

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

In the Matter of:

THE ELECTRONIC APPLICATION OF)	
TAYLOR COUNTY RURAL ELECTRIC)	
COOPERATIVE CORPORATION FOR PASS-)	Case No. 2025-00209
THROUGH OF EAST KENTUCKY POWER)	
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

TAYLOR COUNTY RURAL COOPERATIVE CORPORATION'S
VERIFIED RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
ENTERED SEPTEMBER 3, 2025

Comes now Taylor County Rural Electric Cooperative Corporation's ("Taylor RECC"),
by counsel, and does hereby tender its Verified Response to the Commission Staff's First Request
for Information entered August 26, 2025.

Dated September 10, 2025

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC APPLICATION OF TAYLOR)	
COUNTY RURAL ELECTRIC COOPERATIVE)	
CORPORATION FOR PASS-THROUGH OF EAST)	CASE NO.
KENTUCKY POWER COOPERATIVE, INC.'S)	2025-00209
WHOLESALE RATE ADJUSTMENT)	

CERTIFICATE

STATE OF KENTUCKY)

COUNTY OF TAYLOR)

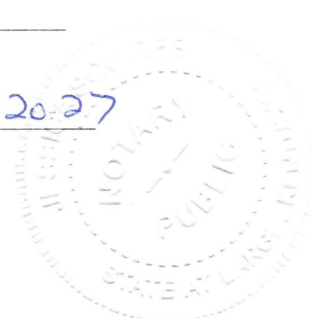
Comes now Patsy R. Walters, after first being duly sworn, and states that she has supervised the preparation of the responses of Taylor County Rural Electric Cooperative Corporation ("Taylor County RECC") to the Public Service Commission Staff's First Request for Information in the above-referenced case dated August 26, 2025, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

Patsy R. Walters
Patsy R. Walters

Subscribed and sworn before me on this 29th day of August 2025.

Jessie Squire
Notary Public

My Commission Expires: 5-20-27
623618




COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

VERIFICATION OF JOHN WOLFRAM

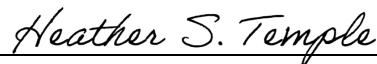
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

John Wolfram, being duly sworn, states that he has supervised the preparation of his responses to Requests for Information in this case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.



John Wolfram

The foregoing Verification was signed, acknowledged and sworn to before me this 9th day of September, 2025, by John Wolfram.



Notary Commission No. KYNP98715

Commission expiration: April 9, 2025

Taylor County Rural Electric Cooperative Corporation
Case No. 2025-00209
Commission Staff's First Request for Information

Request 1: Refer to Exhibit 4 of the Application.

- a. Provide the billing analysis in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.
- b. Reconcile Taylor RECC's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC to Taylor RECC and explain any variance of approximately \$(890) shown in Exhibit 4.

Response 1(a): Please see Attachment 1-1(a) provided in separately in Excel format

Response 1(b): See Application Exhibit 4, page 1. Also see Attachment 1-1(a), Summary tab, last three lines and last column. The slight variance is the result of rounding the proposed per unit charges to the appropriate number of decimal places.

**ATTACHMENT
IS AN EXCEL
SPREADSHEET
AND UPLOADED
SEPARATELY**

Taylor County Rural Electric Cooperative Corporation
Case No. 2025-00209
Commission Staff's First Request for Information

Request 2: Refer to the Direct Testimony of John Wolfram, Exhibit 7.

- a. Confirm that Taylor RECC's proposed rates reflect a strict proportional pass-through of EKPC's wholesale increase in accordance with KRS 278.455. If not confirmed, explain the variance.
- b. If Taylor RECC considered any deviation from strict proportionality pass-through of the wholesale rate increase, explain why no such deviation was proposed.
- c. Provide the class billing determinants used to support the proportional pass-through of the wholesale rate increase.

Response 2(a): Confirmed.

Response 2(b): Not applicable.

Response 2(c): Please see Application Exhibit 4, column Billing Units, beginning on page 2.

Witness: John Wolfram and Patsy Walters

Taylor County Rural Electric Cooperative Corporation
Case No. 2025-00209
Commission Staff's First Request for Information

Request 3: Refer to Exhibit 4 of the Application, which shows revenues associated with the Tennessee Gas/Kinder Morgan special contract.

- a. Identify the Commission case number and Order approving this special contract.
- b. Confirm that no portion of EKPC's wholesale increase being allocated to this load is inconsistent with the terms of the contract and the statutory provisions governing pass-through adjustments for special contracts. If not confirmed, explain the response.

Response 3(a): Please see the Commission's Tariff Library for the Tennessee Gas/Kinder Morgan's special contract. The original is stamped and dated September 9, 2021, by the Commission. The amendment is stamped and dated May 1, 2012, by the Commission.

Response 3(b): Confirmed.

Taylor County Rural Electric Cooperative Corporation
Case No. 2025-00209
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Request 4: Refer to Case No. 2023-00014,2 which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery.

a. Provide a reconciliation between the \$0.01194/kWh FAC roll-in incorporated in Exhibit 4 and Taylor RECC's FAC Form A filings filed after the August 30, 2024 Order in Case No. 2023-00014. Identify any differences between the billing analysis in Exhibit 4 and the FAC recovery amounts reported in Taylor RECC's semi-annual filings.

b. Confirm that Taylor RECC will continue to apply monthly FAC adjustments filed under 807 KAR 5:056 on customer bills following implementation of the proposed pass-through rates.

Response 4(a): The FAC roll-in incorporated in Exhibit 4 reflects the adjustment specified in the Commission's Order in Case No. 2023-00014. The amount shown at the bottom of Exhibit 4 in the Present Rate column was moved from the FAC line to the base energy charge line for all rates on Exhibit 4 which include an energy charge. The amount is annualized such that the "Present Rate" reflects the movement of the ordered incremental energy charge from the FAC to base energy. This is evident in the Excel file provided in response to Item 1a, by comparing the energy charge and FAC in columns "2023 Revenue" and "Present Revenue" for each rate in Exhibit 4. (Note for Taylor County the amount is \$0.01194 per kWh not \$0.01194 per kWh.)

Response 4(b): Confirmed.

Taylor County Rural Electric Cooperative Corporation
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Request 5: Refer to Exhibit 4 of the Application, page 2.

- a. Confirm whether the change in the Residential ETS Customer Charge from the present rate of \$17.01 to a proposed rate of \$17.95 is correct. If not confirmed, explain the response.
- b. Reconcile the figures in Item 5(a) with the figure in the Customer Notice in Exhibit 6.

Response 5(a): Confirmed.

Response 5(b): The Residential ETS Customer Charge in the Customer Notice was inadvertently omitted from the Notice tab in the Excel file provided in response to Item 1 and thus also omitted from Exhibit 6.

Taylor County Rural Electric Cooperative Corporation
Case No. 2025-00209
Commission Staff's First Request for Information

Request 6: Refer to Exhibit 2, Exhibit 3, Exhibit 4, and Exhibit 6 of the Application, generally. Confirm that any discrepancies in the energy charges for rate schedules A, B2, B3, and C3 from the billing analysis are due to rounding. If not confirmed, explain any discrepancies.

Response 6: Confirmed.