

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

In the Matter of:

THE ELECTRONIC APPLICATION OF)	
BIG SANDY RURAL ELECTRIC COOPERATIVE)	
CORPORTION FOR PASS-THROUGH OF EAST)	Case No. 2025-00222
KENTUCKY POWER COOPERATIVE, INC.'S)	
WHOLESALE RATE ADJUSTMENT)	

BIG SANDY RURAL ELECTRIC COOPERATIVE
CORPORATION'S VERIFIED RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
ENTERED SEPTEMBER 3, 2025

Comes now Big Sandy Rural Electric Cooperative Corporation ("Big Sandy RECC"), 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

Commission expiration: July 12, 2027

VERIFICATION OF JOHN WOLFRAM

Commission expiration: April 9, 2025

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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 Big Sandy RECC's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC to Big Sandy RECC 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 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 Big Sandy 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 Big Sandy RECC 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 Case No. 2023-00014, which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery.

- a. Provide a reconciliation between the \$0.01187 per kWh FAC roll-in incorporated in Exhibit 4 and Big Sandy RECC'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 Big Sandy RECC's semi-annual filings.
- c. Confirm that Big Sandy 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. (Note for Big Sandy the amount is \$0.01187 per kWh not \$0.01194 per kWh.)

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 Big Sandy RECC's current tariff.

- a. Describe how Big Sandy 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 making these billing calculations.

Response 4. Big Sandy RECC will not bill the new retail rates until there has been a full billing period following the effective date, with no proration. In other words, all billing cycles are for the previous calendar month, and when there is a rate change, the Cooperative does not prorate, but just starts with the new rates in the first cycle after the first of the month with the new rates.

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Request 5: Refer to Exhibit 4 of the Application.

- a. Regarding 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 for these unmetered lighting accounts.

Response 5(a): All lights are billed per-light, per-month.

Response 5(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 5(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 6: Refer to Exhibit 4, Billing Analysis, page 2. Refer also to Exhibit 2, Proposed Tariffs, Schedule A-2 Commercial and Small Power. The billing analysis shows a proposed demand charge of \$5.943820 per kW. However, the tariff shows a proposed demand charge of \$5.94 per kW. Explain and reconcile the discrepancy.

Response 6: This is a formatting issue. The correct format is \$5.94 with two decimal places.

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Request 7: Refer to Exhibit 4, Billing Analysis, page 4. Refer also to Exhibit 2, Strike Through Tariffs, Schedule YL-1. 120-Watt LED was included in the tariff, however it was not included in the billing analysis. Explain and reconcile the discrepancy.

Response 7: The light remains in the tariff but the utility did not have any in service during the test year so it is not included in the billing analysis.

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Request 8: Refer to Exhibit 4, Billing Analysis, page 3. Refer also to Exhibit 2, Strike Through Tariffs, Schedule LP Large Power Service.

- a. The billing analysis shows a present secondary meter energy charge of \$0.08037 per kWh. However, the tariff shows a present secondary meter energy charge of \$0.08206 per kWh. Explain and reconcile the discrepancy.
- b. The billing analysis shows a present primary meter energy charge of \$0.07320 per kWh. However, the tariff shows a present primary meter energy charge of \$0.07473 per kWh. Explain and reconcile the discrepancy.

Response 8. The billing analysis values are correct. These match the amounts set by the Commission in its Order dated June 20, 2025 in Case No. 2024-00287. The tariff update had not yet been completed at the time the notices were submitted for publication.

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Request 9: Refer to Exhibit 4, Billing Analysis, page 3. Refer also to Exhibit 2, Strike Through Tariffs, Schedule LPR Large Power Service.

- a. The billing analysis shows a present secondary meter energy charge of \$0.07141 per kWh. However, the tariff shows a present secondary meter energy charge of \$0.07473 per kWh. Explain and reconcile the discrepancy.
- b. The billing analysis shows a present primary meter energy charge of \$0.06506 per kWh. However, the tariff shows a present primary meter energy charge of \$0.06653 per kWh. Explain and reconcile the discrepancy.

Response 9: The billing analysis values are correct. These match the amounts set by the Commission in its Order dated June 20, 2025 in Case No. 2024-00287. The tariff update had not yet been completed at the time the notices were submitted for publication.

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Request 10: Refer to Exhibit 4, Billing Analysis, page 3. Refer also to Exhibit 2, Strike Through Tariffs, Schedule IND 1-B.

a. The billing analysis shows a present secondary meter energy charge of \$0.07006 per kWh. However, the tariff shows a present secondary meter energy charge of \$0.0705 per kWh. Explain and reconcile the discrepancy.

b. The billing analysis shows a present primary meter energy charge of \$0.06927 per kWh. However, the tariff shows a present primary meter energy charge of \$0.6996 per kWh. Explain and reconcile the discrepancy.

Response 10: The billing analysis values are correct. These match the amounts set by the Commission in its Order dated June 20, 2025 in Case No. 2024-00287. The tariff update had not yet been completed at the time the notices were submitted for publication.

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Request 11:

Refer to Exhibit 4, Billing Analysis, page 5. Refer also to Exhibit 2, Proposed Tariffs, Schedule IND 1. The billing analysis shows a proposed demand charge of \$6.40774 per kW. However, the tariff shows a proposed demand charge of \$6.41 per kW. Explain and reconcile the discrepancy.

Response 11. This is a formatting issue. The correct format is \$6.41 with two decimal places.

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Request 12: Refer to Exhibit 4, Billing Analysis, page 5. Refer also to Exhibit 2, Proposed Tariffs, Schedule IND 2. The billing analysis shows a proposed demand charge of \$6.40774 per kW. However, the tariff shows a proposed demand charge of \$6.41 per kW. Explain and reconcile the discrepancy.

Response 12. This is a formatting issue. The correct format is \$6.41 with two decimal places.