

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF)	
NOLIN RURAL ELECTRIC COOPERATIVE)	
CORPORATION FOR PASS-THROUGH OF EAST)	Case No. 2025-00211
KENTUCKY POWER COOPERATIVE, INC.'S)	
WHOLESALE RATE ADJUSTMENT)	

NOLIN RURAL ELECTRIC COOPERATIVE
CORPORATION'S APPLICATION

Comes now Nolin Rural Electric Cooperative Corporation ("Nolin"), by counsel, pursuant to KRS 278.455(2), 807 KAR 5:007 and other applicable law, and does hereby request the Kentucky Public Service Commission ("Commission") to grant it a pass-through of East Kentucky Power Cooperative Inc.'s ("EKPC") wholesale rate adjustment, respectfully stating as follows:

1. Nolin is a not-for-profit, member-owned, rural electric distribution cooperative organized under KRS Chapter 279. Nolin is engaged in the business of distributing retail electric power to approximately 31,001 members in the Kentucky counties of Breckinridge, Bullitt, Grayson, Green, Hardin, Hart, LaRue, Meade and Taylor.

2. Pursuant to 807 KAR 5:001, Section 14(1) and 807 KAR 5:007, Sections 1(2) and Section 2(2), Nolin's mailing address is 411 Ring Road, Elizabethtown, Kentucky 42701-6767 and its electronic mail address is kypsc@nolinrecc.com. Nolin's phone number is (270) 765-6153. Nolin no longer has a fax number. Nolin requests the following individuals be included in the service list:

Gregory R. Lee, President and Chief Executive Officer

glee@nolinrecc.com

Sara Roberson, Vice President of Administration and Finance

sroberson@nolinrecc.com

L. Allyson Honaker, Honaker Law Office

allyson@hloky.com

Heather S. Temple, Honaker Law Office

heather@hloky.com

Meredith Cave, Honaker Law Office

meredith@hloky.com

3. Pursuant to 807 KAR 5:001, Section 14(2), Nolin is a Kentucky corporation that was incorporated on July 19, 1938 and is currently in good standing to conduct business within the Commonwealth of Kentucky. A copy of the Certificate of Good Standing is attached as **Exhibit 1**.

4. Pursuant to 807 KAR 5:007, Sections 1(3) and Section 2(2), Nolin is one of the sixteen owner-member cooperatives of EKPC. EKPC has filed an Application for a general adjustment of its existing wholesale rates to its owner-members, including Nolin.¹ In accordance with KRS 278.455, Nolin seeks to pass-through the increase in EKPC's wholesale rates to Nolin's retail members.

5. Pursuant to 807 KAR 5:007 Section 2(1), attached as **Exhibit 2** to this Application are the proposed tariffs of Nolin incorporating the new rates and proposing an effective date of September 1, 2025, which is the same effective date proposed by EKPC in its rate case.

¹ See *In the Matter of the Electronic Application of East Kentucky Power Cooperative, Inc. for a General Adjustment of Rates, Approval of Depreciation Study, Amortization of Certain Regulatory Assets and Other General Relief*, Application, Case No. 2025-00208 (filed August 1, 2025).

6. Pursuant to 807 KAR 5:007 Sections 1(4) and Section 2(2), attached as **Exhibit 3** to this Application is a comparison of the current and the proposed rates of Nolin.

7. Pursuant to 807 KAR 5:007 Sections 1(5)(a)-(b) and Section 2(2), attached as **Exhibit 4** to this Application is a billing analysis which shows the existing and proposed rates for each of Nolin's rate classes. Nolin further states that the effects of the increase in rates from its wholesale supplier, EKPC, are being passed through to its retail members through its retail tariffs on a proportional basis and that the rate design structure proposed for each retail rate schedule does not change the rate design currently in effect.

8. Pursuant to 807 KAR 5:007 Sections 1(6) and Section 2(2), a certification that a complete copy of this filing has been electronically mailed to the Kentucky Attorney General's Office of Rate Intervention and an electronic copy was also sent to rateintervention@ag.ky.gov is attached as **Exhibit 5**.

9. Pursuant to 807 KAR 5:007 Sections 1(7)(b) and (8) and Section 2(2), notice of the proposed rate changes has been given, not more than thirty (30) days prior to August 1, 2025, by publication in in *Kentucky Living*, which was sent to all of Nolin's members. A copy of the notice is attached as **Exhibit 6** and contains all of the required information pursuant to 807 KAR 5:007, Section 3.

10. This application is supported by the Testimony of Mr. John Wolfram, which is attached as **Exhibit 7**.

WHEREFORE, on the basis of the foregoing, Nolin respectfully requests that the Commission accept this Application for filing and allow Nolin to pass-through to its retail members the increase in the wholesale rates granted to EKPC and for the effective date of Nolin's pass-through rates to be the same as the effective date of EKPC's rate increase.

This the 1st day of August 2025.

Respectfully submitted,

Heather S. Temple

L. Allyson Honaker
Heather S. Temple
Meredith L. Cave
HONAKER LAW OFFICE, PLLC
1795 Alysheba Way, Suite 1203
Lexington, KY 40509
(859) 368-8803
allyson@hloky.com
heather@hloky.com
meredith@hloky.com
*Counsel for Nolin Rural Electric
Cooperative Corporation*

CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Commission on August 1, 2025, and that there are no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to prior Commission Orders, no paper copies of this filing will be made.

Heather S. Temple

*Counsel for Nolin Rural Electric
Cooperative Corporation*

Exhibit List

Document	Tab
Certificate of Good Standing	1
Proposed Tariffs Incorporating the New Rates Proposed	2
Comparison of the Current and Proposed Rates	3
Billing Analysis Showing the Existing and Proposed Rates for Each Rate Class	4
Certification of Mailing to Office of Rate Intervention	5
Copy of Notice	6
Testimony of John Wolfram	7

Exhibit 1

Certificate of Good Standing

Commonwealth of Kentucky
Michael G. Adams, Secretary of State

Michael G. Adams
Secretary of State
P. O. Box 718
Frankfort, KY 40602-0718
(502) 564-3490
<http://www.sos.ky.gov>

Certificate of Existence

Authentication number: 340294
Visit <https://web.sos.ky.gov/ftshow/certvalidate.aspx> to authenticate this certificate.

I, Michael G. Adams, Secretary of State of the Commonwealth of Kentucky, do hereby certify that according to the records in the Office of the Secretary of State,

NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION

NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION is a corporation duly incorporated and existing under KRS Chapter 14A and KRS Chapter 272, whose date of incorporation is July 19, 1938 and whose period of duration is perpetual.

I further certify that all fees and penalties owed to the Secretary of State have been paid; that Articles of Dissolution have not been filed; and that the most recent annual report required by KRS 14A.6-010 has been delivered to the Secretary of State.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal at Frankfort, Kentucky, this 30th day of July, 2025, in the 234th year of the Commonwealth.



Michael G. Adams

Michael G. Adams
Secretary of State
Commonwealth of Kentucky
340294/0037954

Exhibit 2

Present and Proposed Tariffs

Proposed Tariffs

NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION
OF

411 RING ROAD
ELIZABETHTOWN, KENTUCKY 42701

(N)

nolinrecc.com

(N)

RATES, RULES AND REGULATIONS FOR FURNISHING

ELECTRICITY

AT

HARDIN, HART, LARUE, GRAYSON, TAYLOR AND GREEN COUNTIES

FILED WITH PUBLIC SERVICE COMMISSION OF KENTUCKY

Issued August 1, 2025

Effective September 1, 2025

ISSUED BY NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION

Issued BY:
Greg Lee, President/CEO

FOR ENTIRE SERVICE AREA

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
20th Revision Sheet No. 20

CANCELING PSC KY NO. 10
19th Revision Sheet No. 20

CLASSIFICATION OF SERVICE

SCHEDULE 1 - RESIDENTIAL, FARM, NON-FARM, TRAILERS AND MOBILE HOMES

APPLICABLE: Entire Service Area

AVAILABILITY OF SERVICE: Available to all residents for uses in the home or on the farm including trailers, mobile homes, schools, churches, community halls and non-profit community welfare institutions where the required total transformer capacity is 50 KVA or less, single or three phase.

TYPE OF SERVICE: Single phase 120/240 volts and three phase service where available at available voltages.

RATES PER MONTH:

Member Cost of Service Charge	\$14.79	(I)
All KWH Charge	\$0.10956 per KWH	(I)

FUEL ADJUSTMENT CLAUSE: The above rate may be increased or decreased by an amount per KWH equal to the fuel adjustment amount per KWH as billed by the Wholesale Power Supplier plus an allowance for line losses. The allowance for line losses will not exceed 10% and is based on a twelve month moving average of such losses. This Fuel Clause is subject to all other applicable provisions as set out in 807 KAR 5:056.

MINIMUM CHARGE: The minimum monthly charge for service shall be \$14.79. (I)

DATE OF ISSUE August 1, 2025
DATE EFFECTIVE September 1, 2025

ISSUED BY _____
President & CEO

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. _____, Dated

FOR ENTIRE SERVICE AREA

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
20th Revision Sheet No. 22

CANCELING PSC KY NO. 10
19th Revision Sheet No. 22

CLASSIFICATION OF SERVICE

SCHEDULE 2 - COMMERCIAL, SMALL POWER, SINGLE PHASE AND THREE PHASE SERVICE

APPLICABLE: Entire Service Area

AVAILABILITY OF SERVICE: Available to commercial members and small power loads requiring transformer capacity of 50 KVA or less, single phase and commercial members requiring three phase service with 50 KVA or less of total transformer capacity all subject to the established rules and regulations of the Cooperative.

TYPE OF SERVICE: Single phase 120/240 volts and three phase service where available at available voltages.

RATES PER MONTH:

Member Cost of Service Charge	\$25.19	(I)
All KWH Charge	\$0.10893 per KWH	(I)

FUEL ADJUSTMENT CLAUSE: The above rate may be increased or decreased by an amount per KWH equal to the fuel adjustment amount per KWH as billed by the Wholesale Power Supplier plus an allowance for line losses. The allowance for line losses will not exceed 10% and is based on a twelve month moving average of such losses. This Fuel Clause is subject to all other applicable provisions as set out in 807 KAR 5:056.

MINIMUM CHARGE: The minimum monthly charge for service shall be \$25.19. (I)

DATE OF ISSUE August 1, 2025
DATE EFFECTIVE September 1, 2025

ISSUED BY _____
President & CEO

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. _____, Dated

FOR ENTIRE SERVICE AREA

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
19th Revision Sheet No. 24

CANCELING PSC KY NO. 10
18th Revision Sheet No. 24

CLASSIFICATION OF SERVICE

SCHEDULE 3 - LARGE POWER

APPLICABLE: Entire Service Area

AVAILABILITY OF SERVICE: Available to consumers located on or near Cooperatives three phase lines whose transformer capacity would be more than 50 KVA and the demand would be 99 kw or less. All subject to the established rules and regulations of the Cooperative.

TYPE OF SERVICE: Three phase 60 cycle at available voltages.

RATES PER MONTH:

Member Cost of Service Charge	\$38.33	(I)
-------------------------------	---------	-----

Demand Charge:

\$6.60 per kilowatt of billing demand per month (I)

Energy Charge:

\$0.08892 net per KWH

MINIMUM CHARGE: The computed minimum monthly charge shall be as specified in the contract for service.

DETERMINATION OF BILLING DEMAND: The billing demand shall be the maximum kilowatt demand established by the member for any period of fifteen consecutive minutes during the month for which the bill is rendered, as indicated or recorded by a demand meter and adjusted for power factor as follows:

POWER FACTOR ADJUSTMENT: The member agrees to maintain unity power factor as nearly as practicable. Power factor may be measured at any time. Should such measurements indicate that the power factor at the time of his maximum demand is less than 90%, the demand for billing purposes shall be the demand as indicated or recorded by the demand meter multiplied by 90% and divided by the percent power factor.

DATE OF ISSUE	<u>August 1, 2025</u>
DATE EFFECTIVE	<u>September 1, 2025</u>

ISSUED BY _____
President & CEO

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. _____, Dated _____

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
19th Revision Sheet No. 26

CANCELING PSC KY NO. 10
18th Revision Sheet No. 26

CLASSIFICATION OF SERVICE

SCHEDULE 4 - INDUSTRIAL

APPLICABLE: Entire Service Area

AVAILABILITY OF SERVICE: Available to Members located on or near Cooperatives three phase lines whose transformer capacity would be 1000 KVA or less and the demand would be 100 kw or more. All subject to the established rules and regulations of the Cooperative.

TYPE OF SERVICE: Three phase 60 cycle at available voltages.

RATES PER MONTH:

Member Cost of Service Charge: \$46.55 (I)

Demand Charge:

\$5.42 per kilowatt of billing demand per month (I)

Energy Charge:

\$0.07937 net per KWH (I)

MINIMUM CHARGE: The minimum monthly charge for service shall be the Member Cost of Service Charge.

DETERMINATION OF BILLING DEMAND: The billing demand shall be the maximum kilowatt demand established by the Member for any period of fifteen consecutive minutes during the month for which the bill is rendered, as indicated or recorded by a demand meter and adjusted for power factor as follows:

POWER FACTOR ADJUSTMENT: The member agrees to maintain unity power factor as nearly as practicable. Power factor may be measured at any time. Should such measurements indicate that the power factor at the time of his maximum demand is less than 90%, the demand for billing purposes shall be the demand as indicated or recorded by the demand meter multiplied by 90% and divided by the percent power factor.

DATE OF ISSUE August 1, 2025
DATE EFFECTIVE September 1, 2025

ISSUED BY _____
President & CEO

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. _____, Dated

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
23rd Revision Sheet No. 28

CANCELING PSC KY NO. 10
22nd Revision Sheet No. 28

CLASSIFICATION OF SERVICE

SCHEDULE 5 - SECURITY LIGHTS

APPLICABLE: Entire Service Area

AVAILABILITY OF SERVICE: Available to all Members of the Cooperative subject to the established rules and regulations of the Cooperative.

TYPES OF SERVICES AVAILABLE	PER MONTH CHARGE	
	PER UNIT	
H.P.S. 100 Watt on a twenty-five foot (25') pole or an existing pole	\$11.30	(I)
L.E.D. 70 Watt on a twenty-five foot (25') pole or an existing pole	\$10.63	(I)
Directional floodlight 100 Watt HPS to be mounted on existing pole	\$10.56	(I)
Directional floodlight 70 Watt L.E.D. to be mounted on existing pole	\$18.76	(I)
Directional floodlight 250 Watt HPS to be mounted on existing pole	\$17.15	(I)
Directional floodlight 108 Watt L.E.D. to be mounted on existing pole	\$19.76	(I)
Directional floodlight 400 Watt HPS to be mounted on existing pole	\$23.55	(I)
Directional floodlight 208 Watt L.E.D. to be mounted on existing pole	\$22.48	(I)
Colonial Type 100 Watt HPS with twenty-foot (20') fiberglass colonial post for underground service only	\$14.74	(I)
Contemporary Type 400 Watt HPS - for underground service only; to be used with the thirty-foot fiberglass pole - (charge does not include pole)	\$25.16	(I)
Thirty-foot (30') fiberglass pole; to be used with underground services only	\$10.63	
Twenty-five foot (25') wood pole for overhead services only - (charge does not include lighting fixture)	\$2.46	
Thirty-foot (30') wood pole for overhead services only - (charge does not include lighting fixture)	\$2.84	
Twenty-five foot (25') wood pole for underground services only - (charge does not include lighting fixture)	\$3.44	

DATE OF ISSUE August 1, 2025
DATE EFFECTIVE September 1, 2025

ISSUED BY _____
President & CEO

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. _____, Dated

Nolin RECC
 411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
 8th Revision Sheet No. 28.1

CANCELING PSC KY NO. 10
 7th Revision Sheet No. 28.1

CLASSIFICATION OF SERVICE

SCHEDULE 5 – SECURITY LIGHTS (cont.)

TYPES OF SERVICES AVAILABLE	PER MONTH CHARGE	
	PER UNIT	
Thirty-foot (30') wood pole for underground services only - (charge does not include lighting fixture)	\$3.83	
Acorn Contemporary Type 400 Watt HPS – for underground service only; to be used with the thirty (30') foot fiberglass pole – (Charge does not include pole.)	\$39.00	(I)
Santa Rosa Contemporary Type 150 Watt HPS – for underground service only; to be used with twenty (20') foot fluted pole	\$37.33	(I)
Santa Rosa Contemporary Type 150 Watt HPS – for underground service only; to be used with twenty (20') foot fluted pole – (charge does not include lighting fixture or pole)	\$9.75	(I)

- * All High Pressure Sodium fixtures will be phased out upon failure and replaced with LED. Upon replacement, the member will be responsible for the current LED rates, if applicable. Newly installed fixtures may be limited to LED as dictated by supply levels.

DATE OF ISSUE August 1, 2025
 DATE EFFECTIVE September 1, 2025

ISSUED BY _____
 President & CEO

Issued by authority of an Order of the Public Service Commission
 of Kentucky in Case No. _____, Dated.

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-8701

PSC KY NO. 10
17th Revision Sheet No. 32

CANCELING PSC KY NO. 10
16th -Revision Sheet No. 32

CLASSIFICATION OF SERVICE

SCHEDULE 7 - INDUSTRIAL

APPLICABLE: Entire Service Area - where three phase service is available at available voltages.

AVAILABILITY: Available to all commercial and industrial Members whose kilowatt demand shall exceed 500 kw for lighting and/or heating and/or power, and whose demand charges will track the wholesale power suppliers.

TYPE OF SERVICE: Three phase 60 hertz at 12,470 volts, primary service as agreed to in the special five year Agreement for Service.

RATES PER MONTH:

Demand Charge:

\$9.95 per kilowatt of billing demand per month (I)

Energy Charge:

All KWH at \$0.07286 net per KWH (I)

MINIMUM CHARGE: The computed minimum monthly charge shall be as specified in the Special Contract for service.

DETERMINATION OF BILLING DEMAND: The billing demand shall be the maximum kilowatt demand established by the Member for any period of fifteen consecutive minutes during the month for which the bill is rendered, as indicated or recorded by a demand meter and adjusted for power factor as follows:

POWER FACTOR ADJUSTMENT: The member agrees to maintain unity power factor as nearly as practicable. Power factor may be measured at any time. Should such measurements indicate that the power factor at the time of his maximum demand is less than 90%, the demand for billing purposes shall be the demand as indicated or recorded by the demand meter multiplied by 90% and divided by the percent power factor.

DATE OF ISSUE August 1, 2025
DATE EFFECTIVE September 1, 2025

ISSUED BY _____
President & CEO

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. _____, Dated

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
17th Revision Sheet No. 36

CANCELING PSC KY NO. 10
16th-Revision Sheet No. 36

CLASSIFICATION OF SERVICE

SCHEDULE 9 - INDUSTRIAL

APPLICABLE: Entire Service Area - Applicable to contracts with contract demands of 1,000 to 4,999 kW with a monthly energy usage equal to or greater than 425 hours per kW of contract demand.

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

RATES PER MONTH:

Consumer Charge:

\$1,237.38 where the industrial consumer demands and/or location requires construction of a substation.

\$689.97 where the industrial consumer's demand or location permits service from an existing substation.

(I)

Demand Charge: \$6.94 per kW of contract demand
\$10.09 per kW for all billing demand in excess of contract demand

(I)

(I)

Energy Charge: \$0.07246 per kWh

(I)

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. 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>Months</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 August 1, 2025
DATE EFFECTIVE September 1, 2025

ISSUED BY _____
President & CEO

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. _____, Dated

Strike Through Tariffs

P.S.C. KY No. ~~10~~ 11

Cancels P.S.C. KY No. ~~9~~ 10

NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION
OF

411 RING ROAD
ELIZABETHTOWN, KENTUCKY 42701

(N)

nolinrecc.com

(N)

RATES, RULES AND REGULATIONS FOR FURNISHING

ELECTRICITY

AT

HARDIN, HART, LARUE, GRAYSON, TAYLOR AND GREEN COUNTIES

FILED WITH PUBLIC SERVICE COMMISSION OF KENTUCKY

ISSUED ~~JULY 24, 1992~~
~~AUGUST 1, 2025~~

EFFECTIVE ~~AUGUST 15, 1992~~
~~September 1, 2025~~

ISSUED BY NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION

BY

Michael

~~MICHAEL L. MILLER~~
~~GENERAL MANAGER~~

Greg Lee

PSC KY NO. 10
~~20th~~ ~~19th~~ Revision Sheet No. 20

CANCELING PSC KY NO. 10
~~19th~~ ~~18th~~ Revision Sheet No. 20

PSC KY NO. 10
~~20th~~ ~~19th~~ Revision Sheet No. 20

CANCELING PSC KY NO. 10
~~19th~~ ~~18th~~ Revision Sheet No. 20

SCHEDULE 1 - RESIDENTIAL, FARM, NON-FARM, TRAILERS AND MOBILE HOMES

AVAILABILITY OF SERVICE: Available to all residents for uses in the home or on the farm including trailers, mobile homes, schools, churches, community halls and non-profit community welfare institutions where the required total transformer capacity is 50 KVA or less, single or three phase.

RATES PER MONTH:

All KWH Charge	\$0.10364 \$0.10956 per KWH	(I)
----------------	--	-----

MINIMUM CHARGE: The minimum monthly charge for service shall be ~~\$13.99~~ \$14.79. (I)

ISSUED BY _____
President & CEO

FOR ENTIRE SERVICE AREA

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
~~20th 19th~~ Revision Sheet No. 22

CANCELING PSC KY NO. 10
~~19th 18th~~ Revision Sheet No. 22

CLASSIFICATION OF SERVICE

SCHEDULE 2 - COMMERCIAL, SMALL POWER, SINGLE PHASE AND THREE PHASE SERVICE

APPLICABLE: Entire Service Area

AVAILABILITY OF SERVICE: Available to commercial members and small power loads requiring transformer capacity of 50 KVA or less, single phase and commercial members requiring three phase service with 50 KVA or less of total transformer capacity all subject to the established rules and regulations of the Cooperative.

TYPE OF SERVICE: Single phase 120/240 volts and three phase service where available at available voltages.

RATES PER MONTH:

Member Cost of Service Charge ~~\$23.83~~ \$25.19 (I)

All KWH Charge ~~\$0.10304~~ \$0.10893 per KWH (I)

FUEL ADJUSTMENT CLAUSE: The above rate may be increased or decreased by an amount per KWH equal to the fuel adjustment amount per KWH as billed by the Wholesale Power Supplier plus an allowance for line losses. The allowance for line losses will not exceed 10% and is based on a twelve month moving average of such losses. This Fuel Clause is subject to all other applicable provisions as set out in 807 KAR 5:056.

MINIMUM CHARGE: The minimum monthly charge for service shall be ~~\$23.83~~ \$25.19. (I)

DATE OF ISSUE ~~September 18, 2024~~ August 1,
2025

DATE EFFECTIVE ~~September 1, 2024~~ September
1, 2025

ISSUED BY _____
President & CEO

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. ~~2023-00014~~, Dated ~~August 30, 2024~~.

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
~~19th~~ ~~18th~~ Revision Sheet No. 24

CANCELING PSC KY NO. 10
~~18th~~ ~~17th~~ Revision Sheet No. 24

CLASSIFICATION OF SERVICE

SCHEDULE 3 - LARGE POWER

APPLICABLE: Entire Service Area

AVAILABILITY OF SERVICE: Available to consumers located on or near Cooperatives three phase lines whose transformer capacity would be more than 50 KVA and the demand would be 99 kw or less. All subject to the established rules and regulations of the Cooperative.

TYPE OF SERVICE: Three phase 60 cycle at available voltages.

RATES PER MONTH:

Member Cost of Service Charge ~~\$36.26~~ \$38.33 (I)

Demand Charge:

~~\$6.24~~ \$6.60 per kilowatt of billing demand per month (I)

Energy Charge:

~~\$0.08411~~ \$0.08892 net per KWH

MINIMUM CHARGE: The computed minimum monthly charge shall be as specified in the contract for service.

DETERMINATION OF BILLING DEMAND: The billing demand shall be the maximum kilowatt demand established by the member for any period of fifteen consecutive minutes during the month for which the bill is rendered, as indicated or recorded by a demand meter and adjusted for power factor as follows:

POWER FACTOR ADJUSTMENT: The member agrees to maintain unity power factor as nearly as practicable. Power factor may be measured at any time. Should such measurements indicate that the power factor at the time of his maximum demand is less than 90%, the demand for billing purposes shall be the demand as indicated or recorded by the demand meter multiplied by 90% and divided by the percent power factor.

DATE OF ISSUE ~~September 18, 2024~~ August 1, 2025

DATE EFFECTIVE ~~September 1, 2024~~ September 1, 2025

ISSUED BY _____
President & CEO

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
~~19th~~ ~~48th~~ Revision Sheet No. 26

CANCELING PSC KY NO. 10
~~18th~~ ~~47th~~ Revision Sheet No. 26

CLASSIFICATION OF SERVICE

SCHEDULE 4 - INDUSTRIAL

APPLICABLE: Entire Service Area

AVAILABILITY OF SERVICE: Available to Members located on or near Cooperatives three phase lines whose transformer capacity would be 1000 KVA or less and the demand would be 100 kw or more. All subject to the established rules and regulations of the Cooperative.

TYPE OF SERVICE: Three phase 60 cycle at available voltages.

RATES PER MONTH:

Member Cost of Service Charge: ~~\$44.03~~ \$46.55 (I)

Demand Charge:

~~\$5.13~~ \$5.42 per kilowatt of billing demand per month (I)

Energy Charge:

~~\$0.07508~~ \$0.07937 net per KWH (I)

MINIMUM CHARGE: The minimum monthly charge for service shall be the Member Cost of Service Charge.

DETERMINATION OF BILLING DEMAND: The billing demand shall be the maximum kilowatt demand established by the Member for any period of fifteen consecutive minutes during the month for which the bill is rendered, as indicated or recorded by a demand meter and adjusted for power factor as follows:

POWER FACTOR ADJUSTMENT: The member agrees to maintain unity power factor as nearly as practicable. Power factor may be measured at any time. Should such measurements indicate that the power factor at the time of his maximum demand is less than 90%, the demand for billing purposes shall be the demand as indicated or recorded by the demand meter multiplied by 90% and divided by the percent power factor.

DATE OF ISSUE ~~September 18, 2024~~ August 1, 2025

DATE EFFECTIVE ~~September 1, 2024~~ September 1, 2025

ISSUED BY _____
President & CEO

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. ~~2023-00014~~, Dated ~~August 30, 2024~~.

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
~~23rd~~ ~~22nd~~ Revision Sheet No. 28

CANCELING PSC KY NO. 10
~~22nd~~ ~~21st~~ Revision Sheet No. 28

CLASSIFICATION OF SERVICE

SCHEDULE 5 - SECURITY LIGHTS

APPLICABLE: Entire Service Area

AVAILABILITY OF SERVICE: Available to all Members of the Cooperative subject to the established rules and regulations of the Cooperative.

TYPES OF SERVICES AVAILABLE	PER MONTH CHARGE	
	PER UNIT	
H.P.S. 100 Watt on a twenty-five foot (25') pole or an existing pole	\$10.69 \$11.30	(I)
L.E.D. 70 Watt on a twenty-five foot (25') pole or an existing pole	\$10.06 \$10.63	(I)
Directional floodlight 100 Watt HPS to be mounted on existing pole	\$9.99 \$10.56	(I)
Directional floodlight 70 Watt L.E.D. to be mounted on existing pole	\$17.75 \$18.76	(I)
Directional floodlight 250 Watt HPS to be mounted on existing pole	\$16.22 \$17.15	(I)
Directional floodlight 108 Watt L.E.D. to be mounted on existing pole	\$18.69 \$19.76	(I)
Directional floodlight 400 Watt HPS to be mounted on existing pole	\$22.28 \$23.55	(I)
Directional floodlight 208 Watt L.E.D. to be mounted on existing pole	\$21.26 \$22.48	(I)
Colonial Type 100 Watt HPS with twenty-foot (20') fiberglass colonial post for underground service only	\$13.94 \$14.74	(I)
Contemporary Type 400 Watt HPS - for underground service only; to be used with the thirty-foot fiberglass pole - (charge does not include pole)	\$23.80 \$25.16	(I)
Thirty-foot (30') fiberglass pole; to be used with underground services only	\$10.63	
Twenty-five foot (25') wood pole for overhead services only - (charge does not include lighting fixture)	\$2.46	
Thirty-foot (30') wood pole for overhead services only - (charge does not include lighting fixture)	\$2.84	
Twenty-five foot (25') wood pole for underground services only - (charge does not include lighting fixture)	\$3.44	

DATE OF ISSUE ~~September 18, 2024~~ August 1, 2025

DATE EFFECTIVE ~~September 1, 2024~~ September 1, 2025

ISSUED BY _____
President & CEO

Nolin RECC
 411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
~~8th~~ 7th Revision Sheet No. 28.1

CANCELING PSC KY NO. 10
 7th ~~6th~~ Revision Sheet No. 28.1

CLASSIFICATION OF SERVICE

SCHEDULE 5 – SECURITY LIGHTS (cont.)

TYPES OF SERVICES AVAILABLE	PER MONTH CHARGE	
	PER UNIT	
Thirty-foot (30') wood pole for underground services only - (charge does not include lighting fixture)	\$3.83	
Acorn Contemporary Type 400 Watt HPS – for underground service only; to be used with the thirty (30') foot fiberglass pole – (Charge does not include pole.)	\$36.89 \$39.00	(I)
Santa Rosa Contemporary Type 150 Watt HPS – for underground service only; to be used with twenty (20') foot fluted pole	\$35.34 \$37.33	(I)
Santa Rosa Contemporary Type 150 Watt HPS – for underground service only; to be used with twenty (20') foot fluted pole – (charge does not include lighting fixture or pole)	\$9.75	(I)

- * All High Pressure Sodium fixtures will be phased out upon failure and replaced with LED. Upon replacement, the member will be responsible for the current LED rates, if applicable. Newly installed fixtures may be limited to LED as dictated by supply levels.

DATE OF ISSUE ~~September 18, 2024~~ August 1, 2025
 DATE EFFECTIVE ~~September 1, 2024~~ September 1, 2025

ISSUED BY _____
 President & CEO

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-8701

PSC KY NO. 10
~~17th~~ ~~16th~~ Revision Sheet No. 32

CANCELING PSC KY NO. 10
~~16th~~ ~~15th~~ Revision Sheet No. 32

CLASSIFICATION OF SERVICE

SCHEDULE 7 - INDUSTRIAL

APPLICABLE: Entire Service Area - where three phase service is available at available voltages.

AVAILABILITY: Available to all commercial and industrial Members whose kilowatt demand shall exceed 500 kw for lighting and/or heating and/or power, and whose demand charges will track the wholesale power suppliers.

TYPE OF SERVICE: Three phase 60 hertz at 12,470 volts, primary service as agreed to in the special five year Agreement for Service.

RATES PER MONTH:

Demand Charge:

~~\$9.36~~ \$9.95 per kilowatt of billing demand per month (I)

Energy Charge:

All KWH at ~~\$0.06855~~ \$0.07286 net per KWH (I)

MINIMUM CHARGE: The computed minimum monthly charge shall be as specified in the Special Contract for service.

DETERMINATION OF BILLING DEMAND: The billing demand shall be the maximum kilowatt demand established by the Member for any period of fifteen consecutive minutes during the month for which the bill is rendered, as indicated or recorded by a demand meter and adjusted for power factor as follows:

POWER FACTOR ADJUSTMENT: The member agrees to maintain unity power factor as nearly as practicable. Power factor may be measured at any time. Should such measurements indicate that the power factor at the time of his maximum demand is less than 90%, the demand for billing purposes shall be the demand as indicated or recorded by the demand meter multiplied by 90% and divided by the percent power factor.

DATE OF ISSUE ~~September 18, 2024~~ August 1,
2025

DATE EFFECTIVE ~~September 1, 2024~~ September
1, 2025

ISSUED BY _____
President & CEO

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. ~~2023-00014~~, Dated ~~August 30, 2024~~.

Nolin RECC
411 Ring Road
Elizabethtown, KY 42701-6767

PSC KY NO. 10
~~17th~~ ~~16th~~ Revision Sheet No. 36

CANCELING PSC KY NO. 10
~~16th~~ ~~15th~~-Revision Sheet No. 36

CLASSIFICATION OF SERVICE

SCHEDULE 9 - INDUSTRIAL

APPLICABLE: Entire Service Area - Applicable to contracts with contract demands of 1,000 to 4,999 kW with a monthly energy usage equal to or greater than 425 hours per kW of contract demand.

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

RATES PER MONTH:

Consumer Charge:

\$1,237.38 where the industrial consumer demands and/or location requires construction of a substation.

~~\$632.50~~ ~~\$689.97~~ where the industrial consumer's demand or location permits service from an existing substation. (I)

Demand Charge: ~~\$6.36~~ ~~\$6.94~~ per kW of contract demand (I)
~~\$9.25~~ ~~\$10.09~~ per kW for all billing demand in excess of contract demand (I)

Energy Charge: ~~\$0.06642~~ ~~\$0.07246~~ per kWh (I)

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. 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>Months</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 ~~September 18, 2024~~ August 1, 2025

DATE EFFECTIVE ~~September 1, 2024~~ September 1, 2025

ISSUED BY _____
President & CEO

Issued by authority of an Order of the Public Service Commission of Kentucky in Case No. ~~2023-00014~~, Dated ~~August 30, 2024~~.

Exhibit 3

Comparison of the Current and Proposed Rates

NOLIN RECC
Present & Proposed Rates

Rate	Item	Present	Proposed
1	<u>Residential</u>		
	Customer Charge	\$ 13.99	\$ 14.79
	Energy Charge per kWh	\$ 0.10364	\$ 0.10956
2	<u>Commercial</u>		
	Customer Charge	\$ 23.83	\$ 25.19
	Energy Charge per kWh	\$ 0.10304	\$ 0.10893
3	<u>Large Power</u>		
	Customer Charge	\$ 36.26	\$ 38.33
	Demand Charge per kW	\$ 6.24	\$ 6.60
	Energy Charge per kWh	\$ 0.08411	\$ 0.08892
4	<u>Industrial</u>		
	Customer Charge	\$ 44.03	\$ 46.55
	Energy Charge per kWh	\$ 0.07508	\$ 0.07937
	Demand Charge over 10 KW per kW	\$ 5.13	\$ 5.42
9	<u>Industrial</u>		
	Customer Charge	\$ 632.50	\$ 689.97
	Demand Charge -Contract per kW	\$ 6.36	\$ 6.94
	Demand Charge - Excess per kW	\$ 9.25	\$ 10.09
	Energy Charge per kWh	\$ 0.06642	\$ 0.07246
5,6	<u>Lighting</u>		
	1 - SL 100W HPS	\$ 10.69	\$ 11.30
	1A - SL 70W LED	\$ 10.06	\$ 10.63
	1B - SL 55W LED	\$ 9.99	\$ 10.56
	12A - DFL 70 W LED EP	\$ 17.75	\$ 18.76
	13 - DFL 250 W HPS EP	\$ 16.22	\$ 17.15
	13A - DFL 108 W LED EP	\$ 18.69	\$ 19.76
	13B - DFL 109 W LED EP	\$ 18.70	\$ 19.77
	14 - DFL 400 W HPS EP	\$ 22.28	\$ 23.55
	14A - DFL 208 W LED EP	\$ 21.26	\$ 22.48
	14B - DFL 202 W LED EP	\$ 21.23	\$ 22.44
	15 - DEL 400 W CONTEMPARY UG	\$ 23.80	\$ 25.16
	21 - COLONIAL 20' FLUTED POLE	\$ 36.73	\$ 38.83
	21 A- COLONIAL 20' FLUTED POLE 35-70 W LED	\$ 34.80	\$ 36.79
	22 - SL ORN UG 400W20' FLUTED POLE	\$ 36.89	\$ 39.00
	23 - 20 FT FP COLONIAL	\$ 35.31	\$ 37.33
	25 - COLONIAL CONSTPDHPS FIXTURE	\$ 10.28	\$ 10.87
Special	<u>AGC Automotive</u>		
	Customer Charge	\$ 5,726.70	\$ 6,127.60
	Demand Charge per kW	\$ 7.30	\$ 9.14
	Interruptible Credit per kW	\$ (5.60)	\$ (5.60)
	Energy Charge per kWh	\$ 0.05129	\$ 0.05464
7	<u>Industrial</u>		
	Demand Charge per kW	\$ 9.36	\$ 9.95
	Energy Charge per kWh	\$ 0.06855	\$ 0.07286
8	<u>Seasonal TOD</u>		
	Demand Charge per kW	\$ 9.25	\$ 9.83
	Energy Charge per kWh	\$ 0.06855	\$ 0.07286
10	<u>Industrial</u>		
	Member Cost of Service Charge	\$ 1,263.40	\$ 1,342.87
	Demand Charge -Contract per kW	\$ 7.43	\$ 7.90
	Demand Charge - Excess per kW	\$ 10.34	\$ 10.99
	Energy Charge per kWh	\$ 0.05901	\$ 0.06272
11	<u>Industrial</u>		
	Consumer Charge	\$ 1,263.24	\$ 1,378.09
	Demand - Contract per kW	\$ 6.36	\$ 6.94
	Demand - Excess per kW	\$ 9.25	\$ 10.09
	Energy Charge per kWh	\$ 0.05931	\$ 0.06470

NOLIN RECC
Present & Proposed Rates

Rate		Item		Present	Proposed
12	<u>Industrial C</u>				
		Consumer Charge New Substation	\$	1,263.24	\$ 1,378.09
		Consumer Charge Existing Sub	\$	632.20	\$ 689.10
		Demand - Contract per kW	\$	6.36	\$ 6.94
		Energy Charge per kWh	\$	0.06640	\$ 0.07238
13	<u>Industrial C</u>				
		Customer Charge	\$	1,263.24	\$ 1,376.93
		Demand Charge per kW	\$	6.36	\$ 6.94
		Energy Charge per kWh	\$	0.06049	\$ 0.06593
14	<u>Industrial C</u>				
		Customer Charge	\$	1,263.24	\$ 1,376.93
		Demand Charge per kW	\$	6.36	\$ 6.94
		Energy Charge per kWh	\$	0.05931	\$ 0.06465

Exhibit 4

Billing Analysis for Each Rate Class

NOLIN RECC
Billing Analysis for Pass-Through Rate Increase

Total Revenue Increase Allocated by East Kentucky Power Cooperative:	\$4,365,954
Total Rate G Revenue Increase Allocated by East Kentucky Power Cooperative:	\$757,859
Total Rate B Revenue Increase Allocated by East Kentucky Power Cooperative:	\$80,425
Remaining Revenue Increase Allocated by East Kentucky Power Cooperative:	\$3,527,671

#	Item	Code	Present Revenue	Present Share	Allocation Revenue	Allocation Share	Allocated Increase	Proposed Revenue	Proposed Share	Base Rate Increase	Base %	Total %	Rounding
1	<u>Base Rates</u>												
2	Residential	1	\$ 48,372,119	78.37%	\$ 48,372,119	78.37%	\$ 2,764,696	\$ 51,137,172	78.37%	\$ 2,765,053	5.72%	5.10%	\$ 357
3	Commercial	2	\$ 4,204,380	6.81%	\$ 4,204,380	6.81%	\$ 240,300	\$ 4,444,623	6.81%	\$ 240,242	5.71%	5.11%	\$ (58)
4	Large Power	3	\$ 1,892,409	3.07%	\$ 1,892,409	3.07%	\$ 108,160	\$ 2,000,760	3.07%	\$ 108,352	5.73%	5.17%	\$ 191
5	Industrial	4	\$ 5,923,908	9.60%	\$ 5,923,908	9.60%	\$ 338,579	\$ 6,261,832	9.60%	\$ 337,925	5.70%	5.16%	\$ (655)
6	Lighting	5,6	\$ 1,328,592	2.15%	\$ 1,328,592	2.15%	\$ 75,935	\$ 1,404,292	2.15%	\$ 75,700	5.70%	5.21%	\$ (236)
7	SubTotal Base Rates		\$ 61,721,407	100.00%	\$ 61,721,407	100.00%	\$ 3,527,671	\$ 65,248,679	100.00%	\$ 3,527,271	5.71%		\$ (399)
8													
9	AGC Automotive	Special	\$ 6,794,436	100.00%	\$ 80,425	100.00%	\$ 757,859	\$ 7,552,295	100.00%	\$ 757,859	11.15%	9.98%	\$ -
10	Industrial	9	\$ 885,194	100.00%	\$ 885,194	100.00%	\$ 80,425	\$ 965,675	100.00%	\$ 80,481	9.09%	8.07%	\$ 56
11													
12	TOTAL Base Rates		\$ 69,401,037		\$ 62,687,026		\$ 4,365,954	\$ 73,766,648		\$ 4,365,611	6.29%		\$ (343)
13													
14	<u>Riders</u>												
15	FAC		\$ (394,938)				\$ (394,938)						
16	ES		\$ 8,489,847				\$ 8,489,847						
17	Prepay Daily Charges		\$ 82,696				\$ 82,696						
18	Other		\$ -				\$ -						
19	Total Riders		\$ 8,177,605				\$ 8,177,605						
20													
21	Total Revenue		\$ 77,578,642				\$ 81,944,253			\$ 4,365,611		5.63%	
22	Target Revenue									\$ 4,365,954			
23	Rate Rounding Variance									\$ (343)			
24	Rate Rounding Variance									-0.01%			

#	Classification	Code	Billing Component	Billing Units	Present Rate	Present Revenue	Target Share	Target Revenue	Proposed Rate	Proposed Revenue	Increase \$	%	Proposed Share	Share Variance	Rate Variance
1	Residential	1													
2			Customer Charge	387,556	13.99	\$ 5,421,908	11.21%		14.79	\$ 5,731,953	\$ 310,045	5.72%	11.21%	0.00%	
3			Energy Charge per kWh	414,417,312	0.10364	\$ 42,950,210	88.79%		0.10956	\$ 45,405,218	\$ 2,455,008	5.72%	88.79%	0.00%	
4			Total Base Rates			\$ 48,372,119	100.00%	\$ 51,136,814		\$ 51,137,172	\$ 2,765,053	5.72%	100.00%	0.00%	\$ 357.28
5			FAC			\$ (218,697)				\$ (218,697)	\$ -	-			
6			ES			\$ 5,949,552				\$ 5,949,552	\$ -	-			
7			Prepay Daily Charges	26,142		\$ 82,696				\$ 82,696	\$ -	-			
8			Other			\$ -				\$ -	\$ -	-			
9			Total Riders			\$ 5,813,551				\$ 5,813,551	\$ -	-			
10			TOTAL REVENUE			\$ 54,185,669				\$ 56,950,722	\$ 2,765,053	5.10%			
11			Average	1,069.31		\$ 139.81				\$ 146.95	\$ 7.13	5.10%			
12	Commercial	2													
13			Customer Charge	25,036	23.83	\$ 596,608	14.19%		25.19	\$ 630,657	\$ 34,049	5.71%	14.19%	0.00%	
14			Energy Charge per kWh	35,013,320	0.10304	\$ 3,607,772	85.81%		0.10893	\$ 3,813,966	\$ 206,193	5.72%	85.81%	0.00%	
15			Total Base Rates			\$ 4,204,380	100.00%	\$ 4,444,681		\$ 4,444,623	\$ 240,242	5.71%	100.00%	0.00%	\$ (57.85)
16			FAC			\$ 6,175				\$ 6,175	\$ -	-			
17			ES			\$ 486,805				\$ 486,805	\$ -	-			
18			Misc Adj			\$ -				\$ -	\$ -	-			
19			Other			\$ -				\$ -	\$ -	-			
20			Total Riders			\$ 492,980				\$ 492,980	\$ -	-			
21			TOTAL REVENUE			\$ 4,697,360				\$ 4,937,603	\$ 240,242	5.11%			
22			Average	1,398.52		\$ 187.62				\$ 197.22	\$ 9.60	5.11%			
23	Large Power	3													
24			Customer Charge	1,089	36.26	\$ 39,487	2.09%		38.33	\$ 41,741	\$ 2,254	5.71%	2.09%	0.00%	
25			Demand Charge per kW	59,350	6.24	\$ 370,344	19.57%		6.60	\$ 391,710	\$ 21,366	5.77%	19.58%	0.01%	
26			Energy Charge per kWh	17,626,651	0.08411	\$ 1,482,578	78.34%		0.08892	\$ 1,567,309	\$ 84,731	5.72%	78.34%	-0.01%	
27			Total Base Rates			\$ 1,892,409	100.00%	\$ 2,000,569		\$ 2,000,760	\$ 108,352	5.73%	100.00%	0.00%	\$ 191.42
28			FAC			\$ (10,975)				\$ (10,975)	\$ -	-			
29			ES			\$ 215,601				\$ 215,601	\$ -	-			
30			Misc Adj			\$ -				\$ -	\$ -	-			
31			Other			\$ -				\$ -	\$ -	-			
32			Total Riders			\$ 204,626				\$ 204,626	\$ -	-			
33			TOTAL REVENUE			\$ 2,097,034				\$ 2,205,386	\$ 108,352	5.17%			
34			Average	16,186.09		\$ 1,925.65				\$ 2,025.15	\$ 99.50	5.17%			

NOLIN RECC
Billing Analysis for Pass-Through Rate Increase

64

NOLIN RECC
Billing Analysis for Pass-Through Rate Increase

#	Classification	Code	Billing Component	Billing Units	Present Rate	Present Revenue	Target Share	Target Revenue	Proposed Rate	Proposed Revenue	Increase \$	%	Proposed Share	Share Variance	Rate Variance
65	Lighting	5,6													
66		1 - SL 100W HPS		18,082	10.69 \$	193,297	14.55%		11.30 \$	204,327 \$	11,030	5.71%	14.55%	0.00%	
67		1A - SL 70W LED		41,843	10.06 \$	420,941	31.68%		10.63 \$	444,791 \$	23,851	5.67%	31.67%	-0.01%	
68		1B - SL 55W LED		21,277	9.99 \$	212,557	16.00%		10.56 \$	224,685 \$	12,128	5.71%	16.00%	0.00%	
69		4 - SL CITY WE 100 W		8,644	10.93 \$	94,479	7.11%		11.55 \$	99,838 \$	5,359	5.67%	7.11%	0.00%	
70		4A - SL CITY 70 W LED		9,665	10.59 \$	102,352	7.70%		11.20 \$	108,248 \$	5,896	5.76%	7.71%	0.00%	
71		4B - SL CITY 55 W LED		2,118	10.52 \$	22,281	1.68%		11.12 \$	23,552 \$	1,271	5.70%	1.68%	0.00%	
72		5 - SL CITY WP 250 W		513	16.80 \$	8,618	0.65%		17.76 \$	9,111 \$	492	5.71%	0.65%	0.00%	
73		5A - WP 108 W LED		57	12.42 \$	708	0.05%		13.13 \$	748 \$	40	5.72%	0.05%	0.00%	
74		5B - WE 109 W LED		-	12.43 \$	-	0.00%		13.14 \$	- \$	-	0.00%	0.00%	0.00%	
75		6 - SL 400 W HPS		454	22.25 \$	10,102	0.76%		23.52 \$	10,678 \$	577	5.71%	0.76%	0.00%	
76		6A - SL 208 W LED		141	18.11 \$	2,554	0.19%		19.15 \$	2,700 \$	147	5.74%	0.19%	0.00%	
77		6B - 202 W LED		-	18.08 \$	-	0.00%		19.11 \$	- \$	-	0.00%	0.00%	0.00%	
78		7 - LT COLONIAL 100 W UG		2,798	13.94 \$	39,004	2.94%		14.74 \$	41,243 \$	2,238	5.74%	2.94%	0.00%	
79		7A - LANT COLONIAL 100 W LED		982	10.39 \$	10,203	0.77%		10.98 \$	10,782 \$	579	5.68%	0.77%	0.00%	
80		7B - LANT COLONIAL 100 WEQ LED UG CONST		831	13.62 \$	11,318	0.85%		14.40 \$	11,966 \$	648	5.73%	0.85%	0.00%	
81		7C - LANT COLONIAL 100 WEQ LED UG CONST		1,489	10.07										
82		8 - SL ORN UG 400 W		755	39.14 \$	29,551	2.22%		41.38 \$	31,242 \$	1,691	5.72%	2.22%	0.00%	
83		8A - SL ORN UG 400W		661	37.76										
84		10 - SL ORN A-POLE27,500 HPS		408	29.21 \$	11,918	0.90%		30.88 \$	12,599 \$	681	5.72%	0.90%	0.00%	
85		11 - SL ORNMENATLA-POLE50,000 HPS		276	33.81 \$	9,332	0.70%		35.74 \$	9,864 \$	533	5.71%	0.70%	0.00%	
86		11A - SL ORN AP LED 400WEQ		48	32.42										
87		12 - DFL 100 W HPS EP		609	9.54 \$	5,810	0.44%		10.09 \$	6,145 \$	335	5.77%	0.44%	0.00%	
88		12A - DFL 70 W LED EP		220	17.75 \$	3,905	0.29%		18.76 \$	4,127 \$	222	5.69%	0.29%	0.00%	
89		13 - DFL 250 W HPS EP		1,237	16.22 \$	20,064	1.51%		17.15 \$	21,215 \$	1,150	5.73%	1.51%	0.00%	
90		13A - DFL 108 W LED EP		368	18.69 \$	6,878	0.52%		19.76 \$	7,272 \$	394	5.72%	0.52%	0.00%	
91		13B - DFL 109 W LED EP		103	18.70 \$	1,926	0.14%		19.77 \$	2,036 \$	110	5.72%	0.15%	0.00%	
92		14 - DFL 400 W HPS EP		1,939	22.28 \$	43,201	3.25%		23.55 \$	45,663 \$	2,463	5.70%	3.25%	0.00%	
93		14A - DFL 208 W LED EP		410	21.26 \$	8,717	0.66%		22.48 \$	9,217 \$	500	5.74%	0.66%	0.00%	
94		14B - DFL 202 W LED EP		1,145	21.23 \$	24,308	1.83%		22.44 \$	25,694 \$	1,385	5.70%	1.83%	0.00%	
95		15 - DEL 400 W CONTEMPARY UG		60	23.80 \$	1,428	0.11%		25.16 \$	1,510 \$	82	5.71%	0.11%	0.00%	
96		21 - COLONIAL 20' FLUTED POLE		60	36.73 \$	2,204	0.17%		38.83 \$	2,330 \$	126	5.72%	0.17%	0.00%	
97		21 A- COLONIAL 20' FLUTED POLE 35-70 W LEI		324	34.80 \$	11,275	0.85%		36.79 \$	11,920 \$	645	5.72%	0.85%	0.00%	
98		22 - SL ORN UG 400W20' FLUTED POLE		12	36.89 \$	443	0.03%		39.00 \$	468 \$	25	5.72%	0.03%	0.00%	
99		23 - 20 FT FP COLONIAL		351	35.31 \$	12,394	0.93%		37.33 \$	13,103 \$	709	5.72%	0.93%	0.00%	
100		23A - 20 FT FP COLONIAL SANTA ROSA		45	34.80										
101		25 - COLONIAL CONSTPDHPS FIXTURE		664	10.28 \$	6,826	0.51%		10.87 \$	7,218 \$	392	5.74%	0.51%	0.00%	
102		25A - COLONIAL CONST PD 20 F9 35070 W LE		73	8.35										
103		Total Base Rates			\$	1,328,592	100.00%	\$ 1,404,527		\$ 1,404,292	\$ 75,700	5.70%	100.00%	0.00%	\$ (235.63)
104		FAC			\$	71,260			\$	71,260	\$ -	-			
105		ES			\$	53,101			\$	53,101	\$ -	-			
106		Misc Adj			\$	-			\$	-	\$ -	-			
107		Other													
108		Total Riders			\$	124,361			\$	124,361	\$ -	-			
109		TOTAL REVENUE			\$	1,452,953			\$	1,528,653	\$ 75,700	5.21%			

110

NOLIN RECC
Billing Analysis for Pass-Through Rate Increase

#	Classification	Code	Billing Component	Billing Units	Present Rate	Present Revenue	Target Share	Target Revenue	Proposed Rate	Proposed Revenue	Increase \$	%	Proposed Share	Share Variance	Rate Variance
111	AGC Automotive	Special													
112			Customer Charge	12	5,726.70	\$ 68,720	1.01%		6,127.60	\$ 73,531	\$ 4,811	7.00%	0.97%	-0.04%	
113			Demand Charge per kW	199,289	7.30	\$ 1,454,810	21.41%		9.14	\$ 1,821,501	\$ 366,692	25.21%	24.12%	2.71%	
114			Interruptible Credit per kW	115,289	(5.60)	\$ (645,618)	-9.50%		(5.60)	\$ (645,618)	\$ -	0.00%	-8.55%	0.95%	
115			Energy Charge per kWh	115,354,350	0.05129	\$ 5,916,525	87.08%		0.054639	\$ 6,302,881	\$ 386,356	6.53%	83.46%	-3.62%	
116			Total Base Rates			\$ 6,794,436	100.00%	\$ 7,552,295		\$ 7,552,295	\$ 757,859	11.15%	100.00%	0.00%	\$ -
117			FAC			\$ (199,307)				\$ (199,307)	\$ -	-			
118			ES			\$ 998,222				\$ 998,222	\$ -	-			
119			Misc Adj			\$ -				\$ -	\$ -	-			
120			Other			\$ -				\$ -	\$ -	-			
121			Total Riders			\$ 798,915				\$ 798,915	\$ -	-			
122			TOTAL REVENUE			\$ 7,593,351				\$ 8,351,210	\$ 757,859	9.98%			
123				9,612,862.50		\$ 632,779.25				\$ 695,934.13	\$ 63,154.88				
124															
125															
126															
127	TOTALS		Total Base Rates			\$ 69,401,037				\$ 73,766,648	\$ 4,365,611	6.29%			
128			FAC			\$ (394,938)				\$ (394,938)	\$ -	-			
129			ES			\$ 8,489,847				\$ 8,489,847	\$ -	-			
130			Misc Adj			\$ 82,696				\$ 82,696	\$ -	-			
131			Other			\$ -				\$ -	\$ -	-			
132			Total Riders			\$ 8,177,605				\$ 8,177,605	\$ -	-			
133			TOTAL REVENUE			\$ 77,578,642				\$ 81,944,253	\$ 4,365,611	5.63%			
134															
135			Rate Rounding Variance							\$ (343)					
136															
137	RATES WITH NO CURRENT MEMBERS														
138															
139	Industrial	7													
140			Demand Charge per kW			9.36				9.95					
141			Energy Charge per kWh			0.06855				0.07286					
142	Seasonal TOD	8													
143			Demand Charge per kW			9.25				9.83					
144			Energy Charge per kWh			0.06855				0.07286					
145	Industrial	10													
146			Member Cost of Service Charge			1,263.40				1,342.87					
147			Demand Charge -Contract per kW			7.43				7.90					
148			Demand Charge - Excess per kW			10.34				10.99					
149			Energy Charge per kWh			0.05901				0.06272					

Exhibit 5

Certificate of Service to Attorney General

Exhibit 5
Statement of Service to the Attorney General

Pursuant to 807 KAR 5:007, Sections 1(6) and Section 2(2), the undersigned does hereby certify that a complete copy of this filing has been sent electronically to the Kentucky Attorney General's Office of Rate Intervention at rateintervention@ag.ky.gov on this the 1st day of August 2025.

Heather S. Temple

Heather S. Temple
Attorney, Honaker Law Office

Exhibit 6

Customer Notice

AFFIDAVIT OF MAILING

Notice is hereby given that the August 2025 issue of *KENTUCKY LIVING*, bearing official notice of PSC Case No. 2025-00211 for the purpose of proposing a general adjustment of the existing rates of **NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION** to reflect the wholesale rate adjustment of wholesale supplier, East Kentucky Power Cooperative, Inc., was entered as direct mail on July 30, 2025, in accordance to the requirements of the cooperatives bylaws.



Shannon Brock
Editor
Kentucky Living

County of Jefferson
State of Kentucky

Sworn to and subscribed before me, a Notary Public,

This 30th day of July, 2025.

My commission expires 6/9/2029



Mary Ann Lyons #KYNP100716
Notary Public, State of Kentucky

East Kentucky Power Cooperative seeks rate increase

East Kentucky Power Cooperative, which generates and transmits wholesale electricity to Nolin RECC, is seeking to raise the base rates it charges Nolin RECC and 15 other electric co-ops.

The proposed rate increase is from EKPC, not Nolin RECC, and any additional revenue from this rate increase will go to EKPC, not Nolin RECC.

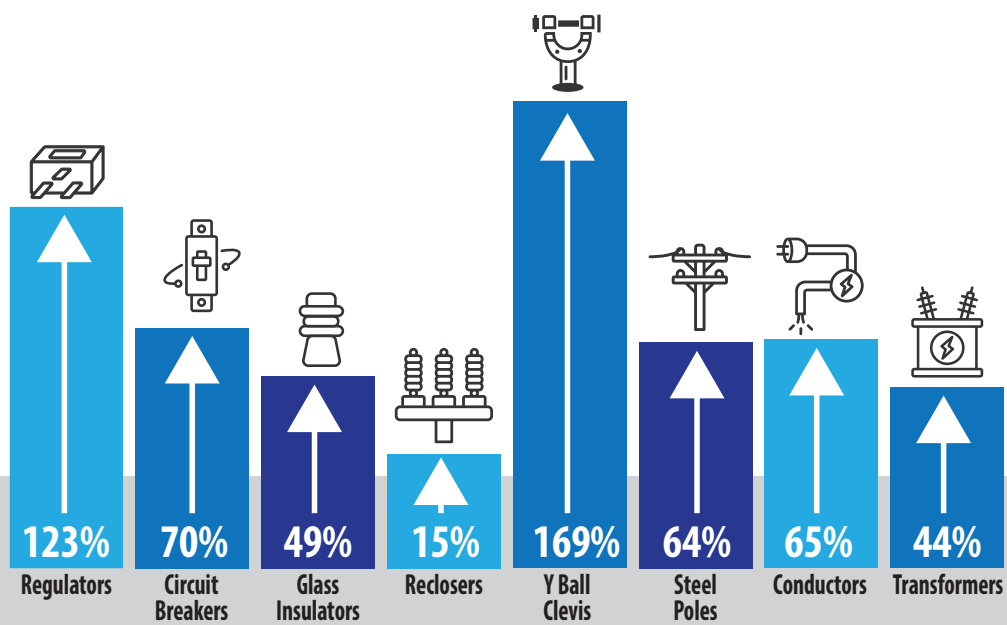
EKPC filed the rate-adjustment request with the Kentucky Public Service Commission August 1, 2025. Nolin RECC also filed an application with the PSC detailing how the adjustment

would be passed through its monthly bills to the membership.
If approved by the PSC, the proposal by EKPC will increase Nolin RECC’s rates and add about \$7.13 or 5.1% to the monthly bill of the average residential member.

EKPC needs a base rate increase to ensure there are sufficient margins to maintain financial strength and reliable service. Inflationary costs of the materials needed to operate and maintain the system along with increased interest expense from higher interest rates are driving the need for an increase.
Please bear in mind that the wholesale

power (EKPC) component of your electric bill is about 68%. The remaining funds are used by Nolin RECC to maintain and operate its system and to cover other costs.
As a not-for-profit, member-owned organization, EKPC strives to keep rates steady by containing and reducing operating costs. One of the most effective ways EKPC has done that is by obtaining low-cost energy through PJM, a major regional energy marketplace. As a result of the effort by our co-op and EKPC to keep energy economical, Nolin RECC’s rates are competitive with neighboring utilities.

Equipment Price Increase Since 2020



Most Nolin RECC revenue goes to purchase power

When you look at your monthly electric bill from Nolin RECC, you might wonder how the money is used to keep the lights on.

You may be surprised that out of every dollar of revenue we collect, about 68 cents of that dollar goes to buy wholesale electricity

from our power supplier, East Kentucky Power Cooperative. We spend another 29 cents of each dollar on operating and maintenance costs, interest expense, depreciation and other costs of doing business.

Typically, our margin—the money left over from revenue

after expenses are paid—is about 3 cents on every dollar received. The margin is reserve capital that covers storm damage, uncollected bills and business risks. When the finances of the cooperative permit, we return margins to the members in the form of capital credits.

NOLIN RECC

Where the revenue goes to keep the lights on



68 cents - purchased power

3 cents - margin

29 cents - other expenses (interest, maintenance, operations, etc.)

Distribution of revenue dollars for Nolin RECC **based on 2024 actuals*

EXPC

NOTICE

In accordance with the requirements of the Public Service Commission ("Commission") as set forth in 807 KAR 5:001, Section 17 and 807 KAR 5:007, Section 3, of the Rules and Regulations of the Commission, notice is hereby given to the member consumers of Nolin Rural Electric Cooperative Corporation ("Nolin RECC") of a proposed rate adjustment. Nolin RECC intends to propose an adjustment of its existing rates to reflect the wholesale rate adjustment of its wholesale supplier, East Kentucky Power Cooperative, Inc., pursuant to KRS 278.455(2), by filing an application with the Commission on or after August 1, 2025, in Case No. 2025-00211. The application will request that the proposed rates become effective on or after September 1, 2025.

The present and proposed rates for each customer classification to which the proposed rates will apply are set forth below:

RATE	ITEM	PRESENT	PROPOSED
1	Residential		
	Customer Charge	\$ 13.99	\$ 14.79
	Energy Charge per kWh	\$ 0.10364	\$ 0.10956
2	Commercial		
	Customer Charge	\$ 23.83	\$ 25.19
	Energy Charge per kWh	\$ 0.10304	\$ 0.10893
3	Large Power		
	Customer Charge	\$ 36.26	\$ 38.33
	Demand Charge per kW	\$ 6.24	\$ 6.60
	Energy Charge per kWh	\$ 0.08411	\$ 0.08892
4	Industrial		
	Customer Charge	\$ 44.03	\$ 46.55
	Energy Charge per kWh	\$ 0.07508	\$ 0.07937
	Demand Charge over 10 KW per kW	\$ 5.13	\$ 5.42
9	Industrial		
	Customer Charge	\$ 632.50	\$ 689.97
	Demand Charge -Contract per kW	\$ 6.36	\$ 6.94
	Demand Charge - Excess per kW	\$ 9.25	\$ 10.09
	Energy Charge per kWh	\$ 0.06642	\$ 0.07246
5,6	Lighting		
	1 - SL 100W HPS	\$ 10.69	\$ 11.30
	1A - SL 70W LED	\$ 10.06	\$ 10.63
	1B - SL 55W LED	\$ 9.99	\$ 10.56
	12A - DFL 70 W LED EP	\$ 17.75	\$ 18.76
	13 - DFL 250 W HPS EP	\$ 16.22	\$ 17.15
	13A - DFL 108 W LED EP	\$ 18.69	\$ 19.76
	13B - DFL 109 W LED EP	\$ 18.70	\$ 19.77
	14 - DFL 400 W HPS EP	\$ 22.28	\$ 23.55
	14A - DFL 208 W LED EP	\$ 21.26	\$ 22.48
	14B - DFL 202 W LED EP	\$ 21.23	\$ 22.44
	15-DEL400W CONTEMPARY UG	\$ 23.80	\$ 25.16
	21-COLONIAL20' FLUTED POLE	\$ 36.73	\$ 38.83
	21A-COLONIAL20' FLUTED POLE 35-70 W LED	\$ 34.80	\$ 36.79
	22-SLORNUG400W20' FLUTED POLE	\$ 36.89	\$ 39.00
	23 - 20 FT FP COLONIAL	\$ 35.31	\$ 37.33
	25-COLONIALCONSTPD HPS FIXTURE	\$ 10.28	\$ 10.87
Special	AGC Automotive		
	Customer Charge	\$ 5,726.70	\$ 6,127.60
	Demand Charge per kW	\$ 7.30	\$ 9.14
	Interruptible Credit per kW	\$ (5.60)	\$ (5.60)
	Energy Charge per kWh	\$ 0.05129	\$ 0.05464
7	Industrial		
	Demand Charge per kW	\$ 9.36	\$ 9.95
	Energy Charge per kWh	\$ 0.06855	\$ 0.07286
8	Seasonal TOD		
	Demand Charge per kW	\$ 9.25	\$ 9.83
	Energy Charge per kWh	\$ 0.06855	\$ 0.07286
10	Industrial		
	Member Cost of Service Charge	\$ 1,263.40	\$ 1,342.87
	Demand Charge -Contract per kW	\$ 7.43	\$ 7.90

RATE	ITEM	PRESENT	PROPOSED
	Demand Charge - Excess per kW	\$ 10.34	\$ 10.99
	Energy Charge per kWh	\$ 0.05901	\$ 0.06272
11	Industrial		
	Consumer Charge	\$ 1,263.24	\$ 1,378.09
	Demand - Contract per kW	\$ 6.36	\$ 6.94
	Demand - Excess per kW	\$ 9.25	\$ 10.09
	Energy Charge per kWh	\$ 0.05931	\$ 0.06470
12	Industrial C		
	Consumer Charge New Substation	\$ 1,263.24	\$ 1,378.09
	Consumer Charge Existing Sub	\$ 632.20	\$ 689.10
	Demand - Contract per kW	\$ 6.36	\$ 6.94
	Energy Charge per kWh	\$ 0.06640	\$ 0.07238
13	Industrial C		
	Customer Charge	\$ 1,263.24	\$ 1,376.93
	Demand Charge per kW	\$ 6.36	\$ 6.94
	Energy Charge per kWh	\$ 0.06049	\$ 0.06593
14	Industrial C		
	Customer Charge	\$ 1,263.24	\$ 1,376.93
	Demand Charge per kW	\$ 6.36	\$ 6.94
	Energy Charge per kWh	\$ 0.05931	\$ 0.06465

The effect of the change requested, in both dollar amounts and as a percentage, for each customer classification to which the proposed rates will apply is set forth below:

RATE		INCREASE	
		DOLLARS	PERCENT
1	Residential	\$ 2,765,053	5.10%
2	Commercial	\$ 240,242	5.11%
3	Large Power	\$ 108,352	5.17%
4	Industrial	\$ 337,925	5.16%
9	Industrial	\$ 80,481	8.07%
5, 6	Lighting	\$ 75,700	5.21%
Special	AGC Automotive	\$ 757,859	9.98%
	Total	\$ 4,365,611	5.63%

The amount of the average usage and the effect upon the average bill for each customer classification to which the proposed rates will apply is set forth below:

RATE		AVERAGE USAGE (KWH)	INCREASE	
			DOLLARS	PERCENT
1	Residential	1,069	\$ 713	5.10%
2	Commercial	1,399	\$ 9.60	5.11%
3	Large Power	16,186	\$ 99.50	5.17%
4	Industrial	51,113	\$ 268.41	5.16%
9	Industrial	909,570	\$ 6,706.73	8.07%
5,6	Lighting	NA	NA	5.21%
Special	AGC Automotive	9,612,863	\$ 63,154.88	9.98%

A person may examine the application and any related documents Nolin RECC has filed with the PSC at the utility's principal office, located at 411 Ring Road, Elizabethtown, Kentucky 42701-6767, (270) 765-6153.

A person may also examine the application: (i) at the Commission's offices located at 211 Sower Boulevard, Frankfort, Kentucky 40601, Monday through Friday, 8:00 a.m. to 4:30 p.m.; or (ii) through the Commission's web-site at <http://psc.ky.gov>. Comments regarding the application may be submitted to the Commission through its Web site or by mail to Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602.

The rates contained in this notice are the rates proposed by Nolin RECC, but the Commission may order rates to be charged that differ from the proposed rates contained in this notice. A person may submit a timely written request for intervention to the Commission at Post Office Box 615, Frankfort, Kentucky 40602, establishing the grounds for the request including the status and interest of the party. If the Commission does not receive a written request for intervention within thirty (30) days of initial publication or mailing of the notice, the Commission may take final action on the application.

Exhibit 7

Direct Testimony of John Wolfram

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

DIRECT TESTIMONY

OF

**JOHN WOLFRAM
PRINCIPAL OF CATALYST CONSULTING LLC**

ON BEHALF OF

**BIG SANDY RURAL ELECTRIC COOPERATIVE CORPORATION
BLUE GRASS ENERGY COOPERATIVE CORPORATION
CLARK ENERGY COOPERATIVE, INC.
CUMBERLAND VALLEY ELECTRIC INC.
FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION
FLEMING-MASON ENERGY COOPERATIVE, INC.
GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION
INTER-COUNTY ENERGY COOPERATIVE CORPORATION
JACKSON ENERGY COOPERATIVE CORPORATION
LICKING VALLEY RURAL ELECTRIC COOPERATIVE CORPORATION
NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION
OWEN ELECTRIC COOPERATIVE INC.
SALT RIVER ELECTRIC COOPERATIVE CORPORATION
SHELBY ENERGY COOPERATIVE INC.
SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION
TAYLOR COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION**


FILED: August 1, 2025

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

VERIFICATION OF JOHN WOLFRAM

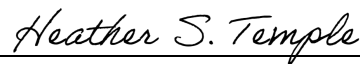
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

John Wolfram, being duly sworn, states that he has supervised the preparation of his Direct Testimony 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 28th day of July, 2025, by John Wolfram.



Notary Commission No. KYNP98715

Commission expiration: April 9, 2029

**DIRECT TESTIMONY
OF
JOHN WOLFRAM**

I. INTRODUCTION

Q. Please state your name, business address and occupation.

A. My name is John Wolfram. I am the Principal of Catalyst Consulting LLC. My business address is 3308 Haddon Road, Louisville, Kentucky 40241.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of each of the sixteen Owner-Members of East Kentucky Power Cooperative, Inc. ("EKPC").

Q. Please summarize your education and professional experience.

A. I received a Bachelor of Science degree in Electrical Engineering from the University of Notre Dame in 1990 and a Master of Science degree in Electrical Engineering from Drexel University in 1997. I founded Catalyst Consulting LLC in June 2012. I have developed cost of service studies and rates for numerous electric utilities, including electric distribution cooperatives, generation and transmission cooperatives, municipal utilities, and investor-owned utilities. I have performed economic analyses, rate mechanism reviews, special rate designs, and wholesale formula rate reviews. From March 2010 through May 2012, I was a Senior Consultant with The Prime Group, LLC. I have also been employed by the parent companies of Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU"), by the PJM Interconnection, and by the Cincinnati Gas & Electric Company.

Q. Have you previously testified before the Kentucky Public Service Commission ("Commission")?

1 A. Yes. To date I have testified or otherwise participated in nearly eighty different regulatory
2 proceedings before this Commission, most recently in Case No. 2025-00107.¹

3 **Q. What is the purpose of your testimony in this proceeding?**

4 A. The purpose of my testimony is to support the proposed rates of the Owner-Members of
5 EKPC, reflecting the flow through of the effects of the increase in wholesale rates proposed
6 by EKPC in Case No. 2025-00208,² pursuant to KRS 278.455.

7 **Q. Are you sponsoring any Exhibits?**

8 A. Yes. I have prepared the following exhibits to the Application in this docket:

- 9 • Exhibit 3: Comparison of Current and Proposed Rates
10 • Exhibit 4: Billing Analysis

11

12 **II. PASS THROUGH OF WHOLESALE RATE INCREASE: OVERVIEW**

13 **Q. What does KRS 278.455 permit for the pass-through of wholesale rate increases?**

14 A. KRS 278.455(2) specifies that

15 “Notwithstanding any other statute, **any revenue increase authorized by**
16 **the Public Service Commission** or any revenue decrease authorized in
17 subsection (1) of this section **that is to flow through the effects of an**
18 **increase or decrease in wholesale rates may, at the distribution**
19 **cooperative's discretion, be allocated to each class and within each tariff**
20 **on a proportional basis that will result in no change in the rate design**
21 **currently in effect....”** (emphasis added)

22

23 KRS 278.455(3) specifies that

24 “Any rate increase or decrease as provided for in subsections (1) and (2) of
25 this section **shall not apply to special contracts** under which the rates are

¹ See *In the Matter of: The Electronic Application of Farmers Rural Electric Cooperative Corporation for a General Adjustment of Rates*, Case No. 2025-00107 (Ky. P.S.C. May 5, 2025).

² See *In The Matter Of: Electronic Application Of East Kentucky Power Cooperative, Inc. For A General Adjustment Of Rates, Approval Of Depreciation Study, Amortization Of Certain Regulatory Assets, And Other General Relief*, Case No. 2025-00208 (filed August 1, 2025).

1 subject to change or adjustment only as stipulated in the contract.”
2 (emphasis added)
3

4 **Q. What is the historical test period for the pass-through rate modeling?**

5 A. The historical test period for the filing is the 12 months ended December 31, 2023.

6 **Q. Why is this period used?**

7 A. The historical test period for the pass-through cases was chosen to match that used by
8 EKPC in its wholesale rate case. The pass-through of wholesale rate increases to retail is
9 best achieved when the wholesale and retail billing determinants align.

10 **Q. Please generally describe the approach you used to determine the proposed rates for**
11 **each distribution cooperative.**

12 A. The approach can be divided into two steps. First, for each distribution cooperative, I
13 collected 2023 billing information for each rate class in the cooperative’s Commission-
14 approved tariffs, to correspond with the 2023 test period used by EKPC in Case No. 2025-
15 00208. I calculated the billings for each rate class and for each base rate billing component
16 within the respective classes (*e.g.*, customer charge, energy charge, demand charge). I also
17 compiled annual amounts for rate riders, billing adjustments, and other non-base-rate
18 billing items by class. I then determined “present” rates and revenues by accounting for a
19 limited number of adjustments that I describe below. All of this is necessary for the
20 proportional allocation of the EKPC revenue increase to the retail classes under the statute.

21 Second, I allocated the EKPC wholesale rate increase to the classes in a
22 proportional manner, as described in more detail below.

23 **Q. Did EKPC provide you with the relevant data regarding its proposed wholesale**
24 **increase?**

1 A. Yes. EKPC provided me with a summary of the proposed increase in dollars and percent,
2 by distribution cooperative and by wholesale rate class, along with the proposed per-unit
3 charges for each wholesale rate class.

4 **Q. Please describe how you allocated the EKPC increases to the retail rate classes for**
5 **each cooperative.**

6 A. For each cooperative, I calculated the current share of (a) each rate class revenue to total
7 cooperative revenue, and (b) each rate class rate component revenue (e.g., customer charge,
8 energy charge, demand charge) to total rate class revenue. This is the “to and within the
9 classes” information (in that order). Then I allocated the EKPC wholesale rate revenue
10 increases proportionately, first to the relevant retail rate classes, and then to the individual
11 base rate billing components of each class, such that the shares of (a) and (b) did not
12 change.³ This means I determined the proposed per-unit charges such that the rate class
13 revenue allocation shares and the billing component allocation shares were maintained. In
14 other words, I allocated the increase first to the rate classes and then to the billing
15 components on a proportionate basis – “to and within the rate classes” -- ensuring to the
16 fullest extent possible that the result would not change the rate design currently in effect,
17 consistent with the statute.

18

19 **III. PASS THROUGH OF WHOLESALE RATE INCREASE: DETAIL**

20 **Q. Please describe the relationship between the EKPC wholesale rate schedules, and the**
21 **retail rate schedules for most of the Owner-Members.**

³ The data does include *de minimis* variations due to rate rounding.

1 A. EKPC provides service to its 16 Owner-Members on four standard rate schedules – Rates
2 B, C, G, and E – plus various rate riders – along with contracts for one large customer, gas
3 pumping stations, and steam service. Most Owner-Members meet the needs of most of
4 their retail rate classes pursuant to EKPC Rate E. Some Owner-Members have a few
5 members taking service under EKPC Rates B or C, and a handful have special contracts
6 that correspond to EKPC Rate G. The vast majority of retail members are served under
7 these EKPC standard rate schedules. Finally, as EKPC demonstrated in the rate increase
8 data provided to me, EKPC provides certain service outside of these standard rate
9 schedules; Owen Electric provides service to an exceptionally large customer under a
10 special contract, Fleming-Mason Energy and Taylor County RECC provide service to gas
11 pumping stations and Fleming-Mason Energy provides steam service.

12 **Q. Did you identify which retail rate classes directly correspond to service on EKPC Rate**
13 **B, C and G?**

14 A. Yes. The Owner-Members identified these classes for me. Most of them actually refer to
15 the EKPC schedule (e.g., B, C, or G) in the name of the retail rate schedule. Here the word
16 “correspond” means that every member on the retail schedule takes wholesale service
17 exclusively on the given wholesale rate schedule.

18 **Q. Please list the retail rate classes which directly correspond to EKPC Rate B.**

19 A. Owner-Members with retail rate classes that correspond to Rate B include the following:

20	Big Sandy	Industrial Rate 1B
21	Blue Grass	Large Industrial Rates B-1 and B-2
22	Fleming-Mason	Large Industrial Rate LIS-6B
23	Grayson	Large Industrial Service - MLF
24	Inter-County	Schedule B1 – Large Industrial Rate
25	Jackson	Large Power Rate 47
26	Nolin	Large Power Rates LLP-4-B1 and LPR-1-B2
27	Owen	Schedule 9 Industrial

1 Salt River Large Power Rates LLP-4-B1 and LPR-1-B2
2 Shelby Large Industrial Rates B1 and B2
3 South Kentucky Large Power Rate LP-3
4

5 **Q. Please list the retail rate classes which directly correspond to EKPC Rate C.**

6 A. Owner-Members with retail rate classes that correspond to EKPC Rate C include the
7 following:

8 Cumberland Valley Schedule V-C
9 Fleming-Mason Large Industrial Service LIS-7
10 Jackson Large Power Rate 46
11 South Kentucky Large Power Rates LP-1, LP-2
12

13 **Q. Please list the retail rate classes which directly correspond to EKPC Rate G.**

14 A. Owner-Members with retail rate classes or special contracts that correspond to EKPC Rate
15 G include the following:

16 Blue Grass Special Contract
17 Cumberland Valley Schedule V-B
18 Fleming-Mason Special Contract
19 Inter-County Schedule G – Large Industrial Rate
20 Licking Valley Large Power Rate LPG
21 Nolin Special Contract
22

23 **Q. For the listings above did you only include retail rate classes under which the Owner-**
24 **Members provided service during 2023?**

25 A. Yes. The lists do not include any retail rate classes that may correspond to EKPC Rates B,
26 C, or G but which had no retail members taking service in 2023.

27 **Q. Did you allocate EKPC Rate G increases to specific retail classes for the special**
28 **contracts?**

29 A. Yes. I separately calculated proposed rates for retail members served under the EKPC Rate
30 G - Special Electric Contract Rate, as well as for those served under EKPC's other large

1 special contracts. These are listed separately in Exhibit 3. These classes are given specific
2 consideration by EKPC, so I determined the retail rate increases associated with these
3 classes using the specific data provided to me for these classes by EKPC.

4 **Q. Why?**

5 A. The statute in KRS 278.455(3) states that

6 “Any increase or decrease as provided for in subsections (1) and (2) of this
7 section shall not apply to special contracts under which the rates are subject
8 to change or adjustment only as stipulated in the contract.”
9

10 This treatment is also consistent with that approved by the Commission for the special
11 contracts in at least EKPC’s last two rate cases, in 2021 and in Case No. 2010-00167.⁴

12 **Q. Did you allocate EKPC Rate B and C increases to specific retail classes?**

13 A. For the Owner-Members listed above, yes. For EKPC Rate B, for the Owner-Members
14 listed above with retail rate classes that directly correspond to EKPC Rate B, I allocated
15 the EKPC Rate B increase to those classes. Then I allocated the remaining EKPC increases
16 to the remaining retail rate classes. All of the allocations were applied proportionately to
17 and within the relevant rate classes, consistent with the statute. I did the same for EKPC
18 Rate C.

19 **Q. Why?**

20 A. Because the proposed rate increases by EKPC vary so much by wholesale rate class, and
21 because certain Owner Member retail rate schedules correspond to particular wholesale
22 classes, this approach complies with the statute.

23 **Q. How did you allocate the remainder of the EKPC rate increases to the retail classes?**

⁴ *In The Matter Of Application Of East Kentucky Power Cooperative, Inc. For General Adjustment Of Electric Rates*, Order, Case No. 2010-00167 (Ky. P.S.C. Jan. 14, 2011).

1 A. For the Owner-Members not listed above, that do not have retail rate classes that
2 correspond to EKPC Rates B, C, or G, I allocated all of the combined/remaining EKPC
3 increases to all of the retail rate classes, proportionately to and within those classes,
4 consistent with the statute.

5 **Q. Overall, is this the same approach used in the last set of pass-through cases associated**
6 **with EKPC's wholesale rate cases in 2021 and in 2010?**

7 A. For the Owner-Members with no retail rate classes that correspond to EKPC Rates B or C,
8 yes it is exactly the same. For the Owner-Members listed above with retail rate classes that
9 correspond to EKPC Rates B or C, it is not exactly the same.

10 **Q. Why is it appropriate to use this method of allocation?**

11 A. Because the approach can be shown to allocate the wholesale rate increase to the retail
12 distribution cooperatives, to each class and within each tariff on a proportional basis, in a
13 manner that will result in no change in the rate design currently in effect, while also
14 avoiding an inappropriate subsidy to large industrial customers from residential and other
15 customer classes.

16 This allocation maintains the rate design currently in effect. The current rate
17 design for certain Owner-Members makes a distinction in retail rates between EKPC Rate
18 B or C and EKPC Rate E. For these Owner-Members, the current rate design considers
19 the fact that certain retail rates correspond to EKPC Rate B and/or C, and others do not. If
20 EKPC changed all of its wholesale rates by the same percentage, then this approach would
21 be moot, but at this time, EKPC is changing its Rate B and C quite differently than it is the
22 Rate E. See the table below:

23

1

Table 1. EKPC Proposed Revenue Increases

EKPC Wholesale Rate Class	Present Revenue \$	Proposed Revenue \$	Increase \$	Percent Change
Rate E	802,194,158	857,865,743	55,671,585	6.94%
Rate B	76,651,633	83,549,772	6,898,140	9.00%
Rate C	30,261,662	32,985,063	2,723,402	9.00%
Rate G	45,700,643	50,727,650	5,027,007	11.00%
Large Special Contract	82,398,571	91,461,856	9,063,284	11.00%
Special Contract Pumping Stations	13,169,151	13,169,151	0	0.00%
Steam Service	13,946,275	14,294,772	348,497	2.50%
Total	1,064,322,093	1,144,054,008	79,731,915	7.49%

2

3

4

5

6

7

8

9

10

11

12

13 **Q.**14 **A.**

15

Here the EKPC Rate E increases are less than 7 percent, while the Rates B and C increases are both 9 percent. The special contract increases are even larger at 11 percent. Pumping Stations are zero percent and steam service is 2.5 percent. The overall range is relatively wide.

This matters because certain retail rates correspond to the EKPC Rate B and C rates. If all of the wholesale rates were increasing by the same percentage then the allocation approach used would not matter as much. But since the majority of EKPC's revenues are increasing by just under 7% under Rate E, and the larger customers taking service on Rates B and C are increasing by 9 percent, the allocation used in this proceeding maintains the current rate design better than other allocation methods that could be used.

Why is the allocation method used in this proceeding the best method?

If this approach is not used, it will create incremental subsidization of large industrial customers by residential customers at the retail level for some of the Owner-Members. For

1 example, Big Sandy has only one retail rate class (Industrial Rate IND-1B) that
2 corresponds to EKPC's Rate B and actually Big Sandy only has one member on this rate
3 schedule. All other Big Sandy members take service under EKPC's Rate E. By using the
4 method proposed in this proceeding, Big Sandy's IND-1B rate bears all of the EKPC Rate
5 B increase, and the remaining Big Sandy rate classes bear the EKPC Rate E increase. This
6 prevents an incremental and inappropriate subsidization of the industrial member by all
7 other Big Sandy members, including residential, as a result of the pass-through.

8 The proposed allocation method maintains the current rate design since the current
9 rate design recognizes differences in the wholesale rate schedules and translates those
10 differences to retail customers via the retail rate schedules. If this translation is lost by
11 virtue of the pass-through, the value of having separate wholesale rate cases diminishes,
12 and the current retail rate designs – which recognize that value – are no longer maintained.
13 If the differences in the retail rate schedules are lost then why would they have more than
14 one wholesale rate schedule?

15 **Q. How does the allocation work for the Owner-Members that do not have retail rate**
16 **classes linked to EKPC Rates B or C?**

17 A. For Owner-Members with no retail rate classes linked to EKPC Rates B or C, all of the
18 wholesale increase amounts are allocated proportionately to and within all of the retail rate
19 classes in such a way that it will result in no change to the rate design currently in effect.

20

21 **IV. ADJUSTMENTS**

22 **Q. Did you make any adjustments to the actual 2023 amounts to determine the “present”**
23 **amounts for the pass-through?**

1 A. Yes. I made two types of adjustments to actual 2023 data. The first was to account for
2 base rate changes related to the Fuel Adjustment Clause (“FAC”), and the second was to
3 account for any retail rate changes stemming from other Commission rate proceedings.

4 **Q. Please describe the adjustments made to account for the FAC.**

5 A. Because the Commission approved a FAC roll-in for service rendered on or after
6 September 1, 2023,⁵ it was necessary to adjust 2023 amounts to reflect the revised base
7 energy charges and FAC charges. I adjusted 2023 amounts to account for the FAC roll-in
8 for all Owner-Members. These adjustments are reflected where applicable in the “Present
9 Rates” and “Present Revenues” in Exhibit 4 and are needed to ensure that the full effects
10 of the wholesale rate increase are flowed through proportionately.

11 **Q. Please describe the adjustments made to account for other rate proceedings before**
12 **the Commission.**

13 A. Some of the Owner-Members had active rate case proceedings at the Commission when
14 the pass-through models were developed. In these instances, for the purpose of developing
15 the public notices of present and proposed rates, the “present” rates in the pass-through
16 models reflected the effective rates at that time, not the rates that the Owner-Members had
17 proposed in their respective rate filings. The reason for this is that those proposed rates
18 had not been approved, were not “effective” under the Commission-approved tariffs and
19 thus did not qualify as “present” rates for the purpose of applying the pass-through. For
20 some of these dockets, the Commission has not yet issued its findings on the proposed
21 rates. The cooperatives to which this applies are:

⁵ See *In The Matter Of Electronic Examination Of The Application Of The Fuel Adjustment Clause Of East Kentucky Power Cooperative, Inc. From November 1, 2020 Through October 31, 2022*, Order, Case No. 2023-00014 (Ky. P.S.C. Aug. 30, 2024).

- 1 1) Farmers RECC ⁶
- 2 2) South Kentucky RECC ⁷

3 For these cooperatives, the pass-through models filed herein are based on the currently
4 effective retail rates. I expect the Commission to issue orders in these dockets during the
5 pendency of this case. When that occurs, the respective cooperatives will update their pass-
6 through models to revise the “present” rates to reflect any rate revisions ordered by the
7 Commission.

8 On July 11, 2025, Clark Energy filed a Notice of Intent to submit a rate filing and
9 expects to file its Application for an alternative rate adjustment pursuant to 807 KAR 5:078
10 in the next few weeks.⁸ For Clark Energy, like the cooperatives listed above, the pass-
11 through model filed herein is based on the currently effective retail rates. Under the
12 streamlined regulation, the Commission should issue a final order in the Clark Energy
13 docket during the pendency of the instant case. When that occurs, Clark Energy expects
14 to update the pass-through models to revise the “present” rates to reflect any rate revisions
15 ordered by the Commission.

16 Blue Grass Energy had an active rate case before the Commission earlier this year.
17 The Commission issued an order revising Blue Grass Energy’s base rates before this
18 Application was filed but after the public notice for this case had to be submitted for

⁶ *In the Matter of: The Electronic Application Of Farmers Rural Electric Cooperative Corporation For A General Adjustment Of Rates*, Case No. 2025-00107.

⁷ *In the Matter of: The Electronic Application Of South Kentucky Rural Electric Cooperative Corporation For A General Adjustment Of Rates And Other General Relief*, Case No. 2024-00402.

⁸ *In the Matter of: Electronic Application Of Clark Energy Cooperative, Inc. For An Alternative Rate Adjustment Pursuant To 807 KAR 5:078*, Case No. 2025-00230.

1 publication. The present rates in this Application reflect the rates that the Commission
2 approved in its Order dated July 21, 2025.⁹

3 Shelby Energy also had an active rate case before the Commission earlier this year.
4 The Commission issued an order revising Shelby Energy's base rates before this
5 Application was filed but after the public notice for this case had to be submitted for
6 publication. The present rates in this Application reflect the rates that the Commission
7 approved in its Order dated July 23, 2025.¹⁰

8 The net effect of each of these qualified conditions will be the same – that is, in
9 each case the dollar amount allocated to each Owner-Member from EKPC will be passed
10 through to the Owner-Member to and within its retail rate classes on a proportional basis.
11 It is only the “starting point” of that allocation which will be revised to ensure that when
12 the instant case is resolved, the pass-throughs reflect the retail rates most recently approved
13 by the Commission for each Owner-Member.

14 **Q. Did you make any other adjustments to the 2023 data for the Owner-Members for**
15 **period-end normalizations, rate switching, or other changes?**

16 **A.** No. EKPC did not propose adjustments of that kind, so neither did I, in order to preserve
17 consistency for the wholesale and retail billing determinants.

18

19 **V. VACANT RATE CLASSES**

⁹ *In the Matter of: Electronic Application Of An Alternative Rate Adjustment For Blue Grass Energy Cooperative Corporation Pursuant To 807 KAR 5:078*, Case No. 2025-00103 (Ky. P.S.C. July 21, 2025).

¹⁰ *In the Matter of: Electronic Application Of Shelby Energy Cooperative, Inc. For A General Adjustment Of Rates*, Case No. 2024-00351 (Ky. P.S.C. July 23, 2025).

1 **Q. How did you determine proposed rates for any rate classes under which no retail**
2 **members took service in 2023 (“vacant rate classes”)?**

3 A. For vacant rate classes, I first checked to see if the per-unit charges were identical to any
4 per-unit charges of other, non-vacant rate classes; if so, I set the proposed vacant rate class
5 per-unit charge equivalently, in order to avoid creating an inappropriate future incentive
6 for rate switching. Otherwise, I increased the vacant rate class per-unit charges by the same
7 percentage as the overall base rate increase for the utility. There is no revenue impact
8 associated with these changes, but the changes are necessary for the flow through of the
9 effects of the proposed EKPC rate increase to result in no change to the retail rate design
10 currently in effect, particularly on an inter-class basis. (For example, increasing other per-
11 unit rates without also increasing the vacant rate class rates will skew the current retail rates
12 relative to one another and could inappropriately provide incentives for rate switching at
13 the retail level.)

14

15 **VI. CONCLUSION**

16 **Q. What is your recommendation to the Commission in this case?**

17 A. In this docket, the proposed rates are based on pass-through models in which the wholesale
18 EKPC increase is allocated to each retail class and within each retail tariff on a proportional
19 basis and results in no change in the retail rate design currently in effect. This is consistent
20 with KRS 278.455. The approach yields rates that are fair, just, and reasonable, and are
21 also consistent with prior Commission precedent. The Commission should find that the
22 pass-through models comply with the statute and are a reasonable basis for retail rate
23 design.

1 The Commission should accept the pass-through models as filed and should accept
2 any updates to certain Owner Member pass-through models to capture any revisions to
3 “present” rates noted in any Commission orders in other Owner Member rate case dockets
4 as appropriate. The Commission should approve the “proposed” rates determined in the
5 pass-through models, either as filed or as revised to reflect the EKPC increase ultimately
6 approved by the Commission, with an effective date identical to the effective date of the
7 EKPC rate revisions.

8 **Q. Does this conclude your testimony?**

9 **A. Yes, it does.**