

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION FOR AN)	
ALTERNATIVE ADJUSTMENT OF RATES)	CASE NO.
FOR MEADE COUNTY RURAL ELECTRIC)	2025-00159
COOPERATIVE CORPORATION PURSUANT)	
TO 807 KAR 5:0078)	

DATA REQUESTS OF THE ATTORNEY GENERAL

Comes now the Attorney General of the Commonwealth of Kentucky, by his Office of Rate Intervention (“Attorney General”), and submits these Data Requests to Meade County Rural Electric Cooperative Corporation (hereinafter “Meade County RECC” or “company”) to be answered by the date specified in the Commission’s July 29, 2025 Order of Procedure, in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and

supplemental responses if the companies receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel.

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

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

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

(10) As used herein, the words "document" or "documents" are to be construed

broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks,

invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

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

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

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

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

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

Respectfully submitted,

RUSSELL COLEMAN
ATTORNEY GENERAL

A handwritten signature in blue ink, appearing to read "Thomas Lacy", with a stylized flourish at the end.

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Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on August 15, 2025 an electronic copy of the foregoing was served via the Commission's electronic filing system.

this 15th day of August, 2025.

A handwritten signature in blue ink, appearing to read "Thomas John Lee", is positioned above a horizontal line.

Assistant Attorney General

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1. Provide all workpapers that supported the calculations found in the Application and supporting testimony.
2. Refer to the Application generally. Provide an organizational chart of Meade County RECC, including all positions. If a position is vacant designate as such.
3. Refer to the Application generally. Does Meade County RECC have any current plans to create any new positions?
4. Refer to the Application, page 1, in which Meade County RECC states that it provides electric power to approximately 31,657 members in the Kentucky counties of Breckinridge, Grayson, Hancock, Hardin, Meade, and Ohio.
 - a. Provide a detailed account of all economic issues that the Company's customers in the above-referenced counties are combating at the present time.
 - b. Provide Meade County RECC's actual number of customers for the years 2020 - 2025.
 - c. Explain in detail whether Meade County RECC projects a future gain or loss in its customer count and provide copies of all projections concerning the same.
 - d. Provide Meade County RECC's total annual energy sales for the years 2020 - 2025.
 - e. Explain whether Meade County RECC expects annual energy sales to increase or decrease and provide copies of all projections concerning the same.
 - f. Provide a map of the company's electric service territory.
 - g. Provide a list of all rural electric cooperatives and investor-owned electric utilities whose service territory is contiguous with Meade County RECC's service territory.

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- h. Explain whether Meade County RECC has ever worked, or plans on working, with any other rural electric cooperative or investor-owned electric utility on any joint ventures to provide electricity to the counties of Breckinridge, Grayson, Hancock, Hardin, Meade, and Ohio.
 - i. Based upon the most recent United States Census information, the poverty rates for Meade County RECC electric service area are as follows:
Breckinridge County- 21.3%¹,

Grayson County - 19.3%²,

Hancock County- 15.9%³,

Hardin County 15.8%⁴,

Meade County - 13.7%⁵,

Ohio County - 13.18%⁶,

Confirm that Meade County RECC is aware of the above percentages of its electric customers who live at or below the poverty line or on fixed incomes.
 - j. Based upon the poverty rates that exist in the Meade County RECC's electric service area, explain in detail all low-income assistance programs and payment plan options that Meade County RECC or other entities provides to its customers experiencing difficulty paying their electric bills.
5. Refer to the Application, pages 1. Meade County RECC asserts that its existing rates went into effect on September 16, 2020, and since then, inflation has caused an increase in the costs of labor and supplies.

¹ https://data.census.gov/profile/Breckinridge_County,_Kentucky?g=050XX00US21027#income-and-poverty

² https://data.census.gov/profile/Grayson_County,_Kentucky?g=050XX00US21085

³ https://data.census.gov/profile/Hancock_County,_Kentucky?g=050XX00US21091#income-and-poverty

⁴ https://data.census.gov/profile/Hardin_County,_Kentucky?g=050XX00US21093#income-and-poverty

⁵ https://data.census.gov/profile/Meade_County,_Kentucky?g=050XX00US21163#income-and-poverty

⁶ https://data.census.gov/profile/Ohio_County,_Kentucky?g=050XX00US21183#income-and-poverty

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- a. Please provide a list of all pro forma adjustments, the monetary value of each adjustment, and a description of why each adjustment is being requested.
 - b. Explain in detail and provide examples of how management has attempted to minimize cost escalation.
 - c. Explain why Meade County RECC is requesting the opportunity to achieve an Operating Times Interest Earned Ratio ("OTIER") of 1.85.
 - d. Identify the Time Interest Earned Ratio ("TIER") which corresponds to the requested OTIER.
 - e. Provide the TIER and OTIER that are required by all loan contract terms.
 - f. Provide rate adjustments reflecting the lowest TIER and OTIER required by loan contracts.
 - g. If Meade County RECC requests an OTIER higher than the loan contract requirements, explain why it is making such request.
 - h. Provide Meade County RECC's annual TIER and OTIER beginning on September 16, 2020, through the present day.
6. Refer to Application, page 2. Meade County RECC states that it has determined that an adjustment of retail rates is necessary for virtually all areas of operations.
 - a. Explain the criteria Meade County RECC uses to determine if the rates provide sufficient revenue.
 - b. Explain the criteria Meade County RECC uses to determine if it has the requisite financial strength.
7. Refer to the Application generally. Provide the following information for Meade County RECC executive staff employees.

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- a. Provide the position title and salary for each executive staff employee for the years 2020 – 2025.
- b. Provide the average raise that the executive staff employees received for the years 2020 – 2025. Ensure to explain whether the annual raise is directly connected to a performance review.
- c. Provide the average bonus that each executive staff employee received for the years 2020 - 2025.
- d. Provide all awards given to the executive staff employees for the years 2020 – 2025.
- e. Provide all vehicle allowances given to the executive staff employees for the years 2020 – 2025.
- f. Provide all incentive compensation given to the executive staff employees for the years 2020 – 2025.
- g. Provide the average raise, if any, which will be given to executive staff employees in 2026.
- h. Provide a detailed explanation of the insurance benefits provided to the Company's executive staff employees, including but not limited to health, dental, vision, life insurance, etc. Ensure to include all premiums paid by the Company's executive staff employees, premiums paid by the Company or parent company on the executive staff employees' behalf, as well as all copays, deductibles, and maximum out of pocket amounts.
- i. Provide a detailed explanation of the retirement benefits provided to the Company's executive staff employees, including but not limited to, whether there is a defined benefit plan, 401(k) matching, etc. Identify all employees who are eligible for both the defined benefit plan and 401k contributions from the Company.

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8. Refer to Exhibit 13. Meade County RECC's the annual salary of Meade County RECC's President/CEO was increased by 37% in 2023. Provide all justifications for why an increase of this amount was appropriate.
 - a. Please provide a comparison of the President/CEO's compensation to all similarly situated roles with other Kentucky RECCs.
 - b. If the information requested in 8(a) is unavailable, discuss how Meade County RECC Board arrived at the salary/salary increase amount without such information.
 - c. If the information requested in 8(a) is unavailable, discuss what factors the Meade RECC considered in setting that salary/salary increase.
9. Refer to the Application generally. Provide the following information for Meade County RECC salaried employees.
 - a. Provide the position title and salary for each salaried employee for the years 2020 – 2025.
 - b. Provide the average raise that the salaried employees received for the years 2020 – 2025. Ensure to explain whether the annual raise is directly connected to a performance review.
 - c. Provide the average bonus that each salaried employee received for the years 2020 - 2025. Ensure to explain all bases used to calculate all bonuses.
 - d. Provide all awards given to the salaried employees for the years 2020 – 2025.
 - e. Provide all vehicle allowances given to the salaried employees for the years 2020 – 2025.
 - f. Provide all incentive compensation given to the salaried employees for the years 2020 – 2025.
 - g. Provide the average raise, if any, which will be given to salaried employees for 2026.
 - h. Provide a detailed explanation of the insurance benefits provided to the Company's salaried employees, including but not limited to health, dental, vision, life insurance, etc. Ensure to include all premiums paid by the Company's salaried employees, premiums paid by the Company or

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parent company on the salaried employees' behalf, as well as all copays, deductibles, and maximum out of pocket amounts.

- i. Provide a detailed explanation of the retirement benefits provided to the Company's salaried employees, including but not limited to, whether there is a defined benefit plan, 401(k) matching, etc.
10. Refer to the Application generally. Provide the following information for Meade County RECC non-salaried employees.
- a. Provide the position title and wages for each non-salaried employee for the years 2020 – 2025.
 - b. Provide the average raise provided to the non-salaried employees for the years 2020 – 2025. Ensure to explain whether the annual raise is directly connected to a performance review.
 - c. Provide the average bonus provided to the non-salaried employees for the years 2020 – 2025.
 - d. Provide all awards given to the non-salaried employees for the years 2015 – 2025.
 - e. Provide all vehicle allowances given to the non-salaried employees for the years 2015 – 2025.
 - f. Provide all incentive compensation given to the non-salaried employees for the years 2015 – 2025.
 - g. Provide the average raise, if any, which will be given to non-salaried employees for 2026.
 - h. Provide a detailed explanation of the insurance benefits provided to the Company's non-salaried employees, including but not limited to health, dental, vision, life insurance, etc. Ensure to include all premiums paid by the Company's non-salaried employees, premiums paid by the Company on the non-salaried employees' behalf, as well as all copays, deductibles, and maximum out of pocket amounts.

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- i. Provide a detailed explanation of the retirement benefits provided to the Company's non-salaried employees, including but not limited to, whether there is a defined benefit plan, 401(k) matching, etc.
11. Refer to the Application generally. Provide a copy of all formal studies conducted that compare Meade County RECC's wage and benefit information to the local wage and benefit information for the geographic area in which Meade County RECC operates. If no such study exists, explain why not.
12. Refer to the Application generally.
 - a. Provide a detailed explanation of all salary and benefits provided to the members of the Board of Directors during the years 2020 – 2025. Ensure to provide the salary amounts, and specific details regarding all benefit packages, including but not limited to health, dental, vision, accidental death and disability, life insurance, bonuses, awards, vehicle allowances, reimbursement of travel expenses, and the like.
 - b. Provide the total amount of the Board of Directors' fees for the test year.
 - c. Provide a breakdown of the total amount of the Board of Directors' fees for the test year.
 - d. Discuss if there will be any changes to the Board of Directors' salaries and/or benefit packages in 2026.
 - e. When setting the Board of Directors' fees and benefits did the Company review other Kentucky rural electric cooperative Board of Directors' fees and benefits? If so, explain in detail the findings. If not, explain in detail why not.
 - f. Provide a detailed explanation of all salary and benefits provided to the Company's attorney during the years 2020 – 2025. Ensure to provide the salary amounts, and specific details regarding all benefit packages, including but not limited to health, dental, vision, accidental death and disability, life insurance, bonuses, awards, vehicle allowances, reimbursement for travel expenses, and the like.

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- g. See Exhibit 12 to the Application. It appears that Board members are paid \$700 each day they attend an meeting of the Board. Confirm whether this understanding is correct.

13. Refer to the Application generally.

- a. Provide a detailed explanation of how Meade County RECC operates its capital credit program, and ensure to discuss how the Company accounts for capital credits that cannot be provided back to the member due to the member passing away, moving, etc.
- b. Provide the monetary amount of capital credits that Meade County RECC currently has on the books, separated by year.

14. Refer to the Application generally.

- a. Explain in detail whether Meade County RECC has participated in, or continues to participate in, the Rural Utilities Services' ("RUS") Cushion of Credit program.
- b. If Meade County RECC received interest income from the RUS Cushion of Credit program for the test year, explain whether this amount was included in the revenue requirement. If not, explain why not.
- c. Provide a detailed account of Meade County RECC's Cushion of Credit deposition amounts for the years 2020 – 2025.
- d. Provide a detailed account of Meade County RECC's RUS/FBB loans, with the corresponding principal and interests amount for the years 2020-2025.

15. Refer Litteral testimony, page 11. Please provide the total costs incurred in relation to storm damage since 2020. Please provide any costs covered or reimbursed FEMA.

- a. At this time, is Meade County RECC awaiting a FEMA determination regarding storm damage? If yes, please explain fully.

16. Refer to Swanson testimony, page 8. Has Meade County RECC incurred any additional debt not referenced in this testimony as of the filing of the

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application? If so, please provide the amount owed and the names of the creditors.

17. Reference the Wolfram testimony at page 21. Please clarify which rate classes are subsidized and to what extent under the proposed rate increase.
18. Meade County RECC states that it is requesting an increase in the residential customer charge from \$0.686 to \$.850 per day (according to Wolfram page 24, \$20.87 to \$25.85 per month).
 - a. Explain how seeking to increase the daily residential customer charge from \$0.686 to \$0.85 which is an increase of approximately 23.9%, is consistent with the principle of gradualism.
 - b. Explain whether Meade County RECC contemplated proposing a lower increase to the residential customer charge so as not to create rate shock for the customers.
 - c. Explain whether Meade County RECC contemplated implementing the proposed higher customer charge in two or multiple phases instead of a 23.9% increase at one time.
 - d. Explain whether the increase in the customer charge is beneficial to residential ratepayers, and if so, how.
 - e. Explain whether Meade County RECC contemplated the prospect of more members being unable to timely pay their monthly bills in the event that the proposed increase is approved.
 - f. Explain how much of the cost of service for each rate class in the instant application is comprised of fixed costs.
 - g. Provide a list of all electric utilities in Kentucky, with the corresponding monthly residential customer charge, residential volumetric charge, average residential customer bill, and rank the utilities from lowest to highest average bill. Compare to Meade County RECC's current and proposed residential customer charge, residential volumetric charge,

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residential average bill, and rank based upon its proposed revenue requirement.

19. Refer to the Application generally. Provide the current average residential customer's monthly usage, total monthly bill, and the projected average bill if the Commission grants Meade County RECC's rate increase request.
20. Please advise as to why Meade County RECC is not proposing changes to the rates of other classes, beyond Resident and Farm customers and the adjustment to Small Commercial.
21. Explain whether any members of the Meade County RECC Board of Directors, or the Company's chief executives serve on the boards of directors of any other organizations. If so, identify all such organizations, including their name and address, the nature of each such organization, and the length of time they served as a member of that board.
22. Explain whether Meade County RECC is seeking any funds/grants from federal, state, or local sources which have been or will be made available. If so, identify the source and amount of those funds/grants, and the current status of the applications for all such funds / grants. If the Company has foregone any relevant opportunities for funds/grants for which it is eligible, explain why.
23. Please provide a detailed list of all organizations to which Meade County RECC pays membership dues, and the annual amount of these dues. Please also identify if Meade County RECC has already, or plans to, renew its membership in these organizations. Please advise if these dues are included are included in the revenue requirement in the pending rate case, and if so, precisely where.
24. Confirm that all charitable contributions and lobbying expenses have been removed from the application.

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25. Please advise if there have been substantial changes to the membership in the rate class data since the test year. Has there been any notable changes to the customer classes?
26. Does Meade County RECC own or partially own any subsidiaries?
- a. If so, does Meade County RECC provide labor or services to the subsidiaries?
 - b. Please provide the organization charts for any owned subsidiaries and list all executives and directors.
 - c. Please provide a detailed breakdown of hours worked for any owned subsidiaries for each employee who provided labor through each year beginning in 2020 through 2024, and in each month of 2025 to date.