220,177.58	0.00	3,376,756.13
0	232.1	ACCOUNTS PAYABLE - EAST KY P	-10,270,155.55	2,793,500.99	0.00	1,007,632.46	0.00	7,476,654.56
0	232.25	A/P - CHARITY JEAN FUNDRAISER	-310.00	-885.00	0.00	15.00	0.00	1,195.00
0	232.51	ACCOUNTS PAYABLE - COBANK	-116,414.19	3,958.56	0.00	2,789.77	0.00	112,455.63
0	232.98	UNINVOICED MATERIAL	140.70	38,109.30	75,707.25	0.00	38,250.00	0.00
0	235.0	CUSTOMER DEPOSITS	-2,791,987.00	183,293.24	206,346.24	0.00	0.00	2,608,693.76
0	236.1	ACCRUED PROPERTY TAXES	-2,157.72	-818,366.55	0.00	173,857.73	0.00	820,524.27
0	236.11	ACCRUED PSC ASSESSMENT	0.00	-54,525.00	0.00	10,905.00	0.00	54,525.00
0	236.2	ACC U S SOC SEC - UNEMPLOYME	0.00	-124.79	0.00	73.26	0.00	124.79
0	236.4	ACC STATE SOC SEC - UNEMPLOY	-318.38	44.04	0.00	141.96	0.00	274.34
0	236.5	ACCRUED KY SALES TAX - CONSU	-286,616.86	42,240.05	11,409.00	0.00	0.00	244,376.81
0	236.51	ACCRUED KY SALES TAX-PREPAY	131,266.13	-2,613.02	0.00	1,648.16	128,653.11	0.00
0	236.52	ACCRUED TN SALES TAX-CONSU	-529.35	-20.44	0.00	27.02	0.00	549.79
0	236.7	ACCRUED TAXES-SCHOOL(PULAS	-184,426.71	50,099.80	14,269.81	0.00	0.00	134,326.91
0	236.71	ACCRUED TAXES-SCHOOL(ADAIR	-3,250.30	972.97	315.95	0.00	0.00	2,277.33
0	236.72	ACCRUED TAXES-SCHOOL(CASEY	-7,952.89	1,233.01	565.00	0.00	0.00	6,719.88
0	236.73	ACCRUED TAXES-SCHOOL(CLINT	-44,257.58	7,128.68	1,125.22	0.00	0.00	37,128.90
0	236.74	ACCRUED TAXES-SCHOOL(CUMB	-198.24	29.01	0.06	0.00	0.00	169.23
0	236.75	ACCRUED TAXES-SCHOOL(LAURE	-25.92	7.70	2.66	0.00	0.00	18.22
0	236.76	ACCRUED TAXES-SCHOOL(LINCO	-6,049.12	1,223.88	735.53	0.00	0.00	4,825.24
0	236.77	ACCRUED TAXES-SCHOOL(MCCR	-35,706.13	8,046.46	2,899.94	0.00	0.00	27,659.67
0	236.78	ACCRUED TAXES-SCHOOL(ROCK	-273.41	72.71	46.73	0.00	0.00	200.70
0	236.79	ACCRUED TAXES-SCHOOL(RUSSE	-55,991.15	12,240.18	3,704.26	0.00	0.00	43,750.97
0	236.8	ACCRUED TAXES-SCHOOL(WAYN	-74,071.44	16,035.17	4,583.63	0.00	0.00	58,036.27
0	237.11	INTEREST ACCR-FFB LOANS	20,368.42	-600,634.20	0.00	310,327.67	0.00	580,265.78
0	237.2	INT ACCRUED-CITY OF MONT-LT	0.00	-40,638.88	0.00	8,127.78	0.00	40,638.88
0	237.33	INTEREST ACCR-CONSUMER DEP	-80,449.25	39,041.42	0.00	8,508.16	0.00	41,407.83
0	241.22	LOCAL TAX W/H - PULASKI COUN	-3,966.57	573.07	0.00	1,718.01	0.00	3,393.50
0	241.23	LOCAL TAX W/H - RUSSELL COUN	-1,363.65	299.21	0.00	543.16	0.00	1,064.44
0	241.25	LOCAL TAX W/H - CLINTON COUN	-2,887.70	806.80	0.00	1,154.22	0.00	2,080.90
0	241.26	LOCAL TAX W/H - LINCOLN COUN	-115.96	76.09	0.00	20.77	0.00	39.87
0	241.27	LOCAL TAX W/H - WAYNE COUNT	-2,512.04	860.22	0.00	869.71	0.00	1,651.82
0	241.28	LOCAL TAX W/H - MCCREARY CO	-3,020.31	690.48	0.00	1,152.98	0.00	2,329.83
0	241.29	LOCAL TAX W/H - JAMESTOWN	-1,472.39	452.83	0.00	534.00	0.00	1,019.56
0	241.3	LOCAL TAX W/H - SOMERSET	-19,878.62	6,075.53	0.00	7,413.02	0.00	13,803.09
0	241.5	MONTICELLO - FRANCHISE TAX	-17,300.00	-30.00	0.00	75.00	0.00	17,330.00



**EXHIBIT RAF-4**

**South Kentucky RECC  
Case No. 2024-00402  
Commission Staff's First Request for Information**

**Request 54:** State the credit metrics that are used in South Kentucky's debt covenants.

**Response 54:**

Along with reporting and other requirements, the general financial covenants that South Kentucky is required to meet are as follows:

- RUS/FFB: The Borrower shall design and implement rates for utility service furnished by it to provide sufficient revenue (along with other revenue available to the Borrower in the case of TIER and DSC) (i) to pay all fixed and variable expenses when and as due, (ii) to provide and maintain reasonable working capital, and (iii) to maintain, on an annual basis, the Coverage Ratios. In designing and implementing rates under this paragraph, such rates should be capable of producing at least enough revenue to meet the requirements of this paragraph under the assumption that average weather conditions in the Borrower's service territory shall prevail in the future, including average Utility System damage and outages due to weather and the related costs. The average Coverage Ratios achieved by the Borrower in the 2 best years out of the 3 most recent calendar years must be not less than the following:
  - TIER = 1.25
  - DSC = 1.25
  - OTIER = 1.10

- ODSC = 1.10
- CFC: The Borrower shall achieve an Average DSC Ratio of not less than 1.35.
- CoBank: The Borrower and its consolidated subsidiaries, if any, will have at the end of each fiscal year of the Borrower, a Debt Service Coverage Ratio for such year of not less than 1.25. The Borrower and its consolidated subsidiaries, if any, will have at the end of each fiscal quarter of the Borrower, a ratio of consolidated total equity to consolidated total assets of not less than 25%.

**EXHIBIT RAF-5**

**South Kentucky RECC  
Case No. 2024-00402  
Commission Staff's First Request for Information**

**Request 2:** Provide the capital structure at the end of the five most recent calendar years and each of the other periods shown in Schedule A1 and Schedule A2.

**Response 2:** Please see the Excel file uploaded separately.

12 Months Ended December 31, 2024

Line No.	Item (a)	Total Capital (b)	Long-Term Debt (c)	Short-Term Debt (d)	Preferred Stock (e)	Common Stock (f)	Retained Earnings (g)	Total Common Equity (h)
1	Beginning Balance	\$ 316,818	\$ 147,747	\$ -	\$ -	\$ -	\$ 169,071	\$ 169,071
2	Jan	315,680	147,394	-	\$ -	\$ -	168,286	\$ 168,286
3	Feb	318,215	146,861	-	\$ -	\$ -	171,354	\$ 171,354
4	Mar	317,736	146,524	-	\$ -	\$ -	171,212	\$ 171,212
5	Apr	317,316	147,086	-	\$ -	\$ -	170,230	\$ 170,230
6	May	314,975	146,552	-	\$ -	\$ -	168,423	\$ 168,423
7	Jun	312,517	145,282	-	\$ -	\$ -	167,235	\$ 167,235
8	Jul	313,271	146,798	-	\$ -	\$ -	166,473	\$ 166,473
9	Aug	317,449	151,266	-	\$ -	\$ -	166,183	\$ 166,183
10	Sep	318,877	151,878	-	\$ -	\$ -	166,999	\$ 166,999
11	Oct	317,706	151,416	-	\$ -	\$ -	166,290	\$ 166,290
12	Nov	315,935	151,008	-	\$ -	\$ -	164,927	\$ 164,927
13	Dec	318,686	151,485	-	\$ -	\$ -	167,201	\$ 167,201
14	Total (L1 through L13)	\$ 4,115,181	\$ 1,931,297	\$ -	\$ -	\$ -	\$ 2,183,884	\$ 2,183,884
15	Average Balance	\$ 316,552	\$ 148,561	\$ -	\$ -	\$ -	\$ 167,991	\$ 167,991
16	Average Capitalization Ratios		46.9%	0.0%	0.0%	0.0%	53.1%	53.1%
17	End-of-period Capitalization Ratios		47.5%	0.0%	0.0%	0.0%	52.5%	52.5%

**EXHIBIT RAF-6**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 53:** Refer to Newton Direct Testimony at pages 5-6, wherein he discusses the new vegetation management plan that began in 2023 and the goal of trimming 800 miles per year to maintain a six-year trimming cycle causing an increase in trimming costs of nearly \$6 million annually.

a. Provide the right-of-way (“ROW”) expenses recorded in account 593, Maintenance of Overhead Lines, by subaccount (including sub account 593.50) for each of the years 2018 through 2024, the test year ended May 31, 2024, and January and February 2025.

b. Provide copies of the general ledger activity for ROW expenses in account 593 by subaccount (including sub account 593.50) for each month during the test year and each month subsequent to the test year with available information.

c. Provide a breakdown of each of the annual amounts in account 593 by subaccount for each of the years 2018 through 2024, the test year ended May 31, 2024, and January and February 2025.

d. Provide a breakdown of the ROW expenses in account 593 by subaccount (including sub account 593.50) for each of the months in 2023 and 2024.

e. Confirm that the only sub account number used to record ROW expenses in account 593 is 593.5. If not confirmed, identify all other subaccounts used.

f. Provide a copy of SKRECC’s current Vegetation Management Plan and a redlined version of the Plan showing all changes to the Plan since the last base rate case, if any.



g. Provide the actual circuit miles trimmed for each year 2018 through 2024, the test year ended May 31, 2024, and for each month in 2025 with available information.

h. Provide the average cost per mile for ROW trimming for each year 2018 through 2024, the test year ended May 31, 2024, and for each month in 2025 with available information.

i. Provide the number of circuit miles needing to be trimmed over each six-year cycle.

j. Provide the projected circuit miles trimmed budgeted for 2025.

k. Provide the bid pricing received for all circuit miles to be trimmed in 2023, 2024, and 2025 for each one of the Company's potential ROW contractors.

l. Identify the Company's ROW contractors utilized in 2022, 2023, 2024, and 2025 to date.

m. Provide copies of the contract(s) in place during 2023, 2024, and 2025 for each ROW contractor being utilized by the Company.

n. Provide a copy of each ROW contractor invoice for expenses recorded to account 593 during the test year and for each month subsequent to the test year with available information.

*All attachments for Response 53 are being provided separately due to size.*

**Response 53(a), (c), and (d):** Please see the Excel spreadsheet provided separately.

**Response 53(b):** Please see Attachment AG 1-53(b).

**Response 53(e):** Confirmed.

**Response 53(f):** Please see Attachment AG 1-53(f).

**Response 53(g) and (h):** Please see the Excel spreadsheet provided separately.

**Response 53(i):** The total miles to be trimmed is 5,017.54. The average number of miles per

year is 836.26

**Response 53(j):** The 2025 budget includes circuit trimming for 901.50 miles.

**Response 53(k):** This response is being filed under seal pursuant to a Motion for Confidential Treatment.

**Response 53(l):** See response to 53(m).

**Response 53(m):** Please see Attachment AG 1-53(m).

**Response 53(n):** Please see Attachment AG 1-53(n).

**South Kentucky RECC  
Case 2024-00402**

ROW Expenses GL 593.50										
	2018	2019	2020	2021	2022	2023	2024	Test Year	1/31/2025	2/28/2025
\$	3,233,862.54	\$ 3,759,516.98	\$ 3,638,950.81	\$ 3,832,900.21	\$ 3,739,770.54	\$ 8,260,070.24	\$ 9,554,931.02	\$ 11,604,592.86	\$ 948,658.47	\$ 841,574.85

South Kentucky RECC  
Case 2024-00402

593.00 and Subaccount Annual Breakdown										
	2018	2019	2020	2021	2022	2023	2024 Test Year		Jan-25	Feb-25
593.00 - Maint. Of Overhead Lines	\$ 4,362,362.79	\$ 4,450,215.57	\$ 4,179,018.87	\$ 4,034,358.55	\$ 5,019,558.27	\$ 5,237,246.72	\$ 6,237,776.74	\$ 5,895,981.72	\$ 552,753.17	\$ 945,692.77
593.01 - Maint. Of Overhead Lines - UAI	\$ 54,868.78	\$ 53,444.18	\$ 67,816.34	\$ 68,614.86	\$ 71,131.78	\$ 34,476.45	\$ -	\$ 15,718.02	\$ -	\$ -
593.10 - Storm Damage Expense	\$ -	\$ 237.11	\$ 767.84	\$ 34,713.69		\$ 1,678,925.75	\$ 206,813.56	\$ 655,473.37	\$ 1,488.02	\$ 70,381.50
593.11 - Storm Damage Reimbursement	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (1,416,873.33)	\$ 56.29	\$ (1,416,873.33)	\$ -	\$ -
593.20 - Maint. Of Overhead Lines - PCB	\$ -	\$ -	\$ -	\$ 200.00	\$ 121.31	\$ -	\$ -	\$ -	\$ -	\$ -
593.50 - Maint. Of Overhead Lines - ROW	\$ 3,233,862.54	\$ 3,759,516.98	\$ 3,638,950.81	\$ 3,832,900.21	\$ 3,739,770.54	\$ 8,260,070.24	\$ 9,554,931.02	\$ 11,604,592.86	\$ 948,658.47	\$ 841,574.85

South Kentucky RECC  
Case 2024-00402

**ROW Monthly Expenses GL 593.50**

<b>2023</b>		<b>2024</b>	
<b>Jan</b>	\$ 337,345.30	<b>Jan</b>	\$ 265,135.87
<b>Feb</b>	\$ 364,066.90	<b>Feb</b>	\$ 269,343.33
<b>Mar</b>	\$ 379,285.20	<b>Mar</b>	\$ 1,213,151.38
<b>Apr</b>	\$ 569,414.66	<b>Apr</b>	\$ 2,129,466.78
<b>May</b>	\$ 328,044.14	<b>May</b>	\$ 1,445,581.46
<b>Jun</b>	\$ 887,444.60	<b>Jun</b>	\$ 552,271.29
<b>Jul</b>	\$ 457,549.60	<b>Jul</b>	\$ 1,492,527.77
<b>Aug</b>	\$ 1,537,426.26	<b>Aug</b>	\$ 1,047,279.46
<b>Sep</b>	\$ 239,705.22	<b>Sep</b>	\$ 158,445.50
<b>Oct</b>	\$ 474,052.26	<b>Oct</b>	\$ 1,372,991.32
<b>Nov</b>	\$ 1,295,970.80	<b>Nov</b>	\$ 365,361.02
<b>Dec</b>	\$ 1,389,765.30	<b>Dec</b>	\$ (756,624.16) To correct over expensed amount from October 2024.

	(g)		(h)	
	Circuit Miles			
	Trimmed	Trimming Cost	Cost per Mile	Notes
2018	159.04	\$ 2,234,309.02	\$ 14,048.72	Costs include hourly work
2019	426.94	\$ 2,563,777.61	\$ 6,005.01	Costs include hourly work
2020	469.48	\$ 2,424,224.65	\$ 5,163.64	Costs include hourly work
2021	576.78	\$ 3,166,837.84	\$ 5,490.55	Costs include hourly work
2022	304.90	\$ 2,970,779.59	\$ 9,743.46	Costs include hourly work
2023	903.68	\$ 6,043,353.75	\$ 6,687.50	
2024	787.66	\$ 7,304,060.12	\$ 9,273.15	
Test Year	1,093.19	\$ 9,235,765.68	\$ 8,448.46	
Jan-25	83.30	\$ 737,025.70	\$ 8,847.85	accrual based on estimated % completion
Feb-25	70.65	\$ 699,127.52	\$ 9,895.65	accrual based on estimated % completion

**EXHIBIT RAF-7**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's Second Request for Information**

**Request 5:** Refer to the annual totals of expense recorded in account 593.50, Maintenance of Overhead Lines – R/W, provided in the Attachment responses to AG 1-53 (a), (b),(d),(g) and (h). Certain annual data from those attachment responses are provided below as an example of some of the costs portrayed for each of the years.

Year	Total ROW Maintenance in Account 593.50	Circuit Mile Contractor Trimming ROW Maintenance in Account 593.50	All Other ROW Maintenance in Account 593.50
2021	3,832,900	3,166,838	666,062
2022	3,739,771	2,970,780	768,991
2023	8,260,070	6,043,354	2,216,716
2024	9,554,931	7,304,060	2,250,871
Test Year	11,604,593	9,235,766	2,368,827

a. Confirm whether the circuit mile trimming costs in the middle data column above and contained in Attachment response to AG 1-53(g) represents just the outside contractor expenses associated with the circuit mile trimming. If not confirmed, explain.

b. Provide a description of each of the other kinds of ROW maintenance expenses recorded in account 593.50 other than the expenses for contractor circuit mile trimming expense. These costs are summed in the third data column in the table above.



c. Describe all known reasons why the other kinds (non-circuit mile contractor trimming) of ROW maintenance expenses recorded in account 593.50 increased substantially from 2022 to 2023, and then remained fairly consistent throughout the remainder of the period portrayed in the table above.

**Response 5(a):** Confirmed.

**Response 5(b):** Please see Excel spreadsheet provided separately.

**Response 5(c):** The increase from 2022 to 2023 is because of the difference in how the contractor costs are now categorized between circuit trimming and hourly work. The hourly work costs are included in the circuit work costs for 2021 and 2022.

Description	2021	2022	2023	2024	Test Year
0 - Unassigned Activity		58			
1000 - OPER & MAINT-OH LINES			100		100
1070 - OPER & MAINT-TRANSFORMERS	-				
1100 - OPER & MAINT-TOOLS & WORK EQUIP	1,637	1,734	2,055	2,607	2,094
1115 - TOOLS & EQUIPMENT	4,195	2,716	3,651	4,930	5,090
1116 - OPERATING SUPPLIES	2,869	2,248	1,916	4,654	2,431
1118 - TESTING WORK EQUIPMENT	1,287	1,440	1,604	1,933	1,886
2015 - NONINVENTORY MATERIAL		922	7,848	6,814	14,809
2031 - FUEL EXPENSE		15	103	95	69
2040 - STORES EXPENSE ALLOCATION		10		16	
2130 - TAX- SALES & USE TAX	62	9		35	31
6000 - CONTRACTOR-ELECTRIC	-				
6100 - CONTRACTOR-RIGHT OF WAY-HOURLY			1,462,561	1,361,958	1,369,751
6101 - CONTRACTOR-RIGHT OF WAY-CIRCUIT				5,229	
6220 - CONTRACTOR - STAKING				29	29
6300 - CONSULTING ENGINEER	43,187	4,528	17,730	4,576	5,901
7020 - EQUIPMENT RENTAL/LEASE				2	2
7030 - FORMS/PRINTING	142		698	210	94
7090 - OFFICE SUPPLIES AND MISC				96	1
7110 - POSTAGE/SHIPPING	47			0	0
7120 - COPIER EXPENSES				1	1
7150 - FEES/LICENSES/SVS CHGS		301		60	60
7160 - SOFTWARE EXP				26	26
7165 - PROFESSIONAL ASSISTANCE				7	7
7180 - EQUIPMENT/SOFTWARE MAINTENANCE				19	19
7190 - PAPER/FORMS/PRINTING				6	6
7235 - RUBBER COVERUP GOODS		1,461	3,824	4,889	4,062
7300 - PUBLIC RELATIONS/GOODWILL		753	19		
7350 - UTILITY-ELECTRIC/GAS/WATER/SEWAGE				0	0
7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE	3,619	4,370	4,424	4,473	4,391
8100 - TRANSPORTATION	80,996	96,107	115,757	130,213	118,907
8515 - ACCRUE PROPERTY TAXES				6	6
8623 - TRANSFER ACCOUNT BALANCE				(99,349)	
8645 - EXPENSE CYBERLIABILITY INSURANCE				1	1

8660 - OTHER ACCOUNTS RECEIVABLE	(171,618)	(23,953)				
9000 - LABOR	296,071	261,747	245,178	293,475	254,745	
9100 - PTO		14,226	32,687	34,554	32,190	
9200 - EMPLOYEE BENEFITS		18,852	171,275	171,715	161,687	
9300 - PAYROLL TAXES		3,046	20,750	24,465	20,863	
9610 - EMPLOYEE TRAVEL/MTG/MEAL EXP		1,571	750	6,625	6,482	
9625 - EMPLOYEE CASUAL CLOTHING	187	300	396	500	401	
9630 - EMPLOYEE MISC EXPENSE			290	151	431	
9640 - EMPLOYEE BOOTS/UNIFORMS	12,624	4,003	3,266	8,065	7,562	
9650 - EMPLOYEE-FIRST AID & SAFETY	2,057	1,672	4,262	5,520	6,413	
9920 - PAYROLL FRINGE BENEFITS - ALLOCATION	190,335	161,158	14,117	13,899	11,356	
Electric Construction		2,190			178	
Spraying	198,365	207,507	101,456	258,363	336,746	
Total	\$ 666,062	\$ 768,991	\$ 2,216,716	\$ 2,250,871	\$ 2,368,827	

**EXHIBIT RAF-8**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's Second Request for Information**

**Request 6:** Refer to the monthly totals of expense recorded in account 593.50, Maintenance of Overhead Lines – R/W, provided in the Attachment response to AG 1-53 (d) for each of the months in 2023 and 2024. Provide the monthly totals of trimming costs only for each of the months in 2023 and 2024 that were recorded in account 593.50, Maintenance of Overhead Lines – R/W (as depicted in the Attachment response to AG 1-53 (g)).

**Response 6:**

Trimming Costs by Month	Sum of Amount
<b>2023</b>	<b>\$6,043,354</b>
Jan	\$165,221
Feb	\$237,259
Mar	\$143,143
Apr	\$413,386
May	\$137,939
Jun	\$735,913
Jul	\$194,221
Aug	\$1,251,386
Sep	\$78,630
Oct	\$319,866
Nov	\$1,146,842
Dec	\$1,219,548
<b>2024</b>	<b>\$7,304,060</b>
Jan	\$123,095
Feb	\$116,742
Mar	\$1,059,426
Apr	\$1,957,403
May	\$1,032,693
Jun	\$351,471
Jul	\$103,239
Aug	\$670,637
Sep	\$11,000
Oct	\$1,272,819
Nov	\$357,939
Dec	\$247,594
<b>Grand Total</b>	<b>\$13,347,414</b>

**EXHIBIT RAF-9**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 50:** Refer to Mr. Wolfram's Exhibit JW-2 at Reference Schedule 1.07 (page 17 of 51) related to the removal of FEMA declared storm costs and reimbursements. Refer also to the summary of operating expense amounts by year provided in the revised attachment response to Staff 1-1.

a. Describe the accounting entries made to record all FEMA declared storm costs and reimbursements. Be sure to indicate what accounts were debited and credited and whether any balance sheet accounts were utilized.

b. If balance sheet accounting is not used to reflect expected FEMA reimbursements in the future, has SKRECC considered such use in order to help avoid the wide swings in year to year reported expenses for FEMA costs that are expected to be reimbursed?

c. Provide the general ledger details that show where the FEMA declared storm costs were recorded in the test year.

d. Provide the general ledger details that show where the FEMA declared storm reimbursements were recorded in the test year.

e. Provide a list of all FEMA declared storm costs by year and by account that were incurred in the test year.

f. Provide a list of all FEMA declared storm reimbursements by year and by account that were received and/or recorded in the test year.

g. Refer to the revised response to Staff 1-1 and further to the test year amount of

expense recorded in account 593.10 of \$655,473.37. Explain all reasons why this amount is higher than the FEMA storm expense amount during the test year of \$420,685 as reflected on Reference Schedule 1.07 at line 1.

h. Provide copies of all correspondence regarding the reimbursements of FEMA declared storm costs during the test year or related to the test year reimbursements.

i. Explain how the reimbursements of FEMA declared storm costs were more than three times the amount of costs (\$1,416,873 in reimbursements compared to \$420,685 in costs).

j. Provide a list of all FEMA declared storm costs incurred, and FEMA declared storm reimbursements received and/or recorded subsequent to the end of the test year.

**Response 50(a):** During the test year FEMA expenses were debited to account 593.10 when incurred. FEMA reimbursement costs were credited to account 593.11 and debited to either the accounts receivable account of 143.00 (balance sheet), or the general funds cash account of 131.10 (balance sheet).

**Response 50(b):** While balance sheet accounting was not used to record FEMA costs and reimbursements during the test year, this type of accounting will be used in the future. Reference Response 50 (j) in this request of the accounting used for the FEMA expenses and reimbursements that occurred after the test year.

**Response 50(c):** Please see Attachment AG 1-50(c) provided separately due to size.

**Response 50(d):** Please see Attachment AG 1-50(d) provided separately due to size.

**Response 50(e):** Please see the response to Item 50(c).

**Response 50(f):** Please see the response to Item 50(d).

**Response 50(g):** There was an entry error. Please see the Excel spreadsheet filed separately for a corrected version of Schedule 1.07.



**Response 50(h):** Please see Attachment AG 1-50(h).

**Response 50(i):** This is due to the timing of the FEMA costs being incurred, and the actual payment being received. The bulk of the expenses were incurred prior to the test year, while the payments were received during the test year.

**Response 50(j):** Please see the Attachment AG 1-50(j). Note that McCreary and Wayne county projects are still pending and a receivable is outstanding in general ledger account 143.

**EXHIBIT RAF-10**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 47:** Refer to Mr. Wolfram's Exhibit JW-2 at Reference Schedule 1.10 (pages 23-27 of 51) and Reference Schedule 1.13 (pages 34-36 of 51). The proforma increase in total expensed and capitalized wages and salaries on Reference Schedule: 1.10 at line 171 is \$723,619, an increase over the test year amount of 5.8% ( $\$723,619/\$12,535,208$  from column 11 line 171). The proforma increase in total expensed and capitalized payroll taxes on Reference Schedule: 1.13 at line 178 is \$108,771, an increase over the test year amount of 11.9% ( $\$108,771/\$911,945$  from column 13 line 174).

a. Provide copies of the source(s) of the test year actual total expensed and capitalized payroll taxes summing to \$911,945 reflected on Reference Schedule: 1.13 at line 174.

b. Indicate whether the actual test year total expensed and capitalized wages and salaries summing to \$12,535,208 reflected on Reference Schedule: 1.10 at line 171 is correct or not. If not, provide a corrected version in electronic format with all formulas intact.

c. Indicate whether the actual test year total expensed and capitalized payroll taxes summing to \$911,945 reflected on Reference Schedule: 1.13 at line 174 is correct or not. If not, provide a corrected version in electronic format with all formulas intact.

d. Explain in detail how the proforma increase percentage for total expensed and capitalized wages and salaries is only 5.8%, while the proforma increase percentage for total expensed and capitalized payroll taxes is much higher at 11.9%.

e. Explain how the percentage of actual payroll taxes in the test year can be only

7.28% of the total actual test year wages and salaries (\$911,945/\$12,535,208), especially when only three employees (ID #'s S05, H85, and H96) exceeded the social security tax limit applicable to the employer paid tax rate portion of the expense during the test year.

**Response 47(a):** Please see Attachment AG 1-47(a)

**Response 47 (b):** Correct.

**Response 47 (c):** Correct.

**Response 47(d)-(e):** The proforma tax calculation does not reduce total wages by the non-taxable portion. The tax amount reported for the test year was calculated on taxable wages which removes certain pre-tax deductions and adds in taxable benefits to arrive at the taxable wages.

**ATTACHMENT AG 1-47(a)**

12/05/2024 2:20:00 pm

# PAYROLL/LABOR TAXES

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## Totals

Pay Date: 06/01/2023 To 05/31/2024

Type	Tax	Payer Obligation	State	Gross Pay	Other Pay	Taxable Amount	Tax Amount
Federal Income		Employee		12,507,423.39	27,784.60	11,159,609.86	1,332,790.80
Federal Unemployment		Employer		12,507,423.39	27,784.60	1,094,979.64	6,569.87
Social Security		Employee		12,507,423.39	27,784.60	11,630,409.73	721,085.39
Social Security		Employer		12,507,423.39	27,784.60	11,630,409.73	721,085.39
Medicare		Employee		12,507,423.39	27,784.60	11,915,296.51	174,091.11
Medicare		Employer		12,507,423.39	27,784.60	11,915,296.51	172,771.82
State Income		Employee	KY	12,507,423.39	27,784.60	11,159,609.86	464,577.68
State Unemployment		Employer	KY	12,507,423.39	27,784.60	1,747,382.22	11,517.75
Miscellaneous	00 - NO LOCALITY NEEDED	Employee		2,594,592.79	0.00	73,097.25	0.00
Miscellaneous	01 - PULASKI PAYROLL TAX	Employee		7,210,346.94	27,784.60	1,941,074.21	19,410.84
Miscellaneous	02 - CLINTON PAYROLL TAX	Employee		4,402,694.90	2,784.60	1,001,197.17	12,515.00
Miscellaneous	03 - WAYNE COUNTY PAYROLL TAX	Employee		5,340,509.93	1,830.60	1,228,944.36	11,060.49
Miscellaneous	04 - RUSSELL COUNTY PAYROLL TAX	Employee		5,169,430.61	954.00	651,939.64	6,141.57
Miscellaneous	05 - MCCREARY COUNTY PAYROLL T	Employee		4,258,836.26	0.00	923,926.79	13,859.08
Miscellaneous	07 - LINCOLN COUNTY PAYROLL TA	Employee		2,460,931.57	0.00	44,400.39	443.99
Miscellaneous	21 - CITY OF SOMERSET PAYROLL TA	Employee		9,681,659.10	26,830.60	6,384,495.63	89,383.68
Miscellaneous	24 - CITY OF JAMESTOWN PAYROLL	Employee		1,024,846.65	0.00	358,546.57	7,170.94
Workers Compensation	WCIN - WORKERS COMPENSATION - I	Employer		4,608,306.97	25,000.00	4,132,615.63	0.00
Workers Compensation	WCOR - WORKERS COMPENSATION -	Employer		33,116.79	0.00	32,017.40	0.00
Workers Compensation	WCOU - WORKERS COMPENSATION -	Employer		7,981,516.06	2,784.60	7,085,201.15	0.00

**EXHIBIT RAF-11**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's Second Request for Information**

**Request 11:** Refer to the Excel attachment revision to Reference Schedule 1.09 on the overall revenue requirement file supplied with the responses to the AG's first set of requests on April 11, 2024, which shows revisions to the proforma retirement plan and 401(k) amounts. Explain what factors prompted the revisions and why they were deemed to be appropriate.

**Response 11:** When completing the response to Attorney General's First Request AG1-Request, Item 60, it was discovered that the sum formula in row 184, column M was incorrect because it excluded row 183, column M. The schedule was revised to correct the formula to include all necessary rows and to update with the changes made to Schedule 1.10.



**EXHIBIT RAF-12**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's Second Request for Information**

**Request 14:** Refer to the Excel attachment revision to Reference Schedule 1.09 on the overall revenue requirement file supplied with the responses to the AG's first set of requests on April 11, 2024, which shows revisions to the proforma retirement plan and 401(k) amounts. Refer also to the response to AG 1-59(l), which explains that "The proforma adjustment assumes for those employees that are not eligible for the RS Pension Plan, they will contribute 2% to the 401k plan to receive the cooperative's matching contribution." For the five employees that the 2% 401(k) matching calculation was used in the revised Reference Schedule 1.09 calculation, indicate for each why they were not eligible for the RS Pension Plan.

**Response 14:** All five of the employees included at the 2% 401k match are no longer eligible for additional contributions to the RS Pension Plan because they have already reached the 30-year maximum for contributions into the plan.

**EXHIBIT RAF-13**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 59:** Refer to Mr. Wolfram's Exhibit JW-2 at Reference Schedule 1.09 (pages 19-22 of 51), which lists the retirement plan and 401(k) costs by employee for the test year and the computation of a proforma adjustment to increase related expense amounts over test year actual amounts. Refer also to the Bessinger Direct Testimony at page 10 related to the identification of the RS Pension Plan and the NRECA 401(k) plan.

- a. Provide copies of the source documents, including actuarial studies, used to determine the RS Pension Plan rate used in the proforma adjustment.
- b. Provide copies of the source documents, including actuarial studies, used to record costs for the RS Pension Plan during 2023 and 2024.
- c. Indicate the full name of the RS Pension Plan.
- d. Explain how the rate per employee in column 8 of Reference Schedule 1.09 was determined. Provide in electronic format with all formulas in place.
- e. Indicate whether the RS Pension Plan commencement after the one-year anniversary for each new employee was factored into the derivation of the 28.86% rate in column 8 of Reference Schedule 1.09. If not, explain why not.
- f. Indicate whether the 28.86% rate, in column 8 of Reference Schedule 1.09 that is applicable to most employees, is a combination of the RS Pension Plan of 26.86% and the 401(k) of 2% since there is not a separate 2% rate reflected for each employee.
- g. Does the use of either a 28.86% or a 2%, in column 8 of Reference Schedule 1.09,

effectively remove the 401(k) match for those employees that participate in the RS Pension Plan?

h. Provide separately the total costs amounts of RS Pension Plan and 401(k) matching included in the total cost proforma amount of \$3,174,034 on line 175 on Reference Schedule 1.09.

i. Identify the effective date applicable to the 28.86% rate in column 8 of Reference Schedule 1.09.

j. Provide the average effective rate per employee for the RS Pension Plan total costs for 2022, 2023, and 2024.

k. Provide the total costs and the costs that were expensed applicable to the RS Pension Plan for 2022, 2023, and 2024.

l. Confirm that this proforma adjustment assumes that every employee will participate in the 401(k) match program.

m. Provide the total number of employees as of the end of the test year and as of the end of 2023 and 2024 and the total number at each date that participated in the 401(k) match program.

**Response 59(a):** Please see Attachment AG 1-59(a).

**Response 59(b):** See Excel spreadsheet provided separately.

**Response 59(c):** NRECA Retirement Security Plan

**Response 59(d):** If the employee was eligible for the RS plan contribution at the end of 2024, the 2024 RS plan rate was used which was calculated as the contribution rate of 27.71% plus the fee rate of 1.15% as shown in Attachment AG 1-59a. If the employee was not eligible for the RS plan at the end of 2024 the 401k rate was used in column 8 of schedule 1.09.

**Response 59(e):** The new employees would not affect the rate set for the year 2024, which was used to calculate the proforma adjustment.

**Response 59(f):** The 28.86% rate is not a combination of the RS rate and the 401k rate.

**Response 59(g):** Yes. The calculation in column 8 of schedule 1.09 is the cost of either the RS plan or the 401k plan match and does not include both for any employees.

**Response 59(h):** Please see Excel spreadsheet provided separately.

**Response 59(i):** January 1, 2024.

**Response 59(j):**

	Contribution Rate	Admin Fee Rate	Total Effective Rate
2022	26.63%	1.11%	27.74%
2023	27.43%	1.14%	28.57%
2024	27.71%	1.15%	28.86%

**Response 59(k):** The total costs for 2022, 2023, and 2024 respectively were \$2,385,419, \$2,370,950, and \$2,453,759.

**Response 59(l):** The proforma adjustment assumes for those employees that are not eligible for the RS Pension Plan, they will contribute 2% to the 401k plan to receive the cooperative's matching contribution.

**Response 59(m):**

	2024	Test Year	2023
	as of 12/31/2024	as of 5/31/2024	as of 12/31/2023
Total Number of Employees	136	133	131
Employees Participating in 401k Match	114	106	101

## THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION

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401(K) PENSION PLAN DEPARTMENT

1

## RETIREMENT SECURITY PLAN CONTRIBUTIONS REPORT

Printed By:

Bill Date: 12/1/2024

REA#	SSN	ID	Name	Status	Cost Waived	Salary Type	Employer			Employee		Admin	Admin	Employer	Employee	Admin		
							Monthly Salary	Rate	Contrib	Rate	Contrib	Fee Rate	Fee Amount	Adjust	Adjust	Fee Adjustment	Make Contrib	Make Adjust
18054	AG 1-59(b) 2024			E -A	No	BS	\$6,051.08	27.7100 %	\$1,676.76	0.00 %	\$0.00	1.15 %	\$69.59	\$0.00	\$0.00	\$0.00	Yes	No
18054		E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$6,427.17	27.7100 %	\$1,780.97	0.00 %	\$0.00	1.15 %	\$73.91	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$4,495.75	27.7100 %	\$1,245.77	0.00 %	\$0.00	1.15 %	\$51.70	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,852.00	27.7100 %	\$2,175.79	0.00 %	\$0.00	1.15 %	\$90.30	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,853.75	27.7100 %	\$2,176.27	0.00 %	\$0.00	1.15 %	\$90.32	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,196.83	27.7100 %	\$1,994.24	0.00 %	\$0.00	1.15 %	\$82.76	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$4,109.75	27.7100 %	\$1,138.81	0.00 %	\$0.00	1.15 %	\$47.26	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$9,645.58	27.7100 %	\$2,672.79	0.00 %	\$0.00	1.15 %	\$110.92	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$6,368.25	27.7100 %	\$1,764.64	0.00 %	\$0.00	1.15 %	\$73.23	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$4,495.75	27.7100 %	\$1,245.77	0.00 %	\$0.00	1.15 %	\$51.70	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$5,973.08	27.7100 %	\$1,655.14	0.00 %	\$0.00	1.15 %	\$68.69	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$5,761.58	27.7100 %	\$1,596.53	0.00 %	\$0.00	1.15 %	\$66.26	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$8,193.50	27.7100 %	\$2,270.42	0.00 %	\$0.00	1.15 %	\$94.23	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -D	Yes	BS	\$4,650.50	27.7100 %	\$0.00	0.00 %	\$0.00	1.15 %	\$0.00	\$0.00	\$0.00	\$0.00	No	No		
18054		E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$5,777.17	27.7100 %	\$1,600.85	0.00 %	\$0.00	1.15 %	\$66.44	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$5,005.83	27.7100 %	\$1,387.12	0.00 %	\$0.00	1.15 %	\$57.57	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$3,685.08	27.7100 %	\$1,021.14	0.00 %	\$0.00	1.15 %	\$42.38	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,853.75	27.7100 %	\$2,176.27	0.00 %	\$0.00	1.15 %	\$90.32	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,813.83	27.7100 %	\$2,165.21	0.00 %	\$0.00	1.15 %	\$89.86	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$4,699.92	27.7100 %	\$1,302.35	0.00 %	\$0.00	1.15 %	\$54.05	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$6,456.33	27.7100 %	\$1,789.05	0.00 %	\$0.00	1.15 %	\$74.25	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,916.67	27.7100 %	\$2,193.71	0.00 %	\$0.00	1.15 %	\$91.04	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$3,685.08	27.7100 %	\$1,021.14	0.00 %	\$0.00	1.15 %	\$42.38	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$15,416.67	27.7100 %	\$4,271.96	0.00 %	\$0.00	1.15 %	\$177.29	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$6,368.25	27.7100 %	\$1,764.64	0.00 %	\$0.00	1.15 %	\$73.23	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No		
18054		E -A	No	BS	\$8,120.67	27.7100 %	\$2,250.24	0.00 %	\$0.00	1.15 %	\$93.39	\$0.00	\$0.00	\$0.00	Yes	No		

## THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION

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401(K) PENSION PLAN DEPARTMENT

1

## RETIREMENT SECURITY PLAN CONTRIBUTIONS REPORT

Printed By:

Bill Date: 12/1/2024

18054	E -A	No	BS	\$3,581.25	27.7100 %	\$992.36	0.00 %	\$0.00	1.15 %	\$41.18	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$6,368.25	27.7100 %	\$1,764.64	0.00 %	\$0.00	1.15 %	\$73.23	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$6,231.33	27.7100 %	\$1,726.70	0.00 %	\$0.00	1.15 %	\$71.66	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,761.58	27.7100 %	\$1,596.53	0.00 %	\$0.00	1.15 %	\$66.26	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,416.67	27.7100 %	\$1,500.96	0.00 %	\$0.00	1.15 %	\$62.29	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$6,368.25	27.7100 %	\$1,764.64	0.00 %	\$0.00	1.15 %	\$73.23	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,593.08	27.7100 %	\$1,549.84	0.00 %	\$0.00	1.15 %	\$64.32	\$0.00	\$0.00	\$0.00	Yes	No
18054	M -A	No	BS	\$18,718.25	27.7100 %	\$5,186.83	0.00 %	\$0.00	1.15 %	\$215.26	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,853.75	27.7100 %	\$2,176.27	0.00 %	\$0.00	1.15 %	\$90.32	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,699.92	27.7100 %	\$1,302.35	0.00 %	\$0.00	1.15 %	\$54.05	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,005.83	27.7100 %	\$1,387.12	0.00 %	\$0.00	1.15 %	\$57.57	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,766.67	27.7100 %	\$1,320.84	0.00 %	\$0.00	1.15 %	\$54.82	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,593.08	27.7100 %	\$1,549.84	0.00 %	\$0.00	1.15 %	\$64.32	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,096.00	27.7100 %	\$1,135.00	0.00 %	\$0.00	1.15 %	\$47.10	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$10,313.92	27.7100 %	\$2,857.99	0.00 %	\$0.00	1.15 %	\$118.61	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,588.25	27.7100 %	\$1,271.40	0.00 %	\$0.00	1.15 %	\$52.76	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,853.75	27.7100 %	\$2,176.27	0.00 %	\$0.00	1.15 %	\$90.32	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$12,139.50	27.7100 %	\$3,363.86	0.00 %	\$0.00	1.15 %	\$139.60	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$12,500.00	27.7100 %	\$3,463.75	0.00 %	\$0.00	1.15 %	\$143.75	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$3,581.25	27.7100 %	\$992.36	0.00 %	\$0.00	1.15 %	\$41.18	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,005.83	27.7100 %	\$1,387.12	0.00 %	\$0.00	1.15 %	\$57.57	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,058.33	27.7100 %	\$1,401.66	0.00 %	\$0.00	1.15 %	\$58.17	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,005.83	27.7100 %	\$1,387.12	0.00 %	\$0.00	1.15 %	\$57.57	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,759.83	27.7100 %	\$1,596.05	0.00 %	\$0.00	1.15 %	\$66.24	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$10,760.42	27.7100 %	\$2,981.71	0.00 %	\$0.00	1.15 %	\$123.74	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$6,022.83	27.7100 %	\$1,668.93	0.00 %	\$0.00	1.15 %	\$69.26	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,702.50	27.7100 %	\$1,303.06	0.00 %	\$0.00	1.15 %	\$54.08	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$6,368.25	27.7100 %	\$1,764.64	0.00 %	\$0.00	1.15 %	\$73.23	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,356.25	27.7100 %	\$2,038.42	0.00 %	\$0.00	1.15 %	\$84.60	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$6,368.25	27.7100 %	\$1,764.64	0.00 %	\$0.00	1.15 %	\$73.23	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$9,460.83	27.7100 %	\$2,621.60	0.00 %	\$0.00	1.15 %	\$108.80	\$0.00	\$0.00	\$0.00	Yes	No



## THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION

PAGE:

401(K) PENSION PLAN DEPARTMENT

1

## RETIREMENT SECURITY PLAN CONTRIBUTIONS REPORT

Printed By:

Bill Date: 12/1/2024

18054	E -A	No	BS	\$6,231.33	27.7100 %	\$1,726.70	0.00 %	\$0.00	1.15 %	\$71.66	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$6,981.83	27.7100 %	\$1,934.67	0.00 %	\$0.00	1.15 %	\$80.29	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,761.58	27.7100 %	\$1,596.53	0.00 %	\$0.00	1.15 %	\$66.26	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$3,685.08	27.7100 %	\$1,021.14	0.00 %	\$0.00	1.15 %	\$42.38	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$8,006.17	27.7100 %	\$2,218.51	0.00 %	\$0.00	1.15 %	\$92.07	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,853.75	27.7100 %	\$2,176.27	0.00 %	\$0.00	1.15 %	\$90.32	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,324.83	27.7100 %	\$1,475.51	0.00 %	\$0.00	1.15 %	\$61.24	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,671.50	27.7100 %	\$1,571.57	0.00 %	\$0.00	1.15 %	\$65.22	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$6,368.25	27.7100 %	\$1,764.64	0.00 %	\$0.00	1.15 %	\$73.23	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -D	Yes	BS	\$6,182.83	27.7100 %	\$0.00	0.00 %	\$0.00	1.15 %	\$0.00	\$0.00	\$0.00	\$0.00	No	No
18054	E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$6,746.50	27.7100 %	\$1,869.46	0.00 %	\$0.00	1.15 %	\$77.58	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$3,685.08	27.7100 %	\$1,021.14	0.00 %	\$0.00	1.15 %	\$42.38	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,094.50	27.7100 %	\$1,965.89	0.00 %	\$0.00	1.15 %	\$81.59	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,130.92	27.7100 %	\$1,975.98	0.00 %	\$0.00	1.15 %	\$82.01	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,094.50	27.7100 %	\$1,965.89	0.00 %	\$0.00	1.15 %	\$81.59	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,197.50	27.7100 %	\$1,994.43	0.00 %	\$0.00	1.15 %	\$82.77	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,283.17	27.7100 %	\$1,463.97	0.00 %	\$0.00	1.15 %	\$60.76	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -D	Yes	BS	\$6,373.50	27.7100 %	\$0.00	0.00 %	\$0.00	1.15 %	\$0.00	\$0.00	\$0.00	\$0.00	No	No
18054	E -A	No	BS	\$9,822.83	27.7100 %	\$2,721.91	0.00 %	\$0.00	1.15 %	\$112.96	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,340.58	27.7100 %	\$1,479.88	0.00 %	\$0.00	1.15 %	\$61.42	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$6,368.25	27.7100 %	\$1,764.64	0.00 %	\$0.00	1.15 %	\$73.23	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$11,001.50	27.7100 %	\$3,048.52	0.00 %	\$0.00	1.15 %	\$126.52	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,227.92	27.7100 %	\$1,448.66	0.00 %	\$0.00	1.15 %	\$60.12	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,495.75	27.7100 %	\$1,245.77	0.00 %	\$0.00	1.15 %	\$51.70	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,109.75	27.7100 %	\$1,138.81	0.00 %	\$0.00	1.15 %	\$47.26	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$3,979.00	27.7100 %	\$1,102.58	0.00 %	\$0.00	1.15 %	\$45.76	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$3,581.25	27.7100 %	\$992.36	0.00 %	\$0.00	1.15 %	\$41.18	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,495.75	27.7100 %	\$1,245.77	0.00 %	\$0.00	1.15 %	\$51.70	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$4,369.75	27.7100 %	\$1,210.86	0.00 %	\$0.00	1.15 %	\$50.25	\$0.00	\$0.00	\$0.00	Yes	No

THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION

REPORT DATE: 12/6/2024

401(K) PENSION PLAN DEPARTMENT

PAGE:

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RETIREMENT SECURITY PLAN CONTRIBUTIONS REPORT

Printed By:

Bill Date: 12/1/2024

18054	E -A	No	BS	\$6,368.25	27.7100 %	\$1,764.64	0.00 %	\$0.00	1.15 %	\$73.23	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,852.00	27.7100 %	\$2,175.79	0.00 %	\$0.00	1.15 %	\$90.30	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,511.25	27.7100 %	\$2,081.37	0.00 %	\$0.00	1.15 %	\$86.38	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,449.83	27.7100 %	\$2,064.35	0.00 %	\$0.00	1.15 %	\$85.67	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$7,853.75	27.7100 %	\$2,176.27	0.00 %	\$0.00	1.15 %	\$90.32	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$6,746.33	27.7100 %	\$1,869.41	0.00 %	\$0.00	1.15 %	\$77.58	\$0.00	\$0.00	\$0.00	Yes	No
18054	E -A	No	BS	\$5,955.00	27.7100 %	\$1,650.13	0.00 %	\$0.00	1.15 %	\$68.48	\$0.00	\$0.00	\$0.00	Yes	No

If your co-op has an Automated Clearinghouse (ACH) agreement on file with NRECA, contributions will be withdrawn automatically from your co-op's bank account. To sign up for ACH, or change your co-op's bank account or routing information, complete the

Total for Employee/Employer Contributions:

REA#	Employer Contribution	Employee Contribution	Employer Adjustment	Employee Adjustment	Total
18054	\$212,669.51	\$0.00	\$0.00	\$0.00	\$212,669.51
Total	\$212,669.51	\$0.00	\$0.00	\$0.00	\$212,669.51

Total for RS Administration Fee:

REA#	Admin Fee Amount	Admin Fee Total	Admin Fee Adjustment
18054	\$8,825.94	\$0.00	\$8,825.94
Total	\$8,825.94	\$0.00	\$8,825.94

**EXHIBIT RAF-14**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 60:** Refer to Mr. Wolfram's Exhibit JW-2 at Reference Schedule 1.09 (pages 19-22 of 51), which lists the retirement plan and 401(k) costs by employee for the test year and the computation of a proforma adjustment to increase related expense amounts over test year actual amounts.

a. The number of employees no longer employed designated with an A in column 3 appears to be 28, while the number of employees hired during the test year or after the end of the test year designated with a C in column 3 appears to be 30. Confirm those totals. If not confirmed, provide the appropriate number for each designation.

b. Did SKRECC experience an unusually high rate of employee turnover between the start of the test year through the date of the filing? If so, explain all known reasons why.

c. Provide the number of new-hires each year during calendar years 2022, 2023, and 2024.

d. Refer to the headcount data provided by month for several periods of time in the response to Staff 1-17. Provide the headcount by month in the same format for each month in 2024 and in 2025 with available information.

**Response 60(a):** The number of employees designated with an A should be 29. Employee H08 should have been marked with an A. Additionally, 5 of those employees marked with an A should have also been marked with a C as their tenure with South Kentucky was very short for a

variety of reasons. As presented, the number of employees marked with a C of 30 is confirmed.

Reference revised Schedule 1.10

**Response 60(b):** During the test year until February 1, 2025, there were 32 terminations, and 2 employees went on Long Term Disability. Of those 32 terminated, 15 were voluntary terminations, 8 were due to retirement, and 9 were due to involuntary terminations.

**Response 60(c):** 2022-12 new hires; 2023- 25 new hires ; 2024-19 new hires

**Response 60(d):** Please see Excel spreadsheet provided separately.

**EXHIBIT RAF-15**

**Shelby Energy Cooperative, Inc.**  
**Case No. 2024-00402**  
**Commission Staff's Second Request for Information**

**Request 3:** Refer to the Direct Testimony of Carrie Bessinger (Bessinger Direct Testimony), page 9, lines 9-11. Refer also to the Wolfram Direct Testimony, Exhibit JW-2, Schedule 1.10. Confirm that the pro forma adjustment to Wages & Salaries is based on 165 total employees. If confirmed, provide an explanation for the employee level used in this adjustment considering South Kentucky RECC currently employs 131 employees.

**Response 3:** The pro forma adjustment is based on an employee count of 136 total employees as referenced by regular wage amounts in Schedule 1.10, Column 13. The other 29 employees had hours during the test year but are no longer employed.

**EXHIBIT RAF-16**



**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 90:** List any regulatory assets or regulatory liabilities by month during the test year or currently subject to pending Commission approval. If there were any, please include in the list citations to the authorities relied upon to create the regulatory asset or liability, the remaining balances for each, the monthly amortization expense for each and the expected date that each regulatory asset or liability will be fully amortized.

**Response 90:**

Account	Account Description	2021	2022	2023	2024
182.3	OTHER REGASSET-DEF METER RETIRE	\$ (187,229)	\$ (187,229)	\$ (187,229)	\$ (187,229)
182.32	OTHER REGASSET-RATE CASE-6/22		\$ 311,729	\$ (69,273)	\$ (69,273)
182.33	OTHER REGASSET-RATE CASE-7/24				\$ 21,998

- Account 182.30 is amortizing the loss on retirement of South Kentucky's old mechanical meters. Account 186.19 accumulated the loss on the retired mechanical meters when the system was changed to AMI meters. Its balance of \$2,808,433.79 was moved to account 182.30 Other Regulatory Asset-Deferred Meter in December 2013. This account amortizes the loss on South Kentucky RECC's retired mechanical meters over a 15-year period. The monthly amortization amount is \$15,602.41 and will end in December 2027. The balance as of May 2024 was \$670,903.62. Please see Attachment AG 1-90.
- Account 182.32 was created to accumulate the expense from the /2022 rate case which is being amortized over 60 months. The monthly amortization is \$5772.75. The balance at

the end of May 2024 was \$213,591.75 and is expected to be fully amortized in June 2027. Please see Attachment AG 1-90.

- Account 182.33 is accumulating costs associated with this rate case.

## **ATTACHMENT AG 1-90**

Michelle Herrman

Wednesday, December 11, 2013 10:53 AM

To:

Cc:

Subject:

Attachments:

Expense Deferral Plan- KY054

Meter Amortization Resolution.pdf; 20120511\_PSC\_ORDER.pdf

Ms. Alger,

Per our discussion last week, I am forwarding to you information on South Kentucky RECC's- KY054, expense deferral plan for its loss on retired mechanical meters. We request your approval of our treatment of this loss as a regulatory asset and the use of account 407.10.

Attached please find our Board resolution and a copy of our Order from the Kentucky Public Service Commission for Case 2011-00096(See page 6).

Per the order of the commission we intend to amortize \$2,808,433.79 on a straight line basis over a 15 year period in the amount of \$187,228.92 per year beginning January 1, 2013. The 15 year depreciation period was directed by the Kentucky Public Service Commission.

It is our intention to utilize the following accounts via journal entry as follows:

Move from deferred debit to regulatory asset:

182.3-Other regulatory asset- deferred meter retirement- Debit-2,808,433.79

186.19- Miscellaneous deferred debits-Retired meters – Credit- 2,808,433.79

Amortization of the regulatory asset (This will be done on a monthly basis)

407.10- Regulatory Credit- Amortization of unrecovered plant-meters- Debit- 187,228.92 (annually)

182.3- Other regulatory asset- deferred meter retirement- Credit- 187,228.92 (annually)

I believe that we have provided the required information as outlined in Bulletin 1767B-1(e).

If any additional information is needed, please let me know.

Thank you for your time and assistance.

Michelle D. Herrman, CPA, PHR  
Vice President of Finance  
Office: 606-451-4337



United States Department of Agriculture

Rural Development

Electric Programs  
Rural Utilities Service

1400 Independence Ave SW  
Room 4133 – STOP 1560  
Washington, DC 20250

Voice: 202.720.9545

November 28, 2022

Mr. Kenneth Simmons  
Manager  
South Kentucky Rural Electric Cooperative Corporation  
P. O. Box 910  
Somerset, Kentucky 42502-0910

Dear Mr. Simmons:

In response to a letter from Ms. Michelle Herrman, dated November 18, 2022, we have reviewed the information submitted regarding South Kentucky Rural Electric Cooperative Corporation's (South Kentucky) expense deferral plan pertaining to regulatory rate increase case expenses. South Kentucky plans to establish a regulatory asset in the amount of \$346,365 and recover this amount in rates over a five-year period commencing July 2022.

All the required information was submitted in the letter and enclosure. The Rural Utilities Service's (RUS) approval to implement the plan is, therefore, given. Be advised, however, that you must obtain RUS' approval prior to making any changes to the approved plan.

Please contact the Technical Accounting Review Branch at 202-720-8775 if you have any questions or if we can be of any further assistance.

Sincerely,

**VICTOR VU**

Digitally signed by VICTOR VU  
Date: 2022.11.28 15:11:41  
-05'00'

VICTOR T. VU  
Deputy Assistant Administrator  
Office of Portfolio Management and Risk Assessment

**EXHIBIT RAF-17**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 80:** Refer to the comparative listing of expense accounts provided in the response to Staff 1-1 and further to the amount listed for the following years applicable to account 582.10, Station Expense - SCADA.

2021	\$10,139.94
2022	\$7,681.02
2023	\$13,638.92
2024	\$78,439.93
Test Year	\$47,716.11

- a. Explain all reasons why the expense for this account increased so dramatically in 2024.
- b. Describe in detail the purpose of each of the amounts recorded in this account and how each of the expense amounts are determined.
- c. Describe all reasons why the higher level of expense beginning in 2024 should be considered recurring in nature.
- d. Provide the amount of expense recorded in this account each month thus far in 2025.

**Response 80(a):** To prepare for the increased fiber demand on the system, equipment upgrades have been and continue to be made.

**Response 80(b):** Please see Excel spreadsheet provided separately. Data tab.

**Response 80(c):** Please see Excel spreadsheet provided separately. Data tab. Items highlighted in yellow could be considered non-recurring and are not planned for in the 2025 budget. All other costs from the test year are recurring in nature.

**Response 80(d):** January 2025 – \$1,541



Row Labels	Sum of Amount	
<b>2021</b>	<b>\$</b>	<b>10,139.94</b>
Jan	\$	513.64
Feb	\$	443.35
Mar	\$	1,833.71
Apr	\$	1,147.77
May	\$	403.39
Jun	\$	403.21
Aug	\$	806.51
Sep	\$	638.06
Oct	\$	1,420.72
Nov	\$	1,723.24
Dec	\$	806.34
<b>2022</b>	<b>\$</b>	<b>7,681.02</b>
Jan	\$	403.09
Feb	\$	511.33
Mar	\$	1,234.02
Apr	\$	13.50
May	\$	1,058.72
Jun	\$	403.33
Jul	\$	403.07
Aug	\$	1,888.40
Nov	\$	1,765.56
<b>2023</b>	<b>\$</b>	<b>13,638.92</b>
Jan	\$	4,692.89
Feb	\$	570.53
Apr	\$	1,019.41
Jun	\$	999.36
Jul	\$	472.14
Sep	\$	484.81
Oct	\$	540.76
Nov	\$	2,276.28
Dec	\$	2,582.74
<b>2024</b>	<b>\$</b>	<b>78,439.93</b>
Jan	\$	10,208.98
Feb	\$	8,154.24
Mar	\$	11,219.80
Apr	\$	3,274.69
May	\$	7,502.31
Jun	\$	2,366.60
Jul	\$	1,375.74
Aug	\$	868.51
Sep	\$	1,381.88
Oct	\$	1,149.08
Nov	\$	1,024.49
Dec	\$	29,913.61
<b>2025</b>	<b>\$</b>	<b>1,540.80</b>
Jan	\$	1,540.80
<b>Grand Total</b>	<b>\$</b>	<b>111,440.61</b>

Acct	Account Desc	Date	Reference	Amount	Dept	Activity
582.1	STATION EXPENSE - SCAD/	1/31/2021	TELEPHONE - VERIZON	\$ 513.64	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	2/28/2021	TELEPHONE - VERIZON	\$ 443.35	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	3/31/2021	SUBSTATION - RECLOSERS(BRAINS)	\$ 478.34	0 - UNASSIGNED DEPT 7180	EQUIPMENT/SOFTWARE MAINTENANCE
582.1	STATION EXPENSE - SCAD/	3/31/2021	SUBSTATION - RECLOSERS(BRAINS)	\$ 952.03	0 - UNASSIGNED DEPT 7180	EQUIPMENT/SOFTWARE MAINTENANCE
582.1	STATION EXPENSE - SCAD/	3/31/2021	TELEPHONE - VERIZON	\$ 403.34	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	4/28/2021	AUTOMATION DIRECT/AMAZON	\$ 744.06	0 - UNASSIGNED DEPT 7180	EQUIPMENT/SOFTWARE MAINTENANCE
582.1	STATION EXPENSE - SCAD/	4/30/2021	TELEPHONE - VERIZON	\$ 403.71	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	5/31/2021	TELEPHONE - VERIZON	\$ 403.39	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	6/30/2021	TELEPHONE - VERIZON	\$ 403.21	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	8/17/2021	TELEPHONE - VERIZON	\$ 403.31	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	8/31/2021	TELEPHONE - VERIZON	\$ 403.20	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	9/30/2021	IBOOT	\$ 235.00	0 - UNASSIGNED DEPT 7190	PAPER/FORMS/PRINTING
582.1	STATION EXPENSE - SCAD/	9/30/2021	TELEPHONE - VERIZON	\$ 403.06	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	10/28/2021	IBOOT DEVICES/MONITOR MOUNT	\$ 1,003.59	0 - UNASSIGNED DEPT 7190	PAPER/FORMS/PRINTING
582.1	STATION EXPENSE - SCAD/	10/31/2021	KY SALES & USE TAX EXPENSE	\$ 14.10	0 - UNASSIGNED DEPT 2130	TAX- SALES & USE TAX
582.1	STATION EXPENSE - SCAD/	10/31/2021	TELEPHONE - VERIZON	\$ 403.03	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	11/30/2021	KY SALES & USE TAX EXPENSE	\$ 56.40	0 - UNASSIGNED DEPT 2130	TAX- SALES & USE TAX
582.1	STATION EXPENSE - SCAD/	11/30/2021	SUBSTATION-APPHARVEST	\$ 1,666.84	0 - UNASSIGNED DEPT 7190	PAPER/FORMS/PRINTING
582.1	STATION EXPENSE - SCAD/	12/31/2021	TELEPHONE - VERIZON	\$ 402.98	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	12/31/2021	TELEPHONE - VERIZON	\$ 403.36	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	1/31/2022	TELEPHONE - VERIZON	\$ 403.09	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	2/23/2022	CONVERTER-APP HARVEST SUB	\$ 108.12	0 - UNASSIGNED DEPT 7190	PAPER/FORMS/PRINTING
582.1	STATION EXPENSE - SCAD/	2/28/2022	TELEPHONE - VERIZON	\$ 403.21	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	3/22/2022	DP PAPER/FORMS/SUPPLIES	\$ 235.00	0 - UNASSIGNED DEPT 7190	PAPER/FORMS/PRINTING
582.1	STATION EXPENSE - SCAD/	3/31/2022	OPERATING SUPPLIES	\$ 595.90	0 - UNASSIGNED DEPT 1116	OPERATING SUPPLIES
582.1	STATION EXPENSE - SCAD/	3/31/2022	TELEPHONE - VERIZON	\$ 403.12	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	4/30/2022	KY SALES & USE TAX EXPENSE	\$ 13.50	0 - UNASSIGNED DEPT 2130	TAX- SALES & USE TAX
582.1	STATION EXPENSE - SCAD/	5/31/2022	DAHL SUBSTATION-APP HARVEST	\$ 59.28	0 - UNASSIGNED DEPT 1116	OPERATING SUPPLIES
582.1	STATION EXPENSE - SCAD/	5/31/2022	DAHL SUBSTATION-APP HARVEST	\$ 192.42	0 - UNASSIGNED DEPT 1116	OPERATING SUPPLIES
582.1	STATION EXPENSE - SCAD/	5/31/2022	TELEPHONE - VERIZON	\$ 807.02	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	6/30/2022	TELEPHONE - VERIZON	\$ 403.33	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	7/31/2022	TELEPHONE - VERIZON	\$ 403.07	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	8/31/2022	OPERATING SUPPLIES	\$ 1,485.27	0 - UNASSIGNED DEPT 1116	OPERATING SUPPLIES
582.1	STATION EXPENSE - SCAD/	8/31/2022	TELEPHONE - VERIZON	\$ 403.13	0 - UNASSIGNED DEPT 7355	UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	11/7/2022	DATAPROBE DC IBOOTS	\$ 510.00	1606 - IT	7190 - PAPER/FORMS/PRINTING
582.1	STATION EXPENSE - SCAD/	11/17/2022	TELEPHONE	\$ 449.54	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	11/17/2022	TELEPHONE	\$ 403.06	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	11/30/2022	TELEPHONE	\$ 402.96	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	1/10/2023	MATERIALS	\$ 636.00	1805 - ENGINEERING	2015 - NONINVENTORY MATERIAL
582.1	STATION EXPENSE - SCAD/	1/11/2023	FIBER SWITCH - SUBSTATION	\$ 3,161.42	1805 - ENGINEERING	5020 - EQUIP - STATION
582.1	STATION EXPENSE - SCAD/	1/31/2023	SALES & USE TAX	\$ 30.60	1606 - IT	2130 - TAX- SALES & USE TAX
582.1	STATION EXPENSE - SCAD/	1/31/2023	TELEPHONE	\$ 406.98	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	1/31/2023	TELEPHONE	\$ 457.89	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	2/28/2023	SALES & USE TAX	\$ 30.60	1606 - IT	2130 - TAX- SALES & USE TAX
582.1	STATION EXPENSE - SCAD/	2/28/2023	TELEPHONE	\$ 539.93	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	4/28/2023	TELEPHONE	\$ 1,019.41	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	6/30/2023	TELEPHONE	\$ 999.36	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	7/28/2023	TELEPHONE	\$ 472.14	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	9/1/2023	TELEPHONE	\$ 484.81	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	10/1/2023	TELEPHONE	\$ 540.76	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	11/1/2023	TELEPHONE	\$ 574.98	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1	STATION EXPENSE - SCAD/	11/6/2023	PAPER/FORMS/SUPPLIES	\$ 1,701.30	1606 - IT	7190 - PAPER/FORMS/PRINTING

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582.1 Data

582.1 STATION EXPENSE - SCAD/	12/1/2023	TELEPHONE	\$	672.88	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	12/6/2023	(10) FIBER ADAPTERS	\$	266.33	1606 - IT	1116 - OPERATING SUPPLIES
582.1 STATION EXPENSE - SCAD/	12/28/2023	TELEPHONE	\$	837.62	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	12/31/2023	DELL ADAPTERS-SCADA REPLACEMENT	\$	805.91	1805 - ENGINEERING	1040 - OPER & MAINT-SCADA
582.1 STATION EXPENSE - SCAD/	1/4/2024	MATERIALS	\$	10,208.98	1805 - ENGINEERING	2015 - NONINVENTORY MATERIAL
582.1 STATION EXPENSE - SCAD/	2/1/2024	TELEPHONE	\$	899.22	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	2/6/2024	FIBER OPTIC CABLES	\$	4,140.54	1800 - METER SHOP	1030 - OPER & MAINT-SUBSTATION
582.1 STATION EXPENSE - SCAD/	2/6/2024	ADAPTER PLATE-EAST SOMERSET SUBSTATIC	\$	294.10	1800 - METER SHOP	1040 - OPER & MAINT-SCADA
582.1 STATION EXPENSE - SCAD/	2/6/2024	FIBER OPTIC CABLE ADAPTER	\$	128.70	1800 - METER SHOP	1030 - OPER & MAINT-SUBSTATION
582.1 STATION EXPENSE - SCAD/	2/20/2024	MATERIALS	\$	1,756.19	1805 - ENGINEERING	2015 - NONINVENTORY MATERIAL
582.1 STATION EXPENSE - SCAD/	2/28/2024	TELEPHONE	\$	935.49	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	3/1/2024	(35) TRIPP FIBER ADAPTERS	\$	915.83	1606 - IT	1040 - OPER & MAINT-SCADA
582.1 STATION EXPENSE - SCAD/	3/12/2024	(2) BLACK BOX FIBER SWITCH	\$	1,581.17	1606 - IT	1116 - OPERATING SUPPLIES
582.1 STATION EXPENSE - SCAD/	3/13/2024	OPERATING SUPPLIES	\$	2,260.15	1606 - IT	1116 - OPERATING SUPPLIES
582.1 STATION EXPENSE - SCAD/	3/20/2024	(3) BLACK BOX FIBER SWITCH	\$	2,371.76	1606 - IT	1116 - OPERATING SUPPLIES
582.1 STATION EXPENSE - SCAD/	3/20/2024	(75) BLACK BOX FIBER	\$	714.54	1606 - IT	1116 - OPERATING SUPPLIES
582.1 STATION EXPENSE - SCAD/	3/28/2024	TELEPHONE	\$	952.34	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	3/29/2024	(50) BLACK BOX FIBER DIAGNOSTICS	\$	2,398.64	1606 - IT	1040 - OPER & MAINT-SCADA
582.1 STATION EXPENSE - SCAD/	3/31/2024	SALES & USE TAX	\$	17.65	1800 - METER SHOP	2130 - TAX- SALES & USE TAX
582.1 STATION EXPENSE - SCAD/	3/31/2024	SALES & USE TAX	\$	7.72	1800 - METER SHOP	2130 - TAX- SALES & USE TAX
582.1 STATION EXPENSE - SCAD/	4/8/2024	(34) BLACK BOX EXTENSIONS	\$	2,086.64	1606 - IT	1040 - OPER & MAINT-SCADA
582.1 STATION EXPENSE - SCAD/	4/8/2024	(11) BLACK BOX EXTENSIONS	\$	677.05	1606 - IT	1040 - OPER & MAINT-SCADA
582.1 STATION EXPENSE - SCAD/	4/8/2024	(6) BLACK BOX EXTENSIONS	\$	366.72	1606 - IT	1040 - OPER & MAINT-SCADA
582.1 STATION EXPENSE - SCAD/	4/22/2024	OPERATING SUPPLIES	\$	144.28	1606 - IT	1116 - OPERATING SUPPLIES
582.1 STATION EXPENSE - SCAD/	5/1/2024	TELEPHONE	\$	965.83	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	5/6/2024	FAN ENCLOSURE HEATERS	\$	5,718.48	1800 - METER SHOP	1040 - OPER & MAINT-SCADA
582.1 STATION EXPENSE - SCAD/	5/6/2024	FIBER OPTIC ADAPTERS/MOUNTS	\$	818.00	1800 - METER SHOP	1040 - OPER & MAINT-SCADA
582.1 STATION EXPENSE - SCAD/	6/1/2024	TELEPHONE	\$	910.69	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	6/25/2024	(40) BLACK BOX FIBER ADAPTERS	\$	374.00	1606 - IT	1116 - OPERATING SUPPLIES
582.1 STATION EXPENSE - SCAD/	6/28/2024	TELEPHONE	\$	1,032.83	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	6/30/2024	SALES & USE TAX	\$	49.08	1800 - METER SHOP	2130 - TAX- SALES & USE TAX
582.1 STATION EXPENSE - SCAD/	7/28/2024	TELEPHONE	\$	1,375.74	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	8/28/2024	TELEPHONE	\$	868.51	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	9/1/2024	TELEPHONE	\$	800.83	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	9/1/2024	(2) BLACK BOX SERIAL SERVER	\$	581.05	1606 - IT	1030 - OPER & MAINT-SUBSTATION
582.1 STATION EXPENSE - SCAD/	10/1/2024	TELEPHONE	\$	1,149.08	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	11/1/2024	TELEPHONE	\$	1,024.49	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	12/1/2024	TELEPHONE	\$	1,024.98	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	12/28/2024	TELEPHONE	\$	148.63	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
582.1 STATION EXPENSE - SCAD/	12/31/2024	POINT COUNT INCREASE FOR GIS-SCADA	\$	28,740.00	1805 - ENGINEERING	1040 - OPER & MAINT-SCADA
582.1 STATION EXPENSE - SCAD/	1/1/2025	TELEPHONE	\$	1,540.80	1606 - IT	7355 - UTIL-TELEPHONE/CELL/INTERNET/TV CABLE
				<b>\$ 111,440.61</b>		

**EXHIBIT RAF-18**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 83:** Refer to the comparative listing of expense accounts provided in the response to Staff 1-1 and further to the amount listed for the following years applicable to account 904.00, Uncollectible Accounts.

2021	\$111,391.55
2022	\$73,318.11
2023	\$149,025.69
2024	\$109,894.95
Test Year	\$137,103.17

- a. Explain all reasons why the expense more than doubled from 2022 to 2023 and then decreased by nearly \$30K in 2024.
- b. Describe in detail the purpose of each of the amounts recorded in this account and how each of the expense amounts are determined.
- c. Describe all reasons why the higher level of expense beginning in 2023 should be considered recurring in nature.
- d. Provide the amount of expense recorded in this account each month in 2023, 2024, and thus far in 2025.

**Response 83(a):** In 2022, there was a recapture of uncollectible bad debt from capital credits reducing the account balance by \$24,454.35. In 2023, there was no general retirement processed to apply capital credit refunds to bad debt and a software conversion caused accounts to not be written off between March and August 2023. These two factors caused the monthly bad debt accrual entry to be inflated.

**Response 83(b):** The accrual for A/R bad debt is recorded in this account. In 2022 and the first quarter of 2023, the accrual was calculated as 40% of A/R over 60 days plus 60% of A/R over 90 days plus 30% of A/C 142.15 Prepay balance. This total was divided by 12 to get a monthly accrual amount. From April 2023 to present the accrual amount is based on 40% of A/R over 60 days plus 60% of A/R over 90 days because account 142.15 is no longer needed with our new software. In the year of conversion, 2023, for 6 months accounts were not written off. This increased the amount in the over 90 days totals which was multiplied by 60%.

**Response 83 (c):** Monthly amounts recorded as bad debt from September 2023 through current should be considered normal and a fair representation of balances from the 60 days and longer receivables expected to be uncollected.

**Response 83 (d):** Please see Excel spreadsheet provided separately.

Sum of Amount	Column Labels				
Row Labels	2021	2022	2023	2024	2025
Jan	22,436.54	7,033.51	6,416.55	6,309.56	12,056.78
Feb	18,941.68	6,795.63	7,247.17	11,145.71	
Mar	20,922.82	7,638.64	11,703.85	10,012.62	
Apr	-43,272.22	12,325.94	18,427.45	11,005.14	
May	18,262.47	11,971.08	19,103.13	12,502.60	
Jun	14,617.80	9,763.93	19,898.17	7,780.98	
Jul	13,831.17	7,385.15	18,917.73	7,924.87	
Aug	10,536.83	-18,081.88	17,974.49	6,173.91	
Sep	9,462.54	6,626.86	8,669.94	7,028.08	
Oct	9,214.04	7,348.90	6,445.87	6,902.89	
Nov	8,556.73	7,827.37	7,865.75	11,718.68	
Dec	7,881.15	6,682.98	6,355.59	11,389.91	
<b>Grand Total</b>	<b>111,391.55</b>	<b>73,318.11</b>	<b>149,025.69</b>	<b>109,894.95</b>	<b>12,056.78</b>

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904 Detail



**EXHIBIT RAF-19**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's Second Request for Information**

**Request 12:** Refer to the Excel attachment revision to Reference Schedule 1.05 supplied with the responses to the AG's first set of requests on April 11, 2024, which shows revisions to the proforma depreciation expense amount. Explain what factors prompted each of the revisions and why they were deemed to be appropriate.

**Response 12:** When completing the response to Attorney General's First Request, Item 69, it was discovered some fully depreciated items were inadvertently omitted from the original schedule. The schedule was revised to correct the omission and provide accurate information.

**EXHIBIT RAF-20**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's Second Request for Information**

**Request 9:** Refer to the Excel attachment revision to Reference Schedule 1.16 supplied with the responses to the AG's first set of requests on April 11, 2024, which shows revisions to the actual test year and projected test year amounts associated with various retiree health insurance benefits. Explain what factors prompted the revisions and why they were deemed to be appropriate.

**Response 9:** When completing the reconciliation for the response to Attorney General's First Request, Item 61(a) it was discovered Schedule 1.16 was inadvertently misstated for the retiree benefits. The revised schedule provided on April 11, 2024, corrects the discrepancies.

**EXHIBIT RAF-21**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 51:** Refer to Mr. Wolfram's Exhibit JW-2 at the Statement of Operations & Revenue Requirement (page 1 of 51) at line 18 and at Reference Schedule 1.14 (pages 37-38 of 51).

a. The actual test year interest on long-term debt reflected on the Statement of Operations & Revenue Requirement at line 18 is \$5,370,206. The actual test year interest on long-term debt (column 8) reflected on Reference Schedule 1.14 at line 52 is only \$5,289,085. Explain which of these test year actual amounts is correct and provide a corrected schedule(s), in electronic format with all formulas intact, if one or both are in error.

b. The proforma test year interest on long-term debt reflected on the Statement of Operations & Revenue Requirement at line 18 is \$5,436,361. The proforma test year interest on long-term debt (column 7) reflected on Reference Schedule 1.14 at line 52 is only \$5,355,240. Explain which of these test year actual amounts is correct and provide a corrected schedule(s), in electronic format with all formulas intact, if one or both are in error.

c. The actual test year interest on long-term debt (column 8) reflected on Reference Schedule 1.14 at lines 16 and 17 for loans FFB 4-6 and FFB 4-7 reflect interest of only \$17,515 for both issuances while the proforma amounts (column 7) at lines 16 and 17 reflect interest amounts of \$32,576 and \$32,577. Explain how the actual test year amounts for these two issuances are so much lower than the proforma amounts and provide a corrected schedule, in electronic format with all formulas intact, if one or both are in error.

**Response 51(a):** The actual test year interest on long-term debt reflected on the Statement of Operations & Revenue Requirement at line 18 is correct. Please see a revised Schedule 1.14 provided separately. The original Schedule 1.14 column 8 amounts used were from amortization schedules. The revised schedule 1.14 uses invoice and expense accrual amounts as recorded in the general ledger.

**Response 51(b):** Please see Revised Schedule 1.14.

**Response 51(c):** FFB Loan 4-7 had an interest rate change of 2.2260% to 4.2020% on April 1, 2024. FFB Loan 4-6 had an interest rate change of 2.2260% to 4.2020% on April 1, 2024. This accounts for the increase in the pro forma interest amount.

**SOUTH KENTUCKY R.E.C.C.**  
**For the 12 Months Ended May 2024**

**Interest on Long Term Debt**

\*\*REVISED

Line #	Type of Debt Issued (1)	Note (2)	Date of Issue (3)	Date of Maturity (4)	Outstanding Amount as of 6/30/2024 (5)	Cost Rate to Maturity (6)	Pro Forma Interest Cost (7)	Test Year Interest Cost (8)	Pro Forma Adj (9)
1	<u>RUS Loans</u>								
2	RET 8-1	C	Nov-97	Nov-27	\$ 1,210,627	3.000%	\$ 36,319	\$ 30,221	\$ 6,098
3	RET 8-2		Jun-99	Jun-29	\$ 1,206,655	2.500%	\$ 30,166	\$ 32,743	\$ (2,577)
4					\$ 2,417,281		\$ 66,485	\$ 62,964	\$ 3,521
5									
6	<u>FFB Loans</u>								
7	FFB 1-1	B	Oct-08	Dec-41	\$ 3,682,220	3.455%	\$ 127,221	\$ 124,874	\$ 2,347
8	FFB 1-2	B	Mar-09	Dec-41	\$ 2,278,951	3.649%	\$ 83,159	\$ 82,275	\$ 884
9	FFB 2-1	B	Mar-09	Dec-42	\$ 12,197,894	3.699%	\$ 451,200	\$ 439,226	\$ 11,974
10	FFB 2-2	B	Aug-10	Dec-42	\$ 9,664,369	3.249%	\$ 313,995	\$ 304,802	\$ 9,193
11	FFB 4-1	B	Jan-13	Jan-46	\$ 11,257,284	2.657%	\$ 299,106	\$ 291,766	\$ 7,340
12	FFB 4-2	B	Dec-13	Jan-46	\$ 4,922,789	3.550%	\$ 174,759	\$ 168,959	\$ 5,800
13	FFB 4-3	B	Feb-14	Mar-44	\$ 2,211,267	3.555%	\$ 78,611	\$ 82,188	\$ (3,577)
14	FFB 4-4	B	Sep-14	Dec-44	\$ 2,245,467	3.555%	\$ 79,826	\$ 83,459	\$ (3,632)
15	FFB 4-5	B	Oct-14	Jan-46	\$ 7,877,812	2.870%	\$ 226,093	\$ 245,165	\$ (19,072)
16	FFB 4-6	B, C	Dec-15	Jan-46	\$ 775,261	4.202%	\$ 32,576	\$ 32,216	\$ 361
17	FFB 4-7	B, C	Dec-15	Jan-46	\$ 775,270	4.202%	\$ 32,577	\$ 36,926	\$ (4,349)
18	FFB 4-9	B	Dec-15	Jan-46	\$ 764,117	3.555%	\$ 27,164	\$ 37,289	\$ (10,124)
19	FFB 4-10	B	Dec-15	Jan-46	\$ 764,069	3.555%	\$ 27,163	\$ 33,365	\$ (6,202)
20	FFB 4-11	B	Dec-15	Jan-46	\$ 2,793,283	2.601%	\$ 72,653	\$ 110,293	\$ (37,640)
21	FFB 4-12	B	Dec-15	Jan-46	\$ 764,069	3.555%	\$ 27,163	\$ 53,838	\$ (26,675)
22	FFB 4-13	B	Feb-16	Jan-46	\$ 2,383,211	2.307%	\$ 54,981	\$ 56,122	\$ (1,141)
23	FFB 4-14	B	Feb-16	Jan-46	\$ 792,259	2.223%	\$ 17,612	\$ 22,181	\$ (4,569)
24	FFB 4-15	B	Feb-16	Jan-46	\$ 1,029,937	2.223%	\$ 22,896	\$ 24,009	\$ (1,114)
25	FFB 5-1	B	Aug-17	Jan-51	\$ 1,764,490	2.571%	\$ 45,365	\$ 47,950	\$ (2,585)
26	FFB 5-2	B	Sep-17	Jan-51	\$ 1,762,378	2.513%	\$ 44,289	\$ 46,868	\$ (2,579)
27	FFB 5-3	B	Feb-18	Jan-51	\$ 4,436,001	2.848%	\$ 126,337	\$ 132,871	\$ (6,533)
28	FFB 5-4	B	Jun-18	Jan-51	\$ 4,447,292	2.977%	\$ 132,396	\$ 138,958	\$ (6,562)
29	FFB 5-5	B	Dec-18	Jan-51	\$ 8,067,117	3.034%	\$ 244,756	\$ 256,663	\$ (11,907)
30	FFB 5-6	B	Feb-20	Jan-51	\$ 4,505,229	1.938%	\$ 87,311	\$ 93,795	\$ (6,483)
31	FFB 5-7	B	Mar-20	Jan-51	\$ 10,664,619	1.118%	\$ 119,230	\$ 133,996	\$ (14,766)
32	FFB 6-1	B	Mar-20	Jan-51	\$ 9,618,197	2.098%	\$ 201,790	\$ 215,246	\$ (13,456)
33	FFB 6-2	B	Jul-23	Dec-54	\$ 9,917,017	3.946%	\$ 391,325	\$ 355,509	\$ 35,816
34	FFB 6-3	D	Aug-24	Dec-54	\$ 5,000,000	3.743%	\$ 187,150	\$ -	\$ 187,150
35	June 2023 True Up*							\$ (15,683)	
36					\$ 127,361,869		\$ 3,728,705	\$ 3,635,124	\$ 77,897
37	<u>CoBank Loans</u>								
38	0087244T01		Apr-16	May-34	\$ 36,626,962	3.550%	\$ 1,300,257	\$ 1,379,154	\$ (78,897)
39					\$ 36,626,962		\$ 1,300,257	\$ 1,379,154	\$ (78,897)
40	<u>CFC Loans</u>								
41	9020001	E	Aug-89	Aug-24	\$ 34,234	6.250%	\$ -	\$ 7,180	\$ (7,180)
42	9021001		Sep-91	Oct-26	\$ 245,176	6.250%	\$ 15,324	\$ 18,408	\$ (3,085)
43	9022001		Jul-93	May-28	\$ 566,985	6.650%	\$ 37,704	\$ 41,925	\$ (4,220)
44	9023001		Jan-99	May-32	\$ 1,630,327	6.700%	\$ 109,232	\$ 113,384	\$ (4,152)
45	9027013	E	Sep-10	Aug-23	\$ -	4.500%	\$ -	\$ 1,216	\$ (1,216)
46	9027014	E	Sep-10	Oct-24	\$ 69,878	4.550%	\$ -	\$ 10,217	\$ (10,217)
47	Misc	Performance Discount						\$ (963)	
48					\$ 2,546,601		\$ 162,260	\$ 191,366	\$ (30,070)
49	<u>City of Monticello</u>								
50	123107		Dec-07	Dec-26	\$ 2,053,333	4.750%	\$ 97,533	\$ 101,597	\$ (4,064)
51									
52									
53	Sub-Total				\$ 171,006,047		\$ 5,355,240	\$ 5,370,206	\$ (14,966)
54									
55	Annualized Cost Rate						3.132%	3.140%	
56									
57									
58	Total Adjustment								\$ (14,966)



**NOTES:**

- A Outstanding balance used to calculate proforma interest expense is as of 6/30/2024.
- B Quarterly payment due date and test year do not end on the same month, used July 23-June 24 to closely represent interest expense for each loan during the test yr.
- C Interest rate increased from test year.
- D New debt since test year.
- E Debt paid in full during or after test year.

This adjustment normalizes the interest on Long-Term Debt. Test year cost of debt is normalized to annualized cost rate (by multiplying the test year end debt amounts by the interest rate in effect at the end of the test year for each loan).

\*\*Revision - Column 8 has been updated to reflect invoice and interest accrual amounts as recorded in the general ledger expense accounts. The original document was based on amounts from amortization schedules.

\*For the second quarter 2023 the monthly interest amortization was calculated by adding the total projected interest and dividing by 3. This created a true-up required in June of 2023. After this, the monthly accrual has been calculated on a daily basis.

**EXHIBIT RAF-22**

**South Kentucky RECC  
Case No. 2024-00402  
Commission Staff's Second Request for Information**

**Request 13:** Refer to Exhibit JW-2 Schedule 1.04. Provide an updated Year-End Customer Normalization adjustment with the month and year entries in chronological order.

**Response 13:** Please see Attachment PSC 2-13. The revised entries are noted with highlights. The months were reordered chronologically (lines 1-12). The Average was recalculated without rounding (line 13). The End of Period Increase over Average (line 15) was determined as the difference between Average (line 13) and May 2024 (line 12). Also, minor adjustments were made to the current base rate revenues (line 22) pursuant to the response to the Attorney General's First Request for Information, Item 42(e). The effects of this revision and other revisions are compiled into a single revised revenue requirements file (for Exhibit JW-2) electronically uploaded to the Commission's website with the response to the Attorney General's First Request for Information.

At this time South Kentucky is maintaining its request for the proposed rates and overall increase as filed in its Application.

## **ATTACHMENT PSC 2-13**

**SOUTH KENTUCKY R.E.C.C.  
For the 12 Months Ended May 2024**

**Year-End Customers**

Line #	Year (1)	Month (2)	Rate 1 A (3)	Rate 2 B (4)	Rate 3 LP (5)	Rate 4 OPS (6)	Total (8)
1	2023	Jun	64,841	4,801	474	160	
2	2023	Jul	64,922	4,827	477	160	
3	2023	Aug	65,002	4,844	479	160	
4	2023	Sep	65,067	4,843	478	160	
5	2023	Oct	65,051	4,822	480	160	
6	2023	Nov	65,007	4,818	482	160	
7	2023	Dec	65,097	4,815	481	159	
8	2024	Jan	65,156	4,810	486	157	
9	2024	Feb	65,238	4,802	484	157	
10	2024	Mar	65,337	5,032	341	90	
11	2024	Apr	65,349	5,042	341	89	
12	2024	May	65,479	5,047	345	89	
13	Average		65,129	4,875	446	142	
14							
15	End of Period Increase over Avg		350	172	(101)	(53)	
16							
17	Total kWh		766,561,470	69,966,370	183,071,000	11,928,714	
18	Average kWh		11,770	14,351	410,780	84,153	
19	Year-End kWh Adjustment		4,121,435	2,464,843	(41,351,864)	(4,439,081)	(39,204,666)
20							
21	Revenue Adjustment						
22	Current Base Rate Revenue		\$ 88,922,729	\$ 8,456,580	\$ 15,727,611	\$ 1,362,149	
23	Average Revenue per kWh		\$ 0.11600	\$ 0.12087	\$ 0.08591	\$ 0.11419	
24	Year End Revenue Adj		\$ 478,095	\$ 297,917	\$ (3,552,534)	\$ (506,902)	(3,283,425)
25							
26	Expense Adjustment						
27	Avg Adj Purchase Exp per kWh		0.06384	0.06384	0.06384	0.06384	
28	Year End Expense Adj		\$ 263,101	\$ 157,349	\$ (2,639,793)	\$ (283,379)	(2,502,722)
29							
30							
31			Revenue	Expense	Net Rev		
32	Test Year Amount		\$ -	\$ -	\$ -		
33							
34	Pro Forma Year Amount		\$ (3,283,425)	\$ (2,502,722)	\$ (780,703)		
35							
36	Adjustment		\$ (3,283,425)	\$ (2,502,722)	\$ (780,703)		
37							
38							
39	For Expense Adjustment:		Test Period				
40	Total Purchased Power Expense		\$ 109,041,205				
41	Less Fuel Adjustment Clause		\$ (11,241,462)				
42	Less Environmental Surcharge		\$ (15,508,843)				
43	Less Other Rate Mechanisms		\$ -				
44	Adjusted Purchased Power Expense		\$ 82,290,900				
45	Total Purchased Power kWh		1,289,071,575				

This adjustment adjusts the test year expenses and revenues to reflect the number of customers at the end of the test year.

**EXHIBIT RAF-23**

Witness: John Wolfram and Carrie Bessinger

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's First Request for Information**

**Request 42:** Refer to Mr. Wolfram's Exhibit JW-2 at Reference Schedule 1.04 (page 8 of 51), which is the proforma adjustment calculation related to year-end customers. Refer also to the statements made about the reclassification of customers in several rate classes starting March 2024 that were made by Mr. Newton in the February 26, 2025 case overview presented by SKRECC to the Staff and Intervenors. Refer also to the copies of monthly managerial reports applicable to each month in the test year provided as Exhibit 23 in the Application. Finally, refer to Mr. Wolfram's Exhibit JW-2 at the Statement of Operations & Revenue Requirement (page 1 of 51) and further to line 2, which lists the test year after proforma Total Sales of Electric Energy of \$122,569,428 in column 4.

a. Confirm that SKRECC reclassified customers that were previously classified as Rate 3 (LP) and Rate 4 (OPS) to Rate 2 (B), as designated on Reference Schedule 1.04, starting in March 2024. If not confirmed explain why not.

b. Refer to subpart a of this question. Provide a list of the customers that were reclassified starting in March 2024 and provide the amount of kWh sales, total revenues, and base rate revenues for each of these customers for each month in the test year.

c. Describe what types of customers are included in each of the rate classes depicted on Reference Schedule 1.04.

d. Refer to the test year kWh reported for each rate class on line 17 of Reference Schedule 1.04. Refer also to the consumer sales and revenue data reported for each month

during the test year in the monthly managerial reports provided as Exhibit 23. Provide a reconciling summary by month that shows the kWh by rate class as depicted on Reference Schedule 1.04 that sums to the amount reported on line 17 compared to the kWh by rate class as depicted in the monthly managerial reports. In addition, explain all differences in the way the kWhs are reported.

e. Refer to the test year current base rate revenue amounts reported on line 22 of Reference Schedule 1.04, which sums to \$119,829,956. Provide a summary by month that shows the base rate revenues, FAC revenues, and ESM revenues by rate class as depicted on Reference Schedule 1.04 that sums to the amount reported on line 22. In addition, explain all reasons why the sum of the test year current base rate revenue amounts of \$119,829,956 does not agree with the Total Sales of Electric Energy of \$122,569,428 reported on line 2 in the Statement of Operations & Revenue Requirement.

**Response 42(a):** In March 2024, 212 member accounts were reclassified from Rate 4-Large Power and Rate 5-Optional Power Service to Rate 2-Small Commercial.

**Response 42(b):** Please see the Excel spreadsheet provided separately.

**Response 42(c):**

Residential, Farm, Non Farm	Rate 1
Small Commercial	Rate 2
Public Buildings	Rate 3
Large Power	Rate 4
Optional Power Service	Rate 5
Street Lighting	Rate 8

**Response 42(d):** The kWh data in the Application, Exhibit 10, Direct Testimony of John Wolfram, Exhibit JW-2, Reference Schedule 1.04, line 17 (the Year-End Customer Adjustment) will not match the kWh data in Exhibit 23 (Monthly Managerial Reports). There are several



reasons for this: first; the data in the Monthly Managerial Reports is grouped into the same categories as the RUS Form 7. The data in the Year-End Customer Adjustment is categorized by Commission approved rate schedule (i.e. by tariff). These two category sets differ, so the information in the Monthly Managerial Reports categories will reflect a combination of customers from the categories in the Year End Customer Adjustment. Second, the kWh data in the Year End Customer Adjustment may not exactly match that of the RUS Form 7, and thus the Monthly Managerial Reports, because the kWh data in the Year End Customer Adjustment reflects the reproduction of billing data performed in conjunction with the Cost-of-Service Study (“COSS”) and that process may include minor adjustments or differences from the RUS Form 7 data. For example, the RUS Form 7 category of “Other Sales to Public Authorities” does not correspond to a single South Kentucky rate schedule in the COSS.

**Response 42(e):** Please see Attachment 1-42(e) for summary data that sums to the amount of Base Rate Revenue on the updated Reference Schedule 1.04, line 22. (See the response to Commission Staff’s Second Request for Information, Item 13.) Note this does not include the FAC and ES revenues, which are rate riders and thus are not considered base rate revenues. However, it does account for the FAC roll-in, which the Commission approved after the test period in Case No. 2023-00014,<sup>1</sup> which moved a portion of the variable charge from the FAC rider to the base rate energy charge. This amount was annualized to ensure that the effects of the roll-in, which will occur in all months on a prospective basis, are reflected in the full twelve months of the adjusted test period.

The sum of the test year current base rate revenue amounts on Reference Schedule 1.04 will not agree with the Total Sales of Electric Energy reported on line 2 in the Statement of

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<sup>1</sup> In the Matter of: *An Electronic Examination Of The Application Of The Fuel Adjustment Clause Of East Kentucky Power Cooperative, Inc. Cooperatives From November 1, 2020 Through October 31, 2022*, Order dated August 30, 2024.

Operations & Revenue Requirement for several reasons. First, the FAC and ES revenues on Reference Schedule 1.04 are not related to the retail rate schedules shown; they are related to the total FAC and ES amounts charged to South Kentucky on the wholesale electric bill from EKPC. See Application, Exhibit 10, Direct Testimony of John Wolfram Exhibit JW-7, page 1. This is part of the expense adjustment is included to ensure that the adjustment only pertains to base rate amounts and excludes rate riders. Second, Reference Schedule 1.04 does not include data for all retail rate schedules; it only includes those classes for which the average customer count and the year-end customer count differ. Third, the values will differ because the effects of the FAC roll-in are accounted for in Reference Schedule 1.04 but not in the other schedule. For these reasons and for the reasons explained in the response to part d, the sum of the test year current base rate revenue amounts does not agree with the Total Sales of Electric Energy reported on line 2 in the Statement of Operations & Revenue Requirement.

Account	Jun-23			Jul-23			Aug-23			Sep-23			Oct-23			Nov-23			Dec-23			Jan-24		
	KWH	Revenue		KWH	Revenue		KWH	Revenue		KWH	Revenue		KWH	Revenue		KWH	Revenue		KWH	Revenue		KWH	Revenue	
1	4,960	\$717.84		6,080	\$717.84		8,480	\$717.84		8,400	\$717.84		5,680	\$717.84		4,240	\$717.84		5,600	\$717.84		8,080	\$717.84	
2	2,078	\$347.15		1,958	\$357.70		2,318	\$350.13		2,318	\$376.98		1,958	\$330.02		1,958	\$330.78		1,838	\$354.68		2,078	\$356.72	
3	4,684	\$1,227.91		5,164	\$1,323.79		6,044	\$1,333.59		5,964	\$1,318.62		5,404	\$1,279.31		4,604	\$1,231.09		5,204	\$1,340.70		6,684	\$1,407.31	
4	2,263	\$364.27		3,063	\$449.55		4,503	\$539.30		4,183	\$522.46		2,823	\$404.89		2,183	\$362.53		3,303	\$492.51		3,783	\$562.58	
5	1,783	\$327.27		1,343	\$306.90		2,143	\$362.67		2,383	\$398.42		1,743	\$357.04		1,943	\$376.09		2,663	\$480.82		3,543	\$576.58	
6	2,155	\$244.33		1,763	\$418.89		818	\$290.17		856	\$279.79		1,268	\$307.85		2,024	\$382.05		1,744	\$387.06		1,860	\$413.67	
7	3,843	\$677.13		3,203	\$660.49		4,483	\$718.67		4,485	\$740.32		4,485	\$834.44		3,845	\$784.80		3,205	\$745.74		3,205	\$696.28	
8	1,502	\$298.98		1,959	\$345.37		2,782	\$422.30		2,478	\$388.92		2,150	\$356.91		2,222	\$361.33		1,434	\$292.30		1,281	\$278.28	
9	4,960	\$741.48		4,960	\$628.36		5,120	\$574.70		4,960	\$548.48		4,720	\$570.40		4,080	\$596.93		7,600	\$812.76		7,680	\$998.12	
10	15,520	\$1,542.25		15,600	\$1,650.70		17,280	\$1,572.59		16,800	\$1,568.22		15,680	\$1,538.09		14,880	\$1,454.23		13,840	\$1,431.04		14,000	\$1,331.46	
11	8,900	\$915.50		7,900	\$870.07		7,600	\$745.98		7,300	\$730.11		7,800	\$796.82		8,900	\$909.81		9,100	\$986.36		11,000	\$1,068.66	
12	200	\$101.45		300	\$112.89		200	\$101.86		200	\$104.72		300	\$107.36		200	\$100.38		200	\$101.06		300	\$110.75	
13	500	\$144.58		300	\$133.25		500	\$189.54		300	\$175.68		300	\$116.84		300	\$117.50		300	\$121.44		300	\$119.51	
14	17,700	\$1,800.72		17,600	\$1,935.37		19,400	\$1,836.51		19,900	\$1,897.18		18,300	\$1,850.25		17,700	\$1,801.65		17,200	\$1,847.48		17,800	\$1,765.90	
15	15,500	\$1,545.94		15,300	\$1,644.87		17,500	\$1,595.93		17,500	\$1,622.87		16,000	\$1,571.70		14,600	\$1,465.23		14,100	\$1,488.77		14,800	\$1,434.81	
16	0	\$125.15		0	\$111.47		100	\$124.06		0	\$130.98		0	\$117.15		0	\$109.96		100	\$146.17		0	\$143.57	
17	800	\$201.59		1,400	\$263.22		700	\$154.91		700	\$139.07		600	\$132.05		700	\$149.88		600	\$138.06		700	\$141.42	
18	4,500	\$529.40		4,300	\$568.08		5,000	\$558.80		4,300	\$499.20		4,600	\$531.22		3,600	\$453.76		3,600	\$482.49		4,500	\$527.71	
19	1,000	\$240.48		1,000	\$244.51		1,100	\$249.64		1,200	\$260.18		1,000	\$246.24		1,400	\$286.01		1,400	\$297.71		1,700	\$477.68	
20	2,500	\$557.78		3,000	\$638.00		2,100	\$536.57		2,800	\$564.33		2,500	\$561.78		2,600	\$601.39		2,500	\$605.03		3,600	\$691.83	
21	1,200	\$238.51		1,200	\$236.60		1,300	\$238.95		1,400	\$237.45		1,200	\$222.78		1,200	\$219.12		1,000	\$238.85		1,000	\$230.29	
22	3,822	\$638.35		3,742	\$672.72		4,862	\$701.06		4,102	\$632.26		3,302	\$551.37		3,102	\$572.40		5,222	\$926.85		7,662	\$1,092.97	
23	4,000	\$610.81		4,600	\$667.71		4,600	\$624.49		5,200	\$690.82		3,800	\$542.38		4,000	\$560.90		3,800	\$570.44		3,800	\$536.86	
24	6,900	\$876.96		7,600	\$979.24		8,500	\$947.84		8,600	\$955.06		7,400	\$897.16		6,500	\$792.89		6,300	\$874.94		7,000	\$913.50	
25	2,300	\$447.61		1,700	\$348.71		1,800	\$272.49		1,700	\$271.51		1,700	\$266.21		3,500	\$538.91		4,600	\$652.34		7,200	\$822.46	
26	2,200	\$372.97		10,000	\$1,055.21		10,300	\$940.23		11,500	\$1,153.96		19,100	\$1,771.04		19,900	\$1,833.64		19,300	\$1,890.42		2,900	\$527.64	
27	6,900	\$850.01		7,500	\$914.17		8,800	\$895.44		8,500	\$885.87		8,600	\$915.75		6,200	\$787.94		4,900	\$714.40		5,200	\$702.42	
28	1,200	\$461.60		2,400	\$499.00		2,100	\$465.22		3,000	\$473.76		1,800	\$465.03		2,400	\$471.89		3,300	\$503.42		4,800	\$635.84	
29	4,315	\$566.65		4,395	\$612.60		5,195	\$650.27		6,955	\$801.02		5,515	\$695.38		4,715	\$605.76		5,515	\$711.16		7,435	\$834.93	
30	2,960	\$452.41		2,720	\$464.14		4,000	\$545.25		3,760	\$519.85		3,040	\$461.12		2,720	\$436.33		3,520	\$552.49		5,200	\$689.47	
31	2,120	\$283.34		2,000	\$298.97		2,200	\$377.34		2,200	\$382.71		2,080	\$371.11		2,240	\$301.57		2,680	\$360.58		3,000	\$388.34	
32	1,517	\$286.71		1,463	\$299.83		1,797	\$287.40		1,843	\$285.14		1,545	\$284.71		1,334	\$281.80		2,349	\$368.28		2,987	\$413.52	
33	6,600	\$766.02		7,200	\$878.25		8,800	\$917.60		7,400	\$821.43		6,200	\$739.83		5,000	\$650.20		4,600	\$558.85		5,000	\$554.43	
34	6,361	\$864.56		6,721	\$948.01		7,921	\$941.08		7,841	\$962.82		6,721	\$900.07		5,881	\$835.42		5,881	\$871.09		7,441	\$946.09	
35	16,305	\$1,553.37		16,392	\$1,688.56		17,083	\$1,514.48		13,277	\$1,264.27		12,219	\$1,224.54		16,090	\$1,520.06		15,214	\$1,522.61		15,392	\$1,414.68	
36	0	\$88.65		0	\$90.23		100	\$95.69		0	\$88.50		0	\$86.13		0	\$86.77		0	\$88.22		0	\$88.41	
37	6,720	\$843.76		7,520	\$971.07		9,120	\$980.62		7,280	\$870.49		5,680	\$741.75		4,320	\$591.26		3,840	\$574.41		4,160	\$531.46	
38	8,126	\$1,095.07		9,686	\$1,302.86		11,766	\$1,334.55		11,806	\$1,375.96		9,326	\$1,222.72		7,286	\$1,066.06		6,286	\$1,029.16		6,286	\$985.38	
39	492	\$178.51		412	\$175.97		412	\$155.99		492	\$177.55		412	\$169.01		412	\$172.15		572	\$214.80		652	\$214.22	
40	7,012	\$895.58		9,292	\$1,301.20		11,092	\$1,229.24		10,492	\$1,175.24		9,052	\$1,077.11		6,292	\$851.81		5,692	\$799.76		6,412	\$792.41	
41	0	\$134.08		0	\$136.48		0	\$136.73		0	\$136.54		0	\$132.89		0	\$132.54		0	\$134.76		0	\$135.05	
42	11,234	\$1,160.63		11,387	\$1,285.44		12,340	\$1,214.83		12,240	\$1,215.72		10,562	\$1,090.48		10,989	\$1,143.57		10,259	\$1,179.86		10,906	\$1,155.84	
43	4,000	\$536.06		6,800	\$837.41		8,800	\$894.55		7,200	\$753.87		7,200	\$857.73		4,200	\$627.79		3,800	\$545.98		3,400	\$459.80	
44	25,200	\$2,448.37		15,300	\$1,783.79		14,000	\$1,475.48		11,900	\$1,352.82		14,300	\$1,569.11		19,800	\$2,016.73		26,000	\$2,635.52		16,200	\$1,511.05	
45	2,341	\$457.88		2,776	\$563.83		2,960	\$531.06		2,991	\$509.61		2,484	\$482.67		2,482	\$457.78		2,907	\$540.65		3,327	\$557.86	
46	1,080	\$211.53		1,240	\$235.21		1,640	\$247.73		1,600	\$244.82		1,200	\$218.63		920	\$196.98		1,440	\$255.90		2,280	\$329.82	
47	10,080	\$1,098.94		9,920	\$1,150.92		10,800	\$1,071.64		11,680	\$1,154.39		9,760	\$1,050.55		8,920	\$986.44		8,720	\$1,018.09		9,200	\$965.62	
48	15,055	\$1,551.09		15,622	\$1,729.04		17,944	\$1,694.78		17,887	\$1,719.15		16,051	\$1,661.59		13,232	\$1,438.56		11,158	\$1,266.55		11,238	\$1,149.18	
49	8,417	\$948.12		9,078	\$1,073.83		11,027	\$1,139.63		10,569	\$1,108.76		9,366	\$1,023.28		7,438	\$859.00		6,477	\$801.98		7,537	\$835.25	
50	8,635	\$929.47		9,336	\$1,083.90		10,496	\$1,022.69		10,455	\$1,092.58		9,306	\$1,001.95		8,133	\$877.36		7,200	\$840.79		6,959	\$745.50	
51	8,150	\$898.71		8,925	\$1,037.64		10,765	\$1,099.19		10,024	\$1,045.71		8,920	\$961.19		7,758	\$848.42		6,714	\$795.53		6,515	\$699.03	
52	12,480	\$1,283.60		13,360	\$1,494.97		15,200	\$1,517.86		14,880	\$1,518.72		12,960	\$1,423.65		11,120	\$1,282.90		9,840	\$1,240.89		9,840	\$1,171.56	
53	9,200	\$968.17		11,600	\$1,347.88		12,800	\$1,269.63		12,560	\$1,293.04		10,480	\$1,108.41		8,720	\$947.04		7,680	\$888.50		7,440	\$768.72	
54	12,840	\$1,338.46		13,680	\$1,515.25		15,760	\$1,484.02		15,280	\$1,461.23		13,480	\$1,369.71		12,280	\$1,274.54		11,320	\$1,270.81		10,360	\$1,036.93	
55	4,617	\$800.08		4,577	\$803.30		4,217	\$771.39		5,097	\$819.90		4,457	\$789.63		4,737	\$810.40		4,337	\$740.98		3,297	\$666.33	
56	14,400	\$1,478.19		15,360	\$1,717.52		17,920	\$1,686.57		16,880	\$1,6													

Account	Jun-23		Jul-23		Aug-23		Sep-23		Oct-23		Nov-23		Dec-23		Jan-24	
	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue
64	1,000	\$483.87	1,000	\$496.68	900	\$478.41	1,200	\$503.61	1,500	\$524.89	1,600	\$530.77	1,800	\$568.86	1,700	\$552.98
65	2,915	\$794.29	2,515	\$666.36	2,815	\$653.80	2,715	\$645.17	3,815	\$727.27	4,115	\$868.16	6,115	\$1,092.45	9,015	\$1,287.07
66	800	\$211.16	700	\$210.36	700	\$200.12	800	\$208.26	700	\$200.02	700	\$202.29	800	\$219.03	900	\$221.99
67	22,474	\$2,153.60	25,174	\$2,571.46	27,674	\$2,417.90	26,974	\$2,410.59	25,074	\$2,350.27	22,374	\$2,126.03	19,574	\$2,026.04	21,074	\$1,998.88
68	2,300	\$341.56	2,300	\$359.51	2,200	\$319.36	2,400	\$341.57	2,300	\$337.97	2,300	\$333.50	2,600	\$414.86	3,200	\$445.79
69	1,700	\$304.01	1,700	\$314.19	2,000	\$317.64	2,100	\$328.74	2,200	\$341.52	2,000	\$323.40	2,300	\$386.87	2,000	\$349.41
70	200	\$108.41	100	\$93.36	200	\$102.75	100	\$98.37	100	\$90.34	100	\$91.85	500	\$143.01	200	\$117.32
71	400	\$114.27	500	\$128.00	400	\$113.34	500	\$121.08	400	\$113.31	400	\$113.13	500	\$147.38	500	\$144.04
72	7,400	\$759.03	2,400	\$394.50	3,000	\$409.55	2,600	\$387.89	2,700	\$401.33	1,800	\$328.70	2,000	\$365.90	3,000	\$429.14
73	4,000	\$532.93	1,960	\$411.33	3,880	\$534.65	3,920	\$510.17	3,240	\$486.08	2,680	\$420.89	2,400	\$420.55	3,200	\$456.82
74	0	\$44.69	0	\$45.49	960	\$145.51	800	\$130.06	600	\$109.73	500	\$98.73	900	\$215.84	1,300	\$235.12
75	17,148	\$1,721.60	13,560	\$1,553.15	18,375	\$1,726.44	17,741	\$1,683.89	15,917	\$1,673.47	13,917	\$1,411.60	11,186	\$1,310.22	11,840	\$1,276.10
76	16,658	\$1,682.59	19,278	\$2,046.74	22,443	\$2,021.69	22,173	\$1,972.66	18,301	\$1,807.13	16,432	\$1,664.81	13,558	\$1,487.48	13,141	\$1,342.70
77	8,590	\$938.29	8,982	\$1,041.82	11,743	\$1,190.92	10,997	\$1,121.70	9,568	\$1,039.24	7,877	\$875.40	6,747	\$806.98	7,404	\$757.15
78	1,120	\$235.46	1,120	\$260.46	2,240	\$347.19	1,280	\$259.94	800	\$224.22	1,440	\$272.92	1,280	\$269.74	1,280	\$290.38
79	0	\$134.08	0	\$136.48	0	\$136.73	0	\$136.54	0	\$132.89	0	\$132.54	0	\$134.76	0	\$135.05
80	4,800	\$617.89	7,600	\$970.03	9,680	\$1,074.09	9,280	\$1,038.36	5,040	\$758.92	3,840	\$539.35	3,360	\$479.32	3,893	\$521.11
81	2,400	\$452.71	2,200	\$458.13	2,000	\$398.31	1,600	\$386.45	2,200	\$447.49	2,800	\$551.42	2,600	\$523.19	3,000	\$533.33
82	8,663	\$1,020.07	9,736	\$1,194.22	11,774	\$1,241.25	13,867	\$1,468.22	12,258	\$1,329.02	10,198	\$1,171.05	7,728	\$1,010.42	8,236	\$993.87
83	560	\$376.24	440	\$369.10	400	\$327.85	520	\$350.20	440	\$362.08	280	\$387.16	280	\$327.93	320	\$396.10
84	2,892	\$467.95	2,829	\$534.45	4,669	\$677.11	4,352	\$662.23	2,954	\$540.05	2,774	\$459.27	2,864	\$492.88	2,946	\$493.67
85	900	\$219.74	1,200	\$321.55	1,700	\$351.43	2,200	\$386.43	1,600	\$342.98	1,400	\$330.70	1,300	\$275.56	1,300	\$263.14
86	6,574	\$816.33	6,574	\$858.50	6,574	\$772.96	6,894	\$809.11	6,254	\$818.14	6,574	\$818.14	7,054	\$878.43	5,934	\$795.76
87	2,600	\$427.28	2,800	\$443.47	3,640	\$501.22	3,632	\$516.95	2,666	\$456.69	2,986	\$537.56	4,786	\$768.41	5,986	\$918.95
88	2,200	\$360.80	5,000	\$612.98	4,000	\$473.09	1,800	\$319.46	1,100	\$217.70	3,000	\$422.38	1,300	\$302.65	1,500	\$306.93
89	16,720	\$1,759.23	17,600	\$1,959.26	18,880	\$1,809.71	18,840	\$1,840.24	17,000	\$1,740.77	15,000	\$1,583.72	13,280	\$1,504.16	12,960	\$1,379.39
90	9,098	\$1,005.16	9,098	\$1,088.98	10,218	\$1,081.21	9,898	\$1,025.27	9,018	\$979.59	8,618	\$945.04	7,818	\$927.34	7,658	\$837.79
91	0	\$134.08	0	\$136.48	0	\$136.73	0	\$136.54	0	\$132.89	300	\$157.89	200	\$152.60	0	\$138.31
92	0	\$201.11	0	\$204.71	0	\$205.09	0	\$204.80	0	\$199.33	0	\$198.81	0	\$202.14	0	\$202.57
93	1,800	\$249.98	1,500	\$238.92	700	\$154.02	700	\$155.00	800	\$160.29	1,000	\$176.30	1,000	\$182.94	1,200	\$190.91
94	8,782	\$999.12	9,918	\$1,218.20	12,603	\$1,287.70	11,982	\$1,263.30	10,026	\$1,154.29	7,988	\$998.16	7,658	\$1,017.38	8,158	\$1,000.76
95	1,223	\$369.64	1,463	\$316.68	2,343	\$376.08	2,223	\$361.72	1,423	\$288.09	1,223	\$449.47	1,903	\$559.64	4,823	\$738.43
96	12,720	\$1,349.37	12,880	\$1,458.02	14,080	\$1,391.96	14,560	\$1,447.45	13,120	\$1,372.48	12,880	\$1,344.94	11,920	\$1,337.95	15,440	\$1,621.52
97	3,840	\$553.62	3,840	\$586.24	3,840	\$525.43	3,840	\$518.55	3,840	\$528.55	3,840	\$544.84	3,360	\$507.98	2,880	\$478.16
98	0	\$78.21	387	\$198.24	0	\$79.76	0	\$79.65	1,644	\$291.02	0	\$79.07	0	\$78.61	1	\$96.53
99	1,065	\$231.97	1,563	\$308.95	1,755	\$307.58	2,675	\$366.78	1,144	\$256.42	680	\$177.85	631	\$179.32	783	\$183.70
100	1,100	\$251.67	1,400	\$288.87	1,600	\$293.82	1,500	\$279.19	1,200	\$263.26	1,200	\$262.09	1,100	\$260.99	1,200	\$257.46
101	300	\$271.83	400	\$280.30	500	\$275.71	500	\$276.18	500	\$271.91	500	\$271.35	400	\$276.09	400	\$273.75
102	219	\$168.49	432	\$190.77	561	\$195.85	484	\$196.69	581	\$208.16	757	\$214.98	1,272	\$280.67	1,833	\$339.15
103	700	\$257.35	300	\$231.45	300	\$227.71	500	\$244.13	300	\$167.67	300	\$222.34	300	\$165.13	300	\$223.70
104	4,439	\$552.94	4,315	\$594.51	4,587	\$542.25	4,707	\$562.68	4,005	\$518.00	3,928	\$513.85	4,534	\$586.92	7,071	\$770.85
105	1,437	\$285.74	1,377	\$298.25	1,406	\$279.78	1,444	\$282.04	1,416	\$283.14	1,495	\$283.82	1,488	\$293.97	1,600	\$284.74
106	1,517	\$286.71	1,463	\$299.83	1,797	\$287.40	1,843	\$285.14	1,545	\$284.71	1,334	\$281.80	2,349	\$368.28	2,987	\$413.52
107	100	\$127.64	200	\$246.91	3,500	\$467.03	300	\$173.91	100	\$108.44	100	\$173.48	0	\$105.70	100	\$154.51
108	13,360	\$1,438.34	13,760	\$1,584.65	15,680	\$1,517.03	15,680	\$1,580.78	13,920	\$1,473.00	12,960	\$1,375.12	10,720	\$1,237.22	10,960	\$1,126.78
109	3,600	\$541.76	3,800	\$586.71	4,200	\$552.89	4,000	\$546.83	3,200	\$496.49	2,200	\$381.77	4,200	\$615.80	6,400	\$766.95
110	4,280	\$638.68	4,480	\$696.82	5,400	\$717.08	5,920	\$783.99	4,480	\$679.23	4,240	\$580.39	4,800	\$722.41	5,760	\$768.67
111	10,080	\$1,127.11	12,080	\$1,427.31	12,960	\$1,340.50	10,880	\$1,187.24	11,200	\$1,231.05	11,440	\$1,260.00	10,480	\$1,201.57	9,600	\$1,066.85
112	3,174	\$578.34	3,274	\$624.78	3,074	\$547.64	3,174	\$568.22	2,974	\$538.51	2,874	\$544.11	3,574	\$674.20	4,374	\$716.09
113	800	\$229.40	1,000	\$329.45	900	\$238.19	700	\$226.71	700	\$210.36	2,400	\$452.88	3,100	\$540.40	1,200	\$253.08
114	1,611	\$327.17	894	\$257.50	871	\$238.94	988	\$250.30	832	\$254.10	1,787	\$368.67	2,482	\$441.52	2,710	\$446.15
115	4,000	\$611.51	4,080	\$648.95	3,840	\$585.00	4,360	\$627.29	3,760	\$600.31	3,840	\$591.25	3,680	\$628.81	3,680	\$586.77
116	4,406	\$630.41	4,606	\$704.99	5,106	\$693.53	4,806	\$673.46	4,106	\$624.85	4,306	\$632.08	4,006	\$641.92	3,906	\$597.77
117	1,528	\$281.26	1,328	\$272.10	1,528	\$276.05	1,888	\$306.41	1,728	\$298.42	1,968	\$347.50	2,568	\$413.71	3,168	\$440.14
118	15,379	\$1,629.96	15,899	\$1,804.24	19,385	\$1,849.34	17,619	\$1,750.07	14,739	\$1,584.79	11,699	\$1,352.21	10,419	\$1,244.99	10,699	\$1,140.42
119	1,920	\$336.08	1,920	\$315.94	1,760	\$288.46	1,840	\$289.77	1,600	\$267.51	2,320	\$341.05	1,920	\$330.36	3,040	\$413.73
120	1,440	\$284.49	1,520	\$311.21	1,920	\$324.58	1,680	\$305.12	1,520	\$283.45	1,280	\$256.53	1,200	\$300.26	1,440	\$330.30
121	23,040	\$2,198.42	24,320	\$2,520.96	23,760	\$2,148.00	24,240	\$2,220.48	22,400	\$2,170.94	22,560	\$2,184.44	21,200	\$2,193.14	21,280	\$2,048.70
122	3,900	\$443.17	3,400	\$428.43	3,600	\$397.86	4,300	\$462.91	3,600	\$415.92	3,800	\$437.29	5,000	\$575.77	6,400	\$655.19
123	1,080	\$231.87	1,260	\$251.23	1,260	\$253.32	1,080	\$238.94	900	\$206.88	540	\$149.64	360	\$114.28	360	\$110.31
124	9,400	\$1,135.04	12,120	\$1,471.61	13,400	\$1,404.77	10,840	\$1,240.86	8,440	\$946.61	7,960	\$920.95	8,440	\$1,044.03	12,600	\$1,294.31
125	2,600	\$389.88	3,300	\$481.93	4,800	\$549.98	4,400	\$557.77	3,100	\$470.71	2,300	\$409.13	2,000	\$399.97	1,900	\$378.75
126	2,300	\$421.53	2,500	\$470.17	2,700	\$438.90	3,600	\$520.33	2,700	\$466.81	2,800	\$447.44	2,200	\$415.42	2,000	\$362.55

Account	Jun-23		Jul-23		Aug-23		Sep-23		Oct-23		Nov-23		Dec-23		Jan-24	
	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue
127	1,600	\$324.98	1,800	\$359.78	1,300	\$295.69	1,400	\$287.91	1,300	\$288.15	1,700	\$321.05	1,500	\$312.86	1,600	\$300.37
128	5,200	\$612.56	6,160	\$758.64	8,160	\$840.49	7,760	\$814.52	7,360	\$789.68	6,240	\$740.48	6,960	\$801.77	7,200	\$790.76
129	0	\$78.21	0	\$79.61	0	\$79.76	0	\$79.65	0	\$77.52	0	\$77.32	0	\$78.61	0	\$78.78
130	443	\$161.92	240	\$144.61	189	\$127.92	236	\$135.66	197	\$129.72	204	\$129.37	256	\$146.18	294	\$141.35
131	10,183	\$1,124.27	10,343	\$1,220.95	11,463	\$1,172.73	10,583	\$1,128.61	10,663	\$1,170.31	8,743	\$1,063.96	8,343	\$1,110.00	10,183	\$1,167.35
132	300	\$104.81	300	\$108.46	400	\$111.56	300	\$104.86	300	\$103.92	300	\$103.75	400	\$114.75	300	\$131.76
133	7,962	\$883.08	8,623	\$1,014.21	10,093	\$1,033.07	9,689	\$1,018.30	8,692	\$940.66	7,149	\$801.19	6,889	\$819.73	6,391	\$694.59
134	3,500	\$617.48	2,900	\$712.75	3,900	\$670.81	3,100	\$552.37	3,600	\$639.07	3,100	\$595.04	3,200	\$624.59	2,900	\$657.22
135	3,446	\$537.87	3,766	\$595.58	4,766	\$645.81	4,726	\$659.42	3,686	\$548.13	3,446	\$602.66	4,486	\$774.63	5,446	\$770.83
136	5,720	\$706.88	5,880	\$777.48	6,600	\$753.00	6,600	\$766.47	5,720	\$707.93	5,080	\$632.33	4,800	\$671.62	4,840	\$594.00
137	7,848	\$902.19	10,060	\$1,129.70	11,224	\$1,083.34	11,094	\$1,086.70	9,890	\$1,027.49	8,293	\$899.05	7,184	\$898.82	7,660	\$860.74
138	246	\$134.79	265	\$155.01	296	\$141.22	174	\$117.38	370	\$155.80	279	\$137.64	335	\$158.61	254	\$150.48
139	9,480	\$1,039.49	9,360	\$1,116.76	8,400	\$920.92	7,800	\$902.39	8,520	\$993.22	7,320	\$900.23	5,400	\$749.95	6,840	\$800.37
140	3,241	\$591.61	3,210	\$618.75	3,808	\$617.51	4,896	\$725.42	3,857	\$666.38	4,159	\$725.14	5,706	\$890.00	6,961	\$943.61
141	4,900	\$697.58	5,700	\$808.31	6,400	\$791.53	6,600	\$821.17	6,000	\$781.39	5,800	\$710.02	5,200	\$769.46	5,400	\$744.45
142	12,473	\$1,356.72	13,393	\$1,550.44	15,713	\$1,560.43	15,633	\$1,570.24	13,193	\$1,412.82	12,393	\$1,381.44	11,713	\$1,350.01	12,113	\$1,291.40
143	5,900	\$696.42	5,900	\$696.42	6,000	\$742.84	6,600	\$779.58	6,100	\$746.83	6,500	\$710.72	7,100	\$862.46	8,300	\$895.62
144	4,000	\$586.82	9,840	\$1,224.17	6,400	\$779.30	5,920	\$744.60	5,040	\$690.00	4,480	\$624.84	4,640	\$647.39	4,640	\$587.52
145	2,800	\$493.97	2,800	\$515.83	3,200	\$490.16	2,600	\$481.72	2,200	\$385.46	1,600	\$340.86	1,200	\$289.24	1,200	\$281.08
146	4,300	\$644.37	3,900	\$653.79	5,900	\$758.00	5,300	\$679.45	5,800	\$727.32	7,400	\$853.27	7,000	\$861.31	5,500	\$690.61
147	400	\$114.27	500	\$128.00	400	\$113.34	500	\$121.08	400	\$113.31	400	\$113.13	500	\$147.38	500	\$144.04
148	6,800	\$952.53	7,280	\$1,076.91	8,080	\$1,078.66	8,400	\$1,131.89	7,600	\$1,049.42	4,560	\$652.32	3,360	\$516.40	3,360	\$492.93
149	640	\$142.11	560	\$137.25	2,880	\$422.48	1,360	\$232.69	1,520	\$255.81	720	\$151.21	4,640	\$690.94	5,040	\$710.22
150	2,612	\$428.06	4,252	\$680.49	7,172	\$991.12	5,652	\$807.89	3,132	\$492.48	1,892	\$330.34	2,852	\$473.76	2,772	\$443.57
151	273	\$112.39	173	\$102.04	373	\$125.06	173	\$99.98	173	\$98.38	73	\$94.15	173	\$100.45	173	\$99.40
152	1,713	\$301.84	2,193	\$384.50	2,393	\$379.96	2,353	\$378.42	1,873	\$320.28	1,993	\$335.68	1,913	\$337.73	2,273	\$371.02
153	2,680	\$410.50	2,880	\$461.65	3,360	\$483.05	3,200	\$467.70	2,760	\$417.66	2,320	\$360.00	2,440	\$390.94	2,960	\$441.18
154	1,994	\$357.38	2,233	\$408.98	3,319	\$515.74	2,286	\$388.76	2,083	\$366.08	1,945	\$347.76	2,736	\$468.62	3,556	\$555.65
155	12,249	\$1,669.41	11,679	\$1,692.04	12,369	\$1,619.88	12,078	\$1,601.69	13,293	\$1,792.52	11,961	\$1,618.11	7,462	\$1,075.77	9,230	\$1,252.15
156	200	\$84.22	300	\$100.90	400	\$109.53	200	\$84.52	400	\$109.61	2,000	\$318.24	2,300	\$371.85	1,500	\$252.35
157	0	\$57.91	2,720	\$439.29	80	\$69.15	0	\$58.97	0	\$57.40	80	\$67.68	160	\$80.02	0	\$58.33
158	4,640	\$668.36	5,520	\$830.82	9,200	\$1,219.99	8,880	\$1,193.20	6,880	\$955.43	3,520	\$516.60	2,560	\$407.30	2,960	\$441.18
159	791	\$161.97	819	\$173.47	867	\$168.46	900	\$173.92	844	\$167.56	823	\$164.65	857	\$175.08	758	\$156.36
160	3,437	\$510.09	3,667	\$571.71	3,988	\$562.29	3,986	\$568.09	3,457	\$508.64	2,347	\$363.52	3,316	\$510.39	4,199	\$601.44
161	480	\$121.06	320	\$103.70	480	\$119.63	320	\$99.85	320	\$99.17	480	\$119.88	320	\$101.84	320	\$99.72
162	7,520	\$1,047.26	7,080	\$1,048.94	7,960	\$1,063.52	8,160	\$1,101.24	8,080	\$1,112.07	7,000	\$970.72	5,680	\$832.76	7,680	\$1,051.68
163	3,271	\$538.07	3,371	\$581.02	3,571	\$560.48	3,671	\$578.61	2,971	\$494.56	3,071	\$507.24	3,271	\$554.32	3,671	\$583.31
164	160	\$78.96	160	\$81.32	160	\$79.25	200	\$84.52	160	\$78.28	200	\$83.35	200	\$85.48	200	\$84.20
165	300	\$137.75	300	\$141.99	400	\$138.53	300	\$138.40	300	\$136.56	300	\$136.31	400	\$141.33	400	\$138.71
166	1,372	\$252.31	1,412	\$270.53	1,052	\$205.98	1,132	\$217.72	1,092	\$213.69	1,052	\$208.25	1,012	\$210.17	972	\$198.05
167	2,200	\$347.35	5,080	\$769.28	5,440	\$745.52	4,960	\$692.51	7,560	\$1,044.20	4,720	\$673.19	3,400	\$521.85	3,560	\$518.79
168	5,000	\$715.72	4,000	\$618.27	5,840	\$796.00	6,200	\$850.89	4,840	\$689.16	4,480	\$641.87	10,000	\$1,421.86	14,120	\$1,884.65
169	206	\$157.86	106	\$160.06	606	\$161.15	606	\$161.95	406	\$158.93	406	\$158.65	206	\$159.51	406	\$160.18
170	8,040	\$1,115.67	9,400	\$1,373.36	10,600	\$1,396.65	10,320	\$1,377.15	9,280	\$1,268.70	8,680	\$1,189.96	6,120	\$892.77	6,880	\$948.19
171	100	\$71.07	100	\$72.94	400	\$109.53	100	\$71.75	100	\$70.45	100	\$70.30	100	\$71.84	200	\$84.20
172	967	\$191.58	1,167	\$228.70	1,467	\$250.76	1,467	\$252.92	1,167	\$216.12	867	\$176.78	767	\$169.28	967	\$189.90
173	800	\$163.16	800	\$170.81	900	\$172.63	900	\$173.92	900	\$174.87	1,100	\$200.80	1,300	\$235.48	1,400	\$239.41
174	2,880	\$436.81	2,880	\$461.65	3,760	\$533.52	3,680	\$529.01	3,040	\$454.20	4,800	\$125.08	6,400	\$245.12	5,120	\$235.59
175	3,240	\$484.17	4,860	\$738.53	5,940	\$808.61	5,040	\$702.73	3,600	\$527.30	4,740	\$675.80	2,700	\$426.39	480	\$120.41
176	5,120	\$731.51	6,000	\$897.93	9,520	\$1,260.37	8,000	\$1,080.81	6,560	\$913.67	4,240	\$610.55	4,000	\$603.67	4,160	\$596.39
177	1,760	\$289.46	4,880	\$741.31	8,560	\$1,139.23	7,760	\$1,050.16	5,360	\$757.04	1,120	\$203.40	160	\$80.02	80	\$68.67
178	6,074	\$860.48	11,507	\$1,672.82	7,303	\$993.88	7,223	\$994.81	5,543	\$793.82	4,303	\$631.63	3,103	\$494.42	2,063	\$338.27
179	3,000	\$452.60	3,540	\$553.94	4,380	\$611.76	4,380	\$618.42	3,480	\$511.63	2,820	\$425.25	2,460	\$393.67	2,700	\$407.55
180	0	\$134.08	0	\$136.48	0	\$136.73	0	\$136.54	0	\$132.89	0	\$132.54	0	\$134.76	0	\$135.05
181	2,500	\$386.82	2,400	\$394.54	2,900	\$425.01	2,700	\$403.84	2,500	\$383.73	2,800	\$422.64	3,400	\$521.85	4,100	\$588.63
182	5,700	\$807.82	5,900	\$883.96	6,100	\$828.81	4,900	\$684.84	4,500	\$644.78	4,700	\$670.59	7,000	\$1,012.77	3,100	\$459.29
183	900	\$176.32	1,000	\$198.78	900	\$172.63	1,000	\$186.70	800	\$161.82	900	\$174.70	800	\$167.29	1,000	\$187.67
184	14,760	\$1,999.77	14,760	\$2,122.85	17,520	\$2,269.88	17,280	\$2,266.13	14,640	\$1,968.34	12,840	\$1,732.82	13,560	\$1,907.33	15,600	\$2,076.07
185	20	\$67.28	31	\$68.81	39	\$68.53	38	\$68.51	31	\$66.82	24	\$66.57	31	\$67.89	40	\$67.90
186	74	\$71.10	114	\$78.42	74	\$71.92	114	\$77.05	74	\$70.49	114	\$75.54	74	\$71.77	114	\$76.56
187	748	\$159.77	618	\$148.90	742	\$156.21	833	\$168.88	733	\$156.51	953	\$185.04	841	\$176.37	818	\$167.62
188	2,436	\$392.28	2,101	\$366.88	2,511	\$390.08	2,175	\$350.94	2,362	\$379.47	2,263	\$366.30	2,241	\$377.77	2,249	\$363.21
189	0	\$67.04	0	\$68.24	0	\$68.36	0	\$68.27	0	\$66.44	0	\$66.27	0	\$67.38	0	\$67.52

Account	Jun-23		Jul-23		Aug-23		Sep-23		Oct-23		Nov-23		Dec-23		Jan-24	
	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue
190	9,500	\$1,307.75	10,400	\$1,513.19	9,500	\$1,257.85	8,500	\$1,144.67	6,300	\$879.73	6,600	\$918.52	5,500	\$808.22	5,400	\$756.78
191	7,440	\$1,036.73	6,840	\$1,015.39	6,600	\$891.90	7,200	\$978.62	6,600	\$918.89	6,480	\$902.86	6,000	\$876.40	5,880	\$818.85
192	2,132	\$370.35	2,372	\$423.14	2,452	\$401.06	2,532	\$414.93	2,132	\$367.35	2,052	\$356.60	2,372	\$413.78	3,332	\$521.49
193	800	\$163.16	800	\$170.81	1,200	\$210.48	1,200	\$212.25	900	\$174.87	700	\$148.60	600	\$140.03	1,300	\$226.48
194	1,320	\$231.57	1,600	\$282.68	2,640	\$392.19	1,920	\$304.21	1,360	\$234.92	1,200	\$213.84	1,280	\$232.75	1,320	\$229.06
195	1,276	\$225.78	1,449	\$261.56	1,786	\$284.42	1,501	\$250.70	1,209	\$215.20	1,033	\$192.04	1,467	\$258.26	1,608	\$266.30
196	3,091	\$511.05	3,308	\$573.26	3,608	\$566.18	3,708	\$584.34	3,108	\$513.46	3,208	\$526.15	4,008	\$655.82	5,610	\$835.81
197	5,498	\$842.67	6,458	\$1,024.56	10,418	\$1,436.37	8,618	\$1,222.36	5,408	\$827.94	5,114	\$816.67	10,286	\$1,559.38	13,046	\$1,844.45
198	3,012	\$561.54	3,092	\$600.65	3,852	\$654.68	3,452	\$609.33	2,932	\$546.55	3,052	\$561.68	3,532	\$647.83	5,412	\$866.56
199	3,440	\$510.48	4,640	\$707.76	5,760	\$785.90	5,920	\$815.13	4,720	\$673.50	3,200	\$474.84	8,000	\$1,149.13	9,520	\$1,289.67
200	1,723	\$297.60	1,323	\$257.19	1,823	\$302.36	1,723	\$292.30	1,823	\$308.24	1,923	\$321.06	1,923	\$333.52	1,923	\$320.17
201	2,672	\$409.45	2,800	\$450.47	2,698	\$399.52	2,741	\$409.08	2,791	\$421.71	3,106	\$462.56	2,728	\$430.21	3,222	\$475.07
202	200	\$84.22	300	\$100.90	100	\$71.68	300	\$97.29	200	\$83.50	200	\$83.35	300	\$99.12	200	\$84.20
203	397	\$86.64	701	\$206.24	743	\$203.94	700	\$199.44	653	\$192.32	557	\$179.49	556	\$184.42	561	\$181.39
204	1,600	\$268.41	1,800	\$310.64	1,600	\$260.96	1,800	\$288.89	1,600	\$266.24	1,600	\$266.04	1,500	\$262.76	1,600	\$265.28
205	3,463	\$513.51	2,094	\$351.76	3,287	\$473.83	3,321	\$483.16	2,566	\$392.34	2,087	\$329.59	2,065	\$339.80	2,146	\$335.90
206	7,120	\$994.63	7,520	\$1,110.48	9,040	\$1,199.80	8,800	\$1,182.99	7,200	\$997.20	5,920	\$829.79	5,680	\$832.76	5,840	\$813.69
207	183	\$94.99	183	\$97.77	103	\$85.32	263	\$105.82	263	\$104.62	343	\$114.87	343	\$118.06	263	\$105.45
208	1,774	\$349.35	2,094	\$409.83	1,734	\$336.05	2,054	\$379.44	1,654	\$329.84	1,694	\$334.71	1,574	\$330.21	2,134	\$391.82
209	2,354	\$386.17	2,665	\$450.50	3,405	\$507.66	2,956	\$455.44	2,477	\$399.12	2,604	\$415.41	6,694	\$989.70	7,671	\$1,069.21
210	1,844	\$307.46	1,571	\$285.69	2,586	\$392.47	4,100	\$589.74	2,124	\$341.52	1,968	\$320.92	2,470	\$402.02	3,184	\$477.15
211	0	\$0.00	40	\$21.31	160	\$79.25	120	\$74.31	160	\$78.28	160	\$78.13	160	\$80.02	240	\$89.37
212	0	\$0.00	0	\$0.00	0	\$0.00	0	\$0.00	0	\$0.00	240	\$67.57	120	\$74.58	0	\$67.52

Account	Feb-24		Mar-24		Apr-24		May-24		Totals	
	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue
1	11,280	\$717.84	7,680	\$717.84	5,520	\$717.84	4,320	\$717.84	80,320	8,614.08
2	2,678	\$394.05	2,078	\$420.72	2,198	\$319.61	2,078	\$318.92	25,536	4,257.46
3	8,604	\$1,505.61	4,684	\$1,196.28	4,524	\$1,169.18	3,524	\$1,100.00	65,088	15,433.39
4	4,743	\$611.84	3,703	\$550.28	2,823	\$367.37	1,863	\$272.29	39,236	5,499.87
5	5,023	\$650.13	3,343	\$508.33	2,503	\$332.08	2,103	\$299.88	30,516	4,976.21
6	3,161	\$531.15	2,342	\$446.25	2,265	\$292.83	2,331	\$312.59	22,587	4,306.63
7	5,125	\$845.35	3,205	\$654.46	2,565	\$537.99	3,205	\$633.36	44,854	8,529.03
8	1,977	\$333.44	1,353	\$260.85	1,143	\$182.90	1,353	\$216.50	21,634	3,738.08
9	14,560	\$1,448.64	8,480	\$914.08	6,240	\$731.12	4,880	\$605.59	78,240	9,170.66
10	13,840	\$1,229.51	13,360	\$1,322.91	14,480	\$1,639.70	14,640	\$1,727.45	179,920	18,008.15
11	12,000	\$1,206.99	10,000	\$972.04	9,700	\$1,112.63	8,600	\$1,033.17	108,800	11,348.14
12	200	\$106.35	400	\$134.08	200	\$67.83	300	\$79.14	3,000	1,227.87
13	1,200	\$233.04	1,500	\$255.17	1,300	\$186.42	900	\$148.11	7,700	1,941.08
14	21,400	\$1,920.28	20,800	\$1,962.45	18,200	\$2,049.87	17,000	\$1,998.71	223,000	22,666.37
15	17,900	\$1,569.89	15,000	\$1,420.59	15,000	\$1,697.03	13,600	\$1,607.90	186,800	18,665.53
16	0	\$114.25	0	\$114.56	0	\$64.61	0	\$66.98	200	1,368.91
17	1,100	\$177.69	1,200	\$180.86	1,100	\$164.37	1,200	\$182.59	10,800	2,025.71
18	5,400	\$583.91	4,200	\$493.07	4,300	\$517.21	4,200	\$527.42	52,500	6,272.27
19	1,800	\$314.08	1,400	\$265.14	1,600	\$219.49	1,600	\$228.56	16,200	3,329.72
20	4,000	\$677.31	2,400	\$528.89	2,200	\$285.65	2,500	\$332.02	32,700	6,580.58
21	1,300	\$255.50	1,100	\$210.66	1,200	\$175.38	1,300	\$194.09	14,400	2,698.18
22	11,142	\$1,379.95	6,102	\$938.73	4,182	\$619.15	3,702	\$589.35	60,944	9,315.16
23	4,400	\$551.57	3,800	\$532.14	4,000	\$495.24	4,200	\$527.42	50,200	6,910.78
24	9,000	\$993.10	6,900	\$884.35	6,700	\$781.84	6,200	\$757.31	87,600	10,654.19
25	8,600	\$880.78	6,900	\$786.98	4,600	\$550.29	3,100	\$400.98	47,700	6,239.27
26	0	\$77.89	100	\$84.76	0	\$64.61	0	\$66.98	95,300	9,839.35
27	7,700	\$838.01	3,900	\$599.70	1,700	\$230.52	5,500	\$676.85	75,400	9,011.08
28	6,600	\$752.04	5,100	\$648.76	4,500	\$539.27	2,400	\$488.20	39,600	6,404.03
29	10,075	\$1,004.16	8,795	\$950.06	8,635	\$1,026.99	5,675	\$729.92	77,220	9,188.90
30	8,480	\$958.94	5,840	\$674.47	4,240	\$510.59	3,120	\$403.28	49,600	6,668.34
31	3,560	\$500.09	2,720	\$332.91	2,520	\$320.94	2,120	\$288.33	29,440	4,206.23
32	3,506	\$431.95	2,251	\$323.41	1,575	\$283.85	1,678	\$297.05	23,845	3,843.65
33	5,800	\$580.22	3,600	\$421.16	5,000	\$594.39	4,200	\$527.42	69,400	7,919.80
34	9,161	\$1,025.22	7,681	\$928.99	6,401	\$809.86	6,241	\$825.25	84,252	10,858.46
35	14,948	\$1,290.32	14,359	\$1,311.67	15,498	\$1,751.95	15,080	\$1,778.01	181,857	17,834.52
36	0	\$86.55	0	\$87.00	100	\$66.23	0	\$66.98	200	1,019.36
37	5,520	\$596.99	4,160	\$527.23	3,840	\$466.48	4,240	\$532.02	66,400	8,227.54
38	6,966	\$788.82	6,286	\$793.33	6,566	\$793.09	7,366	\$918.33	97,752	12,705.33
39	1,212	\$251.92	572	\$205.16	572	\$158.21	412	\$146.00	6,624	2,219.49
40	7,332	\$887.45	5,972	\$779.96	6,332	\$818.92	5,652	\$774.80	90,624	11,383.48
41	0	\$133.52	0	\$132.89	0	\$129.23	0	\$133.97	-	1,608.68
42	10,514	\$1,034.31	10,099	\$1,033.41	10,719	\$1,234.70	10,297	\$1,238.30	131,546	13,987.09
43	6,000	\$633.78	0	\$495.66	2,000	\$263.60	200	67.64	53,600	6,973.87
44	12,000	\$1,319.53	23,200	\$2,175.17	8,000	\$925.19	18,800	\$2,205.62	204,700	21,418.38
45	4,084	\$640.41	3,098	\$545.97	2,745	\$345.75	2,815	\$368.23	35,010	6,001.70
46	3,280	\$388.76	1,880	\$292.70	1,560	\$215.09	800	\$136.61	18,920	2,973.78
47	9,560	\$929.94	8,520	\$883.89	8,800	\$1,013.41	9,080	\$1,088.34	115,040	12,412.17
48	11,794	\$1,116.62	10,422	\$1,051.47	10,892	\$1,244.07	11,423	\$1,357.67	162,718	16,979.77
49	7,149	\$698.14	6,559	\$678.36	7,119	\$828.04	7,478	\$904.22	98,214	10,898.61
50	6,854	\$692.78	6,565	\$704.10	7,330	\$851.31	7,728	\$932.94	98,997	10,775.37
51	6,655	\$688.84	6,147	\$657.42	6,610	\$771.92	6,996	\$848.81	94,179	10,352.41
52	9,920	\$942.90	9,360	\$942.02	10,240	\$1,172.17	10,800	\$1,286.06	140,000	15,277.30
53	7,520	\$744.08	6,960	\$728.78	7,440	\$863.44	8,000	\$964.21	110,400	11,891.90
54	11,800	\$1,137.15	10,080	\$1,053.13	10,960	\$1,251.56	12,200	\$1,446.98	150,040	15,639.77
55	5,377	\$799.29	4,417	\$773.49	4,017	\$503.90	4,737	\$607.71	53,884	8,886.40
56	1,040	\$160.93	320	\$75.74	720	\$140.84	720	\$146.46	109,040	11,737.82
57	9,137	\$1,106.11	6,914	\$884.98	5,231	\$619.86	3,771	\$478.11	62,631	8,718.09
58	1,000	\$207.18	2,000	\$282.79	2,000	\$263.60	1,000	\$159.60	19,000	3,008.12
59	8,172	\$953.41	7,372	\$897.55	5,852	\$740.40	4,252	\$587.41	61,744	8,215.86
60	4,264	\$704.37	1,504	\$516.72	624	\$215.99	1,104	\$279.56	16,226	4,539.56
61	7,806	\$859.33	4,686	\$639.80	3,646	\$471.12	2,206	\$325.23	44,792	6,115.78
62	4,877	\$678.32	2,997	\$449.26	2,317	\$342.71	1,517	\$264.81	28,404	4,787.49
63	2,280	\$333.21	1,720	\$307.30	1,840	\$245.95	1,840	\$256.15	22,720	3,710.98

Account	Feb-24		Mar-24		Apr-24		May-24		Totals	
	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue
64	1,100	\$503.19	900	\$486.51	800	\$142.13	1,000	\$159.60	14,500	5,431.50
65	11,515	\$1,389.47	8,615	\$1,215.69	7,515	\$976.88	5,115	\$741.67	66,780	11,058.28
66	900	\$214.17	900	\$217.71	800	\$131.30	800	\$136.61	9,500	2,373.02
67	18,574	\$1,636.63	18,374	\$1,809.55	22,074	\$2,481.92	22,874	\$2,678.96	272,288	26,661.83
68	4,800	\$538.36	3,100	\$428.85	2,900	\$362.84	2,400	\$320.53	32,800	4,544.70
69	2,500	\$393.34	1,700	\$319.63	1,600	\$219.49	2,000	\$274.55	23,800	3,872.79
70	700	\$178.79	600	\$152.89	300	\$76.16	300	\$79.14	3,400	1,332.39
71	1,400	\$207.83	1,200	\$195.51	800	\$131.30	2,700	\$355.00	9,700	1,884.19
72	4,200	\$503.20	3,000	\$420.75	2,200	\$285.65	2,300	\$309.03	36,600	4,994.67
73	3,200	\$452.51	2,920	\$443.56	3,440	\$422.38	3,160	\$4,407.89	38,000	9,499.76
74	1,900	\$283.74	1,300	\$237.22	800	\$131.30	600	\$113.62	9,660	1,791.05
75	15,093	\$1,433.07	10,333	\$1,109.29	11,106	\$1,267.67	12,720	\$1,506.75	168,936	17,673.25
76	12,340	\$1,183.42	12,396	\$1,245.81	14,357	\$1,626.13	15,076	\$1,777.55	196,153	19,858.71
77	7,203	\$695.55	5,880	\$621.62	6,518	\$761.77	7,310	\$884.90	98,819	10,735.34
78	1,440	\$268.24	1,440	\$260.46	1,600	\$219.49	1,120	\$173.39	16,160	3,081.89
79	0	\$133.52	0	\$132.89	0	\$129.23	0	\$133.97	-	1,608.68
80	3,263	\$441.02	3,183	\$488.58	3,103	\$411.98	3,503	\$475.04	60,545	7,815.69
81	2,800	\$503.98	2,600	\$498.58	2,200	\$293.92	1,400	\$292.23	27,800	5,339.74
82	7,638	\$910.98	7,912	\$929.35	9,150	\$1,056.87	10,782	\$1,289.04	117,942	13,614.36
83	200	\$347.53	120	\$351.22	120	\$66.55	120	\$69.06	3,800	3,731.02
84	2,935	\$458.62	2,952	\$470.56	3,055	\$399.35	2,924	\$400.87	38,146	6,057.01
85	1,300	\$260.68	1,300	\$262.20	1,400	\$197.45	1,400	\$205.59	17,000	3,417.45
86	6,574	\$783.49	6,574	\$806.76	6,574	\$787.35	6,414	\$802.03	78,568	9,707.45
87	9,946	\$1,174.68	5,946	\$828.36	4,266	\$581.40	3,346	\$499.69	52,600	7,654.66
88	1,800	\$311.49	2,600	\$374.52	4,300	\$517.21	3,300	\$423.98	31,900	4,643.19
89	11,960	\$1,232.98	11,560	\$1,259.66	12,600	\$1,432.40	13,720	\$1,621.69	180,120	19,123.21
90	8,938	\$926.32	7,578	\$857.30	7,818	\$939.35	7,338	\$923.61	103,096	11,536.96
91	100	\$143.62	100	\$144.21	0	\$129.23	0	\$133.97	700	1,676.55
92	0	\$200.29	0	\$199.33	0	\$193.84	0	\$200.95	-	2,412.97
93	1,700	\$229.31	1,800	\$231.25	1,800	\$241.56	1,700	\$240.06	15,700	2,450.54
94	8,081	\$811.12	7,496	\$846.78	7,188	\$835.64	7,438	\$899.62	107,318	12,332.07
95	6,903	\$859.63	4,183	\$678.81	2,903	\$376.18	1,183	\$194.14	31,796	5,568.51
96	16,800	\$1,657.93	13,920	\$1,455.88	14,960	\$1,692.62	14,080	\$1,663.07	167,360	17,793.19
97	2,880	\$456.94	3,360	\$478.20	2,880	\$477.19	2,880	\$496.53	41,280	6,152.23
98	10	\$103.58	0	\$77.52	0	\$64.61	0	\$66.98	2,042	1,293.78
99	1,093	\$203.49	873	\$185.99	772	\$128.20	703	\$125.46	13,737	2,655.71
100	1,500	\$273.57	1,400	\$272.90	3,000	\$373.87	3,300	\$423.98	19,500	3,501.67
101	700	\$269.93	300	\$268.23	400	\$264.91	400	\$274.88	5,300	3,275.07
102	3,293	\$435.18	1,981	\$343.37	520	\$100.41	948	\$153.62	12,881	2,827.34
103	300	\$219.69	300	\$221.60	300	\$76.16	500	\$102.13	4,400	2,359.06
104	7,707	\$800.90	5,415	\$637.82	4,231	\$509.60	5,092	\$629.95	60,031	7,220.27
105	1,548	\$273.42	1,419	\$277.41	1,470	\$282.16	1,403	\$292.27	17,503	3,416.74
106	3,506	\$431.95	2,251	\$323.41	1,575	\$283.85	1,678	\$297.05	23,845	3,843.65
107	100	\$115.92	100	\$125.26	0	\$64.61	100	\$68.71	4,700	1,932.12
108	8,160	\$927.26	10,320	\$1,050.88	11,520	\$1,313.31	12,080	\$1,433.18	149,120	16,057.55
109	8,800	\$913.60	6,200	\$736.73	5,200	\$637.04	3,800	\$502.87	55,600	7,279.44
110	7,720	\$876.81	5,880	\$770.06	5,640	\$685.57	4,880	\$627.01	63,480	8,546.72
111	11,360	\$1,131.16	9,360	\$1,015.76	10,160	\$1,163.36	11,120	\$1,322.83	130,720	14,474.74
112	4,874	\$716.46	3,874	\$651.18	3,374	\$488.97	3,174	\$486.04	41,788	7,134.54
113	1,700	\$393.78	1,100	\$231.34	900	\$142.31	900	\$148.11	15,400	3,396.01
114	3,353	\$480.85	3,052	\$470.31	2,936	\$405.64	2,134	\$330.19	23,650	4,271.34
115	3,760	\$573.39	3,760	\$584.39	3,640	\$444.44	3,760	\$476.85	46,160	6,958.96
116	4,006	\$582.98	3,806	\$583.04	4,006	\$495.31	4,006	\$516.03	51,072	7,376.37
117	3,768	\$470.47	2,488	\$380.98	1,928	\$279.22	1,928	\$290.68	25,816	4,056.94
118	10,459	\$1,051.77	10,059	\$1,069.00	10,699	\$1,281.03	11,459	\$1,422.17	158,514	17,179.99
119	3,760	\$453.93	2,480	\$364.10	1,840	\$245.95	1,600	\$228.56	26,000	3,875.44
120	1,760	\$322.07	1,680	\$313.70	1,280	\$184.21	1,280	\$191.79	18,000	3,407.71
121	20,160	\$1,747.48	20,000	\$1,822.10	19,440	\$2,186.60	17,920	\$2,104.47	260,320	25,545.73
122	6,300	\$613.70	5,400	\$565.41	5,800	\$682.61	5,100	\$630.87	56,600	6,309.13
123	180	\$96.49	360	\$111.36	540	\$102.62	540	\$106.73	8,460	1,973.67
124	15,800	\$1,460.99	12,920	\$1,288.13	10,040	\$1,181.04	7,640	\$954.89	129,600	14,343.23
125	2,400	\$299.91	2,200	\$294.70	2,100	\$274.63	1,900	\$263.06	33,000	4,770.42
126	2,400	\$398.59	2,400	\$384.15	2,100	\$274.63	2,100	\$286.03	29,800	4,886.55



	Feb-24		Mar-24		Apr-24		May-24		Totals	
Account	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue
127	1,700	\$295.10	1,500	\$280.15	1,600	\$219.49	1,300	\$194.09	18,300	3,479.62
128	8,800	\$853.49	7,440	\$782.19	6,800	\$792.88	6,240	\$761.91	84,320	9,339.37
129	0	\$77.89	0	\$77.52	0	\$64.61	0	\$66.98	-	916.46
130	333	\$148.79	163	\$121.32	184	\$91.27	262	\$96.09	3,001	1,574.20
131	13,783	\$1,442.03	8,823	\$1,079.89	8,983	\$1,046.59	9,703	\$1,173.47	121,796	13,900.16
132	300	\$101.96	300	\$102.70	300	\$76.16	300	\$79.14	3,800	1,243.83
133	5,978	\$616.10	5,712	\$636.76	6,338	\$749.53	6,785	\$832.44	90,301	10,039.66
134	2,900	\$708.22	3,300	\$672.51	3,400	\$417.98	3,400	\$435.47	39,200	7,303.51
135	9,406	\$1,107.40	5,806	\$1,009.42	5,486	\$674.01	4,126	\$545.91	58,592	8,471.67
136	5,080	\$586.50	4,800	\$576.37	5,000	\$594.39	5,400	\$665.36	65,520	8,032.33
137	9,804	\$996.60	7,261	\$845.52	7,057	\$821.20	7,623	\$920.87	104,998	11,472.22
138	1,019	\$199.54	295	\$147.96	585	\$107.58	840	\$141.20	4,958	1,747.21
139	9,360	\$960.86	6,960	\$780.47	4,920	\$585.58	3,480	\$444.66	87,840	10,194.90
140	8,625	\$1,039.55	5,226	\$790.57	4,509	\$572.67	4,257	\$567.59	58,455	8,748.80
141	6,200	\$757.46	4,900	\$673.91	4,500	\$539.27	4,800	\$596.39	66,400	8,690.94
142	12,753	\$1,317.87	10,433	\$1,139.32	10,953	\$1,270.20	11,193	\$1,351.35	151,956	16,552.24
143	9,100	\$906.47	7,600	\$836.86	7,200	\$836.97	6,900	\$837.78	83,000	9,634.52
144	4,640	\$556.63	3,840	\$502.64	3,920	\$475.31	4,240	\$532.02	61,600	7,951.24
145	1,400	\$274.49	1,800	\$319.98	1,800	\$287.48	2,000	\$302.63	24,600	4,462.90
146	6,500	\$726.13	7,000	\$794.23	6,300	\$737.74	7,100	\$860.76	72,000	8,986.98
147	1,400	\$207.83	1,200	\$195.51	800	\$131.30	2,700	\$355.00	9,700	1,884.19
148	4,640	\$628.17	4,320	\$603.78	4,960	\$589.98	5,760	\$706.74	69,120	9,479.73
149	8,560	\$1,110.15	3,920	\$553.19	2,800	\$351.82	2,320	\$311.32	34,960	5,069.19
150	2,652	\$410.14	2,052	\$343.21	1,812	\$272.85	1,612	\$261.04	38,464	5,934.95
151	173	\$97.43	73	\$94.07	173	\$93.69	73	\$95.50	2,076	1,212.54
152	3,433	\$498.26	2,313	\$368.33	1,913	\$273.41	1,513	\$238.69	25,876	4,188.12
153	4,600	\$623.26	2,640	\$391.29	2,360	\$303.30	2,400	\$320.53	34,600	5,071.06
154	5,072	\$718.27	3,375	\$521.05	2,974	\$409.83	2,614	\$385.36	34,187	5,443.48
155	13,903	\$1,767.09	9,375	\$1,243.11	8,577	\$988.81	8,905	\$1,068.24	131,081	17,388.82
156	600	\$131.44	400	\$107.98	600	\$109.23	500	\$102.13	9,400	1,882.00
157	0	\$57.67	0	\$57.40	0	\$43.08	0	\$44.66	3,040	1,091.56
158	3,120	\$441.29	2,560	\$381.18	3,600	\$440.02	4,320	\$541.21	57,760	8,036.58
159	1,158	\$200.04	1,020	\$186.41	857	\$137.57	841	\$141.33	10,535	2,006.82
160	4,865	\$655.84	3,638	\$517.52	3,262	\$402.75	3,474	\$443.98	43,636	6,216.26
161	480	\$116.69	320	\$97.87	640	\$113.65	480	\$99.83	4,960	1,292.89
162	9,080	\$1,174.09	7,080	\$952.84	6,040	\$709.07	5,880	\$720.54	87,240	11,784.73
163	4,171	\$620.11	3,371	\$533.15	3,071	\$441.65	2,671	\$413.80	40,152	6,406.32
164	600	\$131.44	360	\$102.93	280	\$73.95	160	\$69.76	2,840	1,033.44
165	600	\$135.99	400	\$136.17	300	\$134.06	300	\$139.17	4,300	1,654.97
166	1,172	\$215.61	972	\$194.12	972	\$168.08	1,012	\$179.46	13,224	2,533.97
167	4,280	\$583.91	1,680	\$269.87	1,280	\$184.21	1,040	\$164.20	45,200	6,514.88
168	19,080	\$2,403.62	14,160	\$1,848.31	11,560	\$1,317.73	6,400	\$780.31	105,680	13,968.39
169	206	\$155.54	406	\$157.30	506	\$157.88	506	\$164.00	4,572	1,913.01
170	9,920	\$1,277.37	6,680	\$902.25	5,480	\$647.32	6,960	\$844.67	98,360	13,234.06
171	200	\$82.26	200	\$82.69	200	\$67.83	300	\$79.14	2,100	934.00
172	867	\$170.70	867	\$173.45	867	\$148.38	867	\$154.38	12,304	2,322.95
173	1,800	\$278.99	1,000	\$183.87	1,400	\$197.45	1,400	\$205.59	13,700	2,396.98
174	7,040	\$414.40	7,360	\$210.59	7,120	\$92.09	8,640	\$94.63	62,720	3,832.69
175	660	\$138.82	480	\$118.10	1,020	\$155.55	3,000	\$389.49	35,760	5,285.90
176	8,800	\$1,139.66	4,000	\$563.30	3,520	\$431.20	4,000	\$504.43	67,920	9,333.49
177	160	\$77.34	640	\$138.34	1,600	\$219.49	2,080	\$283.73	34,160	5,048.19
178	5,663	\$766.92	6,623	\$907.95	4,783	\$583.49	4,703	\$598.75	68,891	9,637.24
179	3,360	\$470.79	3,540	\$505.12	3,120	\$387.10	3,300	\$423.98	40,080	5,761.81
180	0	\$133.52	0	\$132.89	0	\$129.23	0	\$133.97	-	1,608.68
181	5,500	\$733.91	3,800	\$538.01	2,300	\$296.69	2,900	\$378.00	37,800	5,473.67
182	6,600	\$869.16	5,100	\$702.42	5,200	\$616.44	7,000	\$849.27	65,800	9,030.15
183	1,200	\$205.22	1,000	\$183.87	1,200	\$175.38	1,100	\$171.09	11,800	2,161.47
184	18,240	\$2,300.34	15,000	\$1,954.54	12,960	\$1,472.09	12,600	\$1,492.95	179,760	23,563.11
185	66	\$67.03	37	\$66.74	27	\$65.04	22	\$67.36	406	808.48
186	114	\$75.13	74	\$70.19	114	\$61.07	74	\$62.69	1,128	861.93
187	1,484	\$243.58	870	\$170.86	676	\$122.50	730	\$133.62	10,046	1,989.86
188	2,309	\$355.41	2,330	\$365.86	2,583	\$345.71	2,438	\$343.37	27,998	4,397.28
189	0	\$66.76	0	\$66.44	0	\$64.61	0	\$66.98	-	804.31

Account	Feb-24		Mar-24		Apr-24		May-24		Totals	
	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue	KWH	Revenue
190	5,900	\$783.10	6,100	\$828.90	6,500	\$759.80	6,100	\$745.81	86,300	11,704.32
191	6,840	\$898.67	6,120	\$831.44	4,920	\$585.58	5,160	\$637.78	76,080	10,393.11
192	3,572	\$528.68	2,932	\$459.91	2,772	\$383.96	2,212	\$335.43	30,864	4,976.68
193	3,100	\$438.83	1,200	\$209.17	500	\$98.21	600	\$113.62	12,900	2,306.51
194	1,600	\$254.40	1,080	\$193.98	1,400	\$197.45	1,120	\$173.39	17,840	2,940.44
195	2,813	\$403.54	1,910	\$298.96	1,617	\$221.38	1,823	\$254.20	19,492	3,132.34
196	8,208	\$1,117.50	5,008	\$741.17	3,808	\$530.89	3,008	\$460.85	49,681	7,616.48
197	23,366	\$3,028.22	12,206	\$1,698.28	8,606	\$1,090.72	5,486	\$777.63	114,510	16,169.25
198	7,972	\$1,144.87	4,692	\$757.24	4,252	\$624.83	3,612	\$576.96	48,864	8,152.72
199	11,600	\$1,483.93	9,680	\$1,281.68	7,680	\$889.91	3,520	\$449.26	77,680	10,511.19
200	1,823	\$294.78	1,923	\$313.50	1,823	\$257.11	2,123	\$302.18	21,876	3,600.01
201	3,172	\$447.68	2,895	\$423.55	2,817	\$353.69	2,645	\$348.69	34,287	5,031.68
202	200	\$82.26	200	\$82.69	200	\$67.83	200	\$70.46	2,600	1,007.50
203	629	\$184.94	595	\$182.34	800	\$183.13	1,005	\$213.91	7,897	2,198.20
204	2,100	\$315.87	2,000	\$310.35	2,200	\$285.65	1,900	\$263.06	21,300	3,364.15
205	2,417	\$354.85	2,129	\$326.67	2,336	\$300.65	1,991	\$273.51	29,902	4,475.57
206	6,560	\$864.25	5,280	\$725.18	5,440	\$642.91	5,840	\$715.92	80,240	10,909.60
207	583	\$142.31	343	\$113.67	343	\$93.91	263	\$88.39	3,476	1,265.18
208	2,534	\$426.06	2,254	\$399.02	2,134	\$337.82	1,534	\$282.61	23,168	4,306.76
209	8,717	\$1,147.94	6,008	\$835.67	4,737	\$584.81	3,342	\$448.93	53,630	7,690.56
210	2,413	\$361.28	3,513	\$508.61	3,214	\$414.07	2,260	\$324.56	31,247	4,725.49
211	120	\$72.43	160	\$77.64	280	\$73.95	200	\$67.64	1,800	792.33
212	0	\$66.76	0	\$66.44	40	\$65.26	0	\$66.98	400	475.11

**ATTACHMENT AG 1-42(e)**

South Kentucky RECC  
Item AG 1-42e Attachment  
Year End Customer Adjustment - Base Rate Revenues

#	Base Rate Revenues	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	TOTAL
1	<b>Rate A</b>													
2	Customers	64,841	64,922	65,002	65,067	65,051	65,007	65,097	65,156	65,238	65,337	65,349	65,479	781,546
3	Energy (kWh)	49,558,205	57,785,616	67,624,412	60,150,781	45,426,448	51,885,020	71,703,817	98,305,788	98,008,781	64,507,984	56,119,572	45,485,046	766,561,470
4	Customer Charge \$	\$ 1,134,718	\$ 1,136,135	\$ 1,137,535	\$ 1,138,673	\$ 1,138,393	\$ 1,137,623	\$ 1,139,198	\$ 1,140,230	\$ 1,141,665	\$ 1,143,398	\$ 1,143,608	\$ 1,145,883	\$ 13,677,055
5	Energy Charge \$	\$ 4,279,351	\$ 4,989,788	\$ 5,839,368	\$ 5,194,020	\$ 3,922,574	\$ 4,480,271	\$ 6,191,625	\$ 8,488,705	\$ 8,463,058	\$ 5,570,264	\$ 4,845,925	\$ 3,927,634	\$ 66,192,583
6	Energy Charge FAC Roll-In \$	\$ 585,282	\$ 682,448	\$ 798,644	\$ 710,381	\$ 536,486	\$ 612,762	\$ 846,822	\$ 1,160,991	\$ 1,157,484	\$ 761,839	\$ 662,772	\$ 537,178	\$ 9,053,091
7	Total Base Rate Revenue \$	\$ 5,999,351	\$ 6,808,371	\$ 7,775,547	\$ 7,043,073	\$ 5,597,453	\$ 6,230,656	\$ 8,177,644	\$ 10,789,926	\$ 10,762,207	\$ 7,475,501	\$ 6,652,305	\$ 5,610,695	\$ 88,922,729
8														
9	<b>Rate B</b>													
10	Customers	4,801	4,827	4,844	4,843	4,822	4,818	4,815	4,810	4,802	5,032	5,042	5,047	58,503
11	Energy (kWh)	5,410,886	5,925,910	6,875,442	6,414,030	5,022,374	4,907,965	5,464,792	6,452,177	6,741,305	5,137,456	5,898,939	5,715,094	69,966,370
12	Customer Charge \$	\$ 192,040	\$ 193,080	\$ 193,760	\$ 193,720	\$ 192,880	\$ 192,720	\$ 192,600	\$ 192,400	\$ 192,080	\$ 201,280	\$ 201,680	\$ 201,880	\$ 2,340,120
13	Energy Charge \$	\$ 473,020	\$ 518,043	\$ 601,051	\$ 560,715	\$ 439,056	\$ 429,054	\$ 477,732	\$ 564,049	\$ 589,325	\$ 449,116	\$ 515,685	\$ 499,614	\$ 6,116,460
14	Energy Charge FAC Roll-In \$	\$ 63,903	\$ 69,985	\$ 81,199	\$ 75,750	\$ 59,314	\$ 57,963	\$ 64,539	\$ 76,200	\$ 79,615	\$ 60,673	\$ 69,666	\$ 67,495	\$ 826,303
15	Total Base Rate Revenue \$	\$ 665,060	\$ 711,123	\$ 794,811	\$ 754,435	\$ 631,936	\$ 621,774	\$ 670,332	\$ 756,449	\$ 781,405	\$ 650,396	\$ 717,365	\$ 701,494	\$ 8,456,580
16														
17	<b>Rate LP</b>													
18	Customers	474	477	479	478	480	482	481	486	484	341	341	345	5,348
19	Energy (kWh)	15,270,573	15,747,321	16,969,828	17,512,567	15,528,902	14,973,352	14,191,885	14,383,680	17,111,461	14,634,018	13,425,569	13,321,844	183,071,000
20	Billed Demand (kW)	49,263	49,753	50,804	52,491	52,436	50,235	50,036	50,178	54,785	50,455	49,093	48,159	607,688
21	Customer Charge \$	\$ 33,180	\$ 33,390	\$ 33,530	\$ 33,460	\$ 33,600	\$ 33,740	\$ 33,670	\$ 34,020	\$ 33,880	\$ 23,870	\$ 23,870	\$ 24,150	\$ 374,360
22	Energy Charge \$	\$ 886,304	\$ 913,975	\$ 984,929	\$ 1,016,429	\$ 901,297	\$ 869,053	\$ 823,697	\$ 834,829	\$ 993,149	\$ 849,358	\$ 779,220	\$ 773,200	\$ 10,625,441
23	Demand Charge \$	\$ 383,268	\$ 387,081	\$ 395,252	\$ 408,376	\$ 407,955	\$ 390,827	\$ 389,278	\$ 390,386	\$ 426,227	\$ 392,537	\$ 381,944	\$ 374,680	\$ 4,727,810
24	Energy Charge FAC Roll-In \$	\$ 392	\$ 394	\$ 396	\$ 395	\$ 397	\$ 398	\$ 398	\$ 402	\$ 400	\$ 282	\$ 282	\$ 285	\$ 4,421
25	Total Base Rate Revenue \$	\$ 1,302,752	\$ 1,334,446	\$ 1,413,711	\$ 1,458,266	\$ 1,342,852	\$ 1,293,620	\$ 1,246,645	\$ 1,259,235	\$ 1,453,256	\$ 1,265,765	\$ 1,185,034	\$ 1,172,030	\$ 15,727,611
26														
27	<b>Rate OPS</b>													
28	Customers	160	160	160	160	160	160	159	157	157	90	89	89	1,701
29	Energy (kWh)	954,768	1,014,496	1,206,061	1,148,060	999,375	890,641	896,384	1,018,260	1,326,624	1,011,725	744,077	718,243	11,928,714
30	Customer Charge \$	\$ 8,293	\$ 8,293	\$ 8,293	\$ 8,293	\$ 8,293	\$ 8,293	\$ 8,241	\$ 8,137	\$ 8,137	\$ 4,665	\$ 4,613	\$ 4,613	\$ 88,163
31	Energy Charge \$	\$ 101,969	\$ 108,348	\$ 128,807	\$ 122,613	\$ 106,733	\$ 95,120	\$ 95,734	\$ 108,750	\$ 141,683	\$ 108,052	\$ 79,467	\$ 76,708	\$ 1,273,987
32	Energy Charge FAC Roll-In \$	\$ 11,276	\$ 11,981	\$ 14,244	\$ 13,559	\$ 11,803	\$ 10,518	\$ 10,586	\$ 12,026	\$ 15,667	\$ 11,948	\$ 8,788	\$ 8,482	\$ 140,878
33	Total Base Rate Revenue \$	\$ 110,262	\$ 116,641	\$ 137,100	\$ 130,906	\$ 115,026	\$ 103,413	\$ 103,975	\$ 116,887	\$ 149,821	\$ 112,717	\$ 84,080	\$ 81,321	\$ 1,362,149
34														
35	<b>Total Base Rate Revenue \$</b>	<b>\$ 8,077,424</b>	<b>\$ 8,970,581</b>	<b>\$ 10,121,170</b>	<b>\$ 9,386,679</b>	<b>\$ 7,687,267</b>	<b>\$ 8,249,464</b>	<b>\$ 10,198,596</b>	<b>\$ 12,922,498</b>	<b>\$ 13,146,688</b>	<b>\$ 9,504,380</b>	<b>\$ 8,638,784</b>	<b>\$ 7,565,539</b>	<b>\$ 114,469,069</b>

**EXHIBIT RAF-24**

**South Kentucky RECC  
Case No. 2024-00402  
Attorney General's Second Request for Information**

**Request 8:** Refer to the Excel attachment response to AG 1-42(b), which shows the kWh and revenues associated with the 212 customer accounts that switched from both Rate 3 (LP) and Rate 4(OPS) to Rate 2 (B).

a. Provide the same type of data by month during the test year that shows the customer accounts that switched from Rate 3 (LP) to Rate 2 (B). Just like with the response to AG 1-42(b), provide in electronic format with all formulas intact.

b. Provide the same type of data by month during the test year that shows the customer accounts that switched from both Rate 4 (OPS) to Rate 2 (B). Just like with the response to AG 1-42(b), provide in electronic format with all formulas intact.

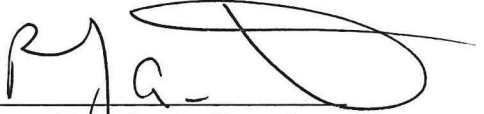
**Response 8(a)-(b):** There were no Rate 3 (Public Buildings) reclassifications to Rate 2 (B) during March 2024. The response to the Attorney General's First Request, Item 42(b) includes all Rate 4 (LP) and Rate 5 (OPS) accounts that were reclassified to Rate 2 (B) during March 2024. The Rate 4 (LP) accounts are numbered 1 through 147 and the Rate 5 (OPS) accounts are numbered 148 through 212 in the Excel spreadsheet provided for the response to Attorney General's First Request, Item 42(b).

# AFFIDAVIT

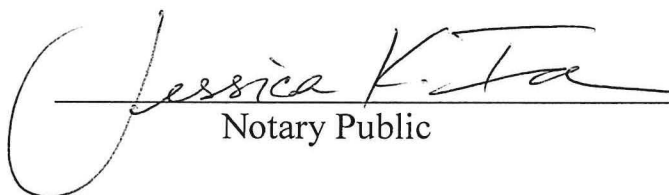
STATE OF GEORGIA            )

COUNTY OF FULTON         )

RANDY A. FUTRAL, being duly sworn, deposes and states: that the attached is his sworn testimony and that the statements contained are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Randy A. Futral

Sworn to and subscribed before me on this  
19th day of May 2025.

  
\_\_\_\_\_  
Notary Public

Jessica K Inman  
NOTARY PUBLIC  
Cherokee County, GEORGIA  
My Commission Expires 07/31/2027