

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF OWEN)	
ELECTRIC COOPERATIVE, INC. FOR PASS-)	
THROUGH OF EAST KENTUCKY POWER)	Case No. 2025-00217
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

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

Comes now Owen Electric Cooperative, Inc.'s ("Owen Electric") Verified Response to the
Commission Staff's First Request for Information entered September 3, 2025.

Dated September 16, 2025

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THROUGH OF EAST KENTUCKY POWER)	Case No. 2025-00217
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

VERIFICATION OF MIKE STAFFORD

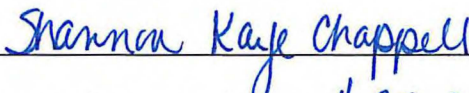
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF OWEN)

Mike Stafford, Vice President of Member Services, 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.

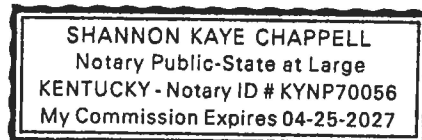


Mike Stafford

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



Commission expiration: 4-25-2027



VERIFICATION OF JOHN WOLFRAM

Commission expiration: April 9, 2025

Owen Electric Cooperative, Inc.
Case No. 2025-00217
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 Owen Electric's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC to Owen Electric 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**

Owen Electric Cooperative, Inc.
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Request 2. Refer to the Direct Testimony of John Wolfram, Exhibit 7.

- a. Confirm that Owen Electric's proposed rates reflect a strict proportional pass-through of EKPC's wholesale increase in accordance with KRS 278.455.
- b. If Owen Electric considered any deviation from strict proportionality, identify and explain why no such deviation was proposed.
- c. Provide the class billing determinants used to support the proportional pass-through.

Response 2(a): Confirmed.

Response 2(b): Not applicable.

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 Owen Electric's tariff, Section A, Special Contract Customer.

- a. Identify any special contract customers served by Owen Electric and cite the Commission case number and Order approving the current special contract.
- b. Confirm that no portion of EKPC's wholesale increase allocated in this case is being applied to service under a special contract except as permitted by the contract and KRS 278.455 and explain how the proposed increase interacts with the contract terms (e.g. pass-through provisions or margins).
- c. Reconcile the "Special Contract" block in Exhibit 4 with the EKPC allocation and provide the supporting calculations and billing determinants used for that block.

Response 3a. Please see the Commission's Tariff Library for all of Owen Electric's approved contracts. All contracts included the original date and any amendments that have been approved by the Commission.

Response 3b-c. Confirmed. The demand and energy pass-through per-unit rates in Exhibit 4 match those specified by EKPC. See the file provided in response to Item 1.

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Request 4. Refer to Owen Electric's Outdoor Lighting schedules in its current tariff, specifically Schedule I, OLS (Outdoor Lighting Service) and Schedules II & III, SOLS (Special Outdoor Lighting Service).

- a. Explain how the unmetered, per-light monthly charges (and any embedded energy components where applicable) were treated in Exhibit 4.
- b. Provide the counts of lights by type used as billing units for each lighting schedule and show the calculation that ties to Exhibit 4.

Response 4a. The billing analysis for lighting is based on the number of lights. 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 4b. See the file provided in response to Item 1.

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Request 5. Refer to Case No. 2023-00014, which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery.

- a. Provide a reconciliation between the \$0.01165/kWh FAC roll-in incorporated in Exhibit 4 with Owen Electric's FAC Form A filings filed after the August 30, 2024 Order in Case No. 2023-00014. Identify any differences between the billing analysis in Exhibit 4 and the FAC recovery amounts reported in Owen Electric's semi-annual filings.
- b. Confirm that Owen Electric 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 5(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 5(b): Confirmed.

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Request 6. Refer to Owen Electric's current tariff, Rules & Regulations, Section 12 (Billing).

- a. Describe how Owen Electric will implement the new rates for bills with service periods that straddle the eventual effective date of the retail pass-through, consistent with Section 12.
- 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 6(a)-(c). Please see Attachment 1-6. The customer charge and outdoor light rates are all updated to the new rate the first day of the month/effective date. The energy charge used for billing cycles that straddle the effective date is calculated based on number of days on the old rate and number of days on the new rate. Accounts with billed demand are read and billed month beginning to month end; therefore, a proration of the demand charge is not necessary. This is consistent with Owen Electric's implementation of EKPC's previous pass-through adjustments.

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Request 7. Refer to Exhibit 4, Billing Analysis, page 3. Refer also Exhibit 2, generally. The ETS Off-Peak – Special Contract rates specified in the billing analysis are not included on the proposed or strike through tariff sheets.

- a. Explain why ETS Off-Peak – Special Contract rates were not included in Exhibit 2.
- b. Provide an update to Exhibit 2 to include the changes made to the ETS Off-Peak – Special Contract rates.

Response 7(a)-(b): This rate schedule does not list a specific rate in the tariff; instead it references the rate schedule it follows such as Schedule 1 Farm & Home.

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Request 8. Refer to Exhibit 4, Billing Analysis, page 5. Refer also Exhibit 2 generally. The Schedule NM – Net Metering – Residential rates specified in the billing analysis are not included on the proposed or strike through tariff sheets.

- a. Explain Schedule NM – Net Metering – Residential rates were not included in Exhibit 2.
- b. Provide an update to Exhibit 2 to include the changes made to the Schedule NM – Net Metering – Residential rates.

Response 8. This rate schedule does not list a specific rate in the tariff; instead it references the rate schedule it follows such as Schedule 1 Farm & Home.

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Request 9. Refer to Exhibit 4, Billing Analysis, page 6. Refer also Exhibit 2, generally. Schedule NM – Net Metering – Small Commercial, Schedule NM – Net Metering – Large Commercial, Prepay Metering Program, and Prepay Metering Program Inclining Block rates specified in the billing analysis are not included on the proposed or strike through tariff sheets.

- a. Explain why rates were not included in Exhibit 2.
- b. Provide an update to Exhibit 2 to include the changes made to the rates.

Response 9. This rate schedule does not list a specific rate in the tariff; instead it references the rate schedule it follows.

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Request 10. Refer to Exhibit 6, Customer Notice, page 26G. Refer also to Exhibit 4, Billing Analysis, generally. Explain why the Net Metering rates were not included in the customer notice.

Response 10. This rate schedule does not list a specific rate in the tariff; instead it references the rate schedule it follows such as Schedule 1 Farm & Home.

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Request 11. Refer to Exhibit 6, Customer Notice, page 26G and 26H. Refer also to Exhibit 4, Billing Analysis, page 1. Explain why the total revenue increase was not included in the table describing the overall percentage and dollar amount of revenue increase requested in the customer notice.

Response 11. A row with totals appears to have been inadvertently omitted. See the file provided in response to Item 1, where the totals match those provided in Exhibit 4.

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Request 12. Refer to Exhibit 6, Customer Notice, page 26h. Refer also to Exhibit 4, Billing Analysis, page 1. Explain why the line item 17, Prepay Metering Program rates, were not included in the table describing the overall percentage and dollar amount of revenue increase requested in the customer notice.

Response 12. These rate schedules do not list a specific rate in the tariff; instead they reference the rate schedule they follow such as Schedule 1 Farm & Home.

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Request 13. Refer to Exhibit 6, Customer Notice, page 26H. Refer also to Exhibit 4, Billing Analysis, page 3. The ETS Off-Peak – Special Contract rate shows a \$0.00 bill increase on the customer notice. However, the billing analysis shows a \$31.00 bill increase. Explain and reconcile the discrepancy.

Response 13. The average amounts appear as zero in the model because there is no customer charge per month, and thus the number of members served is not listed in Exhibit 4. The value should not be zero, but the row to which the notice links is blank. The total amounts are provided but the average is not.

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Request 14. Refer to Exhibit 6, Customer Notice, page 26H. Refer also to Exhibit 4, Billing Analysis, page 6. The billing analysis shows a bill impact of \$7.05 for the Prepay Metering Program – Inclining Block rate. However, the customer notice does not include the bill impact for this specific rate. Explain why the Prepay Metering Program – Inclining Block bill impact was not included in the customer notice.

Response 14. This schedule was inadvertently excluded from the Customer Notice. See the file provided in response to Item 1.