

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

In the Matter of:

THE ELECTRONIC APPLICATION OF CLARK)	
ENERGY COOPERATIVE INC. FOR PASS-)	CASE NO.
THROUGH OF EAST KENTUCKY POWER)	2025-00219
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

CLARK ENERGY COOPERATIVE, INC.
CORPORATION'S VERIFIED RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION ENTERED SEPTEMBER 9, 2025

Comes now Clark Energy Cooperative, Inc. ("Clark Energy"), by counsel, and does hereby tender its Verified Response to the Commission Staff's First Request for Information entered September 9, 2025.


Dated September 22, 2025

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

VERIFICATION OF JOHN WOLFRAM

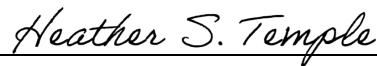
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

John Wolfram, being duly sworn, states that he has supervised the preparation of his 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

Clark Energy Cooperative, Inc.
Case No. 2025-00216
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 Clark Energy's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC to Clark 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**

Clark Energy Cooperative, Inc.
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Request 2: Refer to the Direct Testimony of John Wolfram, Exhibit 7.

- a. Confirm that Clark 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 Clark Energy 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.

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

- a. Provide a reconciliation between the \$0.01178 per kWh FAC roll-in incorporated in Exhibit 4 and Clark 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 Clark Energy's semi-annual filings.
- c. Confirm that Clark 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 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): The billing analysis annualizes the FAC roll-in based on test year billing determinants, while the semi-annual filings reflect actual FAC amounts.

Response 3(c): Confirmed.

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Request 4: Refer to Clark Energy's current tariff.

- a. Describe how Clark Energy 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 making these billing calculations.

Response 4(a)-(d): Clark Energy will not implement new retail rates until there has been a full billing period following the effective date, without prorating.

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Request 5: Clark Energy has filed an alternative rate adjustment application in Case No. 2025-00230. Provide Clark Energy's contingency plan and timeline for updating the pass-through exhibits should a final Order in Case No. 2025-00230 be issued during the pendency of this pass-through proceeding.

Response 5: When the Commission issues its order in the referenced docket, Clark Energy will update the billing analysis in the instant case to reflect the ordered rates as "present rates" for Exhibit 4, and will calculate the "proposed rates" using the filed approach. This will result in the pass-through of the EKPC amount as allocated to Clark Energy, but based on the Commission's order as the starting point instead of the currently-effective rates as the starting point.

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Request 6: Refer to Exhibit 4 of the Application.

- a. From the lighting schedules included in Exhibit 4 of the billing analysis, identify which are billed on a per-light, per-month basis.
- b. For each such schedule, 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 is reflected in these unmetered lighting accounts.

Response 6(a): All lights are billed on this basis.

Response 6(b): The billing analysis for lighting in Exhibit 4 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 6(c): The FAC for unmetered lighting is accounted for in the usage for the rate class assigned to the premise with which the lighting is associated.

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Request 7: Refer to Exhibit 4, Billing Analysis, page 3. Refer also to Exhibit 2, "Present Tariffs", Schedule B-1 and Exhibit 6, Customer Notice. The tariff and customer notice show a present energy charge of \$0.062436 per kWh. However, the billing analysis shows a present energy charge of \$0.062436 per kWh. However, the billing analysis shows a present energy charge of \$0.06244 per kWh. Explain and reconcile the discrepancy.

Response 7: This is a rounding issue. The correct value is \$0.062436. See Attachment 1-1.

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Request 8: Refer to Exhibit 4, Billing Analysis, page 1. Refer also to Exhibit 6, Customer Notice. The billing analysis shows a revenue increase of \$69, 780 for the lighting classes. However, the customer notice shows a revenue increase of \$69,835. Explain and reconcile the discrepancy.

Response 8: The correct value is \$69,780 as shown in the billing analysis.

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Request 9: Refer to Exhibit 4, Billing Analysis, page 4. Refer also to Exhibit 6, Customer Notice. The billing analysis shows a 4.93 percent bill impact for the lighting classes. However, the customer notice shows a 4.91 percent. Explain and reconcile the discrepancy.

Response 9: The correct value is 4.93 percent as shown in the billing analysis.