

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

In the Matter of:

THE ELECTRONIC APPLICATION OF)	
INTER-COUNTY ENERGY COOPERATIVE)	
CORPORATION FOR PASS-THROUGH OF)	Case No. 2025-00216
EAST KENTUCKY POWER COOPERATIVE,)	
INC.'S WHOLESALE RATE ADJUSTMENT)	

INTER-COUNTY ENERGY COOPERATIVE
CORPORATION'S VERIFIED RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
ENTERED SEPTEMBER 3, 2025

Comes now Inter-County Energy Cooperative Corporation's ("Inter-County"), by counsel,
and does hereby tender its Verified Response to the Commission Staff's First Request for
Information entered September 3, 2025.

Dated September 16, 2025

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

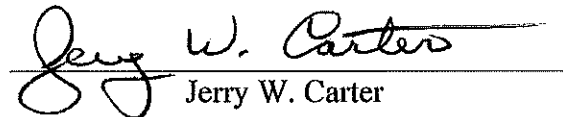
THE ELECTRONIC APPLICATION OF)
INTER-COUNTY ENERGY COOPERATIVE)
CORPORATION FOR PASS-THROUGH OF)
EAST KENTUCKY POWER COOPERATIVE,)
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Case No. 2025-00216

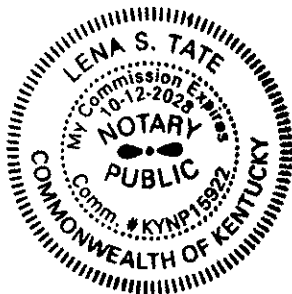
VERIFICATION OF JERRY CARTER

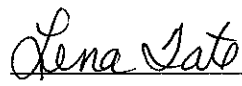
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF BOYLE)

Jerry Carter, President/CEO, 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.


Jerry W. Carter

The foregoing Verification was signed, acknowledged and sworn to before me this 16th day of September 2025, by Jerry Carter.



 #KYNP15922
Commission expiration: 10-12-2028

VERIFICATION OF JOHN WOLFRAM

Commission expiration: April 9, 2025

Inter-County Energy Cooperative Corporation
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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 Inter-County Energy's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC to Inter-County Energy and explain any variance shown in Exhibit 4.

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

Response 1(b): See Application Exhibit 4, page 1. Also see Attachment 1-1, 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**

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

- a. Confirm that Inter-County Energy'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 Inter-County Energy 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): KRS 278.455 requires that an increase must be a strict proportional pass through of the wholesale rate increase and therefore Inter-County Energy did not propose a deviation. However, due to the different rate structures and customer classes of the distribution cooperatives EKPC's proposed increase will affect each distribution cooperative differently. This may necessitate some distribution cooperatives to file streamline rate proceedings that are either revenue neutral or an increase to fix any issues that arise after the pass-through cases are complete.

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

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Request 3: Refer to Exhibit 4 and Inter-County Energy's tariff. Identify any special contract or EKPC Rate G / Schedule IND-G or similar arrangements reflected in revenues or rates.

- a. Identify the Commission case number and Order approving each contract or rider.
- b. Confirm that the pass-through treatment for such load is consistent with KRS 278.455(3) (i.e., special contracts are governed by the contract terms rather than the general proportional pass-through) and explain how the increase is handled for those customers.

Response 3(a): Please see the Commission's Tariff Library for all of Inter-County's approved contracts. All contracts included the original date and any amendments that have been approved by the Commission.

Response 3(b): Confirmed.

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

a. Provide a reconciliation between the \$0.01163/kWh FAC roll-in incorporated in Exhibit 4 with Inter-County Energy's FAC Form A filings filed after the August 30, 2024 Order in Case No. 2023-00014.

b. Identify any differences between the billing analysis in Exhibit 4 and the FAC recovery amounts reported in Inter-County Energy's semi-annual filings.

c. Confirm that Inter-County Energy 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 4(a): The FAC roll-in incorporated in Exhibit 4 reflects the adjustment specified in the Commission's Order in Case No. 2023-00014. The amount shown at the bottom of Exhibit 4 in the Present Rate column was moved from the FAC line to the base energy charge line for all rates on Exhibit 4 which include an energy charge. The amount is annualized such that the "Present Rate" reflects the movement of the ordered incremental energy charge from the FAC to base energy. This is evident in the Excel file provided in response to Item 1a, by comparing the energy charge and FAC in columns "2023 Revenue" and "Present Revenue" for each rate in Exhibit 4.

Response 4(b): Not applicable.

Response 4(c): Confirmed.

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Request 5: Refer to Inter-County Energy's current tariff, Rules & Regulations, Section 10 (Billing).

- a. Describe how Inter-County Energy will implement the new rates for bills with service periods that straddle the effective date, consistent with Section 10.
- b. Provide a worked example (example dates and usage) identifying which components are prorated and which are not (e.g., customer/facility charge, lighting charge, energy, and demand), and how any FAC in effect at that time will be applied.
- c. Identify any tariff provisions, internal policies/procedures, or billing system constraints relied upon in calculating the billing calculations described

Response 5(a): Customer and Energy charges will be prorated based on the number of days of service at the old and new rate. Demand, and Lighting rates will not be prorated, but will go into effect with the next full billing cycle.

Response 5(b): Customer and Energy prorated rates will be calculated based on the following formula:

$$\frac{[(\text{number of days on the original rate} * \text{original rate}) + (\text{number of days on the new rate} * \text{new rate})]}{\text{Total days in billing cycle}}$$

Response 5(c): Inter-County's billing software prevents entering multiple rates for the same billing cycle.

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Request 6: Identify the tariff schedule(s) governing unmetered, per-light, per-month charges (e.g., Outdoor Lighting Service – Security Lights, Schedule 6) and confirm that the proposed lighting charges in Exhibit 4 are derived from that schedule. Provide the kWh/fixture and other assumptions used to reflect EKPC's increase (and FAC/Environmental Surcharge (ES) treatment, if applicable).

Response 6: Confirmed. All of the lights listed in Exhibit 4 are set forth in the tariff for Outdoor Lighting Service – Security Lights Schedule 6. 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).

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Request 7: Refer to Exhibit 6 of the Application, Customer Notice. For Schedule 5 – All Electric School Rate, a 5.06 percent increase is listed in the bill impact table. Reconcile this number with the 4.55 percent total revenue and average increase listed in Exhibit 4 of the Billing Analysis.

Response 7: In the customer notice the overall percentage increase inadvertently refers to the base rate increase, not the total increase. The total increase is 4.55 percent.

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Request 8: Refer to Exhibit 4, Billing Analysis, page 4, line items 115 and 116. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 170,800 Lumen Directional Floodlight rate for the Billing Analysis.

Response 8: Certain types of lamps / lights / fixtures are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time. The correct number of billing units for the noted light is the sum of the units for line 115 and line 116 (so the billing analysis is correct).

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Request 9: Refer to Exhibit 4, Billing Analysis, page 4, line items 113 and 114. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 50,000 Lumen Directional Floodlight rate for the Billing Analysis.

Response 9. Certain types of lamps / lights / fixtures are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time. The correct number of billing units for the noted light is the sum of the units for line 113 and line 114 (so the billing analysis is correct).

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Response 10: Refer to Exhibit 4, Billing Analysis, page 4, line items 111 and 112. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 27,500 Lumen Directional Floodlight rate for the Billing Analysis.

Response 10. Certain types of lamps / lights / fixtures are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time. The correct number of billing units for the noted light is the sum of the units for line 111 and line 112 (so the billing analysis is correct).

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Request 11: Refer to Exhibit 4, Billing Analysis, page 4, line items 117 and 118. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 27,500 Lumen Cobra Head rate for the Billing Analysis.

Response 11. Certain types of lamps / lights / fixtures are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time. The correct number of billing units for the noted light is the sum of the units for line 117 and line 118 (so the billing analysis is correct).

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Request 12: Refer to Exhibit 4, Billing Analysis, page 4, line items 103 and 105. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 9,500 Lumen Security Light rate for the Billing Analysis.

Response 12. Certain types of lamps / lights / fixtures are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time. The correct number of billing units for the noted light is the sum of the units for line 103 and line 105 (so the billing analysis is correct).

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Request 13: Refer to Exhibit 4, Billing Analysis, Page 4, line item 119. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6. Confirm that line item 119 is the 7,000 Lumen Security Light on the tariff. If not confirmed, identify the line item by name of customer class and location in the tariff.

Response 13: Confirmed.

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Request 14: Refer to Exhibit 4, Billing Analysis, page 4, line items 107 and 108. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 4,000 Lumen Decorative Colonial Post rate for the Billing Analysis.

Response 14: Certain types of lamps / lights / fixtures are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time. The correct number of billing units for the noted light is the sum of the units for line 107 and line 108 (so the billing analysis is correct).

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Request 15: Refer to Exhibit 4, Billing Analysis, page 4, line items 109 and 110. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 9,550 Lumen Decorative Colonial Post rate for the Billing Analysis.

Response 15. Certain types of lamps / lights / fixtures are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time. The correct number of billing units for the noted light is the sum of the units for line 109 and line 110 (so the billing analysis is correct).

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Request 16: Refer to Exhibit 4, Billing Analysis, page 4, line items 120 and 121. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 6,000 Lumen Security LED Light rate for the Billing Analysis.

Response 16. Certain types of lamps / lights / fixtures are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time. The correct number of billing units for the noted light is the sum of the units for line 120 and line 121 (so the billing analysis is correct).

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Request 17: Refer to Exhibit 4, Billing Analysis, page 4, line items 104 and 106. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the Pole Charge for the Billing Analysis.

Response 17. Certain types of lamps / lights / fixtures are entered into the billing system multiple times for unknown reasons but presumably due to (a) slight variations in the fixtures/bulbs or (b) inconsistent data entry practices by different staff members over time. The correct number of billing units for the noted poles is the sum of the units for line 104 and line 106 (so the billing analysis is correct).

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Request 18: Refer to Exhibit 4, Billing Analysis, page 2. Refer also to Exhibit 2, generally. The Schedule NM – Net Metering rates specified in the billing analysis are not included on the proposed or strike through Tariff sheets. Explain why the Net Metering rates were not included in Exhibit 2. Additionally, provide an update to Exhibit 2 to include the changes made to the Net Metering rate.

Response 18: Schedule NM does not list a per-unit rate; instead it makes reference to base rates in other schedules, and has no rates included in the tariff that require revision. For this reason it was excluded from the notice.