

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

In the Matter of:

THE ELECTRONIC APPLICATION OF)	
SOUTH KENTUCKY RURAL ELECTRIC)	
COOPERATIVE CORPORATION FOR PASS-)	Case No. 2025-00210
THROUGH OF EAST KENTUCKY POWER)	
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

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

Comes now South Kentucky Rural Electric Cooperative Corporation's ("South Kentucky"), 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

VERIFICATION OF JOHN WOLFRAM

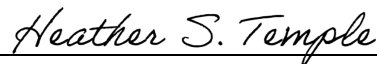
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

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

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF)
SOUTH KENTUCKY RURAL ELECTRIC)
COOPERATIVE CORPORATION FOR PASS-)
THROUGH OF EAST KENTUCKY POWER)
COOPERATIVE, INC.'S WHOLESALE RATE)
ADJUSTMENT)

Case No. 2025-00210

VERIFICATION OF CARRIE BESSINGER

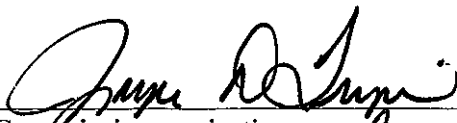
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF PULASKI)

Carrie Bessinger, Chief Financial Officer, being duly sworn, states that she has supervised the preparation of responses to Commission Staff's First Request for Information in the above referenced case and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

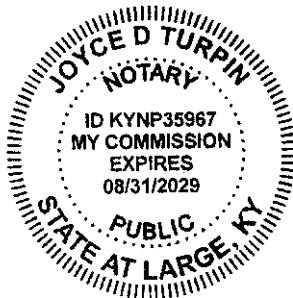


Carrie Bessinger

The foregoing Verification was signed, acknowledged and sworn to before me this 10th day of September 2025, by Carrie Bessinger.



Commission expiration: Aug 31, 2029



South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
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 South Kentucky RECC's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC to South Kentucky RECC and explain any variance shown in Exhibit 4.

Response 1(a): Please see Attachment 1-1 filed separately.

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.

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 2: Refer to Case No. 2023-00014, which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery.

a. Provide a reconciliation between the \$0.01181/kWh FAC roll-in incorporated in Exhibit 4 with South Kentucky RECC's FAC Form A filings filed after the August 30, 2024 Order in Case No. 2023-00014.

b. Identify any differences between the billing analysis in Exhibit 4 and the FAC recovery amounts reported in South Kentucky RECC's semi-annual filings.

c. Confirm that South Kentucky 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. If not confirmed, explain the response.

Response 2(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 as Attachment 1-1, by comparing the energy charge and FAC in columns "2023 Revenue" and "Present Revenue" for each rate in Exhibit 4.

Response 2(b): The billing analysis annualizes the FAC roll-in based on test year billing determinants, while the semi-annual filings reflect actual FAC amounts.

Response 2(c): Confirmed.

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 3: Refer to Exhibit 4 of the Application.

- a. Provide spreadsheets and narrative explanations showing how the billing determinants (customer counts, kWh sales, and kW billing demand) were derived for each rate schedule.
- b. Identify whether the determinants are based on historical test-year data, adjusted for load growth, weather normalization, or other factors, and explain the basis for any such adjustments.

Response 3(a): See Attachment 1-1.

Response 3(b): The only adjustment to 2023 actual test-year data is the FAC roll-in.

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 4: Refer to Exhibit 4 of the Application, Schedules LP-1, LP-2, and LP-3. Provide a detailed explanation of how the kWh and kW billing determinants for each of these schedules were developed, including the basis for any escalation or adjustment percentages.

Response 4: The kWh and kW billing determinants for these schedules reflect the actual values from the South Kentucky billing system. No adjustments or escalations were made.

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 5: Refer to Exhibit 4, Billing Analysis, pages 2 and 4. Refer also to Exhibit 2, Exhibit 3, and Exhibit 6, generally. The following energy charges have an extra zero at the end in Exhibits 2, 3, and 6: Schedule A, Schedule A-ETS, Schedule AES, Schedule B, Schedule B-ETS, and Schedule OPS. Explain why the zero at the end is not also included in the Billing Analysis for those rate schedules.

Response 5(a): This is a formatting issue. The values used in the Billing Analysis are mathematically equivalent to those in the other exhibits.

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
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Request 6: Refer to Exhibit 4, Billing Analysis, page 5. “Sodium Coba w 30’ Aluminum Pole” and “250 W Cobra Head HPS @ 106KWH w/30’ Alu” appear to be the same rate. Refer also to Exhibit 2, Proposed Tariff, Schedule DSTL. Provide the following:

- a. Confirm that both rates listed above are the “250 Watt Cobra Head HPS @ 106 Kwh w/30' Aluminum Pole” listed on the tariff. If not confirmed, explain the response.
- b. Provide the correct number of billing units for the “250 Watt Cobra Head HPS @ 106 Kwh w/30' Aluminum Pole” rate for the Billing Analysis.

Response 6(a): Confirmed.

Response 6(b): The values in the billing analysis are correct; all of the billing units are included under the first listing (“Sodium Coba w 30’ Aluminum Pole”).

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 7: Refer to Exhibit 4, Billing Analysis, page 5, line items 157, 158, and 160. Refer also to Exhibit 2, Proposed Tariff, Schedule DSTL.

- a. Confirm the metered and unmetered rates for the “100 Watt Metal Halide Lexington Lamp @ 44 kWh Mo.” If not confirmed, explain the response.
- b. Explain why there are duplicative rates with varying billing units.
- c. Provide the correct number of billing units for the metered and unmetered “100 Watt Metal Halide Lexington Lamp @ 44 kWh Mo” rate for the Billing Analysis.

Response 7(a): Confirmed.

Response 7(a): The second listing includes zero billing units. It is listed twice because it was in the cooperative billing system as two separate entries.

Response 7(c): The values in the billing analysis are correct; all of the billing units are included under the first listing.

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 8: Refer to Exhibit 4, Billing Analysis, page 5, line item 160. Refer also to Exhibit 2, Proposed Tariff, Schedule DSTL. The “Metal Halide Lexington 100-Watt” rate appears to be the “Metal Halide Lamp or Sodium 100 Watt Acorn @ 44 kWh Mo.” rate in the tariff. Confirm that the two are synonymous and explain whether the different designations were intentional or in error. If intentional, explain why.

Response 8: Confirmed. Please see the response to Item 7.

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 9: Refer to Exhibit 4, Billing Analysis, page 5, line items 156 and 161. Both line items appear to be the same rate. Provide the correct number of billing units for the unmetered 400-Watt Metal Halide Galleria rate.

Response 9(a): The two are the same rate. They are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time. The correct number of billing units is the sum of the units for line 156 and line 161 (so the billing analysis is correct).

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Response 10: Refer to Exhibit 4, Billing Analysis, page 5, DSTL. List which rates have zero billing units.

Response 10: The following DSTL items have zero billing units in Exhibit 4, page 5:

- a) Sodium Cobra on 30' Aluminum Pole 7,000-10,000 Lumens
- b) 250 W Cobra Head HPS @106KWH w/30' Alum Pole
- c) Metal Halide Galleria 1000-Watt
- d) Sodium Cobra on Existing Pole 15000 Lumens - Metered
- e) Sodium Cobra on 30' Aluminum Pole 15000 L Metd
- f) Sodium Cobra on 30' Aluminum Pole 7000 L Metd
- g) LED 173W Area Metered
- h) 1000 Watt Galleria Metered
- i) 400 W Cobra MV 8' Arm Metered
- j) 401 W Cobra MV 12' Arm Metered
- k) 402 W Cobra MV 16' Arm Metered
- l) 30' Aluminum Pole

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 11: Refer to Exhibit 2, Strike Through Tariff, Schedule LP-1. The Substation Charges are missing. Provide a corrected Strike Through of Schedule LP-1.

Response 11: See Attachment 1-11.

ATTACHMENT 1-11

CLASSIFICATION OF SERVICE

LARGE POWER RATE 1
(500 KW TO 4,999 KW)

SCHEDULE LP-1

APPLICABLE: Entire Service Area - Applicable to contracts with contract demands of 500 to 4,999 KW with a monthly energy usage equal to or greater than 400 hours per KW of contract demand.

TYPE OF SERVICE: Three phase 60 hertz at voltages as agreed to in the special Contract for Service

RATES PER MONTH:

Consumer Charge:

The consumer charge is equal to the metering charge plus the substation charge.

1. Metering Charge	\$	<u>245.10</u> 225.00	(1)
2. Substation Charge Based on Contract Kw			
a. - 500 - 999 kw	\$	<u>406.53</u> 373.20	(1)
b. - 1,000 - 2,999 kw	\$	<u>1,218.31</u> 1,118.42	(1)
c. - 3,000 - 7,499 kw	\$	<u>3,062.56</u> 2,811.45	(1)

If retail consumer has provided for the investment in the substation facilities from which it is served, the substation charge does not apply and the only applicable rate is the metering charge.

Demand Charge: \$7.126~~.54~~ per KW of billing demand (1)

Energy Charge: \$0.06947~~06377~~ per KWH (1)

DETERMINATION OF BILLING DEMAND: The billing demand shall be the greater of (a) or (b) listed below:

(a) The contract demand

(b) The ultimate consumer's highest demand during the current month or preceding eleven months coincident with wholesale power suppliers system peak demand. The consumer's peak demand is the highest average rate at which energy is used during any fifteen-minute interval in the below listed hours for each month (and adjusted for power factor as provided herein):

<u>-Month-</u>	<u>Hours Applicable For Demand Billing - EST</u>
October through April	7:00 A.M. to 12:00 Noon 5:00 P.M. to 10:00 P.M.
May through September	10:00 A.M. to 10:00 P.M.

DATE OF ISSUE: JULY 25, 2025~~SEPTEMBER 5, 2024~~

DATE EFFECTIVE: SEPTEMBER 1, 2025~~4~~

ISSUED BY: /s/ KEVIN NEWTON
President & CEO

SOUTH KENTUCKY R.E.C.C.
SOMERSET, KENTUCKY 42501
T-8

FOR: ENTIRE TERRITORY SERVED
P.S.C. KY NO. 7
~~6TH~~ ^{5TH} REVISED SHEET NO. T-8
CANCELLING P.S.C. KY NO. 7
~~5TH~~ ^{4TH} REVISED SHEET NO.

CLASSIFICATION OF SERVICE

LARGE POWER RATE 1 (500 KW to 4,999 KW)

SCHEDULE LP-1

MINIMUM CHARGE

The computed minimum monthly charge shall not be less than the sum of (a), (b) and (c) below:

- (a) The product of the billing demand multiplied by the demand charge, plus,
- (b) The product of the billing demand multiplied by 400 hours and the energy charge per KWH, plus
- (c) The sum of the consumer charge.

POWER FACTOR ADJUSTMENT

The consumer agrees to maintain unity power factor as nearly as practicable at each delivery point at the time of the monthly maximum demand. When the power factor is determined to be less than 90%, the monthly maximum demand at the delivery point will be adjusted by multiplying the actual monthly maximum demand by 90% and divided this product by the actual power factor at the time of the monthly maximum demand. Metering Equipment capable of measuring power factor shall be installed for customers with maximum demand of 1,000 KW or greater.

(T)
(T)

FUEL ADJUSTMENT CLAUSE

As shown in "APPENDIX B" following these tariffs.

CONTRACT FOR SERVICE

The consumer must give satisfactory assurance by means of a written agreement as to the character, amount and duration of the three phase requirements and complete a special contract.

TERMS OF PAYMENT

The rates stated are net. If payment is not made by the due date, the current month charges shall be increased by 5%.

DATE OF ISSUE: ~~JULY 25, 2025~~ SEPTEMBER 5, 2024

DATE EFFECTIVE: SEPTEMBER 1, 202~~5~~4

ISSUED BY: /s/ KEVIN NEWTON
President & CEO

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 12: Refer to Exhibit 2, Strike Through Tariff, Schedule LP-3. The Substation Charges are missing. Provide a corrected Strike Through of Schedule LP-3.

Response 12(a): Please see Attachment 1-12.

ATTACHMENT 1-12

CLASSIFICATION OF SERVICE

LARGE POWER RATE 3
(500 KW TO 2,999 KW)

SCHEDULE LP - 3

APPLICABLE: Entire Service Area - Applicable to contracts with contract demands of 500 to 2,999 KW with a monthly energy usage equal to or greater than 400 hours per KW of contract demand.

TYPE OF SERVICE: Three phase 60 hertz at voltages as agreed to in the special Contract for Service.

RATES PER MONTH:

Consumer Charge:

The consumer charge is equal to the metering charge plus the substation charge:

1. Metering Charge	\$	164.53 151.21	(1)
2. Substation Charge Based on Contract kW			
a. 500 - 999 kW	\$	414.65 381.08	(1)
b. 1,000 - 2,999 kW	\$	1,242.62 1,142.01	(1)

If retail consumer has provided for the investment in the substation facilities from which it is served, the substation charge does not apply and the only applicable rate is the metering charge.

Demand Charge per KW			
Contract demand.....	\$8,227.55		(1)
Excess demand.....	\$10,209.37		(1)
Energy charge per kWh @.....	\$0.06	637400	(1)

DETERMINATION OF BILLING DEMAND: The billing demand (kilowatt demand) shall be the greater of (a) or (b) listed below:

- (a) The contract demand
- (b) The ultimate consumer's highest demand during the current month coincident with wholesale power suppliers system peak demand. The consumer's peak demand is the highest average rate at which energy is used during any fifteen-minute interval in the below listed hours for each month (and adjusted for power factor as provided herein).

-Months-

Hours Applicable For Demand Billing - E.S.T.

October through April

7:00 A.M. to 12:00 Noon

5:00 P.M. to 10:00 P.M.

May through September

10:00 A.M. to 10:00 P.M.

DATE OF ISSUE: JULY 25, 2025~~SEPTEMBER 5, 2024~~

DATE EFFECTIVE: SEPTEMBER 1, 2025~~4~~

ISSUED BY: /s/ KEVIN NEWTON
President & CEO

SOUTH KENTUCKY R.E.C.C.
SOMERSET, KENTUCKY 42501
T-12

FOR: ENTIRE TERRITORY SERVED
P.S.C. KY. NO. 7
~~6TH~~^{5TH} REVISED SHEET NO. T-12
CANCELLING P.S.C. KY. NO. 7
~~5TH~~^{4TH} REVISED SHEET NO.

CLASSIFICATION OF SERVICE

LARGE POWER RATE 3
(500 KW TO 2,999 KW)

SCHEDULE LP - 3

POWER FACTOR ADJUSTMENT:

The consumer agrees to maintain unity power factor as nearly as practicable at each delivery point at the time of the monthly maximum demand. When the power factor is determined to be less than 90%, the monthly maximum demand at the delivery point will be adjusted by multiplying the actual monthly maximum demand by 90% and divided this product by the actual power factor at the time of the monthly maximum demand. Metering Equipment capable of measuring power factor shall be installed for customers with maximum demands of 1,000 KW or greater.

FUEL ADJUSTMENT CLAUSE: As shown in "APPENDIX B" following these tariffs.

CONTRACT FOR SERVICE: The consumer must give satisfactory assurance by means of a written agreement as to the character, amount and duration of the three phase requirements and complete a special contract.

TERMS OF PAYMENT: The rates stated are net. If payment is not made by the due date, the current month charges shall be increased by 5%.

DATE OF ISSUE: ~~JULY 25, 2025~~ SEPTEMBER 5, 2024

DATE EFFECTIVE: SEPTEMBER 1, 2025⁴

ISSUED BY: /s/ KEVIN NEWTON
President & CEO

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 13: Refer to Exhibit 4, Billing Analysis, page 6, Outdoor Lighting/Security Lights. Confirm that the associated tariff is Schedule OL. If not confirmed, identify the correct tariff.

Response 13: Confirmed.

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 14: Refer to Exhibit 4, Billing Analysis, page 6, line items 173, 174, 175, and 176. Refer also to Exhibit 2, Proposed Tariff, Schedule OL.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the metered and unmetered “Mercury Vapor 7,000-10,000 Lumens” rates.

Response 14(a): These are the same rate. They are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time.

Response 14(b): The correct number of billing units is the sum of the units for lines 173 and 174 for unmetered and the sum of the units for lines 175 and 176 for metered (so the billing analysis is correct).

South Kentucky Rural Electric Cooperative Corporation

Case No. 2025-00210

Commission Staff's First Request for Information

Request 15: Refer to Exhibit 4, Billing Analysis, page 6, line items 177 and 178. Refer also to Exhibit 2, Proposed Tariff, Schedule OL.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the unmetered “Sodium 7,000-10,000 Lumens” rate.

Response 15a: These are the same rate. They are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time.

Response 15b: The correct number of billing units is the sum of the units for lines 177 and 178 (so the billing analysis is correct).

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 16: Refer to Exhibit 4, Billing Analysis, page 6, line items 190, 191, 192, and 193. Refer also to Exhibit 2, Proposed Tariff, Schedule OL.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the unmetered “400 Watt Metal Halide @ 167 KWH per Mo.” rates.

Response 16a: These are the same rate. They are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time.

Response 16b: The correct number of billing units is the sum of the units for lines 190 and 191 for unmetered and the sum of the units for lines 192 and 193 for metered (so the billing analysis is correct).

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 17: Refer to Exhibit 4, Billing Analysis, page 6, line items 194 and 196. Refer also to Exhibit 2, Proposed Tariff, Schedule OL.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the unmetered “1000 Watt Metal Halide @ 395 KWH per Mo.” rate.

Response 17a: These are the same rate. They are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time.

Response 17b: The correct number of billing units is the sum of the units for lines 194 and 196 (so the billing analysis is correct).

South Kentucky Rural Electric Cooperative Corporation
Case No. 2025-00210
Commission Staff's First Request for Information

Request 18: Refer to Exhibit 6, Customer Notice. Schedule LP-2 is missing the current Substation 7500-14799 kW charge. Explain whether this was in error or a purposeful exclusion from the notice.

Response 18: This was an error.