

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

In the Matter of:

THE ELECTRONIC APPLICATION OF)	
SHELBY ENERGY COOPERATIVE, INC.)	
FOR PASS-THROUGH OF EAST)	Case No. 2025-00212
KENTUCKY POWER COOPERATIVE, INC.'S)	
WHOLESALE RATE ADJUSTMENT)	

SHELBY ENERGY COOPERATIVE, INC.
VERIFIED RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
ENTERED SEPTEMBER 3, 2025

Comes now Shelby Energy Cooperative, Inc. ("Shelby Energy"), 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

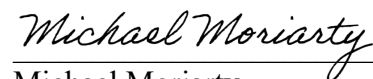
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SHELBY ENERGY COOPERATIVE, INC.)	
FOR PASS-THROUGH OF EAST)	Case No. 2025-00212
KENTUCKY POWER COOPERATIVE, INC.'S)	
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VERIFICATION OF MICHAEL MORIARTY

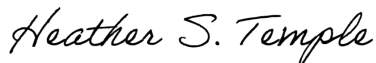
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF SHELBY)

Michael Moriarty, Chief Financial Officer of Shelby Energy Cooperative Inc, being duly sworn, states that he 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 his knowledge, information and belief, formed after reasonable inquiry.



Michael Moriarty

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




Commission expiration: April 9, 2029
KYNP98715

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

VERIFICATION OF JOHN WOLFRAM

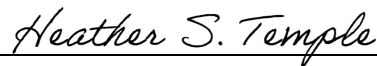
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

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

Shelby Energy Cooperative, Inc.
Case No. 2025-00212
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 Shelby Energy RECC's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC to Shelby Energy RECC and explain any variance shown in Exhibit 4.
- c. Identify any rate rounding variance reflected in Exhibit 4 and reconcile it to the target revenues by class, showing the arithmetic that produces the rounding amounts.

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

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

Response 1(c): See Application Exhibit 4, page 1. The arithmetic for each rate class is provided on the subsequent pages of Exhibit 4.

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

Shelby Energy Cooperative, Inc.
Case No. 2025-00212
Commission Staff's First Request for Information

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

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

Response 2(a): Confirmed.

Response 2(b): Not applicable.

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

Shelby Energy Cooperative, Inc.
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Request 3: Refer to Case No. 2023-00014,4 which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery.

a. Provide a reconciliation between the \$0.01160/kWh FAC roll-in incorporated in Exhibit 4 with Shelby Energy RECC's FAC Form A filings filed after the August 30, 2024 Order in Case No. 2023-00014.

b. Confirm that Shelby Energy 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 3(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. Please see Attachment 1-1(a) and compare the energy charge and FAC in columns "2023 Revenue" and "Present Revenue" for each rate in Exhibit 4.

Response 3(b): Confirmed.

Shelby Energy Cooperative, Inc.
Case No. 2025-00212
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Request 4: Refer to Shelby Energy's current tariff, Rules & Regulations-Section 14 (Billing).

- a. Describe how Shelby Energy will implement the new rates for bills with service periods that straddle the effective date, consistent with Section 14.
- b. Provide a worked example (with specific dates and usage) identifying which components are prorated and which are not (e.g., customer charge, lighting charge, energy, and demand).

Response 4(a): Shelby Energy will prorate the kWh energy charge and customer charge for bills with service periods that straddle the effective date of new rates. The charges will be allocated based on the number of days in the service period for the applicable rates.

Response 4(b): Please see Attachment 1-4 provided separately. The example assumes an effective date of July 1, 2026, and reflects a residential account for a service period from June 7, 2026, to July 9, 2026. The Fuel Cost Adjustment and Environmental Surcharge are based on Shelby Energy's most recent billing amounts and are for illustrative purposes only.

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Shelby Energy Cooperative, Inc.
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Request 5: Refer to Exhibit 6 (Customer Notice) and Exhibit 4 (Billing Analysis) of the Application. Exhibit 6 includes a footnote referencing that the rates in the notice reflect approved rates at the time of the notice and do not include the rates approved in Case No. 2024-00351. Reconcile the rates reflected in the notice for Residential Service (Rate 12), Off Peak Retail Marketing (ETS) (Rate 9), Prepay Service (Rate 15), Large Power Service > 50kW (Rate 2), and General Service < 50kW (Rate 11) with the figures reflected in Exhibit 4 of the Billing Analysis.

Response 5: The differences in Exhibit 4 and Exhibit 6 relate to the timing of the rate revisions approved by the Commission in Case No. 2024-00351. The rates in the Notice in Exhibit 6 did not reflect the Commission's order due to the lead time for publication. The amounts in Exhibit 4 are correct.

Shelby Energy Cooperative, Inc.
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Request 6: Refer to Exhibit 4, Billing Analysis, page 5, line item 110. Refer also to Exhibit 2, Proposed Tariffs, Special Outdoor Lighting Service – Rate 33. The billing analysis gives a proposed energy charge of \$0.073681 per kWh, while the Tariff states \$0.07368 per kWh. Explain why the “1” was not included in the Tariff.

Response 6: The “1” was inadvertently left off the tariff.

Shelby Energy Cooperative, Inc.
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Request 7: Refer to Exhibit 4, Billing Analysis, page 5, line item 119. Refer also to Exhibit 2, Proposed Tariffs, Large Industrial Rate – Schedule C1. The billing analysis gives a proposed energy charge of \$0.07 per kWh, while the Tariff states \$0.06692 per kWh. Explain why the entire energy charge was not included in the billing analysis.

Response 7: This is a display issue only; the display format of the \$0.07 value in Exhibit 4 page 5 is inadvertently limited to two decimal places. The correct value is \$0.06692 per kWh and this was included in the billing analysis.

Shelby Energy Cooperative, Inc.
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Request 8: Refer to Exhibit 4, Billing Analysis, page 5, line item 123. Refer also to Exhibit 2, Proposed Tariffs, Large Industrial Rate – Schedule C2. The billing analysis gives a proposed energy charge of \$0.06 per kWh, while the Tariff states \$0.05983 per kWh. Explain why the entire energy charge was not included in the billing analysis.

Response 8: This is a display issue only; the display format of the \$0.06 value in Exhibit 4 page 5 is inadvertently limited to two decimal places. The correct value is \$0.05983 per kWh and this was included in the billing analysis.

Shelby Energy Cooperative, Inc.
Case No. 2025-00212
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Request 9: Refer to Exhibit 4, Billing Analysis, generally. Refer also to Exhibit 6, Customer Notice, page 26H. The table in the customer notice showing the class revenue increase in dollars and percent does not match the revenue and percentages outlined in the billing analysis. Explain the discrepancy and confirm which revenues are correct.

Response 9: The differences in Exhibit 4 and Exhibit 6 relate to the timing of the rate revisions approved by the Commission in Case No. 2024-00351. The amounts in Exhibit 4 are correct.

Shelby Energy Cooperative, Inc.
Case No. 2025-00212
Commission Staff's First Request for Information

Response 10: Refer to Exhibit 4, Billing Analysis, generally. Refer also to Exhibit 6, Customer Notice, page 26H. The table in the customer notice showing the class bill increase in dollars and percent does not match the bill impacts outlined in the billing analysis. Explain the discrepancy and confirm which bill impacts are correct.

Response 10: The differences in Exhibit 4 and Exhibit 6 relate to the timing of the rate revisions approved by the Commission in Case No. 2024-00351. The amounts in Exhibit 4 are correct.