

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

In the Matter of:

THE ELECTRONIC APPLICATION OF)	
LICKING VALLEY RURAL ELECTRIC)	
COOPERATIVE CORPORTION FOR PASS-)	Case No. 2025-00213
THROUGH OF EAST KENTUCKY POWER)	
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

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

Comes now Licking Valley Rural Electric Cooperative Corporation's ("Licking Valley"),
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

VERIFICATION OF JOHN WOLFRAM

Commission expiration: April 9, 2025

In the Matter of:

VERIFICATION OF TRAVIS STACY


Travis Stacy

Heather S. Temple

Commission expiration: April 9, 2029

KYNP98715

Licking Valley Rural Electric Cooperative Corporation
Case No. 2025-00213
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 Licking Valley RECC's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC to Licking Valley RECC and explain any variance shown in Exhibit 4.

Response 1(a): Please see the Excel file provided separately.

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

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

Licking Valley Rural Electric Cooperative Corporation
Case No. 2025-00213
Commission Staff's First Request for Information

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

- a. Confirm that Licking Valley 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 Licking Valley 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.

Licking Valley Rural Electric Cooperative Corporation
Case No. 2025-00213
Commission Staff's First Request for Information

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 \$0.01201/kWh FAC roll-in incorporated in Exhibit 4 with Licking Valley RECC's FAC Form A filings filed after the August 30, 2024 Order in Case No. 2023-00014.

b. Confirm that Licking Valley 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. This is evident in the Excel file provided in response to Item 1a, by comparing the energy charge and FAC in columns "2023 Revenue" and "Present Revenue" for each rate in Exhibit 4.

Response 3(b): Confirmed.

Licking Valley Rural Electric Cooperative Corporation
Case No. 2025-00213
Commission Staff's First Request for Information

Request 4: Refer to Schedule SL of Licking Valley RECC's current tariff.

- a. Confirm that service under Schedule SL is un-metered and billed on a per-light, per-month basis. If not confirmed, explain the response.
- b. Provide the assumed monthly kWh per fixture by type used in the billing analysis and show how those assumptions translate into the proposed monthly charges.
- c. Explain how the FAC roll-in is reflected for Schedule SL.

Response 4(a): Confirmed.

Response 4(b): The billing analysis for lighting is based on the number of lights, not the assumed usage. The proposed charges reflect the proportional application of the increase to the present per-unit charges (which include the FAC roll-in approved by the Commission in Case No. 2023-00014).

Response 4(c): To incorporate the FAC roll-in for Schedule SL, the annual lighting kWh was multiplied by the roll-in amount to determine the annual dollar amount to be moved from the FAC line to the lighting charges. This is shown in the Excel file provided in Item 1a by comparing the Total Base Rates and the FAC lines for Schedule SL in columns "2023 Revenue" and "Present Revenue."

Licking Valley Rural Electric Cooperative Corporation
Case No. 2025-00213
Commission Staff's First Request for Information

Request 5: Refer to Licking Valley RECC's current tariff, Rules & Regulations-Billing Section.

- a. Describe how Licking Valley RECC will implement the new rates for bills with service periods that straddle the effective date, consistent with its current billing cycle and tariff provisions.
- b. State whether any portion of the bill will be prorated, and if so, identify which components (customer, energy, demand, lighting) are prorated and which are not.
- c. Describe the allocation method used to split usage/charges between the pre- and post-effective-date portions (e.g., by calendar days, meter-read splits, interval-data allocation), and provide the formulas used.
- d. Identify any tariff provisions, internal policies/procedures, or billing-system constraints relied upon in calculating the bill as described above.

Response 5(a): For the applicable cycle(s), the new rates will be implemented as a composite rate based on the number of days in the billing period applicable to the old and new rates. This applies to customer, energy and lighting charges but not to demand charges. Please see Attachment 1-5(a) provided separately.

Response 5(b): Proration will only occur for accounts not connected for the full billing period; otherwise the composite rates will be applied.

Response 5(c): The method is calendar days.

Response 5(d): Licking Valley has internal policies for determination of composite bills.

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

Licking Valley Rural Electric Cooperative Corporation
Case No. 2025-00213
Commission Staff's First Request for Information

Request 6: Refer to Exhibit 6 of the Application.

- a. Confirm whether the average bill dollar increase reflected for the Large Power Rate (LPG) class of \$192,874.02 is correct. If not confirmed, explain the response.
- b. Reconcile this figure with the figure on Page 3 of the Billing Analysis in Exhibit 4 of the Application.

Response 6(a): Confirmed.

Response 6(b): Exhibit 4 shows the increase of \$192,874 (page 3 line 55) which matches the amount in Exhibit 6.

Licking Valley Rural Electric Cooperative Corporation
Case No. 2025-00213
Commission Staff's First Request for Information

Request 7: Refer to Exhibit 4, Billing Analysis, generally. Refer also to Exhibit 2, Proposed Tariffs, Prepay Service. Explain how the Prepay Service impacts the billing analysis for Schedule A – Residential, Farm, Small Community Hall & Church Service and Schedule B – Commercial and Small Power Service.

Response 7: The Prepay Service is a rider to Rate Schedules A and B. The per unit charges do not differ, and the prepay customer count and usage is included in the respective Rate Schedule A and B billing determinants. Like other riders and/or fees, the Prepay Service fee is not adjusted in the billing analysis. This is consistent with the treatment afforded in the most recent set of pass-through cases.

Licking Valley Rural Electric Cooperative Corporation
Case No. 2025-00213
Commission Staff's First Request for Information

Request 8: Refer to Exhibit 4, Billing Analysis, page 3, Large Power Rate. Explain why the Demand Interruptible per kW did not receive a rate change.

Response 8: The Interruptible Rate is a rider linked to the EKPC Interruptible service rider. EKPC did not propose any changes to its interruptible rate and thus the cooperative did not either. This is consistent with the treatment afforded in the most recent set of pass-through cases.