COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CLARK ENRGY COOPERATIVE, INC. FOR A GENERAL ADJUSTMENT OF RATES PURSUANT TO 807 KAR 5:0078	))))	CASE NO. 2025-00230

VERIFIED APPLICATION

Comes now Clark Energy Cooperative Inc. ("Clark Energy"), by counsel, and hereby gives notice to the Kentucky Public Service Commission ("Commission"), pursuant to KRS 278.180, 807 KAR 5:0078, and other applicable law, and for its Application requesting a general adjustment of its existing rates, respectfully states as follows:

INTRODCUTION

1. Clark Energy is a not-for-profit, member-owned, rural electric distribution cooperative organized under KRS Chapter 279. Clark Energy is engaged in the business of distributing retail power to approximately 28,400 members in the Kentucky counties of Bath, Bourbon, Clark, Estill, Fayette, Madison, Menifee, Montgomery, Morgan, Powell, and Rowan.

2. Clark Energy's existing general rates went into effect on August 11, 2020. Since that time, Clark Energy's growth has been stagnant, while the rising inflation caused an increase in the cost of labor and supplies in all areas of the utility.

3. Despite close management supervision to minimize cost-escalation, overall expenses in several aspects of Clark Energy's operations have increased. Clark Energy's Board of Directors, in conjunction with its management, determined that an adjustment of retail rates is necessary in order to account for increases in virtually all areas of its business operations since its

last rate case, improve Clark Energy's overall financial condition, and satisfy current and future loan covenants. Consistent with KRS 278.030(1), Clark Energy seeks Commission approval to demand, collect and receive fair, just and reasonable rates for the retail service it provides. Clark Energy requests approval to increase its annual revenues by $2,820,550 or approximately 5%. Clark Energy proposes the new rates become effective September 12, 2025.

FILING REQUIREMENTS

4. Pursuant to 807 KAR 5:001, Section 14(1), Clark Energy's mailing address is 2640 Iron Works Road, Winchester, Kentucky 40391. Clark Energy's electronic mailing address is psc@clarkenergy.com. Clark Energy's telephone number is (859) 744-4251 and its fax number is (859) 744-4218. Clark Energy requests the following individuals be included on the service list:

R. Christopher Brewer, President/Chief Executive Officer

cbrewer@clarkenergy.com

Billy O. Frasure, Vice President of Finance and Office Services

bfrasure@clarkenergy.com

L. Allyson Honaker, Honaker Law Office PLLC
allyson@hloky.com
Heather S. Temple, Honaker Law Office PLLC
heather@hloky.com
Meredith L. Cave, Honaker Law Office PLLC
meredith@hloky.com

5. Pursuant to 807 KAR 5:001, Section 14(2), Clark Energy states that it incorporated in Kentucky on March 16, 1938, and attests that it is presently a Kentucky corporation in good standing. A copy of the Certificate of Good Standing is attached to the Application as Exhibit 1.

6. Pursuant to 807 KAR 5:078, Section 2(1)-(2), Clark Energy's last general adjustment of rates occurred in Case No. 2020-00104[1]. This Application is fewer than ten (10) years since the effective date of new rates resulting from Clark Energy's last base rate adjustment and at least twelve (12) months have elapsed since the effective date of the most recent base rate adjustment.

7. Pursuant to 807 KAR 5:078, Section 2(3)-(6), Clark Energy seeks approval to increase its annual revenues by $2,820,550 or 4.87%, to achieve an Operating Times Interest Earned Ratio ("OTIER") of, but not exceeding, 1.85. This amount does not exceed one (1) percent per twelve (12) month period since the last base rate adjustment; does not exceed the 1.85 OTIER limitation, the cumulative rate increase is not over five (5) percent of the aggregate of multiple twelve-month periods in this Application; an embedded class cost of service study was completed less than five (5) years prior to the submission of this Application.

8. Pursuant to 807 KAR 5:078, Section 2(7), Clark Energy's request is limited to seeking adjustments in revenue requirements and changes to rate design and does not include any request for a certificate of public convenience and necessity or changes in its tariff beyond those necessary to reflect changes in rates.

9. Pursuant to 807 KAR 5:078, Section 2(8), Clark Energy based its proposed rates on a twelve-month historical test period ending December 31, 2024, which is the same period its most recent annual report was filed with the Commission.

10. Pursuant to 807 KAR 5:078, Section 2(9), this Application is being filed electronically pursuant to the requirements of 807 KAR 5:001, Section 8.

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[1] Case No. 2020-00104, *Electronic Application for Clark Energy Cooperative, Inc. for a General Adjustment of Rates Pursuant to Streamlined Procedure Pilot Program Established in Case No. 2018-00407*, August 11, 2020 Order (Ky. PSC. August 11, 2020).

11. Pursuant to 807 KAR 5:078, Section 2(10)-(11), Clark Energy states it filed the Notice of Intent on July 11, 2025, which was at least thirty (30) days but not more than sixty (60) days before this Application was filed. Clark Energy provided a copy of the Notice of Intent to the Attorney General on the same date via electronic mail to rateintervention@ag.ky.gov. Additionally, Clark Energy provided a copy of this Application to the Attorney General via electronic mail contemporaneously with this filing.

12. Pursuant to 807 KAR 5:078, Section 3(1), a statement discussing the changes materially affecting Clark Energy's rates or service that have occurred since the effective date of the last base rate adjustment and reasons for the proposed adjustment is attached as Exhibit 2.

13. Pursuant to 807 KAR 5:078, Section 3(2), because five (5) or more years have elapsed since Clark Energy's most recent general rate adjustment, a detailed explanation of why Clark Energy did not seek a general rate adjustment in that period is attached as Exhibit 3.

14. Pursuant to 807 KAR 5:078, Section 3(3), new or revised tariff sheets with an effective date of September 12, 2025, are attached as Exhibit 4.

15. Pursuant to 807 KAR 5:078, Section 3(4)(a)(2), a copy of the present tariffs indicating the proposed additions by italicized inserts and striking over proposed deletions are attached as Exhibit 5.

16. Pursuant to 807 KAR 5:078, Section 3(4)(b), a statement that notice has been given in compliance with Section 7 of the regulation, and a copy of the notice, is attached as Exhibit 6.

17. Pursuant to 807 KAR 5:078, Section 3(5), a general statement identifying any electric property or plant held for future use is attached as Exhibit 7.

18. Pursuant to 807 KAR 5:078, Section 3(6), all current agreements related to vegetation management, as well as a statement identifying any changes that occurred since Clark

Energy's base rate adjustment to Clark Energy's policies on vegetation management, indicating the effective date and reason for these changes are attached as Exhibit 8.

19. Pursuant 807 KAR 5:078, Section 3(7), a statement identifying any changes that occurred during the test year to Clark Energy's written policies on the compensation of its attorneys, auditors, and all other professional service providers, indicating the effective date and reason for these changes is attached Exhibit 9.

20. Pursuant to 807 KAR 5:078, Section 3(8)(a), a statement explaining that the depreciation rates reflected in the Application are identical to those most recently approved by the Commission and the case in which they were approved is attached as Exhibit 10.

21. Pursuant to 807 KAR 5:078, Section 3(9), the estimated dates for drawdowns of unadvanced loan funds at test year end and the proposed use of those funds are attached as Exhibit 11.

22. Pursuant to 807 KAR 5:078, Section 3(10)(a)-(b), a schedule of Clark Energy's standard directors' fees, per diems, and any other compensation in effect during the test year is attached as Exhibit 12. This schedule includes a description of any changes that occurred during the test year to Clark Energy's written policies, including the compensation of directors; and indicates the effective date and an explanation for any change.

23. Pursuant to 807 KAR 5:078, Section 3(11)(a)-(e), a schedule reflecting the salaries and other compensation of each executive officer for the test year and two (2) proceeding calendar years is attached as Exhibit 13. The schedule includes the percentage of annual increase and the effective date of each salary increase; the job title, duty, and responsibility of each officer; the number of employees who report to each executive officer; to whom each executive officer reports;

and for employees elected to executive officer status during the test year, the salaries for the test year for those persons whom they replaced.

24. Pursuant to 807 KAR 5:078, Section 3(12), Clark Energy's TIER, OTIER, and debt service coverage ratio, as calculated by the Rural Utility Service, for the test year and the five (5) most recent calendar years, including the data used to calculate each ratio is attached as Exhibit 14.

25. Pursuant to 807 KAR 5:078, Section 3(13), Clark Energy's debt instruments are attached as Exhibit 15.

26. Pursuant to 807 KAR 5:078, Section 3(14), copies of all exhibits and schedules that were prepared for this rate Application in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible are attached as Exhibit 16.

27. Pursuant to 807 KAR 5:078, Section 3(15), a schedule comparing balances for each balance sheet account or subaccount included in Clark Energy's chart of accounts for each month of the test year to the corresponding month of the 12-month period immediately preceding the test year is attached as Exhibit 17.

28. Pursuant to 807 KAR 5:078, Section 3(16), a schedule comparing each income statement account or subaccount included in Clark Energy's chart of accounts for each month of the year to the same month of the twelve (12) month period immediately preceding the test year is attached at Exhibit 18.

29. Pursuant to 807 KAR 5:078, Section 3(17), a schedule showing anticipated and incurred rate case expenses, with supporting documentation, which shall be updated every (30) days during the proceeding is attached as Exhibit 19.

30. Pursuant to 807 KAR 5:078, Section 3(18), a statement estimating the effect that each new rate will have upon the revenues of the utility including, at minimum, the total amount of revenues resulting from the increase or decrease and the percentage of the increase or decrease is attached as Exhibit 20.

31. Pursuant to 807 KAR 5:078, Section 3(19), a statement of the effect upon the average bill for each customer classification to which the proposed rate change will apply is attached as Exhibit 21.

32. Pursuant to 807 KAR 5:078, Section 3(20), a summary of Clark Energy's determination of its revenue requirements based on return on TIER, OTIER, debt service coverage, and any metric required by Clark Energy's current debt instruments, with supporting schedules is attached as Exhibit 22.

33. Pursuant to 807 KAR 5:078, Section 3(21)(a), if Clark Energy had amounts charged or allocated to it by an affiliate or general or home office or paid monies to an affiliate or general or home office during the test period or during the previous three (3) calendar years, a detailed description of the method and amounts allocated or charged to the utility by an affiliate or general or home office for each charge allocation or payment is attached as Exhibit 23 including an explanation of how the allocator for the test period was determined and all facts relied upon, including other regulatory approval to demonstrate that each amount charged, allocated, or paid during the test period was reasonable.

34. Pursuant to 807 KAR 5:078, Section 3(22), a calculation of the normalized depreciation expense (test-year end plant account balance multiplied by depreciation rate) is attached as Exhibit 24.

35. Pursuant to 807 KAR 5:078, Section 3(23), an analysis of FERC Account 930, Miscellaneous General Expenses, for the test year is attached as Exhibit 25. The analysis includes: 1) a complete breakdown of the account by the following categories: industry association dues; debt-serving expenses; institutional and conservation advertising; rate department load studies; director's fees and expenses; dues and subscriptions; and miscellaneous items and 2) detailed supporting workpapers that include for amounts over $100, the date, vendor, reference, dollar amount, and a brief description of each expenditure.

36. Pursuant to 807 KAR 5:078, Section 3(24), an analysis of FERC Account 426, Other Income Deductions, for the test period is attached as Exhibit 26. The analysis includes: 1) a breakdown of the account by the following categories: donations; civic activities; political activities; and other items and 2) detailed supporting workpapers that include for amounts over $1,000, the date, vendor, reference, dollar amount, and a brief description of each expenditure.

37. Pursuant to 807 KAR 5:078, Section 3(25), a trial balance as of the last day of the test year showing account number, subaccount number, account title, subaccount title, and amount is attached as Exhibit 27. The trial balance includes all asset, liability, capital, income, and expense accounts used by Clark Energy; and all income statements accounts showing activity for twelve (12) months that includes the balance in each control account and all underlying subaccounts per the company books.

38. Pursuant to 807 KAR 5:078, Section 3(26), a schedule showing employee health, dental, vision, and life insurance premium contributions by coverage type, including the cost split of each identified premium between the employee and Cark Energy is attached as Exhibit 28.

39. Pursuant to 807 KAR 5:078, Section 3(27), a detailed income statement and balance sheet reflecting the impact of all proposed adjustments is attached as Exhibit 29.

40. Pursuant to 807 KAR 5:078, Section 3(28), the number of customers to be added to the test period end level of customers and the related revenue requirements impact for all pro forma adjustments with complete details and supporting work papers is attached as Exhibit 30.

41. Clark Energy is also providing testimony of three witnesses to support this Application. The Direct Testimony of Chris Brewer, President & CEO of Clark Energy is attached as Exhibit 31; the Direct Testimony of Billy O. Frasure, Vice President of Finance and Office Services is attached as Exhibit 32, and the Direct Testimony of John Wolfram, Principal of Catalyst Consulting, LLC is attached as Exhibit 33.

CONCLUSION

42. Clark Energy has initiated this proceeding because its existing retail rates do not provide sufficient revenue to ensure financial strength of the cooperative. While it is always Clark Energy's goal to keep rates as low as possible, the expense of providing safe and reliable service must be recovered. Additionally, prudent management (and lender requirements) demand that healthy financial benchmarks be maintained. Clark Energy's Application, supporting exhibits, and schedules fully demonstrate that an adjustment to the company's wholesale base rates is both necessary and appropriate. Clark Energy respectfully requests the Commission to award it an increase in rates that is fair, just, and reasonable so that Clark Energy may continue to build equity, maintain its healthy financial condition, satisfy current and future loan covenants, address substantial cost escalation seen on the operations side of its business, and sustain its ability to provide safe, adequate and efficient service at rates that are fair, just and reasonable.

43. The preparation, filing, and administration of this request for substantial rate relief necessitates, *inter alia*, the expenditure of money by Clark Energy for financial, rate, and legal

consultants. Clark Energy is entitled to and requests the Commission to allow recovery of all such reasonable expenses in its new rates amortized over a period of three (3) years.

WHEREFORE, on the basis of the foregoing, Clark Energy respectfully requests the Commission to grant the following relief:

1. Approve the adjustments of Clark Energy's base rates as set forth herein with an effective date to be September 12, 2025;

2. Approve Clark Energy's proposed changes to rate design;

3. Approve the changes to each of the tariffs described herein;

4. Approve recovery of reasonable rate case expenses in rates amortized over a period of three (3) years, or such other period which the Commission finds reasonable; and

5. Grant Clark Energy any and all other due and proper relief to which it may appear entitled.

This the 12th day of August, 2025.

Respectfully submitted,

Heather S. Temple

L. Allyson Honaker
Heather S. Temple
Meredith Cave
HONAKER LAW OFFICE, PLLC
1795 Alysheba Way, Suite 1203
Lexington, KY 40509
Telephone (859) 368-8803
allyson@hloky.com
heather@hloky.com
meredith@hloky.com
Counsel for Clark Energy Cooperative Inc.

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF CLARK)

Comes now R. Christopher Brewer, President and Chief Executive Officer of Clark Energy Cooperative Inc. and, after being duly sworn, does hereby verify, swear and affirm that the averments set forth in this Application are true and correct based upon my personal knowledge and belief, formed after reasonable inquiry, as of this the 12th day of August, 2025.

R. Christopher Brewer
President & CEO
Clark Energy Corporation, Inc.

The foregoing Verification was verified, sworn to and affirmed before me, a NOTARY PUBLIC, by R. Christopher Brewer, President & CEO of Blue Grass Energy Cooperative Corporation, on this 12th day of August, 2025.

Julie E Webb KYNP 21860
NOTARY PUBLIC

My Commission Expires: Feb 3, 2029

JULIE ELAM WEBB NOTARY ID KYNP21860 MY COMM. EXPIRES FEBRUARY 3, 2029 PUBLIC STATE AT LARGE, KY.

CERTIFICATE OF SERVICE

This is to certify that foregoing was submitted electronically to the Commission on August 12, 2025, and that there are no parties that have been excused from electronic filing. Pursuant to prior Commission orders, no paper copies of this filing will be submitted.

Heather S. Temple

Counsel for Clark Energy Cooperative Inc.

Clark Energy Cooperative, Inc.
Case No. 2025-00230

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Alternative Rate Adjustment for Electric Cooperatives - Filing Requirements / Exhibit List

(Historical Test Period: Twelve Months Ending December 31, 2024)

Clark Energy Cooperative, Inc.
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Alternative Rate Adjustment for Electric Cooperatives - Filing Requirements / Exhibit List

(Historical Test Period: Twelve Months Ending December 31, 2024)

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 1

807 KAR 5:078, Section 3(1)
Sponsoring Witness: R. Christopher Brewer

Description of the Exhibit:

A copy of the Certificate of Good Standing is attached.

Commonwealth of Kentucky
Michael G. Adams, Secretary of State

Michael G. Adams
Secretary of State
P. O. Box 718
Frankfort, KY 40602-0718
(502) 564-3490
http://www.sos.ky.gov

Certificate of Existence

Authentication number: 339613
Visit https://web.sos.ky.gov/ftshow/certvalidate.aspx to authenticate this certificate.

I, Michael G. Adams, Secretary of State of the Commonwealth of Kentucky, do hereby certify that according to the records in the Office of the Secretary of State,

CLARK ENERGY COOPERATIVE, INC.

CLARK ENERGY COOPERATIVE, INC. is a corporation duly incorporated and existing under KRS Chapter 14A and KRS Chapter 279, whose date of incorporation is March 16, 1938 and whose period of duration is perpetual.

I further certify that all fees and penalties owed to the Secretary of State have been paid; that Articles of Dissolution have not been filed; and that the most recent annual report required by KRS 14A.6-010 has been delivered to the Secretary of State.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal at Frankfort, Kentucky, this 21st day of July, 2025, in the 234th year of the Commonwealth.

Michael G. Adams
Secretary of State
Commonwealth of Kentucky
339613/0009739

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 2

807 KAR 5:078, Section 3(1)
Sponsoring Witness: R. Christopher Brewer

Description of Filing Requirement:

Statement discussing any changes materially affecting the cooperative's rates or service that have occurred since the effective date of its last base rate adjustment and stating the reasons for the proposed adjustment.

Response:

Clark Energy's Application generally, and specifically the Cost-of-Service Study, underscore the necessity of the adjustment requested by Clark Energy in this proceeding. Due to increased expenses in almost every area of its business, including materials and labor, coupled with the flat sales volumes since the last general adjustment of rates in Case No. 2020-00104, Clark Energy is requesting relief that will align with the cost of providing service and ensure compliance with essential financial metrics set by lenders in its loan covenants. Without an adjustment of rates in the magnitude requested in this case, Clark Energy's insufficient rate structure will continue to put it at risk of non-compliance with its lenders, and could impair the excellent level of safe and reliable service its members deserve and expect.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 3

807 KAR 5:078, Section 3(2)
Sponsoring Witness: Christopher Brewer

Description of Filing Requirement:

If five (5) or more years have elapsed since the cooperative's most recent general rate adjustment, a detailed explanation of why the cooperative did not seek a general rate adjustment in that period.

Response:

Clark Energy filed for a general adjustment of rates in Case No. 2020-00104, *Electronic Application of Clark Energy Cooperative, Inc. for a General Adjustment of Rates Pursuant to Streamlined Procedure Pilot Program Established in Case No. 2018-00407* on May 1, 2020. The rates became effective on August 11, 2020. Therefore, this application is only one (1) day outside of the five (5) years Clark Energy's last general rate adjustment. Clark Energy chose to file an application pursuant to this regulation instead of incurring the additional costs and time for preparing a rate application pursuant to KRS 278.190. Clark Energy determined that filing this case under the streamline regulation instead of a general adjustment of rates under KRS 278.190 was prudent and beneficial to Clark Energy's members. If a more significant increase was supported, Clark Energy would have filed a general adjustment of rates.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 4

807 KAR 5:078, Section 3(3)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

New or revised tariff sheets, if applicable, with an effective date not less than thirty (30) days from the date of the Application

Response: Please see the attached.

CLARK ENERGY COOPERATIVE INC.

OF

2640 Ironworks Road
Winchester, Kentucky 40391

www.clarkenergy.com

Rates, Rules and Regulations for Furnishing Electricity

FOR

Counties of: Bath, Bourbon, Clark, Estill, Fayette, Madison, Menifee, Montgomery, Morgan, Powell, Rowan, Wolfe

Filed with PUBLIC SERVICE COMMISSION OF KENTUCKY

ISSUED August 12, 2025

EFFECTIVE September 12, 2025

ISSUED Robert C. Brewer

PRESIDENT & C.E.O.

Clark Energy Cooperative Inc.
Name of Issuing Corporation

CLASSIFICATION OF SERVICE

Schedule R: Residential

AVAILABILITY

Available to all residential consumers subject to established rules and regulations of the Distributor.

CHARACTER OF SERVICE

Single phase, 60 Hertz, at available secondary voltages.

DELIVERY POINT

The delivery point at which the secondary or utilization voltage is provided shall be specified by the Distributor.

RATES

$33.00	Facility Charge	I
$0.09621	per kWh for all energy	R

MINIMUM MONTHLY CHARGE

I

The minimum monthly charge shall be $33.00.

FUEL ADJUSTMENT CHARGE

The above rate may be increased or decreased by an amount per kWh equal to the fuel adjustment amount per kWh as billed by the Wholesale Power Supplier plus an allowance for line losses. The allowance for line losses will not exceed 10% and is based on a twelve-month moving average of such losses.

Date of Issue: August 12, 2025

Date Effective: September 12, 2025

Issued By: Billy O Fraser
Vice President, Finance & Office Services

Issued by authority of an Order of the Public Service Commission in Case No. dated

CLASSIFICATION OF SERVICE

PREPAY SERVICE RIDER

STANDARD RIDER
Prepay Service is a voluntary rider to Rate Schedule R – Residential.

AVAILABILITY
Available to all residential consumers excluding accounts on budget billing, automatic bank draft, net metered accounts, accounts with lifesaving medical equipment, accounts greater than 200-amp service and three-phase accounts within the area served by Clark Energy.

RATES

$33.00 per month	Facility Charge ($1.10 per day)	I
$ 5.00 per month	Prepay service fee ($.167 per day)	
$0.09621	per kWh for all energy	R

TERMS & CONDITIONS
Members who qualify, as defined in "Availability" above may choose to voluntarily enroll their electric account(s) in the Prepay Service and are subject to the following:

1. The member shall purchase electric energy from the Cooperative in accordance with the present and any future rate schedule of the Cooperative on a prepay basis. The terms and conditions set forth in the member's Application for Membership continue to apply in addition to the terms and conditions of the Agreement for Prepay Service subject to any changes set forth in this agreement.

2. Members choosing to enroll in Prepay Service shall sign a Prepay Service Agreement ("Agreement"). The Agreement shall be for one (1) year. Members are required to notify Clark Energy in writing to terminate the Agreement and opt out of Prepay Service.

3. Upon written cancellation of the Agreement, the member shall be subject to the conditions of the Residential rate schedule without the Prepay Service rider. The member may be required to pay a security deposit at the time of cancellation of the Prepay Service.

4. A current post-pay member can transfer to the Prepay Service program. The Agreement will authorize the kWh used since the last bill date until the date the account is changed to Prepay Service to be calculated and transferred to the Prepay Service account. Clark Energy will, if requested, assist members to set up a payment agreement. Any fees/penalties (returned payment, meter tampering, etc.) shall be paid before any purchases for funding is applied to the member's Prepay Service account.

CLASSIFICATION OF SERVICE

Schedule B-1: Large Industrial Rate

APPLICABLE

All Territory Served

AVAILABILITY

Applicable to non-residential customers willing to contract for demands of 500 KW or greater with a minimum contracted monthly energy (kwh) of 425 hours per kw of contract demand. To determine the minimum contracted monthly energy usage (kwh), the 425 hours is multiplied by the contract demand. The electric power and energy furnished hereunder shall be separately metered for each point of delivery.

RATES

$ 868.72	Facility Charge	
$9.25	Demand Charge per kW of Contract Demand	I
$10.75	Demand Charge per kW for Billing Demand in Excess of Contract Demand	I
$0.05978	Energy Charge per kWh	R

BILLING DEMAND

The monthly billing demand (kilowatt demand) shall be the contract demand plus any excess demand. Excess demand occurs when the consumer's peak demand, during the current month, exceeds the contract demand. The load center's peak demand is highest average rate at which energy is used during any fifteen-minute interval, in the below listed hours for each month, and adjusted for power factor as provided herein:

DATE OF ISSUE: August 12, 2025

DATE EFFECTIVE: September 12, 2025

ISSUED BY: Billy O. Fraser
Vice President, Finance & Office Services

Issued by authority of an Order of the Public Service Commission in Case No.

CLASSIFICATION OF SERVICE

Schedule C: General Power Service

AVAILABILITY

Available for all non-residential general power requirements with Kilowatt (kW) demands less than 50 kW subject to established rules and regulations of the Distributor.

CHARACTER OF SERVICE

Single or three phase, 60 Hertz, at available secondary voltages.

DELIVERY POINT

The delivery point at which the secondary or utilization voltage is provided shall be specified by the Distributor.

RATES

$40.58	Facility Charge-Single Phase	I
$51.85	Facility Charge-Three Phase	
$0.10009	Per kWh for all energy	R

MINIMUM MONTHLY CHARGE

The minimum monthly charge shall be $40.58 single phase and $51.85 for three phase service. I

DATE OF ISSUE August 12, 2025

DATE EFFECTIVE September 12, 2025

ISSUED BY Billy O. Frazier
Vice President, Finance & Office Services

Issued by authority of an Order of the Public Service Commission in Case No.

Clark Energy Cooperative Inc.
Name of Issuing Corporation

CLASSIFICATION OF SERVICE

Schedule E: Public Facilities

AVAILABILITY

Available to public facilities with Kilowatt (kW) demands less than 50 kW subject to established rules and regulations of the Distributor. Not applicable to outdoor lighting system requirements.

CHARACTER OF SERVICE

Single phase, 60 Hertz, at available secondary voltages.

DELIVERY POINT

The delivery point at which the secondary or utilization voltage is provided shall be specified by the Distributor.

RATES

$33.00	Facility Charge	I
$0.09545	All kWh	R

MINIMUM MONTHLY CHARGE

The minimum monthly charge shall be $33.00. I

FUEL ADJUSTMENT CHARGE

The above rate may be increased or decreased by an amount per kWh equal to the fuel adjustment amount per kWh as billed by the Wholesale Power Supplier plus an allowance for line losses.

DATE OF ISSUE August 12, 2025
DATE EFFECTIVE September 12, 2025

ISSUED BY Billy O. Fraser
Vice President, Finance & Office Services

Issued by authority of an Order of the Public Service Commission in Case No.

CLASSIFICATION OF SERVICE

Schedule L: General Power Service

AVAILABILITY

Available to all commercial and industrial consumers for general power requirements with Kilowatt (kW) demands of 50 kW or greater but less than 500 kW.

CONDITIONS OF SERVICE

A power contract shall be executed by the consumer for service under this rate schedule. The power contract shall specify a contract demand for minimum billing purposes of 50 kW or greater but less than 500 kW.

CHARACTER OF SERVICE

Limited to single or three phase, 60 Hertz, at a secondary delivery voltage of 480 volts or less.

DELIVERY POINT

The delivery point shall be specified within the power contract.

RATES

$65.99	Facility Charge	
$7.75	per kW of billing demand	I
$0.07743	per kWh for all energy	R

CLASSIFICATION OF SERVICE

Schedule P: General Power Service

AVAILABILITY

Available to all commercial and industrial consumers for general power requirements with Kilowatt (kW) demands of 500 kW or greater.

CONDITIONS OF SERVICE

A power contract shall be executed by the consumer for service under this rate schedule. The power contract shall specify a contract demand for minimum billing purposes of 500 kW or greater.

CHARACTER OF SERVICES

Limited to three phase, 60 Hertz, at a secondary of delivery voltage specified within the power contract.

DELIVERY POINT

The delivery point shall be specified within the power contract.

RATES

$89.85	Facility Charge	
$7.75	per kW of billing demand	I
$0.06643	per kWh for all energy	R

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 5

807 KAR 5:078, Section 3(4)(a)2
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

New or revised tariff sheets, if applicable, in a format that complies with 807 KAR 5:011 shown either by providing: A copy of the present tariff indicating proposed additions by italicized inserts or underscoring and striking over proposed deletions

Response: Please see the attached.

CLARK ENERGY COOPERATIVE INC.

OF

2640 Ironworks Road
Winchester, Kentucky 40391

www.clarkenergy.com

Rates, Rules and Regulations for Furnishing Electricity

FOR

Counties of: Bath, Bourbon, Clark, Estill, Fayette, Madison, Menifee, Montgomery, Morgan, Powell, Rowan, Wolfe

Filed with PUBLIC SERVICE COMMISSION OF KENTUCKY

ISSUED ~~February 1, 2008~~ *August 12, 2025*

EFFECTIVE ~~March 3, 2008~~ *September 12, 2025*

ISSUED_____

PRESIDENT & C.E.O.

CLASSIFICATION OF SERVICE

Schedule R: Residential

AVAILABILITY

Available to all residential consumers subject to established rules and regulations of the Distributor.

CHARACTER OF SERVICE

Single phase, 60 Hertz, at available secondary voltages.

DELIVERY POINT

The delivery point at which the secondary or utilization voltage is provided shall be specified by the Distributor.

RATES

~~$18.62~~ *$33.00*	Facility Charge	**I**
~~$0.10123~~ *$0.09621*	per kWh for all energy	**R**

MINIMUM MONTHLY CHARGE

The minimum monthly charge shall be ~~$18.62~~ *$33.00*. **I**

FUEL ADJUSTMENT CHARGE

The above rate may be increased or decreased by an amount per kWh equal to the fuel adjustment amount per kWh as billed by the Wholesale Power Supplier plus an allowance for line losses. The allowance for line losses will not exceed 10% and is based on a twelve-month moving average of such losses.

Date of Issue: ~~September 21, 2023~~ August 12, 2025

Date Effective: ~~September 1, 2024~~ September 12, 2025

Issued By: _____
Vice President, Finance & Office Services

Issued by authority of an Order of the Public Service Commission in Case No. ~~2023-00014~~ dated ~~August 30, 2024~~.

CLASSIFICATION OF SERVICE

PREPAY SERVICE RIDER

STANDARD RIDER
Prepay Service is a voluntary rider to Rate Schedule R – Residential.

AVAILABILITY
Available to all residential consumers excluding accounts on budget billing, automatic bank draft, net metered accounts, accounts with lifesaving medical equipment, accounts greater than 200-amp service and three-phase accounts within the area served by Clark Energy.

RATES

~~$ 18.62~~ *$33.00* per month	Facility Charge (~~$.621~~ *$1.10* per day)	**I**
$ 5.00 per month	Prepay service fee ($.167 per day) per	
~~$0.10123~~ *$0.09621*	kWh for all energy	**R**

TERMS & CONDITIONS
Members who qualify, as defined in "Availability" above may choose to voluntarily enroll their electric account(s) in the Prepay Service and are subject to the following:

1. The member shall purchase electric energy from the Cooperative in accordance with the present and any future rate schedule of the Cooperative on a prepay basis. The terms and conditions set forth in the member's Application for Membership continue to apply in addition to the terms and conditions of the Agreement for Prepay Service subject to any changes set forth in this agreement.

2. Members choosing to enroll in Prepay Service shall sign a Prepay Service Agreement ("Agreement"). The Agreement shall be for one (1) year. Members are required to notify Clark Energy in writing to terminate the Agreement and opt out of Prepay Service.

3. Upon written cancellation of the Agreement, the member shall be subject to the conditions of the Residential rate schedule without the Prepay Service rider. The member may be required to pay a security deposit at the time of cancellation of the Prepay Service.

4. A current post-pay member can transfer to the Prepay Service program. The Agreement will authorize the kWh used since the last bill date until the date the account is changed to Prepay Service to be calculated and transferred to the Prepay Service account. Clark Energy will, if requested, assist members to set up a payment agreement. Any fees/penalties (returned payment, meter tampering, etc.) shall be paid before any purchases for funding is applied to the member's Prepay Service account.

CLASSIFICATION OF SERVICE

Schedule B-1: Large Industrial Rate

APPLICABLE

All Territory Served

AVAILABILITY

Applicable to non-residential customers willing to contract for demands of 500 KW or greater with a minimum contracted monthly energy (kwh) of 425 hours per kw of contract demand. To determine the minimum contracted monthly energy usage (kwh), the 425 hours is multiplied by the contract demand. The electric power and energy furnished hereunder shall be separately metered for each point of delivery.

RATES

$ 868.72	Facility Charge	
~~$ 7.41~~ *$9.25*	Demand Charge per kW of Contract Demand	I
~~$ 10.32~~ *$10.75*	Demand Charge per kW for Billing Demand in Excess of Contract Demand	I
~~$ 0 .062436~~ *$0.05978*	Energy Charge per kWh	R

BILLING DEMAND

The monthly billing demand (kilowatt demand) shall be the contract demand plus any excess demand. Excess demand occurs when the consumer's peak demand, during the current month, exceeds the contract demand. The load center's peak demand is highest average rate at which energy is used during any fifteen-minute interval, in the below listed hours for each month, and adjusted for power factor as provided herein:

DATE OF ISSUE: ~~September 21, 2023~~ *August 12, 2025*

DATE EFFECTIVE: ~~September 1, 2024~~ *September 12, 2025*

ISSUED BY: _____
Vice President, Finance & Office Services

Issued by authority of an Order of the Public Service Commission in Case No. ~~2023-00014 dated August 30, 2024.~~

CLASSIFICATION OF SERVICE

Schedule C: General Power Service

AVAILABILITY

Available for all non-residential general power requirements with Kilowatt (kW) demands less than 50 kW subject to established rules and regulations of the Distributor.

CHARACTER OF SERVICE

Single or three phase, 60 Hertz, at available secondary voltages.

DELIVERY POINT

The delivery point at which the secondary or utilization voltage is provided shall be specified by the Distributor.

RATES

~~$26.20~~ *$40.58*	Facility Charge-Single Phase	I
$51.85	Facility Charge-Three Phase	
~~$0.10976~~ *$0.10009*	Per kWh for all energy	R

MINIMUM MONTHLY CHARGE

The minimum monthly charge shall be ~~$26.20~~ *$40.58* single phase and $51.85 for three phase service. I

DATE OF ISSUE ~~September 21, 2023~~ *August 12, 2025*

DATE EFFECTIVE ~~September 1, 2024~~ *September 12, 2025*

ISSUED BY _____
Vice President, Finance & Office Services

Issued by authority of an Order of the Public Service Commission in Case No. ~~2023-00014 dated August 30, 2024~~.

CLASSIFICATION OF SERVICE

Schedule E: Public Facilities

AVAILABILITY

Available to public facilities with Kilowatt (kW) demands less than 50 kW subject to established rules and regulations of the Distributor. Not applicable to outdoor lighting system requirements.

CHARACTER OF SERVICE

Single phase, 60 Hertz, at available secondary voltages.

DELIVERY POINT

The delivery point at which the secondary or utilization voltage is provided shall be specified by the Distributor.

RATES

~~$18.62~~ *$33.00*	Facility Charge	I
~~$0.11030~~ *$0.09545*	All kWh	R

MINIMUM MONTHLY CHARGE

The minimum monthly charge shall be ~~$18.62~~ *$33.00*. I

FUEL ADJUSTMENT CHARGE

The above rate may be increased or decreased by an amount per kWh equal to the fuel adjustment amount per kWh as billed by the Wholesale Power Supplier plus an allowance for line losses.

DATE OF ISSUE ~~September 21, 2023~~ *August 12, 2025*
DATE EFFECTIVE ~~September 1, 2024~~ *September 12, 2025*

ISSUED BY _____
Vice President, Finance & Office Services

Issued by authority of an Order of the Public Service Commission in Case No. ~~2023-00014 dated August 30, 2024.~~

CLASSIFICATION OF SERVICE

Schedule L: General Power Service

AVAILABILITY

Available to all commercial and industrial consumers for general power requirements with Kilowatt (kW) demands of 50 kW or greater but less than 500 kW.

CONDITIONS OF SERVICE

A power contract shall be executed by the consumer for service under this rate schedule. The power contract shall specify a contract demand for minimum billing purposes of 50 kW or greater but less than 500 kW.

CHARACTER OF SERVICE

Limited to single or three phase, 60 Hertz, at a secondary delivery voltage of 480 volts or less.

DELIVERY POINT

The delivery point shall be specified within the power contract.

RATES

$ 65.99	Facility Charge	
~~$ 6.69~~ *$7.75*	per kW of billing demand	I
~~$ 0.08129~~ *$0.07743*	per kWh for all energy	R

DATE OF ISSUE ~~September 21, 2023~~ *August 12, 2025*
DATE EFFECTIVE ~~September 1, 2024~~ *September 12, 2025*

ISSUED BY _____
Vice President, Finance & Office Services

Issued by authority of an Order of the Public Service Commission in Case No. ~~2023-00014 dated August 30, 2024~~.

CLASSIFICATION OF SERVICE

Schedule P: General Power Service

AVAILABILITY

Available to all commercial and industrial consumers for general power requirements with Kilowatt (kW) demands of 500 kW or greater.

CONDITIONS OF SERVICE

A power contract shall be executed by the consumer for service under this rate schedule. The power contract shall specify a contract demand for minimum billing purposes of 500 kW or greater.

CHARACTER OF SERVICES

Limited to three phase, 60 Hertz, at a secondary of delivery voltage specified within the power contract.

DELIVERY POINT

The delivery point shall be specified within the power contract.

RATES

$89.85	Facility Charge	
~~$6.42~~ *$7.75*	per kW of billing demand	**I**
~~$0.07078~~ *$0.06643*	per kWh for all energy	**R**

DATE OF ISSUE ~~September 21, 2023~~ *August 12, 2025*
DATE EFFECTIVE ~~September 1, 2024~~ *September 12, 2025*

ISSUED BY _____
Vice President, Finance & Office Services

Issued by authority of an Order of the Public Service Commission in Case No. ~~2023-00014 dated August 30, 2024.~~

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 6

807 KAR 5:078, Section 3(4)(b)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

A statement that notice has been given in compliance with Section 7 of the regulation and a copy of the notice.

Response:

Clark Energy has given notice in compliance with 807 KAR 5:078, Section 7. Specifically, as of the date Clark Energy submitted this Application, Clark Energy: (i) posted at its place of business a copy of the full notice required by the relevant regulations; (ii) posted to its website a copy of the full notice required by the relevant regulation and a hyperlink to the location on the Commission's website where the case documents are available; (iii) posted to its social media accounts a link to its website where a copy of the full notice by the relevant regulation published may be found; and, (iv) published a copy of the notice in *Kentucky Living* magazine, which was sent to all members, even those that normally opt-out, on or before August 1, 2025. An affidavit of publication in *Kentucky Living* magazine is attached.

KentuckyLiving *Celebrating the energy of your community*

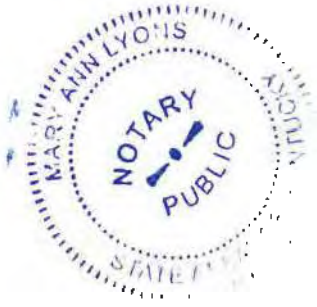
AFFIDAVIT OF MAILING OF FILING NOTICE

Notice is hereby given that the August 2025 issue of *KENTUCKY LIVING*, bearing official notice of filing PSC Case No. 2025-00230, for the purposes of proposing a general adjustment of existing rates of **CLARK ENERGY COOPERATIVE**, was entered as direct mail on July 30, 2025.

Shannon Brock
Editor
Kentucky Living

County of Jefferson
State of Kentucky

Sworn to and subscribed before me, a Notary Public,
This 30th day of July, 2025.
My commission
expires 6-9-2029



Mary Ann Lyons #KYNP100716
Notary Public, State of Kentucky

Kentucky Electric Cooperatives Inc.
P.O. Box 32170 Louisville, KY 40232
1630 Lyndon Farm Court Louisville, KY 40223
(502) 451-2430
(800) KY-LIVING (800) 595-4846
www.kentuckyliving.com

AUGUST 2025

CLARK ENERGY LINES

A publication of Clark Energy Cooperative, Inc., proudly serving our members since 1938.

Water-efficient fixtures save water and energy

Have you been resisting your plumber's advice to switch to low-flow water fixtures? It might be time to get on board because newer plumbing components offer the dual benefit of water conservation and power bill savings.

Low-flow fixtures aren't new—they've been around since the 1990s as a water conservation tool—but they've improved with age. Now, smart toilets, touchless faucets and app-controlled showerheads are leading trends in plumbing.

Here's why switching to these innovative fixtures could be the way to go:

- **Reduced water waste.** The Environmental Protection Agency estimates that switching to low-flow faucets can save an average family 700 gallons of water per year. Additionally, low-flow showerheads can save 2,700 gallons annually.
- **Energy savings.** It takes a lot of energy to deliver and treat the water used every day for bathing, shaving, cooking and cleaning. Example: Letting a faucet run for five minutes consumes about as much energy as a 60-watt light bulb used for 14 hours, EPA research suggests.

PROSTOCK-STUDIO/SHUTTERSTOCK

- **Lower utility bills.** Having low-flow fixtures that use less electricity and less water decreases utility expenses. That leaves more money to cover other household expenses.
- **Short payback period.** The payback period for low-flow showerheads and faucets is typically short, often within a year or less, due to the significant water and energy savings they provide.

Water-efficient plumbing fixtures provide a practical solution for using significantly less water without sacrificing performance with the added benefit of reducing energy use.

NOTICE

Clark Energy Cooperative, Inc. ("Clark Energy") intends to propose a general adjustment of its existing rates by filing an application with the Kentucky Public Service Commission ("KPSC") on or after August 15, 2025, in Case No. 2025-00230 pursuant to 807 KAR 5:078. The application will request that the proposed rates become effective on or after September 15, 2025. Clark Energy intends to propose an adjustment only to certain rates. The present and proposed rates for each customer classification to which the proposed rates will apply are set forth below:

Rate Class		Rates	
		Present	Proposed
R	Residential		
	Facility Charge Per Month	$18.62	$33.00
	Energy Charge Per kWh (all kWh)	$0.10123	$0.09621
PrePay Service Rider (for Residential)			
	Facility Charge Per Month	$18.62	$33.00
	Energy Charge Per kWh (all kWh)	$0.10123	$0.09621
C	General Power Service < 50kW		
	Facility Charge 1Ph (per month)	$26.20	$40.58
	Facility Charge 3Ph (per month)	$51.85	$51.85
	Energy Charge (per kWh)	$0.10976	$0.10009
E	Public Facilities		
	Facility Charge (per month)	$18.62	$33.00
	Energy Charge (per kWh)	$0.11030	$0.09545
L	General Power Service 50-500kW		
	Facility Charge (per month)	$65.99	$65.99
	Energy Charge (per kWh)	$0.08129	$0.07743
	Demand Charge (per kW)	$6.69	$7.75
P	General Power Service 500+kW		
	Facility Charge (per month)	$89.85	$89.85
	Energy Charge (per kWh)	$0.07078	$0.06643
	Demand Charge (per kW)	$6.42	$7.75
B-1	Large Industrial Rate		
	Facility Charge (per month)	$868.72	$868.72
	Demand Charge (per kW) Contract	$7.41	$9.25
	Demand Charge (per kW) Excess	$10.32	$10.75
	Energy Charge (per kWh)	$0.06244	$0.05978

No revisions are proposed to any other charges or Rate Schedules.

The amount of the change requested in both dollar amounts and percentage change for each customer classification to which the proposed rates will apply is set forth below:

Rate Class		Increase	
		Dollars	Percent
R	Residential	$2,820,550	6.69%
D	Time Of Use Marketing Service	$0	0%
C	General Power Service < 50kW	$0	0%
E	Public Facilities	$0	0%
L	General Power Service 50-500kW	$0	0%
P	General Power Service 500+kW	$0	0%
B-1	Large Industrial Rate	$0	0%
S,T,O	Lighting	$0	0%
Total		$2,820,550	4.87%

The amount of the average usage and the effect upon the average bill for each customer classification to which the proposed rates will apply is set forth below:

Rate Class		Average Usage (kWh)	Increase	
			Dollars	Percent
R	Residential	1,042	$9.15	6.69%
D	Time Of Use Marketing Service	27,265	$0	0%
C	General Power Service < 50kW	1,315	$0	0%
E	Public Facilities	968	$0	0%
L	General Power Service 50-500kW	29,676	$0	0%
P	General Power Service 500+kW	221,222	$0	0%
B-1	Large Industrial Rate	799,982	$0	0%
S,T,O	Lighting	NA	$0	0%
Total		NA	NA	4.87%

This table reflects the rate classes that have active customers.

Per 807 KAR 5:078 Section 7, additional information, links, and a copy of Clark Energy's full notice concerning its proposed rate adjustment can be found at Clark Energy's principal office (2640 Ironworks Road, Winchester, KY 40392) and at its satellite offices (28 Bible Camp Lane, Frenchburg, KY 40322; and 170 Halls Lane, Stanton, KY 40380) or on its website (https://www.clarkenergy.com) and via its social media accounts (Instagram: clarkenergycoop; Facebook: Clark Energy Coop; and, Twitter: ClarkEnergy1)[1] . A person may examine the application at the offices of Clark Energy located at 2640 Ironworks Road, Winchester, KY 40392, and at its satellite offices located at 28 Bible Camp Lane, Frenchburg, KY 40322; and 170 Halls Lane, Stanton, KY 40380. A person may examine this application at the Commission's offices located at 211 Sower Boulevard, Frankfort, Kentucky, Monday through Friday, 8:00 a.m. to 4:30 p.m., or through the Commission's Web site at http://psc.ky.gov. Comments regarding the application may be submitted to the Commission through its website or by mail to Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602. A person may submit a timely written request for intervention to the KPSC, 211 Sower Boulevard, Post Office Box 615, Frankfort, Kentucky 40602 or email PSCED@ky.gov, establishing the grounds for the request including the status and interest of the party. The Commission's phone number is (502) 564-3940 and its website is http://psc.ky.gov. The Commission is required to take action on Clark Energy's application within 75 days of the date the application is accepted for filing. The rates contained in this notice are the rates proposed by Clark Energy, but the Commission may order rates to be charged that differ from the proposed rates contained in this notice. Clark Energy is not proposing to make any changes to any lighting rates. There are no changes proposed to other miscellaneous rates.

[1] Clark Energy has a LinkedIn account that is not active, and therefore the notice was not included on that social media.

CLARK ENERGY
A Touchstone Energy® Cooperative

Contact Us

CLARK EC OFFICE LOCATIONS
2640 Ironworks Road,
Winchester 40391

28 Bible Camp Lane,
Frenchburg 40322

170 Halls Lane, Stanton 40380

www.clarkenergy.com

OFFICE HOURS
7 a.m. - 5:30 p.m.,
Monday - Thursday
Friday - Sunday CLOSED

OFFICE PHONE NUMBERS
Winchester - (859) 744-4251
Frenchburg - (606) 768-2383
Stanton - (606) 663-4330
Toll Free - (800) 992-3269
Emergency - (800) 992-3269
Fax - (859) 744-4218
To report an outage, please call (800) 992-3269.

YOUR BOARD OF DIRECTORS

Steve Hale—Powell
Chairman

O.H. Caudill—Montgomery, Bath, Bourbon
Vice Chairman

Bobby Russell—Madison
Secretary-Treasurer

Allen Patrick—Menifee, Rowan, Morgan, Bath
Assistant Secretary-Treasurer

Gale Means—Powell

Dewey Hollon—Powell, Estill, Wolfe

Walter "Smiley" Ballard Jr.—Menifee, Montgomery, Bath

Mary "Susie" Shearer—Clark, Fayette, Bourbon

Everett Curry—Clark

Follow us on social media:

Don't shoot the lines

Dove season is just around the corner. For many hunters, it's akin to a cherished holiday in the late summer with friends and family gathering in dove fields across the bluegrass.

In many rural areas, power lines may stretch across dove fields and are always a popular resting site for the fast-moving birds.

Hunters are reminded to stop and think before taking aim at a bird perched on a power line. While it might seem harmless, shooting at electrical equipment can pose significant risk to Clark Energy essential infrastructure.

"Power lines and electrical equipment are the foundation of a grid that delivers the comforts and conveniences of reliable electricity to the co-op's member-owners," says Barney Toy, Safety Coordinator. "Gunshot aimed for a dove perched on a power line can strike energized equipment, resulting in costly repairs, service interruptions, fire and even personal injury."

Shooting a power line can also have legal consequences. Kentucky law has several provisions that prohibit hunters from damaging the property of another. Whether intentional or accidental, those who cause damage to Clark Energy equipment could be fined and/or held liable for the cost of repairs.

For safety and to avoid penalties, dove hunters should follow these rules:

- Do not shoot at or near overhead power lines, power poles or substations.
- Familiarize yourself with the location of power lines and equipment on land where you shoot/hunt.
- Keep a safe distance from power lines when hunting.
- Do not shoot at, or near, birds perching on utility lines with any type of firearm.
- Do not place decoys or any other hunting/shooting equipment on power lines or other utility equipment.

JUPITERIMAGES

ALEXANDER CANAS ARANGO/SHUTTERSTOCK

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 7

807 KAR 5:078, Section 3(5)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

A general statement identifying any electric property or plant held for future use

Response: Clark Energy has no electric property or plant held for future use.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 8

807 KAR 5:078, Section 3(6)
Sponsoring Witness: R. Christopher Brewer

Description of Filing Requirement:

All current agreements related to vegetative management, as well as a statement identifying any changes that occurred since the cooperative's base rate adjustment to the cooperative's policies on vegetation management, indicating the effective date and reason for these changes.

Response: Please see attached for the current vegetation management agreements. These agreements are being filed under seal with a Motion for Confidential Treatment. There have been no changes to vegetation management policies since the last base rate case.

ATTACHMENT FILED UNDER SEAL PURSUANT TO A MOTION FOR CONFIDENTIAL TREATMENT

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 9

807 KAR 5:078, Section 3(7)
Sponsoring Witness: Brian Frasure

Description of Filing Requirement:

A statement identifying any changes that occurred during the test year to the cooperative's written policies on the compensation of its attorney auditors, and all other professional service providers, indicating the effective date and reason for these changes

Response: Clark Energy does not presently maintain specific written policies that address the compensation of auditors, and other professional service provider, other than specific agreements which may be entered into with the provider. The Cooperative's attorney is paid a monthly retainer fee and legal work is paid at an hourly rate. Clark Energy maintains Board Policy #108 – Services and Compensation of Legal Counsel, a copy is attached. There were no changes to this policy during the test year.

CLARK ENERGY COOPERATIVE, INC.

WINCHESTER, KENTUCKY

BOARD POLICY #108 - Final

SUBJECT: SERVICES AND COMPENSATION OF LEGAL COUNSEL

I. OBJECTIVE

To recognize the value of continuing legal guidance and counsel in the ordinary and special activities of the cooperative to ensure maximum protection of the legal rights of the cooperative and that operations are within the limitation prescribed by law.

II. CONTENT

A. The Corporate Counsel shall coordinate all legal services for the cooperative and shall be responsible for the performance of all legal matters not otherwise assigned to a Special Counsel to the board. Said legal matters shall include, but not be limited to:

1. A review of the Cooperative's Articles of Incorporation and Bylaws and the rendering of opinions on current and potential legal matters that may relate to them, as requested.

2. Rendering oral or written legal opinions and advice, on request, pertaining to contemplated actions of the Board, President & CEO, or his staff.

3. Attending all board meetings, unless requested otherwise by the board chairman, and committee meetings, at the request of the committee chairman, and to serve as legal advisor on matters as requested by the President & CEO or board chairman.

4. Serve as legal liaison and advise the cooperative on all substantive procedures that materially affect the cooperative's legal status and relationship with RUS, CFC, and other federal, state, and local administrative or regulatory agencies, when requested by the board.

5. Assist the cooperative in the preparation of documents and rendering legal opinions and certificates in obtaining loan funds from RUS, CFC, or other financial institutions.

6. Either represent or actively coordinate the legal representation of the cooperative in all court proceedings in which the cooperative may become involved, including the presentation or defense of all tort or contract claims for or against the cooperative in federal or state courts.

7. Either represent or actively coordinate the legal representation of the cooperative in all administrative or quasi-judicial hearings that shall specifically include all rate/loan application and certification hearing before the Kentucky Public Service Commission or other state or federal agencies or commission and any appeals therefrom.

8. Represent the cooperative in all aspects of the condemnation procedure involved in the acquisition of rights-of-way and real property for distribution lines and related facilities.

9. Assist any Special Counsel as requested by the board.

10. Coordinate and administer all legal services performed on behalf of the cooperative, except in those specific instances where a Special Counsel shall have the primary responsibility.

11. On request to provide or make available to the board and the President & CEO certain designated committees or staff members and other interested persons or agencies, written summary reports on all major legal matters involving the cooperative.

B. **COMPENSATION**

1. The Corporate Counsel shall be paid a monthly retainer as set from time to time by the board for attending regular monthly board meetings and for performing services of an incidental nature and shall be paid on an hourly basis for all extra ordinary services.

2. The Corporate Counsel shall be encouraged to attend those meetings concerning legal matters, which are of concern to the cooperative, and such other meetings which would benefit the cooperative and which are approved by the board. Corporate Counsel shall be reimbursed for all travel expense.

3. Special Counsel, as appropriate, shall be paid after invoices are reviewed and approved.

III. RESPONSIBILITY

1. The Corporate Counsel to the board and Special Counsel shall be reasonably familiar with major matters pertaining to the cooperative.

2. The Special Counsel to the board, as appropriate, keeps the President & CEO and the Corporate Counsel advised of areas where legal advice is being provided to the board.

Adopted:	10-25-88
Reviewed:	01-15-98
Reviewed:	01-23-01
Reviewed:	10-31-06
Revised:	07-24-18
Reviewed	12-29-20
Reviewed	11-29-22

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 10

807 KAR 5:078, Section 3(8)(a)-(b)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

A statement explaining whether or not the depreciation rates reflected in the application are identical to those most recently approved by the Commission

Response:

Clark Energy's most recent depreciation study is on file with the Commission. It can be found in Case No. 2020-00104, *Electronic Application of Clark Energy Cooperative, Inc. for a General Adjustment of Rates Pursuant to Streamlined Procedure Pilot Program Established in Case No. 2018-00407.* Clark Energy's depreciation rates are identical to those approved in that proceeding and Clark Energy does not propose to adjust it depreciation rates as a part of this proceeding.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 11

807 KAR 5:078, Section 3(9)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

The estimated dates for drawdowns of unadvanced loan funds at test year end and the proposed use of those funds

Response: At the conclusion of the test year, Clark Energy had $13,500,000 in unadvanced loan funds available with RUS. Clark Energy drew $3 million in April 2025 and $3.5 million in July 2025. Clark Energy anticipates the need to draw down $3 million in April 2026, $3 million in July 2026, and $1 million in October 2026. Loan funds are drawn to cover the costs of Clark Energy's operations.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 12

807 KAR 5:078, Section 3(10)(a)-(b)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

A schedule of the cooperative's standard directors' fees, per diems, and any other compensation in effect during the test year. The schedule shall:

(a) Include a description of any changes that occurred during the test year to the cooperative's written policies, including the compensation of directors; and

(b) Indicate the effective date and explanation of the change.

Response: A schedule of Clark Energy's directors' fees, per diems, and other compensation in effect during the test year is included in the Application, Exhibit 33, Direct Testimony of John Wolfram and the accompanying exhibits. There were no changes in the test year to Clark Energy's written polices. Please see the attached Board Policy #106 – Directors' Compensation and Reimbursement of Expenses and the below is the fee schedule.

Director Fee Schedule

Monthly Fee	$700
Per Diem for Meeting Attendance	$300 per meeting

CLARK ENERGY COOPERATIVE, INC.
WINCHESTER, KENTUCKY

BOARD POLICY #106 - Final

SUBJECT: DIRECTORS' COMPENSATION AND REIMBURSEMENT OF EXPENSES

I. OBJECTIVE

A. The Bylaws of Clark Energy Cooperative, Inc. provides that directors receive reasonable compensation and benefits for their service which shall be determined from time-to-time by resolution of the Board of Directors and further provides that the directors shall receive an advancement or reimbursement for any travel and out-of-pocket expenses necessarily and reasonably incurred in performing their duties.

II. CONTENT

A. **Monthly Compensation:** Each member of the Board of Directors of Clark Energy Cooperative, Inc. shall receive a sum each month as compensation for his or her services which shall be set by resolution of the Board of Directors.

B. **Per Diem Payments:** In addition to the compensation provided in "A" above, a member of the board of directors who attends a regular monthly board meeting, a special called board meeting, or another authorized function of the cooperative shall receive a per diem payment for each such meeting or function. For meetings and functions within 150 miles of the cooperative's headquarters, a per diem under this section "B" shall be paid only for the day or days the director actually attends a meeting or function. For meetings or functions more than 150 miles from the headquarters building an additional one day's per diem payment will be paid for travel to (but not from) the meeting or function unless the Board of Directors designates otherwise. The amount of the per diem payment shall be set by resolution of the Board of Directors.

C. **Board Approval of Per Diem Payments:** The attendance by a director of a meeting or function other than a board meeting must be approved by the Board of Directors prior to said meeting or function or within sixty (60) days thereafter for the director to be entitled to receive the per diem compensation set forth in this policy.

D. **Reimbursement or Advancement for Expenses:** Directors and officers of the cooperative shall be reimbursed for all legitimate expenses for attendance of meetings except that no mileage shall be paid for the attendance of meetings held at the headquarters building. Advancement may be made to a director for anticipated expenses prior to the actual attendance. Unless specifically waived by vote of the Board, receipts shall be attached for all expenses incurred over $100.00 for which a director or officer seeks reimbursement. Whenever a director or officer receives an advancement for anticipated expenses, he shall make a settlement with the cooperative for the advancement received at the next regular Board Meeting held following the occurrence of the event when gave rise to the advancement.

E. **Life Insurance Benefits:** The cooperative shall maintain an accidental business travel policy in the amount of $l00,000 for certain risks while a director or officer is on official business of the cooperative or traveling to or from the cooperative's official business provided that the accident occurs outside of the cooperative's service area.

F. **Aircraft and Rental Car Reimbursement:** The amount reimbursed will be based on a major airline carrier, and rental car. The amount will be calculated 30 days prior to the beginning of the meeting.

G. **Mileage Reimbursement:** Directors who use personal vehicles for official business shall be reimbursed for the most direct route but the amount paid shall not exceed the price of a coach airfare and a full-sized rental vehicle. The amount reimbursed will be based on a major airline carrier, and rental car. The amount will be calculated 30 days prior to the beginning of the meeting. Mileage will be paid at the rate allowed by the IRS for tax deduction and will be effective immediately upon notification that the IRS rates have changed.

II. RESPONSIBILITY

A. The President & CEO will be responsible for administering this policy.

B. The President and CEO or his designee shall audit all expense vouchers of directors and advise the board of any non-adherence to this policy.

C. The Secretary/Treasurer will review all director expenses annually to verify compliance with this policy.

Adopted:	10-25-88
Revised:	01-23-90
Revised:	10-25-94
Reviewed:	01-15-98
Reviewed:	01-23-01
Revised:	08-24-04
Revised:	08-23-05
Revised:	01-23-07
Revised:	05-31-18
Revised:	10-30-18
Revised;	12-28-22

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 13

807 KAR 5:078, Section 3(11)(a)-(e)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

A schedule reflecting the salaries and other compensation of each executive officer for the test year and two (2) preceding calendar years. The schedule shall include:

(a) The percentage of annual increase and the effective date of each salary increase;

(b) The job title, duty, and responsibility of each officer;

(c) The number of employees who report to each executive officer;

(d) To whom each executive officer reports; and

(e) For employees elected to executive officer status during the test year, the salaries for the test year for those persons whom they replaced.

Response: Clark Energy's sole executive officer is its President/CEO. The principal responsibility of the President/CEO is to oversee all cooperative business and ensure everything is completed in accordance with good business practices and consistent with the direction provided by Clark Energy's Board of Directors. The President/CEO reports to the Board of Directors. Each employee of Clark Energy ultimately reports to the President/CEO. Clark Energy has 4 employees who report directly to the President/CEO.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 14

807 KAR 5:078, Section 3(12)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

The cooperative's TIER, OTIER, and debt service coverage ratio, as calculated by the Rural Utility Service, for the test year and the five (5) most recent calendar years, including the data used to calculate each ratio

Response: Clark Energy believes this request seeks information from the test year and the five (5) calendar years most recent to (or preceding) the test year and has provided same. The attachment has been uploaded as an excel spreadsheet separately through the electronic filing system.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 15

807 KAR 5:078, Section 3(13)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

The cooperative's debt instruments

Response: Please see the Excel spreadsheet provided separately.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 16

807 KAR 5:078, Section 3(14)
Sponsoring Witness: Billy O'Brian Frasure and John Wolfram

Description of Filing Requirement:

A copy of all exhibits and schedules that were prepared for the rate application in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible

Response: The requested exhibits and schedules in Excel format are being filed contemporaneously with this Application.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 17

807 KAR 5:078, Section 3(15)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

A schedule comparing balances for each balance sheet account or subaccount included in the cooperative's chart of accounts for each month of the test year to the corresponding month of the twelve (12) month period immediately preceding the test year

Response: Please see the Excel attachment provided separately.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 18

807 KAR 5:078, Section 3(16)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

A schedule comparing each income statement account or subaccount included in the cooperative's chart of accounts for each month of the test year to the same month of twelve (12) month period immediately preceding the test year. The amounts reflect the income or expense activity of each month, and not the cumulative balances at the end of the particular month.

Response: Please see the Excel attachment provided separately.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

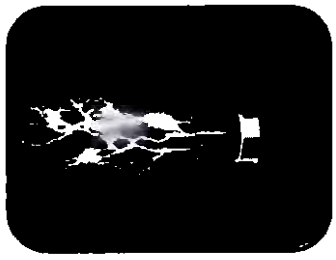
Exhibit 19

807 KAR 5:078, Section 3(17)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

A schedule showing anticipated and incurred rate case expenses, with supporting documentation, which shall be updated every thirty (30) days during the proceeding

Response: Please see the attached invoices. Also see the Excel spreadsheet provided separately.



CATALYST
CONSULTING LLC

3308 Haddon Road
Louisville, KY 40241
(502) 599-1739
johnwolfram@catalystcllc.com

INVOICE

Date: June 1, 2025	**Invoice #:** 250507
Client: Clark Energy Cooperative 2640 Ironworks Road Winchester, KY 40391 Attn: Brian Frasure	**Project:** 2024 Cost of Service & Rate Review Case No. 2025-00xxx For Services Provided in May 2025

	Item	Description	Qty	Rate	Amt
1	Consulting Services	John Wolfram – consulting support for Cost of Service & Rate Review. Initialize models. Begin processing initial data request. Calls or emails with Clark staff and counsel on same.	19.0 hours	$235.00	$ 4,465.00
				TOTAL	**$ 4,465.00**

Routing No.: 083000108
Account No.: 3026937313

V# 665

Please remit payment to Catalyst Consulting LLC by check or ACH as noted above. Thank you.

Approved By _____ CCT DATE: 6-1-25

Approval Date _____

Account Number 928.00 4465.00 K DATE: 6-10-25

CATALYST
CONSULTING LLC

3308 Haddon Road
Louisville, KY 40241
(502) 599-1739
johnwolfram@catalystcllc.com

June 1, 2025

Chris Brewer
President & CEO
Clark Energy Cooperative
2640 Ironworks Road
Winchester, KY 40391

Dear Chris:

Enclosed please find the invoices for services provided by Catalyst Consulting LLC to Clark Energy Cooperative for the month of May 2025.

I appreciate the opportunity to work with you on this project. Please let me know if you have any questions. Thank you.

Sincerely,

John Wolfram
Principal

Enclosure

CATALYST
CONSULTING LLC

3308 Haddon Road
Louisville, KY 40241
(502) 599-1739
johnwolfram@catalystcllc.com

INVOICE

Date: July 1, 2025	**Invoice #:** 250610
Client: Clark Energy Cooperative 2640 Ironworks Road Winchester, KY 40391 Attn: Holly Eades	**Project:** 2024 Cost of Service & Rate Review Case No. 2025-00xxx For Services Provided in June 2025

	Item	Description	Qty	Rate	Amt
1	Consulting Services	John Wolfram – consulting support for Cost of Service & Rate Review. Complete COS and rate design. Attend June BOD meeting. Calls or emails with Clark staff and counsel on same.	34.0 hours	$235.00	$ 7,990.00
2	Mileage	6/25 travel to Winchester	184.0 miles	$ 0.700	$ 128.80
				TOTAL	**$ 8,118.80**

Routing No.: 083000108
Account No.: 3026937313 VH#6665

Please remit payment to Catalyst Consulting LLC by check or ACH as noted above. Thank you.

ST DATE: 7-1-25

DATE: 7-10-25

Approved By_____

Approval Date_____

Account Number 928.00 8118.80

CATALYST
CONSULTING LLC

3308 Haddon Road
Louisville, KY 40241
(502) 599-1739
johnwolfram@catalystcllc.com

July 1, 2025

Chris Brewer
President & CEO
Clark Energy Cooperative
2640 Ironworks Road
Winchester, KY 40391

Dear Chris:

Enclosed please find the invoices for services provided by Catalyst Consulting LLC to Clark Energy Cooperative for the month of June 2025.

I appreciate the opportunity to work with you on this project. Please let me know if you have any questions. Thank you.

Sincerely,

John Wolfram
Principal

Enclosure

HONAKER
LAW
OFFICE

L. Allyson Honaker
allyson@hloky.com
(859) 368-8803 (office)
(859)396-3172 (mobile)

#175

ACCT DATE: 6-30-25

DATE: 7-10-25

Approved By_____

Approval Date_____

Account Number 923.00 4293.00

1795 Alysheba Way, Ste 1203
Lexington, KY 40509

July 06, 2025

Invoice No. 1544

Clark Energy Cooperative, Inc.
Mr. Chris Brewer PE, Pres & CEO
2640 Iron Works Road
Winchester, KY 40391

Client Number: 00885 Clark Energy Cooperative, Inc.
Matter 00885-0002 Clark Energy - 2025 Rate
For Services Rendered Through 6/30/2025.

Fees

Date	Timekeeper	Description	Hours	Amount
6/5/2025	LAH	Telephone conference with C. Brewer re updated board meeting.	0.20	$58.00
6/11/2025	LAH	Draft table of contents for streamline case; forward same to B. Frasure.	0.40	$116.00
6/13/2025	LAH	Exchange emails with B. Frasure re rate case and table of contents.	0.10	$29.00
6/17/2025	HST	Draft notice, notice of intent, and board resolution. Send to C.Brewer and B Frasier	0.80	$220.00
6/17/2025	MLC	Draft streamline application	1.30	$344.50
6/17/2025	LAH	Conference with H. Temple re draft documents; review board resolution and notice and edit same; review emails from H. Temple, et. al. re same.	0.40	$116.00
6/18/2025	MLC	Draft streamline application including exhibits and testimony of Chris Brewer	3.30	$874.50
6/18/2025	LAH	Review email and attachments from J. Wolfram re COSS; review drafts from H. Temple re streamline documents.	1.20	$348.00

Continued On Next Page

6/18/2025	HST	Review revenue and COSS models from J.Wolfram.	0.30	$82.50
6/19/2025	LAH	Telephone conference with J. Wolfram re board meeting.	0.10	$29.00
6/20/2025	MLC	Draft, edit, and revise streamline application, exhibits, and testimony	1.60	$424.00
6/20/2025	LAH	Review email and board presentation from J. Wolfram; telephone conference with J. Wolfram re same.	0.80	$232.00
6/23/2025	HST	Call with J.Wolfram and A.Honaker re rate design changes to match pass-through case.	0.40	$110.00
6/23/2025	LAH	Telephone conference with J.Wolfram, et. al. re rate design changes to match pass-through case.	0.40	$116.00
6/24/2025	LAH	Telephone conference with C. Brewer re rate design change in streamline and upcoming board meeting.	0.30	$87.00
6/25/2025	LAH	Participate virtually in board meeting; review email and signed board resolution from C. Brewer; conference with H. Temple re same.	2.00	$580.00
6/27/2025	LAH	Review request for case number and Commission acknowledgment letter.	0.10	$29.00
6/27/2025	LAH	Conference with H. Temple and M. Cave re status of drafts for streamline and next steps.	0.20	$58.00
6/27/2025	HST	Conference with A. Honaker and M. Cave re status of drafts for streamline and next steps.	0.20	$55.00
6/27/2025	MLC	Conference with A. Honaker and H. Temple re status of drafts for streamline and next steps.	0.20	$53.00
6/27/2025	HST	File for case number.	0.10	$27.50
6/29/2025	HST	Email J.Wolfram re COSS for customer notice.	0.20	$55.00
6/30/2025	HST	Review J.Wolfram proposed changes to rates for customer notice. Update customer notice. Send for review. Review multiple emails re additional updates to notice. Make edits to notice. Send for review.	0.80	$220.00
6/30/2025	LAH	Review emails from J. Wolfram and C. Brewer re rate design.	0.10	$29.00
		Billable Hours / Fees:	**15.50**	**$4,293.00**

Continued On Next Page

Timekeeper Summary

Timekeeper LAH worked 6.30 hours at $290.00 per hour, totaling $1,827.00.

Timekeeper HST worked 2.80 hours at $275.00 per hour, totaling $770.00.

Timekeeper MLC worked 6.40 hours at $265.00 per hour, totaling $1,696.00.

Payment Detail

Date	Description	Amount
6/16/2025	Check Number 69994 against Inv# 1488)	($485.00)
	Total Payments Received:	**($485.00)**

Current Invoice Summary

Prior Balance:	$485.00	
Payments Received:	($485.00)	**Last Payment: 6/16/2025**
Unpaid Prior Balance:	$0.00	
Current Fees:	$4,293.00	
Advanced Costs:	$0.00	
TOTAL AMOUNT DUE:	**$4,293.00**	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 20

807 KAR 5:078, Section 3(18)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

A statement estimating the effect that each new rate will have upon the revenues of the utility including, at minimum, the total amount of revenues resulting from the increase or decrease and the percentage of the increase or decrease

Response: Clark Energy is requesting approval to increase its annual revenues by $2,820,550, or 4.87%. For additional details on the revenue requirement and the effect of the proposed rates on revenue please see the Application, Exhibit 33, Direct Testimony of John Wolfram and supporting documents attached to the testimony.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 21

807 KAR 5:078, Section 3(19)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

A statement of the effect upon the average bill for each customer classification to which the proposed rate change will apply

Response:

Rate Class		Average Usage (kWh)	Increase Dollars	Increase Percent
R	Residential	1,042	$9.15	6.69%
D	Time Of Use Marketing Service	27,265	$0	0%
C	General Power Service < 50kW	1,315	$0	0%
E	Public Facilities	968	$0	0%
L	General Power Service 50-500kW	29,676	$0	0%
P	General Power Service 500+kW	221,222	$0	0%
B-1	Large Industrial Rate	799,982	$0	0%
S,T,O	Lighting	NA	$0	0%
Total		NA	NA	4.87%

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 22

807 KAR 5:078, Section 3(20)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

A summary of the cooperative's determination of its revenue requirement based on return on TIER, OTIER, debt service coverage, and any metric required by the cooperative's current debt instruments, with supporting schedules

Response: Please see the Application, Exhibit 33, Direct Testimony of John Wolfram, Exhibit JW-2.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 23

807 KAR 5:078, Section 3(21)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

If the cooperative had amounts charged or allocated to it by an affiliate or general or home office or paid monies to an affiliate or general or home office during the test period or during the previous three (3) calendar years:

(a) A detailed description of the method and amounts allocated or charged to the utility by the affiliate or general or home office for each charge allocation or payment;

(b) An explanation of how the allocator for the test period was determined; and

(c) All facts relied upon, including other regulatory approval, to demonstrate that each amount charged, allocated, or paid during the test period was reasonable.

Response: Clark Energy did not have amounts charged or allocated to it by an affiliate and did not pay money to an affiliate or home office. However, Clark Energy has one subsidiary Clark Energy Propane Plus, LLC. Please see the Excel spreadsheet provided separately for the amounts paid to Clark Energy from Clark Energy Propane Plus, LLC.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 24

807 KAR 5:078, Section 3(22)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

A calculation of the normalized depreciation expense (test-year end plant account balance multiplied by depreciation rate

Response:
Please see the Application, Exhibit 33, Direct Testimony of John Wolfram, Exhibit JW-2, Reference Schedule 1.05 for the calculation of the normalized depreciation expense.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 25

807 KAR 5:078, Section 3(23)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

An analysis of FERC Account No. 930, Miscellaneous General Expenses, for the test year. The analysis shall include:

(a) A complete breakdown of this account by the following categories:

1. *Industry association dues;*
2. *Debt-serving expenses;*
3. *Institutional and conservation advertising;*
4. *Rate department load studies;*
5. *Director's fee and expenses;*
6. *Dues and subscriptions; and*
7. *Miscellaneous; and*

(b) Detailed supporting workpapers that shall include for amounts over $100, the date, vendor, dollar amount, and a brief description of each expenditure

Response: Please see the Excel spreadsheet provided separately.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 26

807 KAR 5:078, Section 3(24)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

An analysis of FERC Account No. 426, Other Income Deductions, for the test period. The analysis shall include:

(a) A complete breakdown of this account by the following categories:

1. Donations;

2. Civic activities;

3. Political activities; and

4. Other; and

(b) Detailed supporting workpapers that shall include for amounts over $1,000, the date, vendor, dollar amount, and a brief description of each expenditure

Response: Please see the Excel spreadsheet provided separately.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 27

807 KAR 5:078, Section 3(25)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

A trial balance as of the last day of the test year showing account number, subaccount number, account title, subaccount title, and amount. The trial balance shall include:

a. All asset, liability, capital, income, and expense accounts used by the cooperative; and

b. All income statements accounts showing activity for twelve (12) months that includes the balance in each control account and all underlying subaccounts per the company books

Response: Please see the Excel spreadsheet provided separately.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 28

807 KAR 5:078, Section 3(26)
Sponsoring Witness: Billy O'Brian Frasure

Description of Filing Requirement:

A schedule showing employee health, dental, vision, and life insurance premium contributions by coverage type, including the cost split of each identified premium between the employee and the cooperative

Response: Please see the Excel spreadsheet provided separately.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 29

807 KAR 5:078, Section 3(27)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

A detailed income statement and balance sheet reflecting the impact of all proposed adjustments

Response: Please see the Application, Exhibit 33, Direct Testimony of John Wolfram, Exhibit JW-2.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 30

807 KAR 5:078, Section 3(28)
Sponsoring Witness: John Wolfram

Description of Filing Requirement:

The number of customers to be added to the test period end level of customers and the related revenue requirements impact for all pro forma adjustments with complete details and supporting work papers

Response: Please see the Application, Exhibit 33, Direct Testimony of John Wolfram for the number of customers to be added to be added to the test period end level of customers and the related revenue requirements impact for all pro forma adjustments with complete details and supporting work papers.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 31

Sponsoring Witness: R. Christopher Brewer

Description:

In support of its Application, Clark Energy provides the written testimony of Mr. R. Christopher Brewer, President and Chief Executive Officer of Clark Energy Cooperative Inc. Mr. Brewer's testimony is included as Exhibit 31.

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
CLARK ENRGY COOPERATIVE	)	CASE NO.
INC. FOR AN ALTERNATIVE RATE	)	2025-00230
ADJUSTMENT PURSUANT TO	)	
807 KAR 5:0078	)	

DIRECT TESTIMONY OF R. CHRISTOPHER BREWER,

PRESIDENT AND CHIEF EXECUTIVE OFFICER,

ON BEHALF OF CLARK ENERGY COOPERATIVE INC.

Filed: August 12, 2025

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
CLARK ENRGY COOPERATIVE, INC.	)	CASE NO.
FOR A GENERAL ADJUSTMENT OF	)	2025-00230
RATES PURSUANT TO 807 KAR 5:0078	)	

VERIFICATION OF R. CHRISTOPHER BREWER

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF CLARK)

R. Christopher Brewer, President and Chief Executive Officer of Clark Energy Cooperative Inc., being duly sworn, states that he has supervised the preparation of his Direct Testimony 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.

R. Christopher Brewer

The foregoing Verification was signed, acknowledged and sworn to before me this 12th day of August 2025, by R. Christopher Brewer.

Julie E. Webb

Commission Exp

~~Notary ID~~: Feb 3, 2029

Notary ID

~~Commission expiration~~: KYNP21860

JULIE ELAM WEBB NOTARY PUBLIC STATE AT LARGE KY ID KYNP21860 MY COMM. EXPIRES FEBRUARY 3, 2029

Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.

A. My name is R. Christopher Brewer and I serve as President and Chief Executive Officer of Clark Energy Cooperative Inc. ("Clark Energy" or the "Cooperative"). My business address is 2640 Iron Works Road, Winchester, Kentucky 40391.

Q. PLEASE BRIEFLY DESCRIBE YOUR PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND.

A. I received a Bachelor of Science Degree in Electrical Engineering from the University of Kentucky in 1990. I graduated from the National Rural Electric Cooperative Association ("NRECA") Management Internship Program in Lincoln, Nebraska in 2000. I am a registered Professional Engineer in the state of Kentucky. Prior to working at Clark Energy, I worked for Fox Creek RECC and Blue Grass Energy. At Fox Creek RECC, I began my employment as an engineer and then became the Manager of Engineering. When Fox Creek RECC consolidated with Blue Grass Energy in 1998, I became the Manager of Engineering for Blue Grass Energy responsible for all of the engineering and planning functions of the cooperative. I was then promoted to the Vice President of Engineering and then the Vice President of Power Delivery. I assumed my current position of President and CEO of Clark Energy in December 2014.

Q. PLEASE BRIEFLY DESCRIBE YOUR DUTIES AT CLARK ENERGY.

A. As the chief executive, I oversee all departments at Clark Energy and lead an experienced team responsible for the overall operational and financial success of the organization. My primary duty as the President and CEO of Clark Energy is to ensure that the activities of the cooperative are carried out in a way that is consistent

with good business practices, Clark Energy's established policies, regulatory oversight, and the direction provided by Clark Energy's Board of Directors.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is first to provide an overview of the Cooperative's business and existing retail electric distribution system. I will describe the events that preceded the filing of this case, discuss the Cooperative's financial and operational condition, and explain the reasons behind the Cooperative's need to review its existing rates ensuring the continued provision of safe, reliable retail electric service to its member-owners.

Q. ARE YOU SPONSORING ANY EXHIBITS?

A. Yes. Attached to my testimony and labeled Attachment CB-1 is a Resolution of Clark Energy's Board of Directors dated June 25, 2025, pursuant to which Clark Energy's management was authorized and directed to prepare and submit the Application my testimony supports.

Q. PLEASE GENERALLY DESCRIBE THE COOPERATIVE'S BUSINESS.

A. Clark Energy is a not-for-profit, member-owned rural electric cooperative corporation with its headquarters in Winchester, Kentucky. The Cooperative provides retail electric service to approximately 28,400 customers in all or a portion of Bath, Bourbon, Clark, Estill, Fayette, Madison, Menifee, Montgomery, Morgan, Powell, and Rowan counties. The Cooperative is one of the sixteen (16) owner members of East Kentucky Power Cooperative, Inc. ("EKPC"), which serves as the wholesale electricity provider for the Cooperative. Clark Energy owns and

maintains approximately 2,373 circuit miles of distribution lines connecting 24 substations. During the test year in this case Clark Energy's average residential customer used 1,042 kWh of electricity per month.

Q. WHEN DID CLARK ENERGY LAST SEEK A GENERAL ADJUSTMENT OF ITS RATES?

A. Clark Energy filed its last general rate case in 2020, in Case No. 2020-00104, *Electronic Application of Clark Energy Cooperative, Inc. for a General Adjustment of Rates Pursuant to Streamlined Procedure Pilot Program Established in Case No. 2018-00407.* The rates in that proceeding became effective on August 11, 2020.

Q. PLEASE DESCRIBE IN DETAIL IMPORTANT CHANGES THAT HAVE OCCURRED AT THE COOPERATIVE SINCE THE EFFECTIVE DATE OF ITS 2020 GENERAL BASE RATE ADJUSTMENT.

A. Clark Energy, like most utilities in the state, has been affected by unprecedented inflation in almost all areas of its business including all materials used to provide safe and reliable service to its members and labor – both employee and contractors. Clark Energy has also seen an increase in its interest expense due to higher interest rates and has seen increased damage and expenses related to storms over the past few years. Clark Energy's rate of growth remained steady over the past several years but has not allowed Clark Energy's revenues to keep up with the rising inflation costs.

Q. HAS CLARK ENERGY ENACTED ANY COST-CONTAINMENT MEASURES SINCE ITS LAST RATE ADJUSTMENT TO AVOID FILING A RATE INCREASE?

A. Yes. Clark Energy has implemented multiple cost-containment measures that have allowed it to maintain current rates for the last five years. Key measures the Cooperative has taken include introducing a 401(k)-style retirement plan in place of a defined benefit plan for new hires, changing to a virtual format for annual meetings, promoting paperless billing to our members in an effort to reduce both printing and mailing costs, and reducing communication and information technology ("IT") costs by adopting cloud based systems for phone and hardware.

Q. DESPITE ITS EFFORTS, WHAT ARE THE PRINCIPAL REASONS THAT AN ADJUSTMENT OF CLARK ENERGY'S RATES IS NECESSARY?

A. As discussed above, Clark Energy implemented multiple cost containment measures in an effort to avoid having to increase rates to its members. However, despite Clark Energy's best efforts it now finds that it is necessary to increase its rates by approximately 5%. The main drivers for this proposed increase are significant increases in the cost of materials used to provide safe and reliable service, and labor costs of both Clark Energy employees and contract labor. Additionally, rising interest rates over the last several years are contributing negatively to the Cooperative's financial situation. Somewhat related to the increasing labor costs is the increasing restoration costs due to large storms. Unfortunately, Clark Energy has been hit by significant storms in the last few years that have caused extensive damage to the system. While some storms have been

reimbursed by Federal Emergency Management Agency ("FEMA"), not all storms qualify for FEMA assistance. Even if the storm is covered by FEMA, the reimbursement process often takes many months and does not cover 100% of the storm related costs. Recently, there have been storms that historically would have qualified for FEMA reimbursement that have ended up not being declared a FEMA disaster. This puts pressure on the Cooperative's margins because we must utilize portions of the budget for storm restoration that would otherwise be utilized in other ways.

Q. PLEASE DESCRIBE THE PROCESS TAKEN BY CLARK ENERGY'S BOARD OF DIRECTORS TO DETERMINE THAT A RATE ADJUSTMENT WAS NECESSARY?

A. Clark Energy's Board of Directors closely monitors the finances of the cooperative at least on a monthly basis. The Board of Directors began discussing the possible need for a rate case in 2024. The Board of Directors authorized management to hire a rate consultant, John Wolfram, Principal at Catalyst Consulting LLC to prepare a comprehensive cost-of-service study ("COSS"). The Board also authorized management to hire regulatory counsel to assist in preparing and advising the Board of Directors and management on an application for a rate adjustment. L. Allyson Honaker, sole member of Honaker Law Office, PLLC was engaged to assist Clark Energy in preparing the documents required for a rate increase pursuant to the Commission's new regulation pertaining to a streamline rate proceeding. Both Mr. Wolfram and Mrs. Honaker presented information to the Board of Directors regarding the percentage of increase needed, the results of the

COSS and rate design as well as the procedural steps and timeline for having new rates in effect.

Q. DID THE COOPERATIVE'S BOARD OF DIRECTORS APPROVE AND AUTHORIZE THE FILING OF THE APPLICATION IN THIS CASE?

A. Yes. The Board of Directors signed a Resolution dated June 25, 2025, authorizing Clark Energy's management to file the Application in this proceeding and to request the relief contained in this Application. Clark Energy's Board of Directors relied on its review of information from Clark Energy management and the expert guidance of its legal counsel and rate consultant. A copy of the Board's Resolution is attached to my testimony as Attachment CB-1.

Q. ON WHAT BASIS DO YOU BELIEVE THE COMMISSION SHOULD GRANT CLARK ENERGY'S RELIEF REQUESTED IN THIS PROCEEDING?

A. Clark Energy was able to avoid adjusting its rates for five years due to cost-containment measures implemented by management and the prudent decisions by the Board of Directors. In the years following Clark Energy's last rate increase, we have experienced a global pandemic and record inflation. As a result, Clark Energy is requesting an approximate 5% increase in its rates to address these increasing economic pressures. In order to allow Clark Energy to maintain a favorable financial condition, the Commission should approve this modest rate increase.

Q. WHY DID CLARK ENERGY FILE THIS RATE APPLICATION PURSUANT TO THE STREAMLINE PROCEDURES ESTABLISHED IN

807 KAR 5:078 INSTEAD OF A GENERAL RATE APPLIATION PURSUANT TO KRS 278.190?

A. Clark Energy has made a great effort to implement cost-containment measures to assist in saving money for its members. The cooperative has operated efficiently while still providing safe and reliable service without the need for an increase in its rates. Clark Energy's management and its Board of Directors regularly review and monitor the finances of the Cooperative and until recently, it was not deemed necessary to seek an increase in its rates. Due to this consistent review, when management and the Board of Directors saw that Clark Energy's financial condition began to deteriorate, they believed it was prudent to start the process and prepare to file for an increase in its rates. After Mr. Wolfram completed the COSS and the revenue requirement, it was determined that Clark Energy only required an approximate 5% increase. Based on the streamline regulation, Clark Energy can request an increase up to 5% in this proceeding. Due to the cost savings and the shortened timeframe to develop a rate application pursuant to the streamline regulation and the shorter timeframe for the Commission to enter a decision on a streamline rate application, Clark Energy determined that it was in the best interest of both the Cooperative and its members to file this application pursuant to the streamline rate regulation. Had the COSS supported a higher percentage increase, Clark Energy would have filed for a general adjustment of rates pursuant to KRS 278.190. Therefore, based on the cost containment measures, the small percentage of increase required, and the fact Clark Energy has not filed for a rate increase since

its last general rate case 5 years ago, Clark Energy believes it is prudent to seek an adjustment of rates pursuant to 807 KAR 5:078.

Q. HAVE YOU REVIEWED THE ANSWERS PROVIDED IN THE FILED EXHIBITS WHICH ADDRESS CLARK ENERGY'S COMPLIANCE WITH THE HISTORICAL PERIOD FILING REQUIREMENTS UNDER 807 KAR 5:0078 AND ITS VARIOUS SUBSECTIONS?

A. Yes. I hereby incorporate and adopt those portions of exhibits for which I am identified as the sponsoring witness as part of this Direct Testimony.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

ATTACHMENT CB-1

RESOLUTION OF THE BOARD OF DIRECTORS OF CLARK ENERGY COOPERATIVE, INC. AUTHORIZING THE FILING OF A RATE APPLICATION UNDER THE STREAMLINED PROCEDURES WITH THE KENTUCKY PUBLIC SERVICE COMMISSION AND ALL OTHER NECESSARY FILINGS IN RELATION TO THE RATE APPLICATION

A meeting of the Board of Directors ("Board") of Clark Energy Cooperative, Inc. ("Clark Energy") was held on June 25, 2025, after due and proper notice of such meeting was given, and after a quorum was declared, during which meeting the Board discussed and considered the cost of service study ("COSS") presented by its consultant, John Wolfram.

Upon motion by director Patrick and seconded by director Caudill, and duly carried, the following RESOLUTION was unanimously adopted:

WHEREAS, Clark Energy is owned by the members it serves, and its purpose is to provide safe, efficient, and reliable electric service at rates and terms that are fair, just and reasonable; a

WHEREAS, the leadership and management of Clark Energy have reviewed the Cooperative's financial condition and it has become apparent to Clark Energy's Board that it is the prudent decision to request an increase in its revenues through its rates by filing an Application with the Kentucky Public Service Commission under the streamline procedures, for a rate proceeding; and,

WHEREAS, the Board has retained the services of a respected rate consultant, John Wolfram of Catalyst Consulting, LLC, who has completed a comprehensive COSS, which indicates that Clark Energy needs an increase in its annual revenue to maintain an adequate financial position for the company; and,

WHEREAS, Clark Energy intends to file a rate adjustment application with the Commission under the streamlined rate procedure, using a historical 12-month test period beginning on January 1, 2024 and ending on December 31, 2024; and

NOW, THEREFORE BE IT RESOLVED by the Clark Energy Board of Directors that the Board of Directors hereby grants approval for the management of Clark Energy to take all necessary and advisable actions in connection with the Application for a rate adjustment to be filed using the streamline procedures, with the Kentucky Public Service Commission.

NOW, THEREFORE BE IT FURTHER RESOLVED by the Clark Energy Board of Directors that the Board of Directors grants approval for the Application to be filed with the Kentucky Public Service Commission for an adjustment of rates, using the streamlined procedures, for an increase not to exceed 5% of Clark Energy's electric revenue or approximately 2.82 million dollars.

DATE: 6-25-25

CHAIRMAN OF THE BOARD

ATTEST:

SECRETARY

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 32

Sponsoring Witness: Billy O'Brian Frasure

Description: In support of its Application, Clark Energy provides the written testimony of Mr. Billy O'Brian Frasure, Vice President of Finance and Office Services, Mr. Frasure's testimony is included as Exhibit 32.

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
CLARK ENRGY COOPERATIVE	)	CASE NO.
INC. FOR AN ALTERNATIVE RATE	)	2025-00230
ADJUSTMENT PURSUANT TO	)	
807 KAR 5:0078	)	

DIRECT TESTIMONY OF BILLY O'BRIAN FRASURE,

VICE PRESIDENT OF FINANCE AND OFFICE SERVICES,

ON BEHALF OF

CLARK ENERGY COOPERATIVE, INC.

Filed: August 12, 2025

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
CLARK ENRGY COOPERATIVE, INC.	)	CASE NO.
FOR A GENERAL ADJUSTMENT OF	)	2025-00230
RATES PURSUANT TO 807 KAR 5:0078	)	

VERIFICATION OF BILLY O'BRIAN FRASURE

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF CLARK)

Billy O'Brian Frasure, Vice President of Finance and Office Services of Clark Energy Cooperative, Inc. being duly sworn, states that he has supervised the preparation of his Direct Testimony 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.

Billy O'Brian Frasure

Billy O'Brian Frasure

The foregoing Verification was signed, acknowledged and sworn to before me this the 12th day of August 2025, by Billy O'Brian Frasure.

JULIE ELAM WEBB NOTARY ID KYNP21860 MY COMM. EXPIRES FEBRUARY 3, 2029 PUBLIC STATE AT LARGE, KY.

Julie E Webb

Notary ID: KYNP21860

Commission expiration: Feb 3, 2029

Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

A. My name is Billy O'Brian Frasure, Vice President of Finance and Office Services of Clark Energy Cooperative Inc. ("Clark Energy" or the "Cooperative"). My business address is 2640 Iron Works Road, Winchester, Kentucky 40391.

Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I hold a Bachelor of Business Administration Degree from Morehead State University and have been a Certified Public Accountant since June 2012. Additionally, I completed National Rural Electric Cooperative Association's ("NRECA") Management Internship Program in May 2025. My professional career in cooperative finance began at Big Sandy Rural Electric Cooperative Corporation ("Big Sandy") in July 2012. I began my career with Big Sandy as a Financial Accountant. I served in this role for approximately four years until being promoted to Accounting and Finance Manager. I served in this capacity for Big Sandy approximately four additional years. In August 2020, I accepted the role of Vice President of Finance and Office Services with Clark Energy.

Q. PLEASE BRIEFLY DESCRIBE YOUR DUTIES AT THE COOPERATIVE.

A. As Vice President of Finance and Office Services, I am responsible for finance, accounting, billing, and regulatory activities for the Cooperative. This includes managing Clark Energy's debt portfolio through regular communication with representatives of Rural Utilities Service ("RUS"), Cooperative Finance Corporation ("CFC"), CoBank, and Federal Financing Bank ("FFB"). I am also responsible for closely monitoring the Cooperative's overall financial condition on a continuous basis to ensure that any financial concerns are identified and addressed. I regularly interact with Clark Energy's President

and CEO, R. Christopher Brewer, and the Board of Directors to provide financial analysis and summaries in order that they might also stay abreast of the Cooperative's overall financial condition. I oversee day-to-day finance, accounting, and billing functions of the Cooperative. This includes the preparation of financial statements, various accounting reports, monthly billing, payroll, and accounts payable. I have been authorized to consult with rate experts, accountants, auditors, attorneys, and other professionals as needed to assist with any issues or questions I might have to assure that Clark Energy remains financially sound and able to respond to events which could impact the Cooperatives' finances.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to provide a general overview of the Cooperative's financial health including a discussion of notable financial metrics and detail certain expense categories, as well as describe its debt portfolio, labor expenses, depreciation practices, and various other relevant matters. I will also summarize the necessity of the rate relief requested by the Cooperative in this proceeding.

Q. ARE YOU FAMILIAR WITH THE APPLICATION AND SUPPORTING EXHIBITS FILED BY CLARK ENERGY IN THIS CASE?

A. Yes, I am familiar with the documents filed in support of the Application and have been closely involved in compiling and analyzing the necessary information with Clark Energy's expert rate consultant, Mr. John Wolfram of Catalyst Consulting LLC, so that he could complete a fully allocated Cost of Service Study ("COSS") upon which this rate case is based. Examples of the types of information I reviewed and provided to Mr. Wolfram include income and expense data for the test year, customer usage data for Clark Energy's

different rate classes, and various categories of information utilized to prepare all pro forma adjustments and COSS reports and exhibits. I also prepared numerous spreadsheets, summaries, and other reports necessary to comply with the filing requirements provided in the Commission's regulations at 807 KAR 5:001 Section 16, and in KRS 278.180 and KRS 278.190. Specifically, I am designated as the Responsible Witness for Application Exhibits 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 23, 25, 26, 27, 28 and 32. Along with Mr. Wolfram, I am also jointly the Responsible Witness for Application Exhibit 16.

Q. PLEASE GENERALLY DESCRIBE THE RELIEF SOUGHT BY CLARK ENERGY IN THIS PROCEEDING.

A. To address Clark Energy's current financial condition, the Board of Directors in conjunction with its management, has determined that a general adjustment of rates is necessary to account for substantial cost increases, as well as cumulative inflationary pressures, to improve its overall financial condition, and to satisfy current and future loan covenants. Consistent with KRS 278.300(1), Clark Energy seeks Commission approval to demand, collect, and receive fair, just and reasonable rates for the retail service it provides. Specifically, Clark Energy seeks approval to increase its annual revenue by $2,820,550. Included in this request is an increase of the monthly residential customer charge in Schedule R– Residential ("Residential") from $18.62 to $33.00 and decreasing the energy charge from $0.10123 to $0.09621. Clark Energy is also proposing to increase the monthly customer charges for Schedule C – General Power Service < 50kW from $26.20 to $40.58 and decreasing the energy charge from $0.10976 to $0.10009. Clark Energy is also proposing various other adjustments to other rate classes. Full details can be found in the Direct Testimony of John Wolfram. Clark Energy is requesting the allocation of revenue

requirement in this way to more accurately reflect the cost to serve those customers. The Application requests that these rates become effective on September 12, 2025. The justification for these increases is principally based upon Mr. Wolfram's COSS and is discussed in greater detail in his testimony which can be found at Application Exhibit 33.

Q. IS CLARK ENERGY'S APPLICATION SUPPORTED BY A HISTORICAL TEST YEAR?

A. Yes, the test year in this case consists of the twelve (12) month period ending December 31, 2024.

Q. WHY WAS THE TWELVE-MONTH PERIOD ENDING DECEMBER 31, 2024 CHOSEN AS THE HISTORICAL TEST YEAR?

A. 807 KAR 5:078, Section 2(8) requires a streamline application be based on the latest annual report on file with the Commission. Additionally, Clark Energy believes that its proposed test year reasonably reflects the performance of the Cooperative, as adjusted for appropriate known and measurable changes.

Q. PLEASE GENERALLY DESCRIBE THE LOAD SERVED BY CLARK ENERGY.

A. Clark Energy serves a ten (10) county service territory, which includes portions of Bath, Bourbon, Clark, Estill, Fayette, Madison, Menifee, Montgomery, Morgan, Powell, and Rowan counties. The Cooperative's customer base is primarily residential served under the "Residential" class schedules. As of the end of the test year, the residential load comprised approximately 76 percent of Clark Energy's total energy sales and represented approximately 77 percent of the Cooperative's total revenue from energy sales. The Cooperative serves a smaller number of commercial/industrial customer loads, representing approximately 24 percent of the Cooperative's total energy sales and 23

percent of the Cooperative's total energy revenue. Mr. Wolfram includes a more detailed discussion of Clark Energy's rate classes, the costs, and revenues associated with each rate class in his testimony.

Q. PLEASE GENERALLY DESCRIBE ANY NOTBALE TRENDS IN CLARK ENERGY'S REVENUES AND MARGINS IN RECENT YEARS.

A. Clark Energy has experienced steadily decreasing margins since 2022, even with a consistent customer load. Mr. Wolfram's COSS reveals that our current residential customer charge of $18.62 is significantly below the cost-based rate of $44.21, a $25.59 variance. This substantial difference ties our revenue generation directly to weather variability, resulting in considerable year-to-year fluctuations. To foster greater revenue predictability and reduce this exposure, Clark Energy is seeking to move toward cost-based rates for the residential customer class.

Q. PLEASE DESCRIBE CLARK ENERGY'S OPERATIONAL EXPENSES IN RECENT YEARS, INCLUDING IF THESE EXPENSES HAVE INCREASED?

A. Yes, expenses have increased due to a combination of factors. While Clark Energy has worked diligently to keep operating expenses low, inflationary cost pressures have created a need for additional revenue. Compounding this, we have experienced a rise in storm restoration costs resulting from an increasing number of severe weather events. In the past, major weather events often received Federal Emergency Management Agency ("FEMA") disaster declarations, with Clark Energy being reimbursed 87% of restoration costs. However, a critical shift occurred in January 2025 when an ice storm caused over $1 million in restoration costs, yet FEMA denied our disaster declaration request. This unreimbursed expense has severely impacted Clark Energy's financial condition in 2025.

Though our twelve-month test period does not encompass 2025, we believe it is important to bring to the Commission's attention the growing frequency of severe weather events and the current unpredictability of FEMA assistance.

Q. PLEASE GENERALLY DESCRIBE CLARK ENERGY'S EXISTING DEBT PORTFOLIO AND ANY RECENT EFFORTS TO REDUCE INTEREST EXPENSE.

A. Clark Energy's lenders are Federal Financing Bank (FFB), Cooperative Finance Corporation (CFC) and Co-Bank. As of July 1, 2025, the outstanding principal balance on Clark Energy's long-term debt is $75,568,344. Of this amount, 54 percent is at fixed interest rates. For its short-term borrowing needs Clark Energy has an $8,500,000 line of credit with CFC and a $5,000,000 line of credit with Co-Bank.

Q. IS CLARK ENERGY PROPOSING TO ADJUST ITS DEPRECIATION RATES AS PART OF THIS PROCEEDING?

A. No.

Q. PLEASE GENERALLY DESCRIBE CLARK ENERGY'S WORKFORCE.

A. Currently, Clark Energy employs 57 full-time employees. However, considering its size, both in terms of customers served and the size of the service territory, Clark Energy could easily justify a staffing level of several additional employees. Clark Energy continually evaluates numerous factors, including both labor cost and quality of service, when making the decision to hire additional staff or outsource labor tasks to contractors.

Q. PROVIDE ADDITIONAL DETAIL CONCERNING CLARK ENERGY'S LABOR EXPENSES, INCLUDING THE BENEFITS OFFERED TO EMPLOYEES.

A. Clark Energy offers its employees a competitive compensation package to attract and retain a qualified workforce.

Health Insurance: All full-time Clark Energy employees are eligible for health insurance beginning on their first day of employment with the Cooperative. Employee contribution percentages vary depending on the coverage selected. Employees currently contribute 10% of employee only, 25% of employee-child, 26% of employee-spouse, and 29% of family insurance premiums.

Health Reimbursement Arrangement (HRA): Clark Energy offers $650 annually to full-time employees to cover qualified medical expenses. This benefit is offered on a use it or lose it basis. The funds become available on January 1 every year and remain available through December 31.

Dental and Vision Insurance: All full-time employees are also eligible for dental and vision insurance. Employee contribution percentages vary depending on the coverage selected. Employees currently contribute 0% of employee only, 18% of employee-child, 17% of employee-spouse, and 24% of family insurance premiums.

Group Term Life Insurance: Group-term life insurance is provided by Clark Energy to full-time employees at three (3) times the employees annual salary. 807 KAR 5:078, Section 6(3) requires the removal of life insurance premiums above the lesser of employee salary or $50,000 per employee from the revenue requirement. In this case, for simplicity Clark Energy has removed all life insurance premiums from the revenue requirement.

Accidental Death and Dismemberment Insurance: Clark Energy does not pay for AD&D insurance as a benefit to employees. However, employees may elect to obtain this insurance coverage on their own.

Spouse Life Insurance: Clark Energy provides $10,000 spouse life insurance coverage as a benefit to married full-time employees. Employees may elect additional coverage, but are responsible for the additional premiums that result from the coverage.

Long-Term Disability Insurance: Clark Energy provides long-term disability insurance coverage to full-time employees.

Retirement: Full-time employees hired before January 1, 2023, participate in a Retirement Security ("RS") Plan funded by Clark Energy. Full-time employees hired on January 1, 2023, and after participate in a 401(k) plan. As part of this 401(k) plan, Clark Energy funds 6% of a full-time employee's base salary without requiring contribution from the employee. Clark Energy will additionally match an employee's contributions up to 4% of the employee's base salary.

Q. HOW DOES CLARK ENERGY DETERMINE WHETHER AND WHEN WAGE INCREASES SHOULD BE AWARDED TO EMPLOYEES?

A. Clark Energy conducts an annual wage and salary study to ensure that wage increases given to employees are consistent with local and industry trends. Both a budget for wage increases and a wage and compensation plan are approved by the Clark Energy Board of Directors on an annual basis. All Clark Energy employees are subject to annual performance reviews which are considered when awarding wage increases to employees.

Q. WHY IS IT IMPORTANT THAT CLARK ENERGY MAINTAIN A STRONG FINANCIAL CONDITION?

A. As the Commission is aware, Clark Energy is owned by the Members it serves. While it is always the Cooperative's goal to keep rates as low as possible, the expense of providing

safe and reliable service must be recovered. Without an increase in rates, and revenue, Clark Energy will be in danger of not recovering the costs of providing service.

Q. WHY DID CLARK ENERGY DECIDE TO FILE A STREAMLINED RATE PROCEEDING INSTEAD OF A CASE FOR A GENERAL INCREASE IN RATES?

A. Clark Energy understands the burden that raising rates can have on our membership. To reduce this burden on our members as much as possible but remain in a stable financial position, Clark Energy is seeking an approximate 5% rate increase. This fits well within the Streamlined Rate Proceeding Requirements. Clark Energy's management appreciates the work the Commission has done to provide an alternative option to cooperatives seeking an adjustment to rates. Management believes that using these alternative procedures will reduce the costs borne by the Cooperative, expedite the timeline of having approved rates, and reduce the workload of both Cooperative and Commission staff.

Q. DID CLARK ENERGY CONSIDER ITS LOW-INCOME CUSTOMERS WHEN DESIGNING ITS PROPOSED RATES?

A. Yes. While Clark Energy's primary obligation is to its entire membership, a separate analysis has been conducted to assess the potential impact of its proposed rate design on low-income members. To ensure these members would not be adversely affected, a random sample of 100 residential accounts that received assistance during 2024 was selected. The analysis revealed that this group had an average monthly usage of 1,235 kWh, compared to the overall residential average of 1,042 kWh. Based on this comparison, Clark Energy determined that the proposed rate structure will not negatively impact low-income members. Additionally, the rate design is structured to more accurately reflect the costs associated with operating the distribution system. This approach provides greater cost

alignment among service classes, reduces fluctuations in monthly bills, and supports a more predictable and efficient budgeting process, benefiting all members.

Q. IS CLARK ENERGY PROPOSING ANY OTHER TARIFF REVISIONS OTHER THAN THE PROPOSED ADJUSTMENTS TO RATES?

A. No. Clark Energy does not propose any request to change its published tariff beyond that necessary to reflect changes in rates.

Q. DID CLARK ENERGY FIND IT NECESSARY TO MAKE PRO FORMA ADJUSTMENTS FOUND IN 807 KAR 5:078, SECTION 6?

A. Yes. The adjustments required by 807 KAR 5:078, Section 6 are part of the COSS and can be found and discussed at length in Mr. Wolfram's testimony. Each of the adjustments proposed are consistent with 807 KAR 5:078, Section 6 are reasonable and reflect the known and measurable changes to Clark Energy's test year. These adjustments are necessary to ensure that rates are based on the most accurate and appropriate data. Mr. Wolfram describes each of these adjustments in more detail in his testimony.

Q. PLEASE EXPLAIN WHY THE COMMISSION SHOULD GRANT THE RELIEF REQUESTED BY CLARK ENERGY IN THIS PROCEEDING.

A. As discussed throughout this filing, the rate relief sought by Clark Energy in this case is crucial to maintain its financial ability to operate and to provide its members with reliable power at a reasonable retail cost. The requested rate increase has been specifically designed to account for Clark Energy's cost of service to the various member classes it serves. In the past few years, the costs of essential materials, labor, depreciation, interest, and storm restoration have increased tremendously to such a degree that Clark Energy's Board of Directors and management realized the need to request a general adjustment in rates. The

rates requested in this case are derived from the results of Mr. Wolfram's comprehensive COSS and are reasonable and necessary for the provision of safe and reliable service at fair, just and reasonable rates.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

Clark Energy Cooperative Inc.
Case No. 2025-00230
Adjustments of Rates Pursuant to 807 KAR 5:078
Filing Requirements/Exhibit List

Exhibit 33

Sponsoring Witness: John Wolfram

Description: In support of its Application, Clark Energy provides the written testimony of Mr. John Wolfram, rate consultant and principal of Catalyst Consulting, LLC. Mr. Wolfram's testimony is included as Exhibit 33.

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
CLARK ENERGY ENRGY COOPERATIVE, INC.	)	CASE NO.
FOR A GENERAL ADJUSTMENT OF	)	2025-00230
RATES PURSUANT TO 807 KAR 5:0078	)	

DIRECT TESTIMONY OF
JOHN WOLFRAM
PRINCIPAL, CATALYST CONSULTING LLC
ON BEHALF OF
CLARK ENERGY COOPERATIVE, INC.

Filed: August 12, 2025

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

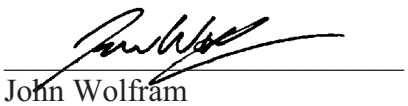
In the Matter of:

ELECTRONIC APPLICATION OF	)	
CLARK ENERGY ENRGY COOPERATIVE, INC.	)	CASE NO.
FOR A GENERAL ADJUSTMENT OF	)	2025-00230
RATES PURSUANT TO 807 KAR 5:0078	)	

VERIFICATION OF JOHN WOLFRAM

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

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



John Wolfram

The foregoing Verification was signed, acknowledged and sworn to before me this 8th of August, 2025, by John Wolfram.

Heather S. Temple

Notary ID: KYNP98715

Commission expiration: April 9, 2025

DIRECT TESTIMONY
OF
JOHN WOLFRAM

Table of Contents

DIRECT TESTIMONY
OF
JOHN WOLFRAM

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.

A. My name is John Wolfram. I am the Principal of Catalyst Consulting LLC. My business address is 3308 Haddon Road, Louisville, Kentucky, 40241.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am testifying on behalf of Clark Energy Cooperative, Inc. ("Clark Energy" or the "Cooperative").

Q. BRIEFLY DESCRIBE YOUR EDUCATION AND WORK EXPERIENCE.

A. I received a Bachelor of Science degree in Electrical Engineering from the University of Notre Dame in 1990 and a Master of Science degree in Electrical Engineering from Drexel University in 1997. I founded Catalyst Consulting LLC in June 2012. I have developed cost of service studies and rates for numerous electric and gas utilities, including electric distribution cooperatives, generation and transmission cooperatives, municipal utilities, and investor-owned utilities. I have performed economic analyses, rate mechanism reviews, special rate designs, and wholesale formula rate reviews. From March 2010 through May 2012, I was a Senior Consultant with The Prime Group, LLC. I have also been employed by the parent companies of Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU"), by the PJM Interconnection, and by the Cincinnati Gas & Electric Company. A more detailed description of my qualifications is included in Exhibit JW-1.

Q. HAVE YOU EVER TESTIFIED BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION ("COMMISSION")?

A. Yes. I have testified in numerous regulatory proceedings before this Commission and have been involved in Commission matters nearly continuously since 1999. A listing of my testimony in other proceedings is included in Exhibit JW-1.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to: (i) describe Clark Energy's rate classes, (ii) describe the calculation of Clark Energy's revenue requirement; (iii) explain the pro forma adjustments to the test period results; (iv) describe the Cost of Service Study ("COSS") process and results; (v) present the proposed allocation of the revenue increase to the rate classes; (vi) describe the rate design, proposed rates, and estimated billing impact by rate class, and (vii) support certain filing requirements from 807 KAR 5:001.

Q. ARE YOU SPONSORING ANY EXHIBITS?

A. Yes. I have prepared the following exhibits to support my testimony:

Exhibit JW-1 – Qualifications of John Wolfram

Exhibit JW-2 – Revenue Requirements & Pro Forma Adjustments

Exhibit JW-3 – COSS: Summary of Results

Exhibit JW-4 – COSS: Functionalization & Classification

Exhibit JW-5 – COSS: Allocation to Rate Classes & Returns

Exhibit JW-6 – COSS: Billing Determinants

Exhibit JW-7 – COSS: Purchased Power, Meters, & Services

Exhibit JW-8 – COSS: Zero Intercept Analysis

Exhibit JW-9 – Present & Proposed Rates

III. CLASSES OF SERVICE

Q. PLEASE DESCRIBE THE CUSTOMER CLASSES SERVED BY CLARK ENERGY.

A. Clark Energy currently has members taking service pursuant to several major rate classifications. These include residential, general service, public facilities, general power service (large commercial), large industrial, and lighting. Clark Energy's residential members comprise 74 percent of test year energy usage and 74 percent of test year revenues from energy sales, on an unadjusted basis, as shown in Table 1 below.

Table 1. Rate Class Data (2024)

Rate Class	Code	Members	kWh	%	Revenue	%
Residential	R	25,695	321,373,036	73.92%	$42,005,562	74.17%
Resid TOU	D	1	327,183	0.08%	$24,044	0.04%
General Power Service < 50kW	C	2,032	32,071,501	7.38%	$4,669,690	8.25%
Public Facilities	E	314	3,649,587	0.84%	$522,504	0.92%
General Power Service 50-500kW	L	119	42,496,124	9.78%	$5,150,171	9.09%
General Power Service 500+kW	P	8	21,237,280	4.89%	$2,213,582	3.91%
Large Industrial Rate	B-1	1	9,599,778	2.21%	$857,826	1.51%
Lighting	S,T,O	9,988	3,978,657	0.92%	$1,187,646	2.10%
TOTAL		38,158	434,733,146	100.00%	$56,631,025	100.00%

Q. DOES THE DATA IN TABLE 1 RECONCILE PRECISELY WITH THE DATA IN CLARK ENERGY'S RUS FORM 7 AND THE ANNUAL FINANCIAL REPORT FILED WITH THE COMMISSION?

A. No; the data does not reconcile perfectly, but it is extremely close. The reason for this is that the data in Table 1 represents my reproduction of Clark Energy's 2024 billing data by rate class. I made certain adjustments to the cooperative's actual booked amounts as needed to perform the cost of service study.

IV. REVENUE REQUIREMENT

Q. PLEASE DESCRIBE HOW CLARK ENERGY'S PROPOSED REVENUE INCREASE WAS DETERMINED.

A. Clark Energy proposes a general adjustment in rates using a historical test period. The proposed revenue increase was determined first by analyzing the revenue deficiency based on financial results for the test period after the application of certain pro forma adjustments described herein. The revenue deficiency was determined as the difference between (i) Clark Energy's net margins for the adjusted test period without reflecting a general adjustment in rates and (ii) the cap of the lower of (a) an OTIER of 1.85 and (b) the overall rate increase of 5 percent, pursuant to the requirements of the applicable regulation in 807 KAR 5:078 ("Streamlined Regulation"). The 5 percent is driven by the number of years since Clark Energy's last rate case. Based on the more limiting amount, the revenue deficiency is $2,821,079 for an increase of 5 percent. Because this amount is lower than the amount required to reach the overall cap of 1.85 OTIER, this amount is the

overall revenue deficiency used in the rate design effort. Due to the rounding of actual per-unit rates in the tariff, Clark Energy's request is for an increase of $2,820,550 or 4.87 percent.

Q. WHAT IS THE HISTORICAL TEST PERIOD FOR THE RATE CASE APPLICATION?

A. The historical test period for the filing is the 12 months ended December 31, 2024.

Q. HAVE YOU PREPARED AN EXHIBIT THAT SHOWS HOW CLARK ENERGY'S REVENUE DEFICIENCY IS CALCULATED?

A. Yes. Exhibit JW-2 shows the calculation of Clark Energy's revenue deficiency.

Q. PLEASE EXPLAIN THE REVENUE DEFICIENCY CALCULATION IN EXHIBIT JW-2 IN DETAIL.

A. The purpose of Exhibit JW-2 is to calculate the difference between Clark Energy's net margin for the adjusted test year and the margin necessary for Clark Energy to achieve the lower of a 1.85 OTIER or the 5 percent overall percentage increase, pursuant to the limits established in the Streamlined Regulation. Page 1 of the exhibit presents revenues and expenses for Clark Energy for the actual test year, the proposed pro forma adjustments, the adjusted test year at present rates, and the adjusted test year at a 1.85 OTIER (which is higher than the 5 percent cap). The revenues include total sales of electric energy and other electric revenue.

Expenses are tabulated next. The Total Cost of Electric Service is shown on line 22. Total Cost of Electric Service includes operation expenses, maintenance expenses, depreciation and amortization expenses, taxes, interest expenses on long-term debt, other interest expenses, and other deductions. Utility Operating Margins

are calculated by subtracting Total Cost of Electric Service from Total Operating Revenue. Non-operating margins and capital credits are added to Utility Operating Margins to determine Clark Energy's Net Margins.

The TIER, OTIER, Margins at Target OTIER, and Revenue Deficiency amounts are calculated at the bottom of page 1 of Exhibit JW-2.

Q. WHAT IS THE OTIER FOR CLARK ENERGY FOR THE UNADJUSTED TEST YEAR AND THE ADJUSTED TEST YEAR?

A. Exhibit JW-2 shows on Line 35 that the OTIER for the unadjusted test year is 0.43 and for the adjusted test year is 0.35, both of which are unreasonably low.

Q. WHAT IS THE REVENUE DEFICIENCY CALCULATED IN EXHIBIT JW-2?

A. Based on an increase of 5 percent, Clark Energy requires an increase of $2,821,079 before rate rounding.

Q. IS CLARK ENERGY REQUESTING AN INCREASE THAT IS CAPPED?

A. Yes. Under the Streamlined Regulation, Clark Energy's request is limited to the lower of the amount that (a) yields an OTIER of 1.85 or (b) represents a 5 percent increase over test year revenues. In this case the 5 percent increase is the limiting factor. This is shown on Exhibit JW-2, page 1, lines 39-46.

Q. WHY DOES THIS MATTER?

A. Clark Energy believes the Commission should approve the request as filed, but if the Commission does not, and instead makes any downward adjustments to the revenue requirement or pro forma adjustments, Clark Energy respectfully requests that the Commission revisit the limiting factor, i.e., revisit the difference between

the revenue requirement at the 1.85 OTIER and the 5 percent cap, *after* making any downward adjustments, and apply the appropriate limitation. At the filed rates, a downward adjustment of $767,816 could be made (*i.e.* $3,588,895 less $2,821,079) without impacting Clark Energy's overall requested rate increase or proposed rates. If any findings by the Commission affect the application of the cap, the Commission should take that into account.

V. PRO FORMA ADJUSTMENTS

Q. PLEASE BROADLY DESCRIBE THE NATURE OF THE PRO FORMA ADJUSTMENTS MADE TO CLARK ENERGY'S ELECTRIC OPERATIONS FOR THE TEST YEAR SHOWN IN EXHIBIT JW-2.

A. Clark Energy made adjustments pursuant to 807 KAR 5:078, Section 6 which remove revenues and expenses that are addressed in other rate mechanisms, are ordinarily excluded from rates, or are non-recurring on a prospective basis, consistent with standard Commission practices, or are to be excluded pursuant to the Streamlined Regulation. The pro forma adjustments are included in Exhibit JW-2. The pro forma adjustments are summarized below for convenience.

Table 2. Pro Forma Adjustments

Reference Schedule	Pro Forma Adjustment Item
1.01	Fuel Adjustment Clause
1.02	Environmental Surcharge
1.03	Rate Case Expenses
1.04	Year-End Customer Normalization
1.05	G&T Capital Credits
1.06	Non-Recurring Items
1.07	Depreciation Expense Normalization
1.08	Advertising & Donations

1.09	Directors Expense
1.10	Interest
1.11	Life Insurance Premiums
1.12	Wages

Q. DID YOU PREPARE A DETAILED INCOME STATEMENT AND BALANCE SHEET RELECTING THE IMPACT OF ALL PROPOSED ADJUSTMENTS?

A. Yes. These are included in Exhibit JW-2 pages 3 and 4.

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.01.

A. This adjustment accounts for the fuel cost expenses and revenues included in the Fuel Adjustment Clause ("FAC") for the test period. Consistent with Commission practice, FAC expenses and revenues included in the test year have been eliminated.

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.02.

A. This adjustment removes Environmental Surcharge ("ES") revenues and expenses because these are addressed by a separate rate mechanism. This is consistent with the Commission's practice of eliminating the revenues and expenses associated with full-recovery cost trackers.

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.03.

A. This adjustment estimates the rate case costs amortized over a 3-year period for inclusion in the revenue requirement, consistent with standard Commission practice.

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.04.

A. This adjustment adjusts the test year expenses and revenues to reflect the number of customers at the end of the test year. The numbers of customers served at the end of the test period for some rate classes differed from the average number of customers for the test year. The change in revenue is calculated by applying the average revenue per kWh for each rate class to the difference between average customer count and test-year-end customer count (at average kWh/customer) for each class. The change in operating expenses was calculated by applying an operating ratio to the revenue adjustment, consistent with the approach accepted by the Commission for other utilities in rate proceedings (*e.g.,* Case Nos. 2019-00053, 2012-00221 & 2012-00222, and 2017-00374, and every distribution cooperative rate case since then in which I provided direct testimony).

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.05.

A. This adjustment removes the G&T Capital Credits from the test period, consistent with standard Commission practice.

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.06.

A. This adjustment removes the contribution made for non-recurring items, consistent with standard Commission practice.

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.07.

A. This adjustment normalizes depreciation expenses by replacing the test year actual expenses with test year-end balances (less any fully depreciated items) at approved depreciation rates, consistent with typical Commission practice.

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.08.

A. This adjustment eliminates donations, promotional advertising, dues, and gift expenses pursuant to 807 KAR 5:016, consistent with Commission practice.

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.09.

A. This adjustment removes certain Director expenses, including costs for directors attending EKPC / KAEC / NRECA annual meeting(s), training, or tours when the director is not the Clark Energy representative for the respective organization. Expenses that may not be fully removed for rate-making purposes include the costs of attending NRECA director training/education seminars (especially for new directors). These seminars help directors to meet their fiduciary duties to the membership by educating them on industry issues. The adjustment removes all Director expenses specified in the Streamlined Regulation; any specified in the Streamlined Regulation but not listed in Reference Schedule 1.09 were not incurred by Clark Energy during the test year.

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.10.

A. This adjustment normalizes the interest on Interest Expense from test year to recent amounts.

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.11.

A. The regulation calls for the removal of Life Insurance premiums above the lesser of employee salary or $50,000 per employee from the revenue requirement. In this case for simplicity Clark Energy has removed all life insurance premiums from the revenue requirement.

Q. PLEASE EXPLAIN THE ADJUSTMENT TO OPERATING REVENUES OR EXPENSES SHOWN IN REFERENCE SCHEDULE 1.12.

A. This adjustment normalizes Clark Energy's employee wages and salaries to account for changes due to wage increases, departures, or new hires for a standard year of 2,080 hours. The exhibit shows adjustment data for employees based on regular time and overtime adjusted from test year 2024.

Q. IS CLARK ENERGY REQUIRED TO INCLUDE AN ADJUSTMENT TO OPERATING EXPENSES TO REFLECT THE REMOVAL OF COSTS FOR THE LEAST GENEROUS RETIREMENT PLAN FOR EMPLOYESS WHO QUALIFY FOR MORE THAN ONE PLAN?

A. No. The requirement does not apply because Clark Energy does not have any employees for which the cooperative contributes to more than one retirement plan.

Q. IS CLARK ENERGY REQUIRED TO INCLUDE AN ADJUSTMENT TO OPERATING EXPENSES TO REFLECT EMPLOYEE CONTRIBUTIONS FOR HEALTHCARE INSURANCE PREMIUMS BASED ON THE NATIONAL AVERAGE FOR COVERAGE TYPE, CONSISTENT WITH THE STREAMLINED REGULATION?

A. No. The requirement to adjust to national average contribution levels pursuant to the Streamlined Regulation does not apply because Clark Energy's employee health care insurance premium contribution is not zero.

VI. COST OF SERVICE STUDY

Q. DID YOU PREPARE A COSS FOR CLARK ENERGY BASED ON FINANCIAL AND OPERATING RESULTS FOR THE TEST YEAR?

A. Yes. I prepared a fully allocated, embedded COSS based on pro forma operating results for the test year. The objective in performing the COSS is to assess Clark Energy's overall rate of return on rate base and to determine the relative rates of return that Clark Energy is earning from each rate class. Additionally, the COSS provides an indication of whether each class is contributing its appropriate share towards Clark Energy's cost of providing service.

Q. WHAT PROCEDURE WAS USED IN PERFORMING THE COSS?

A. The three traditional steps of an embedded COSS – functionalization, classification, and allocation – were utilized. The COSS was prepared using the following procedure: (1) costs were functionalized to the major functional groups; (2) costs

were classified as energy-related, demand-related, or customer-related; and then (3) costs were allocated to the rate classes.

Q. IS THIS A STANDARD APPROACH USED IN THE ELECTRIC UTILITY INDUSTRY AND ACCEPTED BY THIS COMMISSION?

A. Yes. The same approach has been employed and accepted in several cases filed by other utilities in Kentucky, including rate cases noted in Exhibit JW-1. The approach is consistent with that I applied in other recent distribution cooperative rate filings before this Commission.

Q. HOW ARE COSTS FUNCTIONALIZED AND CLASSIFIED IN THE COST OF SERVICE MODEL?

A. Clark Energy's test-year costs are functionalized and classified according to the practices specified in *The Electric Utility Cost Allocation Manual* published by the National Association of Regulatory Utility Commissioners ("NARUC") dated January 1992. Costs are functionalized to the categories of power supply, transmission, station equipment, primary and secondary distribution plant, customer services, meters, lighting, meter reading and billing, and load management.

Q. IS THE COSS UNBUNDLED?

A. Yes. This unbundling distinguishes between the functionalized costs components, i.e., purchased power demand, purchased power energy, distribution demand, and distribution customer – which allows the development of rates based on these separate cost components.

Q. HOW WERE COSTS CLASSIFIED AS ENERGY-RELATED, DEMAND-

RELATED, OR CUSTOMER-RELATED?

A. Costs are classified in connection with how they vary. Costs classified as *energy-related* vary with the amount of kilowatt-hours consumed. Costs classified as *demand-related* vary with the capacity needs of customers, such as the amount of transmission or distribution equipment necessary to meet a customer's needs, or other elements that are related to facility size. Transmission lines and distribution substation transformers are examples of costs typically classified as demand costs. Costs classified as *customer-related* include costs incurred to serve customers regardless of the quantity of electric energy purchased or the peak requirements of the customers and vary with the number of customers. A meter is one example of a customer-related cost. Customer-related costs also include the cost of the minimum system necessary to provide a customer with access to the electric grid. Distribution costs related to overhead conductor, underground conductor, and line transformers were split between demand-related and customer-related using the "zero-intercept" method, which I explain further below. Customer Services, Meters, Lighting, Meter Reading, Billing, Customer Account Service, and Load Management costs were classified as customer-related.

Q. PLEASE EXPLAIN THE APPLICATION OF THE ZERO INTERCEPT METHOD TO THE CLASSIFICATION OF CERTAIN DISTRIBUTION COSTS.

A. In preparing this study, the zero-intercept method was used to determine the customer components of overhead conductor, underground conductor, and line transformers. The zero-intercept method uses linear regression to determine the

theoretical cost for connecting a customer of zero size to the grid. This method is less subjective than other approaches and is preferred when the necessary data are available. With the zero-intercept method, a zero-size conductor or line transformer is the absolute minimum system. The zero-intercept analysis is included in Exhibit JW-8.

Q. IS THE ZERO-INTERCEPT METHOD A STANDARD APPROACH GENERALLY ACCEPTED WITHIN THE ELECTRIC UTILITY INDUSTRY?

A. Yes. The NARUC *Electric Utility Cost Allocation Manual* identifies the zero-intercept (or "minimum intercept") as one of two standard methodologies for classifying distribution fixed costs. The manual states on page 92 that the zero-intercept method "requires considerably more data and calculation than the minimum-size method. In most instances, it is more accurate, although the differences may be relatively small." The Commission has accepted the zero-intercept method in many rate filings for many years. The Commission should do so in this case also, because the zero intercept calculations shown in Exhibit JW-8 are reasonable.

Q. HAVE YOU PREPARED AN EXHIBIT SHOWING THE RESULTS OF THE FUNCTIONALIZATION AND CLASSIFICATION STEPS OF THE COSS?

A. Yes. Exhibit JW-4 shows the results of the first two steps of the COSS – functionalization and classification.

Q. IN THE COST OF SERVICE MODEL, ONCE COSTS ARE FUNCTIONALIZED AND CLASSIFIED, HOW ARE THESE COSTS ALLOCATED TO THE CUSTOMER CLASSES?

A. Once costs for all of the major accounts are functionalized and classified, the resultant cost matrix for the major groupings (e.g., Plant in Service, Rate Base, Operation and Maintenance Expenses) is then transposed and allocated to the customer classes using allocation vectors. The results of the class allocation step of the COSS are included in Exhibit JW-5.

Q. HOW ARE ENERGY-RELATED, CUSTOMER-RELATED, AND DEMAND-RELATED COSTS ALLOCATED TO THE RATE CLASSES IN THE COSS?

A. Power supply energy-related costs are allocated on the basis of total test year kWh sales to each customer class. Power supply and transmission demand-related costs are allocated using a 12CP methodology, to mirror the basis of cost allocation used in the applicable EKPC wholesale tariff. With the 12CP methodology, these demand-related costs are allocated on the basis of the demand for each rate class at the time of the wholesale system peak (also known as "Coincident Peak" or "CP") for each of the twelve months. Customer-related costs are allocated on the basis of the average number of customers served in each rate class during the test year. Distribution demand-related costs are allocated on the basis of the relative demand levels of each rate class. Specifically, the demand cost component is allocated by the maximum class demands for primary and secondary voltage and by the sum of individual customer demands for secondary voltage. The customer cost component

of customer services is allocated on the basis of the average number of customers for the test year. Meter costs were specifically assigned by relating the costs associated with various types of meters to the class of customers for whom these meters were installed. The demand analysis is provided in Exhibit JW-6. The purchased power, meter, and service analyses are provided in Exhibit JW-7.

Q. HOW IS THE TARGET MARGIN INCORPORATED INTO THE COSS?

A. The COSS first determines results on an actual or unadjusted basis. The COSS then takes into account the pro forma adjustments and a target margin. The target margin is based on the rate of return on rate base that will yield the target revenue from electric rates. In this case, a rate of return on rate base of 3.65 percent yields a total revenue requirement equivalent to the target Total Sales of Electric Energy plus the Other Electric Revenue noted on Page 1 of Exhibit JW-2, lines 1-4 in the Proposed Rates column.

Q. PLEASE SUMMARIZE THE RESULTS OF THE COSS.

A. The results of the COSS are provided in Exhibit JW-3 on page 1. The following table summarizes the rates of return for each customer class in the study. The Pro Forma Rate of Return on Rate Base was calculated by dividing the net utility operating margin (including the pro forma adjustments) by the net cost rate base for each customer class. The Unitized Pro Forma Return on Rate Base is the previous column normalized to a total return on rate base equal to one (1.00). Any negative values for pro forma rate of return on rate base indicate that expenses exceed revenues. Also, any rate class for which the rate of return is greater than the total system rate of return is providing a subsidy to the other rate classes; any

class with a rate of return that is less than the total system rate of return (i.e. any class with a unitized rate of return less than 1.00) is receiving a subsidy.

Table 3. COSS Results: Rates of Return

#	Rate	Code	Pro Forma Return on Rate Base	Unitized Pro Forma Return on Rate Base
1	Residential	R	-1.10%	(0.81)
2	Residential TOU	D	136.97%	100.59
3	General Power Service < 50kW	C	6.62%	4.86
4	Public Facilities	E	1.48%	1.08
5	General Power Service 50-500kW	L	55.92%	41.07
6	General Power Service 500+kW	P	31.87%	23.41
7	Large Industrial Rate	B-1	63.43%	46.59
8	Lighting	S,T,O	8.86%	6.51
9	TOTAL		1.36%	1.00

Q. DOES THE COSS PROVIDE INFORMATION CONCERNING THE UNIT COSTS INCURRED BY CLARK ENERGY TO PROVIDE SERVICE UNDER EACH RATE SCHEDULE?

A. Yes. Customer-related, demand-related, and energy-related costs for each rate class are shown in Exhibit JW-3 page 2 and at the end of Exhibit JW-5. Customer-related costs are stated as a cost per member per month. Energy-related costs are stated as a cost per kWh. For rate classes with a demand charge, demand-related costs are stated as a cost per kW per month. For rate classes without a demand charge, the demand-related costs are incorporated into the per kWh charge.

Q. BASED ON THE COSS, DO CLARK ENERGY'S EXISTING RATES APPROPRIATELY REFLECT THE COST OF PROVIDING SERVICE TO EACH RATE CLASS?

A. No. The wide range of rates of return for the rate classes indicates that existing rates maintain a degree of subsidization between the rate classes. The unbundled costs within each rate class indicate an imbalance within the current rate structure between the recovery of fixed costs and variable costs, particularly within the residential class. This is relatively common among electric utilities, at least to a certain degree.

Q. WHAT GUIDANCE DOES THE COSS PROVIDE FOR RATE DESIGN?

A. First, the COSS indicates that rates for the residential rate class are insufficient and should be increased. The need to increase rates is limited to the residential rate schedule because it is the only rate class being subsidized (and significantly so) by the collective other rate classes.

Second, the COSS supports a fixed monthly charge of $44.38 for the residential class. This is shown on Exhibit JW-3, page 2. Since the current charge is $18.62 per month, the fixed residential customer charge should be increased. This is a significant issue for Clark Energy because the current charge is below cost-based rates. This means that the current rate structure places too little recovery of fixed costs in the fixed charge, which results in significant under-recovery of fixed costs, particularly when members embrace conservation or energy efficiency or otherwise reduce overall consumption. At bottom, this is a fundamental challenge facing Clark Energy from a cost recovery standpoint, particularly because

residential members make up the vast majority of Clark Energy's membership, and it is essential for Clark Energy's financial well-being to address this issue.

VII. ALLOCATION OF THE PROPOSED INCREASE

Q. PLEASE SUMMARIZE HOW CLARK ENERGY PROPOSES TO ALLOCATE THE REVENUE INCREASE TO THE CLASSES OF SERVICE.

A. Clark Energy relied on the results of the COSS as a guide to determine the allocation of the proposed revenue increase to the classes of service. Generally, Clark Energy is proposing to allocate revenue increases to the underperforming rate classes with the aim of making the resultant rates of return on rate base for the rate classes less divergent. In this case, this means applying the rate increases to residential only.

Q. WHAT IS THE PROPOSED BASE RATE REVENUE INCREASE FOR EACH RATE CLASS?

A. Clark Energy is proposing the base rate revenue increases as follows:

Table 4. Proposed Base Rate Increases

Code	Rate Class	Increase	
		Dollars	Percent
R	Residential	$2,820,550	6.69%
D	Time Of Use Marketing Service	$0	0%
C	General Power Service < 50kW	$0	0%
E	Public Facilities	$0	0%
L	General Power Service 50-500kW	$0	0%
P	General Power Service 500+kW	$0	0%
B-1	Large Industrial Rate	$0	0%
S,T,O	Lighting	$0	0%
TOTAL		$2,820,550	4.87%

VIII. PROPOSED RATES

Q. HAVE YOU PREPARED AN EXHIBIT SHOWING THE RECONSTRUCTION OF CLARK ENERGY'S TEST-YEAR BILLING DETERMINANTS?

A. Yes. The reconstruction of Clark Energy's billing determinants is shown on Exhibit JW-9.

Q. WHAT ARE THE PROPOSED CHARGES FOR CLARK ENERGY'S RATE CLASSES?

A. Clark Energy proposes several changes to rates:

a) Clark Energy proposes to increase the Residential Rate R facility charge by $14.38 from $18.62 to $33.00 per month and to decrease the energy charge from $0.10123 to $0.09621 per kWh. This achieves an overall increase for Rate R of $2.8 million. Clark Energy proposes this facility charge because the cost based rate is over $44 and this would place the charge approximately 75 percent of what it should be in order to recover the actual fixed cost of providing service. The reduction to the energy charge is also consistent with the COSS as the current rate is higher than the cost to serve in $ per kWh.

b) Clark Energy proposes to increase the General Power Service Rate C and the Public Facilities Rate E facility charges by the same increment as Rate R because they too are far below cost-of-service, and to reduce the respective energy charges so that the overall classes do not experience a net revenue increase. As with Rate R, this is consistent with the COSS.

c) Clark Energy proposes to increase the demand charges for the large customer classes Rates L, P and B-1, and to decrease the respective energy charges for each so that the overall classes do not experience a net revenue increase. This is proposed in order to move the demand and energy charges closer to cost-based rates and is consistent with the COSS.

Q. DO THE PROPOSED RATES GENERATE THE EXACT TARGET REVENUE INCREASE OF $2,821,079?

A. No, but it is extremely close. Due to rate rounding, the proposed rates generate $2,820,550 which varies by $529 or 0.02 percent from the exact revenue deficiency for the test period, based on test year consumption.

Q. WHAT IS THE PROPOSED AVERAGE BILLING INCREASE FOR EACH RATE CLASS?

A. Clark Energy proposes the average billing increases in the following table:

Table 5. Proposed Average Billing Increases

Code	Rate Class	Average Usage (kWh)	Increase	
			Dollars	Percent
R	Residential	1,042	$9.15	6.69%
D	Time Of Use Marketing Service	27,265	$0	0%
C	General Power Service < 50kW	1,315	$0	0%
E	Public Facilities	968	$0	0%
L	General Power Service 50-500kW	29,676	$0	0%
P	General Power Service 500+kW	221,222	$0	0%
B-1	Large Industrial Rate	799,982	$0	0%
S,T,O	Lighting	NA	$0	0%
TOTAL				4.87%

Q. WILL THE RATES PROPOSED BY CLARK ENERGY IN THIS PROCEEDING ELIMINATE ALL INTER-CLASS SUBSIDIZATION?

A. No. The proposed rates move Clark Energy's rate structures in the direction of cost-based rates without fully adopting those rates. See Exhibit JW-3, page 1 of 2. This is consistent with the ratemaking principle of gradualism and will allow the avoidance of rate shock while still making some movement to improve the price signal to members consistent with how Clark Energy actually incurs costs.

Q. IS CLARK ENERGY PROPOSING CHANGES TO THE MISCELLANEOUS SERVICE CHARGES IN THIS CASE?

A. No.

Q. IS CLARK ENERGY PROPOSING CHANGES TO ANY OTHER TARIFF TERMS AND CONDITIONS IN THIS CASE?

A. No.

IX. FILING REQUIREMENTS

Q. HAVE YOU REVIEWED THE ANSWERS PROVIDED IN THE FILED EXHIBITS WHICH ADDRESS CLARK ENERGY'S COMPLIANCE WITH THE FILING REQUIREMENTS UNDER THE APPLICABLE ADMINISTRATIVE REGULATION AND ITS VARIOUS SUBSECTIONS?

A. Yes. I hereby incorporate and adopt those portions of exhibits for which I am identified as the sponsoring witness as part of this Direct Testimony.

X. CONCLUSION

Q. DO YOU HAVE ANY CLOSING COMMENTS?

A. Yes. Clark Energy's rates of return in the COSS clearly demonstrate that the proposed increase in base rates is necessary for Clark Energy's financial health. By virtue of the Streamlined Regulation, Clark Energy is capped at a 5 percent overall

increase. With rate rounding, Clark Energy is requesting an increase of $2,820,550 or $9.15 per month for the average residential member. This increase is necessary to meet the financial obligations described in the company witness testimony. The proposed rates are designed to produce revenues that achieve the revenue requirement. In particular, the increase in facility charges is needed to keep moving the rate structure towards cost-based rates, in order to reduce the revenue erosion that results from having too great a portion of utility fixed cost recovery embedded in the variable charge. The Commission has recognized in recent orders that for an electric cooperative that is strictly a distribution utility, there is a need for a means to guard against the revenue erosion that often occurs due to the decrease in sales volumes that accompanies poor regional economics, changes in weather patterns, and the implementation or expansion of demand-side management and energy-efficiency programs. For Clark Energy at this juncture, this is the case. The proposed rates are fair, just and reasonable and should be approved as filed.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

Exhibit JW-1
Qualifications of John Wolfram

JOHN WOLFRAM

Summary of Qualifications

Provides consulting services to electric utilities regarding utility rate and regulatory filings, cost of service studies, wholesale and retail rate designs, tariffs and special contracts, formula rates, energy policy, and other matters.

Employment

CATALYST CONSULTING LLC — June 2012 – Present
Principal

THE PRIME GROUP, LLC — March 2010 – May 2012
Senior Consultant

LG&E and KU, Louisville, KY — 1997 - 2010
(Louisville Gas & Electric Company and Kentucky Utilities Company)
Director, Customer Service & Marketing (2006 - 2010)
Manager, Regulatory Affairs (2001 - 2006)
Lead Planning Engineer, Generation Planning (1998 - 2001)
Power Trader, LG&E Energy Marketing (1997 - 1998)

PJM INTERCONNECTION, LLC, Norristown, PA — 1990 - 1993; 1994 - 1997
Project Lead – PJM OASIS Project
Chair, Data Management Working Group

CINCINNATI GAS & ELECTRIC COMPANY, Cincinnati, OH — 1993 - 1994
Electrical Engineer - Energy Management System

Education

Bachelor of Science Degree in Electrical Engineering, University of Notre Dame, 1990
Master of Science Degree in Electrical Engineering, Drexel University, 1997
Leadership Louisville, 2006

Associations

Senior Member, Institute of Electrical and Electronics Engineers ("IEEE") & Power Engineering Society

Articles

"FERC Formula Rate Resurgence" *Public Utilities Fortnightly*, Vol. 158, No. 9, July 2020, 34-37.

"Economic Development Rates: Public Service or Piracy?" *IAEE Energy Forum*, International Association for Energy Economics, 2016 Q1 (January 2016), 17-20.

Presentations

"Utilities Driving Economic Development" panel discussion at the Mid-America Regulatory Conference, Jun. 2025.

"Utility Rates for the Modern Grid" presented as APPA Online Virtual Course, Apr. 2025

“Evolving Rate Structures: Adapting Co-op Rate Pricing Models for the Modern Grid” presented to CFC Independent Borrowers Executive Summit, Nov. 2024

“Aligning Rates with the Modern Grid” presented to APPA Business & Financial Conference, Sep 2024.

“Cooperative Rate Cases” presented to Kentucky Electric Cooperatives Fall Managers’ Meeting, Oct. 2023.

“New Developments in Kentucky Rate Filings” presented to Electric Cooperatives Accountants' Association Summer Meeting, Jun. 2022.

“Avoiding Shock: Communicating Rate Changes” presented to APPA Business & Financial Conference, Sep. 2020.

“Revisiting Rate Design Strategies” presented to APPA Public Power Forward Summit, Nov. 2019.

“Utility Rates at the Crossroads” presented to APPA Business & Financial Conference, Sep. 2019.

“New Developments in Kentucky Rate Filings” presented to Electric Cooperatives Accountants' Association Summer Meeting, Jun. 2019.

“Electric Rates: New Approaches to Ratemaking” presented to CFC Statewide Workshop for Directors, Jan. 2019.

“The Great Rate Debate: Residential Demand Rates” presented to CFC Forum, Jun. 2018.

“Benefits of Cost of Service Studies” presented to Tri-State Electric Cooperatives Accountants’ Association Spring Meeting, Apr. 2017.

“Proper Design of Utility Rate Incentives” presented to APPA/Area Development’s Public Power Consultants Forum, Mar. 2017.

“Utility Hot Topics and Economic Development” presented to APPA/Area Development’s Public Power Consultants Forum, Mar. 2017.

“Emerging Rate Designs” presented to CFC Independent Borrowers Executive Summit, Nov. 2016.

“Optimizing Economic Development” presented to Grand River Dam Authority Municipal Customer Annual Meeting, Sept. 2016.

“Tomorrow’s Electric Rate Designs, Today” presented to CFC Forum, Jun. 2016.

“Reviewing Rate Class Composition to Support Sound Rate Design” presented to EEI Rate and Regulatory Analysts Group Meeting, May 2016.

“Taking Public Power Economic Development to the Next Level” presented to APPA/Area Development’s Public Power Consultants Forum, Mar. 2016.

“Ratemaking for Environmental Compliance Plans” presented to NARUC Staff Subcommittee on Accounting and Finance Fall Conference, Sep. 2015.

"Top Utility Strategies for Successful Attraction, Retention & Expansion" presented to APPA/Area Development's Public Power Consultants Forum, Mar. 2015.

"Economic Development and Load Retention Rates" presented to NARUC Staff Subcommittee on Accounting and Finance Fall Conference, Sep. 2013.

Expert Witness Testimony & Proceedings

FERC

Submitted direct testimony for Viridon Path 15, LLC in FERC Docket No. ER25-2707 regarding a proposed wholesale transmission rate.

Submitted direct testimony for Cheyenne Light, Fuel & Power Company in FERC Docket No. ER25-2171 regarding proposed revisions to a Transmission Formula Rate.

Submitted direct testimony for DATC Path 15, LLC in FERC Docket No. ER25-1310 regarding a proposed wholesale transmission rate.

Submitted testimony for Evergy Missouri, Inc., Evergy Metro, Inc., and Evergy Kansas Central, Inc. in FERC Docket Nos. ER25-206, ER25-207, and ER25-208 regarding proposed Wholesale Distribution Access Service rates.

Submitted direct testimony for Black Hills Colorado Electric, LLC in FERC Docket No. ER22-2185 regarding a proposed Transmission Formula Rate.

Submitted testimony for Evergy Kansas Central, Inc. and Evergy Generating, Inc. in FERC Docket Nos. ER22-1974-000, ER22-1975-000 and ER22-1976-000 regarding revised capital structures under transmission and generation formula rates.

Submitted affidavit for Constellation Mystic Power, LLC in FERC Docket No. ER18-1639-000 in response to arguments raised in formal challenges to an informational filing required for a cost-of-service rate for the operation of power plants in ISO New England.

Submitted direct testimony for El Paso Electric Company in FERC Docket No. ER22-282 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for TransCanyon Western Development, LLC in FERC Docket No. ER21-1065 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Cleco Power LLC in FERC Docket No. ER21-370 regarding a proposed rate schedule for Blackstart Service under Schedule 33 of the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff.

Submitted direct testimony for Constellation Mystic Power, LLC in FERC Docket No. ER18-1639-005 supporting a compliance filing for a cost-of-service rate for compensation for the continued operation of power plants in ISO New England.

Submitted direct testimony for DATC Path 15, LLC in FERC Docket No. ER20-1006 regarding a proposed wholesale transmission rate.

Submitted direct testimony for Tucson Electric Power Company in FERC Docket No. ER19-2019 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Cheyenne Light, Fuel & Power Company in FERC Docket No. ER19-697 regarding a proposed Transmission Formula Rate.

Supported Kansas City Power & Light in FERC Docket No. ER19-1861-000 regarding revisions to fixed depreciation rates in the KCP&L SPP Transmission Formula Rate.

Supported Westar Energy and Kansas Gas & Electric Company in FERC Docket No. ER19-269-000 regarding revisions to fixed depreciation rates in the Westar SPP Transmission Formula Rate.

Submitted direct testimony for Midwest Power Transmission Arkansas, LLC in FERC Docket No. ER15-2236 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Kanstar Transmission, LLC in FERC Docket No. ER15-2237 regarding a proposed Transmission Formula Rate.

Supported Westar Energy and Kansas Gas & Electric Company in FERC Docket Nos. FA15-9-000 and FA15-15-000 regarding an Audit of Compliance with Rates, Terms and Conditions of Westar's Open Access Transmission Tariff and Formula Rates, Accounting Requirements of the Uniform System of Accounts, and Reporting Requirements of the FERC Form No. 1.

Submitted direct testimony for Westar Energy in FERC Docket Nos. ER14-804 and ER14-805 regarding proposed revisions to a Generation Formula Rate.

Supported Intermountain Rural Electric Association and Tri-State G&T in FERC Docket No. ER12-1589 regarding revisions to Public Service of Colorado's Transmission Formula Rate.

Supported Intermountain Rural Electric Association in FERC Docket No. ER11-2853 regarding revisions to Public Service of Colorado's Production Formula Rate.

Supported Kansas Gas & Electric Company in FERC Docket No. FA14-3-000 regarding an Audit of Compliance with Nuclear Plant Decommissioning Trust Fund Regulations and Accounting Practices.

Supported LG&E Energy LLC in FERC Docket No. PA05-9-000 regarding an Audit of Code of Conduct, Standards of Conduct, Market-Based Rate Tariff, and MISO's Open Access Transmission Tariff at LG&E Energy LLC.

Submitted remarks and served on expert panel in FERC Docket No. RM01-10-000 on May 21, 2002 in Standards of Conduct for Transmission Providers staff conference, regarding proposed rulemaking on the functional separation of wholesale transmission and bundled sales functions for electric utilities.

Kansas

Submitted direct and rebuttal testimony for Evergy Metro, Inc. in Docket No. 23-EKCE-775-RTS regarding a jurisdictional cost allocation in a retail rate case.

Submitted report for Westar Energy, Inc. in Docket No. 21-WCNE-103-GIE regarding plans and options for funding the decommissioning trust fund, depreciation expenses, and overall cost recovery in the event of premature closing of the Wolf Creek nuclear plant.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 18-WSEE-328-RTS regarding overall rate design, prior rate case settlement commitments, lighting tariffs, an Electric Transit rate schedule, Electric Vehicle charging tariffs, and tariff general terms and conditions.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 18-KG&E-303-CON regarding the Evaluation, Measurement and Verification ("EM&V") of an energy efficiency demand response program offered pursuant to a large industrial customer special contract.

Submitted report for Westar Energy, Inc. in Docket No. 18-WCNE-107-GIE regarding plans and options for funding the decommissioning trust fund, depreciation expenses, and overall cost recovery in the event of premature closing of the Wolf Creek nuclear plant.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 15-WSEE-115-RTS regarding rate designs for large customer classes, establishment of a balancing account related to new rate options, establishment of a tracking mechanism for costs related to compliance with mandated cyber and physical security standards, other rate design issues, and revenue allocation.

Kentucky

Submitted direct testimony on behalf of sixteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case Nos. 2025-00209 through 2021-00222 regarding rate design for the pass-through of a proposed wholesale rate revision.

Submitted direct testimony and responses to data requests on behalf of Farmers R.E.C.C. in Case No. 2025-00107 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Blue Grass Energy in Case No. 2025-00103 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Cumberland Valley Electric in Case No. 2024-00388 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct and rebuttal testimony and responses to data requests on behalf of South Kentucky R.E.C.C. in Case No. 2024-00402 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Shelby Energy Cooperative in Case No. 2024-00351 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Jackson Energy Cooperative in Case No. 2024-00324 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2024-00149 regarding the Fuel Adjustment Clause.

Submitted direct testimony, responses to data requests, and rebuttal testimony on behalf of Big Sandy R.E.C.C. in Case No. 2024-00287 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Licking Valley R.E.C.C. in Case No. 2024-00211 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony, rebuttal testimony, and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2024-00085 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Adopted direct testimony on behalf of Kentucky Power Company in Case No. 2023-00159 regarding the zero intercept analysis in a base rate case.

Submitted responses to data requests on behalf of Big Rivers Electric Corporation and Kenergy Corp. in Case No. 2023-00312 regarding a Large Industrial Customer Standby Service Tariff.

Submitted direct testimony on behalf of Big Sandy R.E.C.C. in Case No. 2023-00285 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony, rebuttal testimony, and responses to data requests on behalf of Kenergy Corp. in Case No. 2023-00276 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony, rebuttal testimony, and responses to data requests on behalf of Fleming-Mason Energy Corporation in Case No. 2023-00223 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Shelby Energy Cooperative in Case No. 2023-00213 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony and responses to data requests on behalf of Farmers RECC in Case No. 2023-00158 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony, rebuttal testimony, and responses to data requests on behalf of Taylor County RECC in Case No. 2023-00147 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted tariff worksheets and responses to data requests on behalf of sixteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case No. 2023-00135 regarding rate design for the pass-through of an approved wholesale earning mechanism bill credit.

Submitted direct testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2023-00102 regarding a Qualifying Facilities tariff.

Submitted direct testimony on behalf of Big Rivers Electric Corporation and Kenergy Corp. in Case No. 2023-00045 regarding a marginal cost of service study in support of an economic development rate for a special contract.

Submitted direct and rebuttal testimony and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2021-00358 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2021-00289 regarding a Large Industrial Customer Standby Service Tariff.

Submitted direct testimony on behalf of Big Rivers Electric Corporation and Jackson Purchase Energy Corporation in Case No. 2021-00282 regarding a marginal cost of service study in support of an economic development rate for a special contract.

Submitted direct testimony, responses to data requests, and rebuttal testimony on behalf of sixteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case Nos. 2021-00104 through 2021-00119 regarding rate design for the pass-through of a proposed wholesale rate revision.

Submitted direct testimony and responses to data requests on behalf of Kenergy Corp. in Case No. 2021-00066 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony on behalf of Big Rivers Electric Corporation in Case No. 2021-00061 regarding two cost of service studies in a review of the Member Rate Stability Mechanism Charge for calendar year 2020.

Submitted direct testimony and responses to data requests on behalf of Licking Valley R.E.C.C. in Case No. 2020-00338 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Cumberland Valley Electric in Case No. 2020-00264 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Taylor County R.E.C.C. in Case No. 2020-00278 regarding the cost support and tariff changes for the implementation of a Prepay Metering Program.

Submitted direct testimony and responses to data requests on behalf of Meade County R.E.C.C. in Case No. 2020-00131 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Clark Energy Cooperative in Case No. 2020-00104 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2019-00435 regarding an Environmental Compliance Plan and Environmental Surcharge rate mechanism.

Submitted direct testimony and responses to data requests on behalf of Jackson Energy Cooperative in Case No. 2019-00066 regarding revenue requirements, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2019-00053 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and data request responses on behalf of Big Rivers Electric Corporation in Case No. 2018-00146 regarding ratemaking issues associated with the anticipated termination of contracts regarding the operation of an electric generating plant owned by the City of Henderson, Kentucky.

Submitted direct testimony on behalf of fifteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case No. 2018-00050 regarding the economic evaluation of and potential cost shift resulting from a proposed member purchased power agreement.

Submitted direct testimony on behalf of Big Sandy R.E.C.C. in Case No. 2017-00374 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony on behalf of Progress Metal Reclamation Company in Kentucky Power Company Case No. 2017-00179 regarding the potential implementation of a Load Retention Rate or revisions to an Economic Development Rate.

Submitted direct testimony on behalf of Kenergy Corp. and Big Rivers Electric Corporation in Case No. 2016-00117 regarding a marginal cost of service study in support of an economic development rate for a special contracts customer.

Submitted rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2014-00134 regarding ratemaking treatment of revenues associated with proposed wholesale market-based-rate purchased power agreements with entities in Nebraska.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2013-00199 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2012-00535 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2012-00063 regarding an Environmental Compliance Plan and Environmental Surcharge rate mechanism.

Submitted direct, rebuttal, and rehearing direct testimony on behalf of Big Rivers Electric Corporation in Case No. 2011-00036 regarding revenue requirements and pro forma adjustments in a base rate case.

Submitted direct testimony for Louisville Gas & Electric Company in Case No. 2009-00549 and for Kentucky Utilities Company in Case No. 2009-00548 for adjustment of electric and gas base rates, in support of a new service offering for Low Emission Vehicles, revised special charges, and company offerings aimed at assisting customers.

Submitted discovery responses for Kentucky Utilities and/or Louisville Gas & Electric Company in various customer inquiry matters, including Case Nos. 2009-00421, 2009-00312, and 2009-00364.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2008-00148 regarding the 2008 Joint Integrated Resource Plan.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Administrative Case No. 2007-00477 regarding an investigation of the energy and regulatory issues in Kentucky's 2007 Energy Act.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2007-00319 for the review, modification, and continuation of Energy Efficiency Programs and DSM Cost Recovery Mechanisms.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2007-00067 for approval of a proposed Green Energy program and associated tariff riders.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2005-00467 and 2005-00472 regarding a Certificate of Public Convenience and Necessity for the construction of transmission facilities.

Submitted discovery responses for Kentucky Utilities in Case No. 2005-00405 regarding the transfer of a utility hydroelectric power plant to a private developer.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2005-00162 for the 2005 Joint Integrated Resource Plan.

Presented company position for Louisville Gas & Electric Company and Kentucky Utilities Company at public meetings held in Case Nos. 2005-00142 and 2005-00154 regarding routes for proposed transmission lines.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in a Focused Management Audit of Fuel Procurement practices by Liberty Consulting in 2004.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in an Investigation into their Membership in the Midwest Independent Transmission System Operator, Inc. (“MISO”) in Case No. 2003-00266.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in a Focused Management Audit of its Earning Sharing Mechanism by Barrington-Wellesley Group in 2002-2003.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2002-00381 regarding a Certificate of Public Convenience and Necessity for the acquisition of four combustion turbines.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2002-00029 regarding a Certificate of Public Convenience and Necessity for the acquisition of two combustion turbines.

Missouri

Submitted direct, rebuttal and surrebuttal testimony for Evergy Metro, Inc. in Case No. ER-2022-0130 regarding a jurisdictional cost allocation analysis in a retail rate case.

Virginia

Submitted direct testimony for Kentucky Utilities Company d/b/a Old Dominion Power in Case No. PUE-2002-00570 regarding a Certificate of Public Convenience and Necessity for the acquisition of four combustion turbines.

Exhibit JW-2
Revenue Requirements &
Pro Forma Adjustments

CLARK ENERGY COOPERATIVE
Statement of Operations & Revenue Requirement
For the 12 Months Ended December 31, 2024

Line #	Description (1)	2024 Actual Test Year (2)	Pro Forma Adjustments (4)	Pro Forma Test Yr (5)	At Proposed Rates (6)
1	Operating Revenues				
2	Total Sales of Electric Energy	56,421,579	(8,388,140)	48,033,439	50,854,518
3	Other Electric Revenue	1,380,275	-	1,380,275	1,380,275
4	Total Operating Revenue	57,801,854	(8,388,140)	49,413,714	52,234,793
5					
6	Operating Expenses:				
7	Purchased Power	39,166,969	(8,480,808)	30,686,161	30,686,161
8	Distribution Operations	2,353,738	-	2,353,738	2,353,738
9	Distribution Maintenance	4,847,953	-	4,847,953	4,847,953
10	Customer Accounts	1,533,365	-	1,533,365	1,533,365
11	Customer Service	319,402	-	319,402	319,402
12	Sales Expense	9,218	-	9,218	9,218
13	A&G	1,924,438	39,191	1,963,629	1,963,629
14	Total O&M Expense	50,155,083	(8,441,616)	41,713,467	41,713,467
15					
16	Depreciation	6,305,895	120,319	6,426,214	6,426,214
17	Taxes - Other	54,082	-	54,082	54,082
18	Interest on LTD	2,057,808	328,722	2,386,530	2,386,530
19	Interest - Other	348,806	-	348,806	348,806
20	Other Deductions	44,961	-	44,961	44,961
21					
22	Total Cost of Electric Service	58,966,635	(7,992,576)	50,974,059	50,974,059
23					
24	Utility Operating Margins	(1,164,781)	(395,564)	(1,560,345)	1,260,734
25					
26	Non-Operating Margins - Interest	66,346	29,884	96,230	96,230
27	Income(Loss) from Equity Investments	290,776		290,776	290,776
28	Non-Operating Margins - Other	251,755	185,652	437,407	437,407
29	G&T Capital Credits	268,537	(268,537)	-	-
30	Other Capital Credits	189,549	-	189,549	189,549
31					
32	Net Margins	(97,818)	(448,565)	(546,383)	2,274,696
33					
34	Cash Receipts from Lenders	-	-	-	-
35	OTIER	0.43		0.35	1.53
36	TIER	0.95		0.77	1.95
37	TIER excluding GTCC	0.82		0.77	1.95
38					
39	Target OTIER	1.85		1.85	
40	Margins at Target OTIER	2,816,100		3,042,512	
41	Revenue Requirement	61,782,735		54,016,571	
42	Revenue Deficiency (Excess)	2,913,918		3,588,895	
43	Associated Increase %	5.16%		6.36%	
44					
45	Percentage Cap on Increase %	5.00%		5.00%	
46	Percentage Cap Increase Amount $	2,821,079		2,821,079	
47					
48	Permissible Increase	2,821,079		2,821,079	
49					
50	Increase $			$ 2,821,079	$ 2,821,079
51	Increase %			5.00%	5.00%

CLARK ENERGY COOPERATIVE
Summary of Pro Forma Adjustments

Reference Schedule #	Item (1)	Revenue (2)	Expense (3)	Non-Operating Income (4)	Net Margin (5)
1.01	Fuel Adjustment Clause	(2,826,503)	(2,826,503)	-	-
1.02	Environmental Surcharge	(5,766,680)	(5,766,680)	-	-
1.03	Rate Case Expenses	-	16,667	-	(16,667)
1.04	Year-End Customer Normalization	205,043	112,375	-	92,667
1.05	GTCC	-	-	(268,537)	(268,537)
1.06	Non-Recurring Items		(77,500)	215,536	293,036
1.07	Depreciation Expense Normalization	-	120,319	-	(120,319)
1.08	Advertising & Donations	-	(198,428)	-	198,428
1.09	Directors Expense	-	(10,800)	-	10,800
1.10	Interest	-	328,722	-	(328,722)
1.11	Life Insurance Premiums	-	(31,743)	-	31,743
1.12	Wages	-	340,995	-	(340,995)
	Total	(8,388,140)	(7,992,576)	(53,001)	(448,565)

CLARK ENERGY COOPERATIVE
Summary of Adjustments to Test Year Balance Sheet

Line #	Description (1)	Actual Test Yr (2)	Pro Forma Adjs (3)	Pro Forma Test Yr (4)
1	***Assets and Other Debits***			
2	Total Utility Plant in Service	163,218,446	-	163,218,446
3	Construction Work in Progress	2,455,647	-	2,455,647
4	Total Utility Plant	165,674,093	-	165,674,093
5	Accum Provision for Depr and Amort	56,633,826	-	56,633,826
6	Net Utility Plant	109,040,267	-	109,040,267
7				
8	Investment in Subsidiary Companies	4,936,775	-	4,936,775
9	Investment in Assoc Org - Patr Capital	32,913,945	-	32,913,945
10	Investment in Assoc Org - Other Gen Fnd	-	-	-
11	Investment in Assoc Org - Non Gen Fnd	789,708	-	789,708
12	Investment in Economic Development Projects	-	-	-
13	Other Investment	-	-	-
14	Special Funds	-	-	-
15	Total Other Prop & Investments	38,640,428	-	38,640,428
16				
17	Cash - General Funds	161,342	-	161,342
18	Cash - Construction Fund Trust	-	-	-
19	Special Deposits	30	-	30
20	Temporary Investments	-	-	-
21	Accts Receivable - Sales Energy (Net)	1,171,160	-	1,171,160
22	Accts Receivable - Other (Net)	1,820,234	-	1,820,234
23	Renewable Energy Credits	-	-	-
24	Material & Supplies - Elec & Other	1,186,099	-	1,186,099
25	Prepayments	71,904	-	71,904
26	Other Current & Accr Assets	8,940	-	8,940
27	Total Current & Accr Assets	4,419,709	-	4,419,709
28				
29	Other Regulatory Assets	-	-	-
30	Other Deferred Debits	1,197,196	-	1,197,196
31				
32	Total Assets & Other Debits	153,297,600	-	153,297,600
33				
34	***Liabilities & Other Credits***			
35	Memberships	-	-	-
36	Patronage Capital	66,591,148	-	66,591,148
37	Operating Margins - Current Year	(706,695)	-	(706,695)
38	Non-Operating Margins	608,877	-	608,877
39	Other Margins & Equities	4,626,947	-	4,626,947
40	Total Margins & Equities	71,120,277	-	71,120,277
41				
42	Long Term Debt - RUS (Net)	12,285,485	-	12,285,485
43	Long Term Debt - FFB - RUS GUAR	51,949,349	-	51,949,349
44	Long Term Debt - Other - RUS GUAR	-	-	-
45	Long Term Debt - Other (Net)	3,130,698	-	3,130,698
46	Long Term Debt - RUS -Econ Dev - Net	-	-	-
47	Total Long Term Debt	67,365,532	-	67,365,532
48				
48	Obligations Under Capital Leases-Noncurrent	62,324	-	62,324
49	Accum Operating Provisions	2,345,847	-	2,345,847
50				
51	Notes Payable	5,212,653	-	5,212,653
52	Accounts Payable	957,539	-	957,539
53	Consumer Deposits	966,930	-	966,930
54	Current Maturities LTD	3,412,128	-	3,412,128
55	Current Maturities LTD - Capital Leases	239,180	-	239,180
56	Other Current & Accr Liabilities	1,174,273	-	1,174,273
57	Total Current & Accr Liabilities	11,962,703	-	11,962,703
58				
59	Regulatory Liabilities	-	-	-
60	Other Deferred Credits	440,917	-	440,917
61	Total Liabilities & Other Credits	153,297,600	-	153,297,600

CLARK ENERGY COOPERATIVE
Summary of Adjustments to Test Year Statement of Operations

	Reference Schedule >	1.01	1.02	1.03	1.04	1.05	1.06	1.07	1.08	1.09	1.10	1.11	1.12	
	Item >	Fuel Adjustment Clause	Environmental Surcharge	Rate Case Expenses	Year-End Customer Normalization	GTCC	Non-Recurring Items	Depreciation Expense Normalization	Advertising & Donations	Directors Expense	Interest	Life Insurance Premiums	Wages	TOTAL
1														
2	Operating Revenues:													
3	Base Rates				205,043									205,043
4	FAC & ES	(2,826,503)	(5,766,680)											(8,593,183)
5	Other Electric Revenue						0							0
6	Total Revenues	(2,826,503)	(5,766,680)	0	205,043	0	0	0	0	0	0	0	0	(8,388,140)
7														
8	Operating Expenses:													
9	Purchased Power				112,375									112,375
10	Base Rates													0
11	FAC & ES	(2,826,503)	(5,766,680)											(8,593,183)
12	Distribution - Operations													0
13	Distribution - Maintenance													0
14	Consumer Accounts													0
15	Customer Service													0
16	Sales													0
17	Administrative and General			16,667			(77,500)		(198,428)	(10,800)		(31,743)	340,995	39,191
18	Total Operating Expenses	(2,826,503)	(5,766,680)	16,667	112,375	0	(77,500)	0	(198,428)	(10,800)	0	(31,743)	340,995	(8,441,616)
19														
20	Depreciation							120,319						120,319
21	Taxes - Other													0
22	Interest on Long Term Debt										328,722			328,722
23	Interest Expense - Other													0
24	Other Deductions													0
25	Total Cost of Electric Service	(2,826,503)	(5,766,680)	16,667	112,375	0	(77,500)	120,319	(198,428)	(10,800)	328,722	(31,743)	340,995	(7,992,576)
26														
27	Utility Operating Margins	0	0	(16,667)	92,667	0	77,500	(120,319)	198,428	10,800	(328,722)	31,743	(340,995)	(395,564)
28														
29	Non-Operating Margins - Interest						29,884							29,884
29a	Income(Loss) from Equity Invstmts													
30	Non-Operating Margins - Other						185,652							185,652
31	G&T Capital Credits					(268,537)								(268,537)
32	Other Capital Credits													0
33	Total Non-Operating Margins	0	0	0	0	(268,537)	215,536	0	0	0	0	0	0	(53,001)
34														
35	Net Margins	0	0	(16,667)	92,667	(268,537)	293,036	(120,319)	198,428	10,800	(328,722)	31,743	(340,995)	(448,565)

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

Fuel Adjustment Clause

Line #	Year (1)	Month (2)	Revenue (3)	Expense (4)
	Booked balance		$ (313,069)	
1	2024	Jan	$ 389,769	$ 278,273
2	2024	Feb	$ 143,323	$ 499,662
3	2024	Mar	$ 256,276	$ 578,144
4	2024	Apr	$ 455,721	$ 385,127
5	2024	May	$ 448,159	$ 74,737
6	2024	Jun	$ 186,022	$ 272,495
7	2024	Jul	$ 464,076	$ 304,578
8	2024	Aug	$ 312,969	$ 256,591
9	2024	Sep	$ 142,326	$ 307,533
10	2024	Oct	$ 210,674	$ 207,894
11	2024	Nov	$ 222,114	$ (138,840)
12	2024	Dec	$ (91,857)	$ (199,691)
13		TOTAL	$ 2,826,503	$ 2,826,503
14				
15	Test Year Amount		$ 2,826,503	$ 2,826,503
16				
17	Pro Forma Year Amount		$ -	$ -
18				
19	Adjustment		$ (2,826,503)	$ (2,826,503)

This adjustment removes the FAC revenues and expenses from the test period.

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

Environmental Surcharge

Line #	Year (1)	Month (2)	Revenue (3)	Expense (4)
	Booked Balance		$ (54,223)	
1	2024	Jan	$ 603,339	$ 544,175
2	2024	Feb	$ 588,920	$ 705,691
3	2024	Mar	$ 399,940	$ 485,123
4	2024	Apr	$ 281,741	$ 289,304
5	2024	May	$ 348,329	$ 296,842
6	2024	Jun	$ 426,729	$ 412,137
7	2024	Jul	$ 631,448	$ 606,800
8	2024	Aug	$ 599,509	$ 594,014
9	2024	Sep	$ 471,652	$ 511,328
10	2024	Oct	$ 444,052	$ 470,932
11	2024	Nov	$ 457,949	$ 383,315
12	2024	Dec	$ 567,295	$ 467,019
13		TOTAL	$ 5,766,680	$ 5,766,680
14				
15	Test Year Amount		$ 5,766,680	$ 5,766,680
16				
17	Pro Forma Year Amount		$ -	$ -
18				
19	Adjustment		$ (5,766,680)	$ (5,766,680)

This adjustment removes the Envionmental Surcharge revenues and expenses from the test period.

Reference Schedule: 1.03

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

Rate Case Expenses

Line #	Item (1)		Expense (2)
1	Legal - Honaker Law Firm	$	30,000
2	Consulting - Catalyst Consulting LLC	$	20,000
3	Subtotal	$	50,000
4			
5	Total Amount	$	50,000
6	Amortization Period (Years)	$	3
7	Annual Amortization Amount	$	16,667
8			
9	Test Year Amount	$	-
10			
11	Pro Forma Year Amount	$	16,667
12			
13	Adjustment	$	16,667

This adjustment estimates the rate case costs amortized over a 3 year period, consistent with standard Commission practice.

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

Year-End Customers

Line #	Year (1)	Month (2)	Res Rate R (3)	GS Rate C (4)	Pub Rate E (5)	GS Rate L (6)	Total (7)
1	2024	Jan	25,559	1,983	312	119	
2	2024	Feb	25,633	1,999	309	119	
3	2024	Mar	25,567	1,996	309	120	
4	2024	Apr	25,582	2,017	314	118	
5	2024	May	25,649	2,016	315	119	
6	2024	Jun	25,691	2,033	321	120	
7	2024	Jul	25,692	2,056	319	119	
8	2024	Aug	25,767	2,048	318	120	
9	2024	Sep	25,768	2,049	315	121	
10	2024	Oct	25,798	2,063	312	120	
11	2024	Nov	25,817	2,069	312	118	
12	2024	Dec	25,811	2,054	313	119	
13	Average		25,695	2,032	314	119	[redacted]
14							
15	End of Period Increase over Avg		116.5	22.1	(1.1)	(0.3)	
16							
17	Total kWh		321,373,036	32,071,501	3,649,587	42,496,124	
18	Average kWh		12,507	15,784	11,620	356,113	
19	Year-End kWh Adjustment		1,456,761	348,560	(12,588)	(118,704)	1,674,029
20							
21	**Revenue Adjustment**						
22	Current Base Rate Revenue		$ 38,273,772	$ 4,231,361	$ 472,728	$ 4,584,712	
23	Average Revenue per kWh		$ 0.11909	$ 0.13194	$ 0.12953	$ 0.10789	
24	Year End Revenue Adj		$ 173,492	$ 45,987	$ (1,631)	$ (12,806)	205,043
25							
26	**Expense Adjustment**						
27	Avg Adj Purchase Exp per kWh		0.06713	0.06713	0.06713	0.06713	
28	Year End Expense Adj		$ 97,790	$ 23,398	$ (845)	$ (7,968)	112,375
29							
30							

		Revenue	Expense	Net Rev
31				
32	Test Year Amount	$ -	$ -	$ -
33				
34	Pro Forma Year Amount	$ 205,043	$ 112,375	$ 92,667
35				
36	Adjustment	$ 205,043	$ 112,375	$ 92,667
37				
38				

	For Expense Adjustment:	**Test Period**
39		
40	Total Purchased Power Expense	$ 39,114,087
41	Less Fuel Adjustment Clause	$ (2,826,503)
42	Less Environmental Surcharge	$ (5,766,680)
43	Less DLC & Other Charges	$ 6,497
44	Adjusted Purchased Power Expense	$ 30,527,401
45	Total Purchased Power kWh	454,759,977

This adjustment adjusts the test year expenses and revenues to reflect the number of customers at the end of the test year.

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

G&T Capital Credits

Line #	Item (1)	Account (2)		Expense (3)
1	East Kentucky Power Cooperative	424.00	$	268,537
2				
3	Test Year Amount		$	268,537
4				
5	Pro Forma Year Amount		$	-
6				
7	Adjustment		$	(268,537)

This adjustment removes the G&T Capital Credits from the test period, consistent with Commission practice.

Reference Schedule: 1.06

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

Non-Recurring Items

Line #	Item (1)	Revenue (2)	Expense (3)
1	Acct 923 - Design Fee	-	77,500
2	Acct 421 - ERC Tax Credit	185,652	-
3	Acct 419 - Interest ERC Tax Credit	29,884	-
4	Test Year Total Amount	215,536	77,500
5			
6	Pro Forma Year Amount	-	-
7			
8	Adjustment	(215,536)	(77,500)

This adjustment adjusts revenues and expenses to remove any non-recurring items.

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

Depreciation

Line #	Acct # (1)	Description (2)	Test Yr Ending Bal (3)	Fully Depr Items (4)	Rate (5)	Normalized Expense (6)	Test Year Expense (7)	Pro Forma Adj (8)
1	Distribution Plant							
1	301.00	Intangible Plant	183					
2	360.00	Land	304,008					
3	362.00	Station equipment	251,911	-	6.67%	16,808		
4	364.00	Poles, towers & fixtures	42,349,395	-	3.73%	1,580,479		
5	365.00	Overhead conductors & devices	45,652,368	-	5.05%	2,306,358		
6	366.00	Underground conduit	2,816,770	-	3.10%	87,207		
7	367.00	Underground conductor & devices	8,786,683	-	4.19%	367,986		
8	368.00	Line transformers	20,872,509	-	3.04%	633,689		
9	369.00	Services	16,337,278	-	2.38%	388,174		
10	370.00	Meters	277,869	-	6.67%	18,539		
11	370.10	Automated Meter Reading	-	-	6.67%	-		
12	370.40	AMI/TS2 Modules	-	-	6.67%	-		
13	370.50	RF Metering	6,894,551	-	6.67%	460,004		
14	371.00	Installations on customer premises	3,935,155	-	6.07%	238,943		
15	373.00	Street Lighting / signal systems	1,096,323	-	7.33%	80,382		
16		Subtotal	149,575,000	-		6,178,570	6,041,566	137,004
17								
18	General Plant					9.996		
19	389.00	Land	16,614					
20	390.00	Structures and improvements	3,988,554	-	1.99%	79,452		
21	391.00	Office furn and eqt	430,019	295,895	7.00%	9,389		
22	391.01	Computer/equipment	1,267,893	906,407	15.96%	57,693		
23	391.02	Computer software	629,429	601,175	20.00%	5,651		
24	393.00	Stores	153,538	100,799	6.00%	3,164		
25	394.00	Tools, shop and garage	429,136	281,002	6.00%	8,888		
26	395.00	Laboratory	187,770	98,645	6.00%	5,348		
27	396.00	Power operated	172,264	151,742	12.00%	2,463		
28	397.00	Communications	899,615	459,224	8.04%	35,407		
29	398.00	Miscellaneous	942,321	560,720	10.00%	38,160		
30		Subtotal	9,117,153	3,455,610		245,615	264,329	(18,714)
31	A	Distribution & General Subtotal	158,692,154	3,455,610		6,424,184	6,305,895	118,289
32								
33	Transporation Charged to Clearing							
34	392.00	Transportation	4,526,292	1,806,562	15.60%	424,278	420,790	$ 3,488
35	B	Allocation of Clearing to O&M						$ 2,029
36								
37	A+B	TOTAL	163,218,446	5,262,172		6,848,462	6,726,685	**120,319**
38								

39 This adjustment normalizes depreciation expenses by replacing test year actual expenses with test year end balances, less any fully depreciated items, at approved depreciation rates.

40

41	Allocation of Clearing to O&M		Labor $	Alloc	Depr $
42					
43	580-589	Operations	$ 374,838	10.8%	$ 377
44	590-598	Maintenance	$ 877,786	25.3%	$ 883
45	901-905	Consumer Accounts	$ 359,864	10.4%	$ 362
46	907-912	Customer Service	$ 122,974	3.5%	$ 124
47	920-935	Administrative & General	$ 282,563	8.1%	$ 284
48		Subtotal	$ 2,018,025	58.2%	$ 2,029
49					
50	Capital	Balance Sheet Accounts	$ 1,451,219	41.8%	$ 1,459
51		Subtotal		41.8%	$ 1,459
52					
53		Total	$ 3,469,245	100.0%	$ 3,488

Reference Schedule: 1.08

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

Donations, Promotional Advertising, & Dues

Line #	Item (1)	Account (2)		Expense (3)
1	Donations	426.10	$	11,867.76
2	Misc Advertising Expense	930.10	$	-
3	Misc Expense	930.20	$	32,632.94
4	Annual Meeting - Prizes/Shirts	930.21	$	5,790.43
5	Director Elections	930.22	$	-
6	Member Education	930.23	$	17,844.56
7	Membership Dues	930.24	$	5,103.54
8	KY Living Magazine	930.25	$	125,188.37
9	Test Year Amount		$	198,427.60
10				
11	Pro Forma Year Amount		$	-
12				
13	Adjustment		$	(198,427.60)

This adjustment removes charitable donations, promotional advertising expenses, and other applicable items from the revenue requirement consistent with standard Commission practices.

Reference Schedule: 1.09

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

Directors Expense

Line #	Item (1)	Account (2)		Expense (3)
1	Director Expenses	930.40-50	$	10,800
2				
3	Test Year Amount		$	10,800
4				
5	Pro Forma Year Amount		$	-
6				
7	Adjustment		$	(10,800)

This adjustment removes certain Director expenses from the revenue requirement consistent with the Commission Orders in Case No. 2018-00407.

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

Interest on Long Term Debt

Line #	Type of Debt Issued (1)	Actual Date (2)	Actual Amount (3)	Pro Forma Date (4)	Pro Forma Amount (5)	Pro Forma Adj (6)
1	FBB Loans					
2	FFB Quarterly Payment	3/31/2024	$ 379,429	3/31/2025	$ 401,117	$ 21,688
3	FFB Quarterly Payment	6/30/2024	$ 379,574	6/30/2025	$ 401,049	$ 21,476
4	FFB Quarterly Payment	9/30/2024	$ 375,503	9/30/2025	$ 401,258	$ 25,754
5	FFB Quarterly Payment	12/31/2024	$ 413,378	12/31/2025	$ 396,842	$ (16,536)
6			$ 1,547,884		$ 1,600,267	$ 52,383
7	CFC Loans					$ -
8	CFC LTD/Interest Accrual	1/31/2024	$ 13,884	1/31/2025	$ 11,660	$ (2,224)
9	CFC LTD/Interest Accrual	2/29/2024	$ 16,547	2/28/2025	$ 11,522	$ (5,025)
10	CFC LTD/Interest Accrual	3/31/2024	$ 13,469	3/31/2025	$ 11,239	$ (2,230)
11	CFC LTD/Interest Accrual	4/30/2024	$ 13,330	4/30/2025	$ 11,101	$ (2,229)
12	CFC LTD/Interest Accrual	5/31/2024	$ 13,192	5/31/2025	$ 10,962	$ (2,230)
13	CFC LTD/Interest Accrual	6/30/2024	$ 12,914	6/30/2025	$ 10,678	$ (2,236)
14	CFC LTD/Interest Accrual	7/31/2024	$ 12,775	7/31/2025	$ 10,549	$ (2,226)
15	CFC LTD/Interest Accrual	8/31/2024	$ 12,637	8/31/2025	$ 10,401	$ (2,236)
16	CFC LTD/Interest Accrual	9/30/2024	$ 12,357	9/30/2025	$ 10,116	$ (2,241)
17	CFC LTD/Interest Accrual	10/31/2024	$ 12,218	10/31/2025	$ 9,977	$ (2,241)
18	CFC LTD/Interest Accrual	11/30/2024	$ 12,080	11/30/2025	$ 9,839	$ (2,241)
19	CFC LTD/Interest Accrual	12/31/2024	$ 22,420	12/31/2025	$ 9,552	$ (12,868)
20			$ 167,823		$ 127,596	$ (40,227)
21	RUS Loans					
22	Interest Accrued/RUS	1/31/2024	$ 11,495	1/31/2025	$ 43,735	$ 32,240
23	Interest Accrued/RUS	2/29/2024	$ 23,677	2/28/2025	$ 39,458	$ 15,781
24	Interest Accrued/RUS	3/31/2024	$ 21,062	3/31/2025	$ 43,621	$ 22,559
25	Interest Accrued/RUS	4/30/2024	$ 21,737	4/30/2025	$ 51,807	$ 30,070
26	Interest Accrued/RUS	5/31/2024	$ 21,057	5/31/2025	$ 53,466	$ 32,409
27	Interest Accrued/RUS	6/30/2024	$ 32,234	6/30/2025	$ 51,698	$ 19,464
28	Interest Accrued/RUS	7/31/2024	$ 30,560	7/31/2025	$ 53,353	$ 22,793
29	Interest Accrued/RUS	8/31/2024	$ 28,708	8/31/2025	$ 74,815	$ 46,108
30	Interest Accrued/RUS	9/30/2024	$ 36,429	9/30/2025	$ 62,082	$ 25,654
31	Interest Accrued/RUS	10/31/2024	$ 35,006	10/31/2025	$ 64,067	$ 29,062
32	Interest Accrued/RUS	11/30/2024	$ 33,877	11/30/2025	$ 61,926	$ 28,049
33	Interest Accrued/RUS	12/31/2024	$ 51,527	12/31/2025	$ 63,905	$ 12,378
34			$ 347,367		$ 663,934	$ 316,566
35						
36	Total Adjustment					$ 328,722

This adjustment normalizes the interest on Long-Term Debt. Test year cost of debt is adjusted to 2025 debt payment schedule for each loan.

Reference Schedule: 1.11

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

Life Insurance Premiums

Line #	Item (1)	Account (2)	Expense (3)
1	Life Insurance Premiums - employees	$	30,749
2	Life Insurance Premiums - spouses	$	994
3			
4	Test Year Amount	$	31,743
5			
6	Pro Forma Year Amount	$	-
7			
8	Adjustment	$	(31,743)

The regulation calls for the removal of Life Insurance premiums above the lesser of employee salary or $50,000 per employee from the revenue requirement. In this case for simplicity Clark Energy has removed all life insurance premiums from the revenue requirement.

CLARK ENERGY COOPERATIVE
For the 12 Months Ended December 31, 2024

Wages & Salaries

Line #		ID (1)	Hours Worked Regular (2)	Hours Worked Overtime (3)	Actual Test Year Wages Regular	Actual Test Year Wages Overtime	Actual Test Year Wages Total		2025 Wage Rate	Pro Forma Wages at 2,080 Hours Regular	Pro Forma Wages at 2,080 Hours Overtime	Pro Forma Wages at 2,080 Hours Total	Pro Forma Adjustment
1		1001	2,080.00	524.80	$ 67,774	$ 25,950	$ 93,724		$ 37.75	$ 78,520	$ 29,717	$ 108,237	$ 14,512
2		1002	2,080.00	-	$ 104,002	$ -	$ 104,002		$ 53.51	$ 111,301	$ -	$ 111,301	$ 7,299
3		1003	2,080.00	-	$ 228,729	$ -	$ 228,729	C	$ 114.46	$ 238,077	$ -	$ 238,077	$ 9,348
4		1004	2,080.00	183.50	$ 86,411	$ 11,520	$ 97,931		$ 42.39	$ 88,171	$ 11,668	$ 99,839	$ 1,908
5		1005	2,080.00	198.50	$ 50,570	$ 7,328	$ 57,898		$ 25.05	$ 52,104	$ 7,459	$ 59,563	$ 1,665
6		1006	2,080.00	488.00	$ 99,259	$ 35,004	$ 134,263		$ 49.05	$ 102,024	$ 35,905	$ 137,929	$ 3,665
7		1007			$ -	$ -	$ -	A	$ 35.97	$ 53,236	$ -	$ 53,236	$ 53,236
8		1008	2,080.00	39.50	$ 59,048	$ 1,730	$ 60,778		$ 31.63	$ 65,790	$ 1,874	$ 67,664	$ 6,887
9		1009	2,080.00	331.50	$ 83,502	$ 20,054	$ 103,555		$ 41.36	$ 86,029	$ 20,566	$ 106,595	$ 3,040
10		1010	2,080.00	-	$ 142,432	$ -	$ 142,432		$ 71.54	$ 148,803	$ -	$ 148,803	$ 6,371
11	D	1011	1,115.65	79.50	$ 49,323	$ 5,272	$ 54,595		$ 44.21	$ 81,346	$ 5,272	$ 86,618	$ 32,024
12		1012	2,080.00	39.00	$ 76,767	$ 2,188	$ 78,955		$ 37.66	$ 78,333	$ 2,203	$ 80,536	$ 1,581
13		1013	2,040.00	706.00	$ 80,785	$ 42,302	$ 123,087		$ 41.12	$ 85,530	$ 43,546	$ 129,076	$ 5,989
14		1014	2,080.00	-	$ 149,527	$ -	$ 149,527		$ 74.24	$ 154,419	$ -	$ 154,419	$ 4,892
15		1015	2,080.00	171.00	$ 82,205	$ 9,977	$ 92,182		$ 41.10	$ 85,488	$ 10,542	$ 96,030	$ 3,849
16		1016	2,080.00	262.50	$ 82,436	$ 15,660	$ 98,096		$ 40.64	$ 84,531	$ 16,002	$ 100,533	$ 2,437
17		1017	2,080.00	-	$ 114,906	$ -	$ 114,906		$ 58.77	$ 122,242	$ -	$ 122,242	$ 7,336
18		1018	2,080.00	363.00	$ 75,551	$ 19,791	$ 95,342		$ 39.10	$ 81,328	$ 21,290	$ 102,618	$ 7,276
19		1019	2,080.00	11.00	$ 45,580	$ 369	$ 45,949		$ 22.36	$ 46,509	$ 369	$ 46,878	$ 929
20	E	1020	720.00	61.30	$ 15,408	$ 1,968	$ 17,376		$ 21.40	$ 44,512	$ 1,968	$ 46,480	$ 29,104
21		1021	2,080.00	-	$ 114,355	$ -	$ 114,355		$ 59.90	$ 124,592	$ -	$ 124,592	$ 10,237
22		1022	2,080.00	-	$ 149,444	$ -	$ 149,444	F	$ 75.68	$ 72,653	$ -	$ 72,653	$ (76,791)
23		1023	2,080.00	204.00	$ 100,513	$ 14,855	$ 115,368		$ 52.52	$ 109,242	$ 16,071	$ 125,313	$ 9,945
24		1024	2,052.00	240.00	$ 86,109	$ 15,095	$ 101,204		$ 43.78	$ 91,062	$ 15,761	$ 106,823	$ 5,619
25		1025	2,080.00	206.30	$ 58,640	$ 8,837	$ 67,477		$ 30.84	$ 64,147	$ 9,543	$ 73,691	$ 6,214
26		1026	2,080.00	121.00	$ 89,905	$ 7,932	$ 97,836		$ 44.21	$ 91,957	$ 8,024	$ 99,981	$ 2,145
27		1027	2,080.00	5.50	$ 50,014	$ 203	$ 50,217		$ 25.13	$ 52,270	$ 207	$ 52,478	$ 2,261
28	F	1028	670.00	164.00	$ 29,380	$ 10,787	$ 40,167			$ -	$ -	$ -	$ (40,167)
29		1029	2,080.00	424.00	$ 90,005	$ 27,512	$ 117,517		$ 44.58	$ 92,726	$ 28,353	$ 121,079	$ 3,563
30		1030	2,080.00	333.50	$ 83,702	$ 20,177	$ 103,879		$ 47.36	$ 98,509	$ 23,692	$ 122,201	$ 18,322
31		1031	-	-	$ -	$ -	$ -	A	$ 38.00	$ 54,720	$ -	$ 54,720	$ 54,720
32		1032	-	-	$ -	$ -	$ -	A	$ 24.45	$ 36,186	$ -	$ 36,186	$ 36,186
33		1033	-	-	$ -	$ -	$ -	A	$ 24.45	$ 36,186	$ -	$ 36,186	$ 36,186
34		1034	2,080.00	55.00	$ 51,945	$ 2,097	$ 54,042		$ 25.42	$ 52,874	$ 2,097	$ 54,971	$ 929
35		1035	2,080.00	124.80	$ 46,233	$ 4,219	$ 50,453		$ 23.15	$ 48,152	$ 4,334	$ 52,486	$ 2,033
36		1036	2,080.00	320.50	$ 98,080	$ 22,858	$ 120,937		$ 48.81	$ 101,525	$ 23,465	$ 124,990	$ 4,053
37		1037	2,080.00	89.25	$ 76,296	$ 5,024	$ 81,319		$ 38.15	$ 79,352	$ 5,107	$ 84,459	$ 3,140
38		1038	2,080.00	149.50	$ 68,014	$ 7,433	$ 75,447		$ 33.53	$ 69,742	$ 7,519	$ 77,262	$ 1,814
39	G	1039	1,320.00	2.00	$ 28,616	$ 69	$ 28,685			$ -	$ -	$ -	$ (28,685)
40		1040	2,040.00	594.50	$ 66,414	$ 29,450	$ 95,864		$ 37.75	$ 78,520	$ 33,664	$ 112,184	$ 16,319
41		1041	2,040.00	398.50	$ 49,568	$ 14,787	$ 64,356		$ 25.05	$ 52,104	$ 14,974	$ 67,078	$ 2,722
42	G	1042	800.00	5.00	$ 17,568	$ 165	$ 17,733			$ -	$ -	$ -	$ (17,733)
43		1043	2,070.00	107.00	$ 65,921	$ 5,146	$ 71,067		$ 32.86	$ 68,349	$ 5,274	$ 73,623	$ 2,555
44		1044	-	-	$ -	$ -	$ -	H	$ 15.00	$ 16,800	$ -	$ 16,800	$ 16,800
45		1045	2,080.00	138.50	$ 50,760	$ 5,110	$ 55,870		$ 25.84	$ 53,747	$ 5,368	$ 59,115	$ 3,245
46	E	1046	1,160.00	23.00	$ 24,850	$ 738	$ 25,588		$ 22.04	$ 45,676	$ 760	$ 46,437	$ 20,849
47		1047	2,080.00	11.00	$ 55,546	$ 443	$ 55,989		$ 27.38	$ 56,950	$ 452	$ 57,402	$ 1,413
48		1048	2,012.00	-	$ 132,810	$ -	$ 132,810		$ 68.29	$ 109,264	$ -	$ 109,264	$ (23,546)
49		1049	2,080.00	350.50	$ 89,396	$ 22,623	$ 112,019		$ 43.42	$ 90,314	$ 22,828	$ 113,142	$ 1,123
50		1050	2,080.00	330.50	$ 82,050	$ 19,596	$ 101,646		$ 40.74	$ 84,739	$ 20,197	$ 104,936	$ 3,290
51		1051	2,040.00	542.00	$ 74,047	$ 29,894	$ 103,941		$ 40.98	$ 85,238	$ 33,317	$ 118,555	$ 14,614
52		1052	2,080.00	405.00	$ 95,948	$ 28,258	$ 124,207		$ 47.64	$ 99,091	$ 28,941	$ 128,033	$ 3,826
53		1053	2,080.00	10.00	$ 65,753	$ 482	$ 66,234		$ 34.75	$ 72,280	$ 521	$ 72,801	$ 6,567
54	F	1054	80.00	-	$ 1,956	$ -	$ 1,956			$ -	$ -	$ -	$ (1,956)
55	D	1055	1,490.00	-	$ 36,593	$ -	$ 36,593		$ 25.61	$ 53,269	$ -	$ 53,269	$ 16,676
56	E	1056	1,960.00	100.50	$ 67,340	$ 5,234	$ 72,574		$ 35.18	$ 73,174	$ 5,303	$ 78,478	$ 5,904
57		1057	2,080.00	257.00	$ 97,204	$ 18,044	$ 115,247		$ 48.15	$ 100,152	$ 18,562	$ 118,714	$ 3,466
58		1058	2,080.00	318.50	$ 67,871	$ 15,796	$ 83,667		$ 33.70	$ 70,096	$ 16,100	$ 86,196	$ 2,529
59		1059	2,056.00		$ 50,279	$ -	$ 50,279		$ 25.25	$ 51,491	$ -	$ 51,491	$ 1,212
60		1060	2,080.00	312.00	$ 101,251	$ 22,886	$ 124,137		$ 49.67	$ 103,314	$ 23,246	$ 126,559	$ 2,422
61		1061	1,008.00	-	20,160.00		20,160.00	B	25.00	24,975.00	-	24,975.00	4,815
62		1062	2,080.00	-	$ 60,671		$ 60,671		$ 29.47	$ 61,298	$ -	$ 61,298	$ 626
63		1063	2,080.00	15.00	$ 85,001	$ 885	$ 85,886		$ 38.34	$ 79,747	$ 863	$ 80,610	$ (5,276)
64		1064	1,966.00	1.00	$ 44,123	$ 34	$ 44,158		$ 23.57	$ 47,583	$ 35	$ 47,618	$ 3,461
65		TOTAL	111,839.65	9,817.95	$ 4,418,543	$ 565,780	$ 4,984,323			$ 4,742,359	$ 582,959	$ 5,325,318	$ 340,995

This adjustment normalizes actual test year labor to 2020 wages rates and headcount.

Notes

A	Began employment with Clark during 2025.
B	Part-time employee must work less than 1,000 hours.
C	Bonus pay not included.
D	Out of office during a significant portion of 2024 due to health.
E	Began employment with Clark during 2024.
F	Retired in 2024.
G	Terminated employment during 2024.
H	Seasonal

CLARK ENERGY COOPERATIVE **2024**
Summary of Rates of Return by Class

#	Rate (1)	Code (2)	Pro Forma Operating Revenue (3)	Pro Forma Operating Expenses (4)	Margin (5)	Pro Forma Rate of Return on Rate Base (7)	Unitized Rate of Return on Rate Base (8)
1	Residential	R	$ 37,050,333	$ 38,082,955	$ (1,032,622)	-1.10%	(0.81)
2	Resid TOU	D	$ 66,431	$ 26,482	$ 39,949	136.97%	100.59
3	General Power Service < 50kW	C	$ 4,139,722	$ 3,597,385	$ 542,337	6.62%	4.86
4	Public Facilities	E	$ 448,971	$ 432,859	$ 16,112	1.48%	1.08
5	General Power Service 50-500kW	L	$ 4,383,524	$ 3,208,443	$ 1,175,081	55.92%	41.07
7	General Power Service 500+kW	P	$ 1,878,455	$ 1,628,314	$ 250,141	31.87%	23.41
8	Large Industrial Rate	B-1	$ 727,784	$ 587,580	$ 140,204	63.43%	46.59
9	Lighting	S,T,O	$ 1,007,433	$ 629,744	$ 377,688	8.86%	6.51
10	Total		$ 49,702,653	$ 48,193,761	$ 1,508,891	1.36%	1.00

					After Rate Revisions	
#	Rate	Code	Share of Revenue	Share of Energy	Pro Forma Rate of Return on Rate Base	Unitized Rate of Return on Rate Base
11	Residential	R	74.5%	73.9%	1.90%	0.49
12	Resid TOU	D	0.1%	0.1%	136.97%	35.06
13	General Power Service < 50kW	C	8.3%	7.4%	6.62%	1.69
14	Public Facilities	E	0.9%	0.8%	1.48%	0.38
15	General Power Service 50-500kW	L	8.8%	9.8%	55.92%	14.31
17	General Power Service 500+kW	P	3.8%	4.9%	31.87%	8.16
18	Large Industrial Rate	B-1	1.5%	2.2%	63.43%	16.24
19	Lighting	S,T,O	2.0%	0.9%	8.86%	2.27
20	Total		100.0%	100.0%	3.91%	1.00

Exhibit JW-3
COSS: Summary of Results

CLARK ENERGY COOPERATIVE
Summary of Cost-Based Rates

#	Rate (1)	Code (2)	Cost-Based Rates: Customer $/Month (3)	Energy $/KWH (4)	Demand $/KW (5)
1	Residential	R	44.38	0.08660	-
2	Resid TOU	D	43.59	0.08259	-
3	General Power Service < 50kW	C	48.96	0.08425	-
4	Public Facilities	E	44.88	0.05733	4.33
5	General Power Service 50-500kW	L	51.58	0.05733	5.01
6	General Power Service 500+kW	P	52.93	0.05733	6.25
7	Large Industrial Rate	B-1	52.46	0.04663	7.39

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Plant in Service							
Intangible Plant							
301.00 ORGANIZATION	P301	PT&D	$ 183	-	-	-	1
302.00 FRANCHISES	P302	PT&D	-	-	-	-	-
303.00 MISC. INTANGIBLE	P303	PT&D	-	-	-	-	-
Total Intangible Plant	PINT		$ 183	$ -	$ -	$ -	$ 1
Steam Production							
310.00 LAND AND LAND RIGHTS	P310	F016	$ -	-	-	-	-
311.00 STRUCTURES AND IMPROVEMENTS	P311	F016	-	-	-	-	-
312.00 BOILER PLANT EQUIPMENT	P312	F016	-	-	-	-	-
313.00 ENGINES AND ENGINE DRIVEN GENERATORS	P313	F016	-	-	-	-	-
314.00 TURBOGENERATOR UNITS	P314	F016	-	-	-	-	-
315.00 ACCESSORY ELEC EQUIP	P315	F016	-	-	-	-	-
316.00 MISC POWER PLANT EQUIPMENT	P316	F016	-	-	-	-	-
317.00 ASSET RETIREMENT COST FOR STEAM PROD	P317	F016	-	-	-	-	-
Total Steam Production Plant	PPROD		$ -	$ -	$ -	$ -	$ -
Transmission							
350.00 LAND AND LAND RIGHTS	P350	F011	$ -	-	-	-	-
352.00 STRUCTURES AND IMPROVEMENTS	P352	F011	-	-	-	-	-
353.00 STATION EQUIPMENT	P353	F011	-	-	-	-	-
354.00 TOWERS AND FIXTURES	P354	F011	-	-	-	-	-
355.00 POLES AND FIXTURES	P355	F011	-	-	-	-	-
356.00 CONDUCTORS AND DEVICES	P356	F011	-	-	-	-	-
359.00 ROADS AND TRAILS	P359	F011	-	-	-	-	-
Total Transmission Plant	PTRAN		$ -	$ -	$ -	$ -	$ -

Exhibit JW-4
COSS: Functionalization & Classification

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Plant in Service										
Intangible Plant										
301.00 ORGANIZATION	P301	PT&D	51	96	-	20	9	6	-	-
302.00 FRANCHISES	P302	PT&D	-	-	-	-	-	-	-	-
303.00 MISC. INTANGIBLE	P303	PT&D	-	-	-	-	-	-	-	-
Total Intangible Plant	PINT		$ 51	$ 96	$ -	$ 20	$ 9	$ 6	$ -	$ -
Steam Production										
310.00 LAND AND LAND RIGHTS	P310	F016	-	-	-	-	-	-	-	-
311.00 STRUCTURES AND IMPROVEMENTS	P311	F016	-	-	-	-	-	-	-	-
312.00 BOILER PLANT EQUIPMENT	P312	F016	-	-	-	-	-	-	-	-
313.00 ENGINES AND ENGINE DRIVEN GENERATORS	P313	F016	-	-	-	-	-	-	-	-
314.00 TURBOGENERATOR UNITS	P314	F016	-	-	-	-	-	-	-	-
315.00 ACCESSORY ELEC EQUIP	P315	F016	-	-	-	-	-	-	-	-
316.00 MISC POWER PLANT EQUIPMENT	P316	F016	-	-	-	-	-	-	-	-
317.00 ASSET RETIREMENT COST FOR STEAM PROD	P317	F016	-	-	-	-	-	-	-	-
Total Steam Production Plant	PPROD		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Transmission										
350.00 LAND AND LAND RIGHTS	P350	F011	-	-	-	-	-	-	-	-
352.00 STRUCTURES AND IMPROVEMENTS	P352	F011	-	-	-	-	-	-	-	-
353.00 STATION EQUIPMENT	P353	F011	-	-	-	-	-	-	-	-
354.00 TOWERS AND FIXTURES	P354	F011	-	-	-	-	-	-	-	-
355.00 POLES AND FIXTURES	P355	F011	-	-	-	-	-	-	-	-
356.00 CONDUCTORS AND DEVICES	P356	F011	-	-	-	-	-	-	-	-
359.00 ROADS AND TRAILS	P359	F011	-	-	-	-	-	-	-	-
Total Transmission Plant	PTRAN		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Plant in Service (Continued)							
Distribution							
360.00 LAND AND LAND RIGHTS	P360	F001	$ 304,008	-	-	-	304,008
361.00 STRUCTURES AND IMPROVEMENTS	P361	F001	-	-	-	-	-
362.00 STATION EQUIPMENT	P362	F001	251,911	-	-	-	251,911
364.00 POLES, TOWERS AND FIXTURES	P364	F002	42,349,395	-	-	-	-
365.00 OVERHEAD CONDUCTORS AND DEVICE	P365	F003	45,652,368	-	-	-	-
366.00 UNDERGROUND CONDUIT	P366	F004	2,816,770	-	-	-	-
367.00 UNDERGROUND CONDUCTORS AND DEV	P367	F004	8,786,683	-	-	-	-
368.00 LINE TRANSFORMERS	P368	F005	20,872,509	-	-	-	-
369.00 SERVICES	P369	F006	16,337,278	-	-	-	-
370.00 METERS	P370	F007	7,172,420	-	-	-	-
371.00 INSTALLATIONS ON CONSUMERS PRE	P371	F013	3,935,155	-	-	-	-
372.00 LEASED PROP. ON CONSUMERS PREMISES	P372	F013	-	-	-	-	-
373.00 STREET LIGHTING AND SIGNAL SYS	P373	F008	1,096,323	-	-	-	-
Total Distribution Plant	PDIST		$ 149,574,817	$ -	$ -		$ 555,919
Total Transmission and Distribution Plant	PT&D		$ 149,574,817	$ -	$ -	$ -	$ 555,919
Total Production, Transmission & Distribution Plant	PPT&D		$ 149,574,817	$ -	$ -	$ -	$ 555,919

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Plant in Service (Continued)										
Distribution										
360.00 LAND AND LAND RIGHTS	P360	F001	-	-	-	-	-	-	-	-
361.00 STRUCTURES AND IMPROVEMENTS	P361	F001	-	-	-	-	-	-	-	-
362.00 STATION EQUIPMENT	P362	F001	-	-	-	-	-	-	-	-
364.00 POLES, TOWERS AND FIXTURES	P364	F002	17,044,351	25,305,044	-	-	-	-	-	-
365.00 OVERHEAD CONDUCTORS AND DEVICE	P365	F003	18,373,697	27,278,670	-	-	-	-	-	-
366.00 UNDERGROUND CONDUIT	P366	F004	341,450	2,475,320	-	-	-	-	-	-
367.00 UNDERGROUND CONDUCTORS AND DEV	P367	F004	1,065,126	7,721,557	-	-	-	-	-	-
368.00 LINE TRANSFORMERS	P368	F005	4,993,104	15,879,405	-	-	-	-	-	-
369.00 SERVICES	P369	F006	-	-	-	16,337,278	-	-	-	-
370.00 METERS	P370	F007	-	-	-	-	7,172,420	-	-	-
371.00 INSTALLATIONS ON CONSUMERS PRE	P371	F013	-	-	-	-	-	3,935,155	-	-
372.00 LEASED PROP. ON CONSUMERS PREMISES	P372	F013	-	-	-	-	-	-	-	-
373.00 STREET LIGHTING AND SIGNAL SYS	P373	F008	-	-	-	-	-	1,096,323	-	-
Total Distribution Plant	PDIST		$ 41,817,728	$ 78,659,995	$ -	$ 16,337,278	$ 7,172,420	$ 5,031,477	$ -	$ -
Total Transmission and Distribution Plant	PT&D		$ 41,817,728	$ 78,659,995	$ -	$ 16,337,278	$ 7,172,420	$ 5,031,477	$ -	$ -
Total Production, Transmission & Distribution Plant	PPT&D		$ 41,817,728	$ 78,659,995	$ -	$ 16,337,278	$ 7,172,420	$ 5,031,477	$ -	$ -

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Plant in Service (Continued)							
General Plant							
389.00 LAND AND LAND RIGHTS	P389	PT&D	$ 16,614	-	-	-	62
390.00 STRUCTURES AND IMPROVEMENTS	P390	PT&D	3,988,554	-	-	-	14,824
391.00 OFFICE FURNITURE AND EQUIPMENT	P391	PT&D	2,327,341	-	-	-	8,650
392.00 TRANSPORTATION EQUIPMENT	P392	PT&D	4,526,292	-	-	-	16,823
393.00 STORES EQUIPMENT	P393	PT&D	153,538	-	-	-	571
394.00 TOOLS, SHOP & GARAGE EQUIPMENT	P394	PT&D	429,136	-	-	-	1,595
395.00 LABORATORY EQUIPMENT	P395	PT&D	187,770	-	-	-	698
396.00 POWER OPERATED EQUIPMENT	P396	PT&D	172,264	-	-	-	640
397.00 COMMUNICATION EQUIPMENT	P397	PT&D	899,615	-	-	-	3,344
398.00 MISCELLANEOUS EQUIPMENT	P398	PT&D	942,321	-	-	-	3,502
399.00 OTHER TANGIBLE PROPERTY	P399	PT&D	-	-	-	-	-
Total General Plant	PGP		$ 13,643,446	$ -	$ -	$ -	$ 50,708
Total Plant in Service	TPIS		$ 163,218,446	$ -	$ -	$ -	$ 606,628
Construction Work in Progress (CWIP)							
CWIP Production	CWIP1	PPROD	$ -	-	-	-	-
CWIP Transmission	CWIP2	PTRAN	-	-	-	-	-
CWIP Distribution	CWIP3	PDIST	2,455,646	-	-	-	9,127
CWIP General Plant	CWIP4	PGP	-	-	-	-	-
CWIP Other	CWIP5	PDIST	-	-	-	-	-
Total Construction Work in Progress	TCWIP		$ 2,455,646	$ -	$ -	$ -	$ 9,127
Total Utility Plant			$ 165,674,093	$ -	$ -	$ -	$ 615,755

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Plant in Service (Continued)										
General Plant										
389.00 LAND AND LAND RIGHTS	P389	PT&D	4,645	8,737	-	1,815	797	559	-	-
390.00 STRUCTURES AND IMPROVEMENTS	P390	PT&D	1,115,109	2,097,543	-	435,649	191,259	134,169	-	-
391.00 OFFICE FURNITURE AND EQUIPMENT	P391	PT&D	650,672	1,223,927	-	254,203	111,601	78,288	-	-
392.00 TRANSPORTATION EQUIPMENT	P392	PT&D	1,265,449	2,380,335	-	494,383	217,045	152,258	-	-
393.00 STORES EQUIPMENT	P393	PT&D	42,926	80,744	-	16,770	7,362	5,165	-	-
394.00 TOOLS, SHOP & GARAGE EQUIPMENT	P394	PT&D	119,977	225,679	-	46,872	20,578	14,436	-	-
395.00 LABORATORY EQUIPMENT	P395	PT&D	52,496	98,746	-	20,509	9,004	6,316	-	-
396.00 POWER OPERATED EQUIPMENT	P396	PT&D	48,161	90,592	-	18,816	8,260	5,795	-	-
397.00 COMMUNICATION EQUIPMENT	P397	PT&D	251,512	473,099	-	98,260	43,138	30,262	-	-
398.00 MISCELLANEOUS EQUIPMENT	P398	PT&D	263,452	495,558	-	102,925	45,186	31,698	-	-
399.00 OTHER TANGIBLE PROPERTY	P399	PT&D	-	-	-	-	-	-	-	-
Total General Plant	PGP		$ 3,814,398	$ 7,174,961	$ -	$ 1,490,203	$ 654,231	$ 458,946	$ -	$ -
Total Plant in Service	TPIS		$ 45,632,177	$ 85,835,052	$ -	$ 17,827,500	$ 7,826,660	$ 5,490,429	$ -	$ -
Construction Work in Progress (CWIP)										
CWIP Production	CWIP1	PPROD	-	-	-	-	-	-	-	-
CWIP Transmission	CWIP2	PTRAN	-	-	-	-	-	-	-	-
CWIP Distribution	CWIP3	PDIST	686,543	1,291,401	-	268,217	117,753	82,604	-	-
CWIP General Plant	CWIP4	PGP	-	-	-	-	-	-	-	-
CWIP Other	CWIP5	PDIST	-	-	-	-	-	-	-	-
Total Construction Work in Progress	TCWIP		$ 686,543	$ 1,291,401	$ -	$ 268,217	$ 117,753	$ 82,604	$ -	$ -
Total Utility Plant			$ 46,318,720	$ 87,126,454	$ -	$ 18,095,718	$ 7,944,413	$ 5,573,033	$ -	$ -

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Rate Base							
Utility Plant							
Plant in Service			$ 163,218,446	$ -	$ -	$ -	$ 606,628
Construction Work in Progress (CWIP)			2,455,646	-	-	-	9,126.81
Total Utility Plant	TUP		$ 165,674,093	$ -	$ -	$ -	$ 615,755
Less: Acummulated Provision for Depreciation							
Electric Plant Amortization	ADEPREPA	TUP	$ -	-	-	-	-
Retirement Work in Progress	RWIP	PDIST	(425,070)	-	-	-	(1,580)
Steam Production	ADEPRPP	PPROD	-	-	-	-	-
Transmission	ADEPRTP	PTRAN	-	-	-	-	-
Distribution	ADEPRD12	PDIST	47,788,946	-	-	-	177,615
Dist-Structures	ADEPRD1	P361	-	-	-	-	-
Dist-Station	ADEPRD2	P362	-	-	-	-	-
Dist-Poles and Fixtures	ADEPRD3	P364	-	-	-	-	-
Dist-OH Conductor	ADEPRD4	P365	-	-	-	-	-
Dist-UG Conduit	ADEPRD5	P366	-	-	-	-	-
Dist-UG Conductor	ADEPRD6	P367	-	-	-	-	-
Dist-Line Transformers	ADEPRD7	P368	-	-	-	-	-
Dist-Services	ADEPRD8	P369	-	-	-	-	-
Dist-Meters	ADEPRD9	P370	-	-	-	-	-
Dist-Installations on Customer Premises	ADEPRD10	P371	-	-	-	-	-
Dist-Lighting & Signal Systems	ADEPRD11	P373	-	-	-	-	-
Accum Amtz - Electric Plant Acquisition		PGP	-	-	-	-	-
Accum Amtz - Electric Plant in Service		PGP	-	-	-	-	-
General Plant		PGP	9,269,951	-	-	-	34,453
Total Accumulated Depreciation & Amort	TADEPR		$ 56,633,827	$ -	$ -	$ -	$ 210,489
Net Utility Plant	NTPLANT		$ 109,040,266	$ -	$ -	$ -	$ 405,266
Working Capital							
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP	$ 1,373,514	$ -	$ -	$ -	$ 2,154
Materials and Supplies (13-Month Avg)	M&S	TPIS	1,244,510	-	-	-	4,625
Prepayments (13-Month Average)	PREPAY	TPIS	128,266	-	-	-	477
Total Working Capital	TWC		$ 2,746,290	$ -	$ -	$ -	$ 7,256
Less: Customer Deposits	CSTDEP	TPIS	$ 966,930	-	-	-	3,594
Net Rate Base	RB		$ 110,819,626	$ -	$ -	$ -	$ 408,929

CLARK ENERGY COOPERATIVE
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12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Rate Base										
Utility Plant										
Plant in Service			$ 45,632,177	$ 85,835,052	$ -	$ 17,827,500	$ 7,826,660	$ 5,490,429	$ -	$ -
Construction Work in Progress (CWIP)			686,543.05	1,291,401.41	-	268,217.46	117,753.28	82,604.34	-	-
Total Utility Plant	TUP		$ 46,318,720	$ 87,126,454	$ -	$ 18,095,718	$ 7,944,413	$ 5,573,033	$ -	$ -
Less: Acummulated Provision for Depreciation										
Electric Plant Amortization	ADEPREPA	TUP	-	-	-	-	-	-	-	-
Retirement Work in Progress	RWIP	PDIST	(118,840)	(223,540)	-	(46,428)	(20,383)	(14,299)	-	-
Steam Production	ADEPRPP	PPROD	-	-	-	-	-	-	-	-
Transmission	ADEPRTP	PTRAN	-	-	-	-	-	-	-	-
Distribution	ADEPRD12	PDIST	13,360,706	25,131,759	-	5,219,738	2,291,578	1,607,550	-	-
Dist-Structures	ADEPRD1	P361	-	-	-	-	-	-	-	-
Dist-Station	ADEPRD2	P362	-	-	-	-	-	-	-	-
Dist-Poles and Fixtures	ADEPRD3	P364	-	-	-	-	-	-	-	-
Dist-OH Conductor	ADEPRD4	P365	-	-	-	-	-	-	-	-
Dist-UG Conduit	ADEPRD5	P366	-	-	-	-	-	-	-	-
Dist-UG Conductor	ADEPRD6	P367	-	-	-	-	-	-	-	-
Dist-Line Transformers	ADEPRD7	P368	-	-	-	-	-	-	-	-
Dist-Services	ADEPRD8	P369	-	-	-	-	-	-	-	-
Dist-Meters	ADEPRD9	P370	-	-	-	-	-	-	-	-
Dist-Installations on Customer Premises	ADEPRD10	P371	-	-	-	-	-	-	-	-
Dist-Lighting & Signal Systems	ADEPRD11	P373	-	-	-	-	-	-	-	-
Accum Amtz - Electric Plant Acquisition		PGP	-	-	-	-	-	-	-	-
Accum Amtz - Electric Plant in Service		PGP	-	-	-	-	-	-	-	-
General Plant		PGP	2,591,668	4,874,980	-	1,012,508	444,513	311,828	-	-
Total Accumulated Depreciation & Amort	TADEPR		$ 15,833,534	$ 29,783,199	$ -	$ 6,185,818	$ 2,715,708	$ 1,905,079	$ -	$ -
Net Utility Plant	NTPLANT		$ 30,485,186	$ 57,343,254	$ -	$ 11,909,900	$ 5,228,705	$ 3,667,955	$ -	$ -
Working Capital										
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP	$ 361,596	$ 613,616	$ -	$ 42,571	$ 72,461	$ 7,558	$ 272,237	$ 1,322
Materials and Supplies (13-Month Avg)	M&S	TPIS	347,937	654,476	-	135,931	59,677	41,863	-	-
Prepayments (13-Month Average)	PREPAY	TPIS	35,860	67,454	-	14,010	6,151	4,315	-	-
Total Working Capital	TWC		$ 745,393	$ 1,335,545	$ -	$ 192,512	$ 138,288	$ 53,736	$ 272,237	$ 1,322
Less: Customer Deposits	CSTDEP	TPIS	270,332	508,499	-	105,613	46,366	32,526	-	-
Net Rate Base	RB		$ 30,960,247	$ 58,170,300	$ -	$ 11,996,799	$ 5,320,627	$ 3,689,165	$ 272,237	$ 1,322

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Operation and Maintenance Expenses								
Steam Power Production Operations Expense								
500 OPERATION SUPV AND ENGINEERING	OM500	PPROD	$	-	-	-	-	-
501 FUEL	OM501	F017		-	-	-	-	-
502 STEAM EXPENSES	OM502	F016		-	-	-	-	-
503 STEAM FROM OTHER SOURCES	OM503	F016		-	-	-	-	-
504 STEAM TRANSFERRED - CREDIT	OM504	F016		-	-	-	-	-
505 ELECTRIC EXPENSES	OM505	F016		-	-	-	-	-
506 MISC STEAM POWER EXPENSES	OM506	F016		-	-	-	-	-
507 RENTS	OM507	F016		-	-	-	-	-
509 ALLOWANCES	OM509	F017		-	-	-	-	-
Total Steam Production Operation Expense	OMPO		$	-	$ -	$ -	$ -	$ -
Steam Power Production Maintenance Expense								
510 MAINENANCE SUPV AND ENGINEERING	OM510	F017	$	-	-	-	-	-
511 MAINTENANCE OF STRUCTURES	OM511	F016		-	-	-	-	-
512 MAINTENANCE OF BOILER PLANT	OM512	F017		-	-	-	-	-
513 MAINTENANCE OF ELECTRIC PLANT	OM513	F017		-	-	-	-	-
514 MAINTENANCE OF MISC STEAM PLANT	OM514	F016		-	-	-	-	-
Total Steam Production Maintenance Expense	OMPM		$	-	$ -	$ -	$ -	$ -
Total Steam Production Operation and Maintenance Expenses	OMP			-	-	-	-	-

CLARK ENERGY COOPERATIVE
Cost of Service Study
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12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Operation and Maintenance Expenses										
Steam Power Production Operations Expense										
500 OPERATION SUPV AND ENGINEERING	OM500	PPROD	-	-	-	-	-	-	-	-
501 FUEL	OM501	F017	-	-	-	-	-	-	-	-
502 STEAM EXPENSES	OM502	F016	-	-	-	-	-	-	-	-
503 STEAM FROM OTHER SOURCES	OM503	F016	-	-	-	-	-	-	-	-
504 STEAM TRANSFERRED - CREDIT	OM504	F016	-	-	-	-	-	-	-	-
505 ELECTRIC EXPENSES	OM505	F016	-	-	-	-	-	-	-	-
506 MISC STEAM POWER EXPENSES	OM506	F016	-	-	-	-	-	-	-	-
507 RENTS	OM507	F016	-	-	-	-	-	-	-	-
509 ALLOWANCES	OM509	F017	-	-	-	-	-	-	-	-
Total Steam Production Operation Expense	OMPO		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Steam Power Production Maintenance Expense										
510 MAINENANCE SUPV AND ENGINEERING	OM510	F017	-	-	-	-	-	-	-	-
511 MAINTENANCE OF STRUCTURES	OM511	F016	-	-	-	-	-	-	-	-
512 MAINTENANCE OF BOILER PLANT	OM512	F017	-	-	-	-	-	-	-	-
513 MAINTENANCE OF ELECTRIC PLANT	OM513	F017	-	-	-	-	-	-	-	-
514 MAINTENANCE OF MISC STEAM PLANT	OM514	F016	-	-	-	-	-	-	-	-
Total Steam Production Maintenance Expense	OMPM		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Steam Production Operation and Maintenance Expenses	OMP		-	-	-	-	-	-	-	-

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Operation and Maintenance Expenses (Continued)								
Purchased Power								
555 PURCHASED POWER	OM555	OMPP	$	39,166,969	$ 11,589,879	$ 27,577,090	-	-
556 SYSTEM CONTROL & LOAD DISPATCHING	OM556	OMPP		-	-	-	-	-
557 OTHER EXPENSES	OM557	OMPP		-	-	-	-	-
559 RENEWABLE ENERGY CR EXP	OM559	OMPP		-	-	-	-	-
Total Purchased Power	TPP		$	39,166,969	$ 11,589,879	$ 27,577,090	$ -	$ -
Transmission Expenses								
560 OPERATION SUPERVISION AND ENG	OM560	PTRAN	$	-	-	-	-	-
561 LOAD DISPATCHING	OM561	PTRAN		-	-	-	-	-
562 STATION EXPENSES	OM562	PTRAN		-	-	-	-	-
563 OVERHEAD LINE EXPENSES	OM563	PTRAN		-	-	-	-	-
564 UNDERGROUND LINE EXPENSES	OM564	PTRAN		-	-	-	-	-
565 TRANSMISION OF ELEC BY OTHERS	OM565	PTRAN		-	-	-	-	-
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN		-	-	-	-	-
567 RENTS	OM567	PTRAN		-	-	-	-	-
568 MAINTENANCE SUPERVISION AND ENG	OM568	PTRAN		-	-	-	-	-
569 MAINTENANCE OF STRUCTURES	OM569	PTRAN		-	-	-	-	-
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN		-	-	-	-	-
571 MAINT OF OVERHEAD LINES	OM571	PTRAN		-	-	-	-	-
572 MAINT OF UNDERGROUND LINES	OM572	PTRAN		-	-	-	-	-
573 MAINT MISC	OM573	PTRAN		-	-	-	-	-
574 MAINT OF TRANS PLANT	OM574	PTRAN		-	-	-	-	-
Total Transmission Expenses			$	-	$ -	$ -	$ -	$ -
Distribution Operation Expense								
580 OPERATION SUPERVISION AND ENGI	OM580	PDIST	$	89,688	-	-	-	333
581 LOAD DISPATCHING	OM581	P362		-	-	-	-	-
582 STATION EXPENSES	OM582	P362		-	-	-	-	-
583 OVERHEAD LINE EXPENSES	OM583	P365		848,331	-	-	-	-
584 UNDERGROUND LINE EXPENSES	OM584	P367		86,971	-	-	-	-
585 STREET LIGHTING EXPENSE	OM585	P371		7,901	-	-	-	-
586 METER EXPENSES	OM586	P370		399,801	-	-	-	-
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	F012		-	-	-	-	-
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	P369		152,247	-	-	-	-
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST		563,780	-	-	-	2,095
588 MISC DISTR EXP -- MAPPING	OM588x	F015		168,384	-	-	-	-
589 RENTS	OM589	PDIST		36,634	-	-	-	136
Total Distribution Operation Expense	OMDO		$	2,353,738	$ -	$ -	$ -	$ 2,565

CLARK ENERGY COOPERATIVE
Cost of Service Study
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12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Operation and Maintenance Expenses (Continued)										
Purchased Power										
555 PURCHASED POWER	OM555	OMPP	-	-	-	-	-	-	-	-
556 SYSTEM CONTROL & LOAD DISPATCHING	OM556	OMPP	-	-	-	-	-	-	-	-
557 OTHER EXPENSES	OM557	OMPP	-	-	-	-	-	-	-	-
559 RENEWABLE ENERGY CR EXP	OM559	OMPP	-	-	-	-	-	-	-	-
Total Purchased Power	TPP		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Transmission Expenses										
560 OPERATION SUPERVISION AND ENG	OM560	PTRAN	-	-	-	-	-	-	-	-
561 LOAD DISPATCHING	OM561	PTRAN	-	-	-	-	-	-	-	-
562 STATION EXPENSES	OM562	PTRAN	-	-	-	-	-	-	-	-
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	-	-	-	-	-	-	-	-
564 UNDERGROUND LINE EXPENSES	OM564	PTRAN	-	-	-	-	-	-	-	-
565 TRANSMISION OF ELEC BY OTHERS	OM565	PTRAN	-	-	-	-	-	-	-	-
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	-	-	-	-	-	-	-	-
567 RENTS	OM567	PTRAN	-	-	-	-	-	-	-	-
568 MAINTENANCE SUPERVISION AND ENG	OM568	PTRAN	-	-	-	-	-	-	-	-
569 MAINTENANCE OF STRUCTURES	OM569	PTRAN	-	-	-	-	-	-	-	-
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	-	-	-	-	-	-	-	-
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	-	-	-	-	-	-	-	-
572 MAINT OF UNDERGROUND LINES	OM572	PTRAN	-	-	-	-	-	-	-	-
573 MAINT MISC	OM573	PTRAN	-	-	-	-	-	-	-	-
574 MAINT OF TRANS PLANT	OM574	PTRAN	-	-	-	-	-	-	-	-
Total Transmission Expenses			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Distribution Operation Expense										
580 OPERATION SUPERVISION AND ENGI	OM580	PDIST	25,075	47,166	-	9,796	4,301	3,017	-	-
581 LOAD DISPATCHING	OM581	P362	-	-	-	-	-	-	-	-
582 STATION EXPENSES	OM582	P362	-	-	-	-	-	-	-	-
583 OVERHEAD LINE EXPENSES	OM583	P365	341,428	506,904	-	-	-	-	-	-
584 UNDERGROUND LINE EXPENSES	OM584	P367	10,543	76,428	-	-	-	-	-	-
585 STREET LIGHTING EXPENSE	OM585	P371	-	-	-	-	-	7,901	-	-
586 METER EXPENSES	OM586	P370	-	-	-	-	399,801	-	-	-
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	F012	-	-	-	-	-	-	-	-
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	P369	-	-	-	152,247	-	-	-	-
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	157,620	296,487	-	61,579	27,034	18,965	-	-
588 MISC DISTR EXP -- MAPPING	OM588x	F015	-	168,384	-	-	-	-	-	-
589 RENTS	OM589	PDIST	10,242	19,266	-	4,001	1,757	1,232	-	-
Total Distribution Operation Expense	OMDO		$ 544,907	$ 1,114,634	$ -	$ 227,623	$ 432,893	$ 31,115	$ -	$ -

CLARK ENERGY COOPERATIVE
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12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Operation and Maintenance Expenses (Continued)								
Distribution Maintenance Expense								
590 MAINTENANCE SUPERVISION AND EN	OM590	PDIST	$	213,894	-	-	-	795
592 MAINTENANCE OF STATION EQUIPME	OM592	P362		10,138	-	-	-	10,138
593 MAINTENANCE OF OVERHEAD LINES	OM593	P365		4,321,979	-	-	-	-
594 MAINTENANCE OF UNDERGROUND LIN	OM594	P367		182,744	-	-	-	-
595 MAINTENANCE OF LINE TRANSFORME	OM595	P368		82,500	-	-	-	-
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	P373			-	-	-	-
597 MAINTENANCE OF METERS	OM597	P370		30,329		-	-	-
598 MAINTENANCE OF MISC DISTR PLANT	OM598	PDIST		6,369	-	-	-	24
Total Distribution Maintenance Expense	OMDM		$	4,847,953	$ -	$ -	$ -	$ 10,957
Total Distribution Operation and Maintenance Expenses				7,201,691	-	-	-	13,522
Transmission and Distribution Expenses				7,201,691	-	-	-	13,522
Steam Production, Transmission and Distribution Expenses				7,201,691	-	-	-	13,522
Production, Purchased Power, Trans and Distr Expenses	OMSUB		$	46,368,660	$ 11,589,879	$ 27,577,090	$ -	$ 13,522
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	OM901	F009	$	114,759	-	-	-	-
902 METER READING EXPENSES	OM902	F009		137,944	-	-	-	-
903 RECORDS AND COLLECTION	OM903	F009		1,253,661	-	-	-	-
904 UNCOLLECTIBLE ACCOUNTS	OM904	F009		27,000	-	-	-	-
905 MISC CUST ACCOUNTS	OM903	F009		-	-	-	-	-
Total Customer Accounts Expense	OMCA		$	1,533,365	$ -	$ -	$ -	$ -
Customer Service Expense								
907 SUPERVISION	OM907	F010	$	43,952	-	-	-	-
908 CUSTOMER ASSISTANCE EXPENSES	OM908	F010		265,836		-	-	-
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	OM908x	F012		-	-	-	-	-
909 INFORMATIONAL AND INSTRUCTIONA	OM909	F010		4,220	-	-	-	-
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	F012			-	-	-	-
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	F010		5,395	-	-	-	-
911 SUPERVISION	OM911	F010			-	-	-	-
912 DEMONSTRATION AND SELLING EXP	OM912	F012		9,218	-	-	-	-
913 ADVERTISING EXPENSES	OM913	F012			-	-	-	-
914 SALES	OM914	F012			-	-	-	-
916 MISC SALES EXPENSE	OM916	F012			-	-	-	-
917 MISC SALES EXPENSE	OM917	F012			-	-	-	-
Total Customer Service Expense	OMCS		$	328,620	$ -	$ -	$ -	$ -
Sub-Total Transmission, Distribution, Cust Acct and Cust Service	OMSUB2			9,063,676	-	-	-	13,522

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12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Operation and Maintenance Expenses (Continued)										
Distribution Maintenance Expense										
590 MAINTENANCE SUPERVISION AND EN	OM590	PDIST	59,800	112,485	-	23,363	10,257	7,195	-	-
592 MAINTENANCE OF STATION EQUIPME	OM592	P362	-	-	-	-	-	-	-	-
593 MAINTENANCE OF OVERHEAD LINES	OM593	P365	1,739,466	2,582,513	-	-	-	-	-	-
594 MAINTENANCE OF UNDERGROUND LIN	OM594	P367	22,152	160,592	-	-	-	-	-	-
595 MAINTENANCE OF LINE TRANSFORME	OM595	P368	19,736	62,765	-	-	-	-	-	-
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	P373	-	-	-	-	-	-	-	-
597 MAINTENANCE OF METERS	OM597	P370	-	-	-	-	30,329	-	-	-
598 MAINTENANCE OF MISC DISTR PLANT	OM598	PDIST	1,781	3,349	-	696	305	214	-	-
Total Distribution Maintenance Expense	OMDM		$ 1,842,934	$ 2,921,703	$ -	$ 24,058	$ 40,891	$ 7,409	$ -	$ -
Total Distribution Operation and Maintenance Expenses			2,387,842	4,036,338	-	251,681	473,784	38,524	-	-
Transmission and Distribution Expenses			2,387,842	4,036,338	-	251,681	473,784	38,524	-	-
Steam Production, Transmission and Distribution Expenses			2,387,842	4,036,338	-	251,681	473,784	38,524	-	-
Production, Purchased Power, Trans and Distr Expenses	OMSUB		$ 2,387,842	$ 4,036,338	$ -	$ 251,681	$ 473,784	$ 38,524	$ -	$ -
Customer Accounts Expense										
901 SUPERVISION/CUSTOMER ACCTS	OM901	F009	-	-	-	-	-	-	114,759	-
902 METER READING EXPENSES	OM902	F009	-	-	-	-	-	-	137,944	-
903 RECORDS AND COLLECTION	OM903	F009	-	-	-	-	-	-	1,253,661	-
904 UNCOLLECTIBLE ACCOUNTS	OM904	F009	-	-	-	-	-	-	27,000	-
905 MISC CUST ACCOUNTS	OM903	F009	-	-	-	-	-	-	-	-
Total Customer Accounts Expense	OMCA		$ -	$ -	$ -	$ -	$ -	$ -	$ 1,533,365	$ -
Customer Service Expense										
907 SUPERVISION	OM907	F010	-	-	-	-	-	-	43,952	-
908 CUSTOMER ASSISTANCE EXPENSES	OM908	F010	-	-	-	-	-	-	265,836	-
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	OM908x	F012	-	-	-	-	-	-	-	-
909 INFORMATIONAL AND INSTRUCTIONA	OM909	F010	-	-	-	-	-	-	4,220	-
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	F012	-	-	-	-	-	-	-	-
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	F010	-	-	-	-	-	-	5,395	-
911 SUPERVISION	OM911	F010	-	-	-	-	-	-	-	-
912 DEMONSTRATION AND SELLING EXP	OM912	F012	-	-	-	-	-	-	-	9,218
913 ADVERTISING EXPENSES	OM913	F012	-	-	-	-	-	-	-	-
914 SALES	OM914	F012	-	-	-	-	-	-	-	-
916 MISC SALES EXPENSE	OM916	F012	-	-	-	-	-	-	-	-
917 MISC SALES EXPENSE	OM917	F012	-	-	-	-	-	-	-	-
Total Customer Service Expense	OMCS		$ -	$ -	$ -	$ -	$ -	$ -	$ 319,402	$ 9,218
Sub-Total Transmission, Distribution, Cust Acct and Cust Service	OMSUB2		2,387,842	4,036,338	-	251,681	473,784	38,524	1,852,767	9,218

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Operation and Maintenance Expenses (Continued)							
Administrative and General Expense							
920 ADMIN. & GEN. SALARIES-	OM920	OMSUB2	$ 551,765	-	-	-	823
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB2	208,192	-	-	-	139
923 OUTSIDE SERVICES EMPLOYED	OM923	OMSUB2	135,301	-	-	-	202
924 PROPERTY INSURANCE	OM924	NTPLANT		-	-	-	-
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB2		-	-	-	-
926 EMPLOYEE BENEFITS	OM926	LBSUB2		-	-	-	-
928 ASSOCIATED DUES	OM928	OMSUB2		-	-	-	-
929 DUPLICATE CHARGES - CREDIT	OM929	OMSUB2	(36,020)	-	-	-	(54)
930 MISCELLANEOUS GENERAL EXPENSES	OM930	OMSUB2	609,694	-	-	-	910
931 RENTS AND LEASES	OM931	NTPLANT		-	-	-	-
932 MAINTENANCE OF GENERAL PLANT	OM932	PGP	455,507		-	-	1,693
933 TRANSPORTATION EXPENSES	OM933	PGP		-	-	-	-
935 MAINT OF GENERAL PLANT	OM935	NTPLANT		-	-	-	-
Total Administrative and General Expense	OMAG		$ 1,924,438	$ -	$ -	$ -	$ 3,713
Total Operation and Maintenance Expenses	TOM		$ 50,155,083	$ 11,589,879	$ 27,577,090	$ -	$ 17,235
Operation and Maintenance Expenses Less Purchase Power	OMLPP		$ 10,988,114	$ -	$ -	$ -	$ 17,235

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Operation and Maintenance Expenses (Continued)										
Administrative and General Expense										
920 ADMIN. & GEN. SALARIES-	OM920	OMSUB2	145,364	245,718	-	15,321	28,842	2,345	112,790	561
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB2	45,431	71,593	-	4,122	18,159	1,258	67,414	75
923 OUTSIDE SERVICES EMPLOYED	OM923	OMSUB2	35,645	60,254	-	3,757	7,073	575	27,658	138
924 PROPERTY INSURANCE	OM924	NTPLANT	-	-	-	-	-	-	-	-
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB2	-	-	-	-	-	-	-	-
926 EMPLOYEE BENEFITS	OM926	LBSUB2	-	-	-	-	-	-	-	-
928 ASSOCIATED DUES	OM928	OMSUB2	-	-	-	-	-	-	-	-
929 DUPLICATE CHARGES - CREDIT	OM929	OMSUB2	(9,490)	(16,041)	-	(1,000)	(1,883)	(153)	(7,363)	(37)
930 MISCELLANEOUS GENERAL EXPENSES	OM930	OMSUB2	160,625	271,516	-	16,930	31,870	2,591	124,632	620
931 RENTS AND LEASES	OM931	NTPLANT	-	-	-	-	-	-	-	-
932 MAINTENANCE OF GENERAL PLANT	OM932	PGP	127,350	239,547	-	49,753	21,843	15,323	-	-
933 TRANSPORTATION EXPENSES	OM933	PGP	-	-	-	-	-	-	-	-
935 MAINT OF GENERAL PLANT	OM935	NTPLANT	-	-	-	-	-	-	-	-
Total Administrative and General Expense	OMAG		$ 504,925	$ 872,587	$ -	$ 88,883	$ 105,904	$ 21,939	$ 325,130	$ 1,357
Total Operation and Maintenance Expenses	TOM		$ 2,892,766	$ 4,908,925	$ -	$ 340,564	$ 579,688	$ 60,464	$ 2,177,898	$ 10,575
Operation and Maintenance Expenses Less Purchase Power	OMLPP		$ 2,892,766	$ 4,908,925	$ -	$ 340,564	$ 579,688	$ 60,464	$ 2,177,898	$ 10,575

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Other Expenses								
Depreciation Expenses								
Steam Prod Plant	DEPRPP	PPROD		-	-	-	-	-
Transmission	DEPRTP	PTRAN		-	-	-	-	-
Dist-Structures	DEPRDP1	P361		-	-	-	-	-
Dist-Station	DEPRDP2	P362		-	-	-	-	-
Dist-Poles and Fixtures	DEPRDP3	P364		-	-	-	-	-
Dist-OH Conductor	DEPRDP4	P365		-	-	-	-	-
Dist-UG Conduit	DEPRDP5	P366		-	-	-	-	-
Dist-UG Conductor	DEPRDP6	P367		-	-	-	-	-
Dist-Line Transformers	DEPRDP7	P368		-	-	-	-	-
Dist-Services	DEPRDP8	P369		-	-	-	-	-
Dist-Meters	DEPRDP9	P370		-	-	-	-	-
Dist-Installations on Customer Premises	DEPRDP10	P371		-	-	-	-	-
Dist-Lighting & Signal Systems	DEPRDP11	P373		-	-	-	-	-
Distribution Plant	DEPRDP12	PDIST		6,041,566	-	-	-	22,454
General Plant	DEPRGP	PGP		264,329	-	-	-	982
Asset Retirement Costs	DEPRGP	PGP		-	-	-	-	-
AMORT Property Losses & Unrecover	DEPRLTEP	PT&D		-	-	-	-	-
AMORT ELECT PLANT ACQUISIT ADJ	DEPRAADJ	PDIST		-	-	-	-	-
Total Depreciation Expense	TDEPR		$	6,305,895	-	-	-	23,437
Property Taxes	PTAX	NTPLANT	$	-	-	-	-	-
Other Taxes	OT	NTPLANT	$	54,082	-	-	-	201
Interest -- LTD	INTLTD	NTPLANT	$	2,057,808	-	-	-	7,648
Interest -- Other	INTOTH	NTPLANT	$	348,806	-	-	-	1,296
Donations	DONAT	NTPLANT	$	11,868	-	-	-	44
Regulatory Liabilities	REGLIAB	NTPLANT	$	-	-	-	-	-
Other Deductions	DEDUCT	NTPLANT	$	33,093	-	-	-	123
Total Other Expenses	TOE		$	8,811,551	$ -	$ -	$ -	$ 32,750
Total Cost of Service (O&M + Other Expenses)			$	58,966,634	$ 11,589,879	$ 27,577,090	$ -	$ 49,984

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Other Expenses										
Depreciation Expenses										
Steam Prod Plant	DEPRPP	PPROD	-	-	-	-	-	-	-	-
Transmission	DEPRTP	PTRAN	-	-	-	-	-	-	-	-
Dist-Structures	DEPRDP1	P361	-	-	-	-	-	-	-	-
Dist-Station	DEPRDP2	P362	-	-	-	-	-	-	-	-
Dist-Poles and Fixtures	DEPRDP3	P364	-	-	-	-	-	-	-	-
Dist-OH Conductor	DEPRDP4	P365	-	-	-	-	-	-	-	-
Dist-UG Conduit	DEPRDP5	P366	-	-	-	-	-	-	-	-
Dist-UG Conductor	DEPRDP6	P367	-	-	-	-	-	-	-	-
Dist-Line Transformers	DEPRDP7	P368	-	-	-	-	-	-	-	-
Dist-Services	DEPRDP8	P369	-	-	-	-	-	-	-	-
Dist-Meters	DEPRDP9	P370	-	-	-	-	-	-	-	-
Dist-Installations on Customer Premises	DEPRDP10	P371	-	-	-	-	-	-	-	-
Dist-Lighting & Signal Systems	DEPRDP11	P373	-	-	-	-	-	-	-	-
Distribution Plant	DEPRDP12	PDIST	1,689,085	3,177,203	-	659,889	289,706	203,229	-	-
General Plant	DEPRGP	PGP	73,900	139,008	-	28,871	12,675	8,892	-	-
Asset Retirement Costs	DEPRGP	PGP	-	-	-	-	-	-	-	-
AMORT Property Losses & Unrecover	DEPRLTEP	PT&D	-	-	-	-	-	-	-	-
AMORT ELECT PLANT ACQUISIT ADJ	DEPRAADJ	PDIST	-	-	-	-	-	-	-	-
Total Depreciation Expense	TDEPR		1,762,985	3,316,211	-	688,760	302,381	212,121	-	-
Property Taxes	PTAX	NTPLANT	-	-	-	-	-	-	-	-
Other Taxes	OT	NTPLANT	15,120	28,441	-	5,907	2,593	1,819	-	-
Interest -- LTD	INTLTD	NTPLANT	575,316	1,082,182	-	224,764	98,676	69,222	-	-
Interest -- Other	INTOTH	NTPLANT	97,518	183,434	-	38,098	16,726	11,733	-	-
Donations	DONAT	NTPLANT	3,318	6,241	-	1,296	569	399	-	-
Regulatory Liabilities	REGLIAB	NTPLANT	-	-	-	-	-	-	-	-
Other Deductions	DEDUCT	NTPLANT	9,252	17,403	-	3,615	1,587	1,113	-	-
Total Other Expenses	TOE		$ 2,463,510	$ 4,633,912	$ -	$ 962,440	$ 422,532	$ 296,408	$ -	$ -
Total Cost of Service (O&M + Other Expenses)			$ 5,356,276	$ 9,542,837	$ -	$ 1,303,004	$ 1,002,220	$ 356,871	$ 2,177,898	$ 10,575

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Labor Expenses - for Labor Allocator								
Steam Power Production Operations Expense								
500 OPERATION SUPV AND ENGINEERING	LB500	PPROD	$	-	-	-	-	-
501 FUEL	LB501	F017		-	-	-	-	-
502 STEAM EXPENSES	LB502	F016		-	-	-	-	-
503 STEAM FROM OTHER SOURCES	LB503	F016		-	-	-	-	-
504 STEAM TRANSFERRED - CREDIT	LB504	F016		-	-	-	-	-
505 ELECTRIC EXPENSES	LB505	F016		-	-	-	-	-
506 MISC STEAM POWER EXPENSES	LB506	F016		-	-	-	-	-
507 RENTS	LB507	F016		-	-	-	-	-
509 ALLOWANCES	LB509	F017		-	-	-	-	-
Total Steam Production Operation Expense	LBPO		$	-	$ -	$ -	$ -	$ -
Steam Power Production Maintenance Expense								
510 MAINENANCE SUPV AND ENGINEERING	LB510	F017	$	-	-	-	-	-
511 MAINTENANCE OF STRUCTURES	LB511	F016		-	-	-	-	-
512 MAINTENANCE OF BOILER PLANT	LB512	F017		-	-	-	-	-
513 MAINTENANCE OF ELECTRIC PLANT	LB513	F017		-	-	-	-	-
514 MAINTENANCE OF MISC STEAM PLANT	LB514	F016		-	-	-	-	-
Total Steam Production Maintenance Expense	LBPM		$	-	$ -	$ -	$ -	$ -
Total Steam Production Operation and Maintenance Expenses	LBP			-	-	-	-	-

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Labor Expenses - for Labor Allocator										
Steam Power Production Operations Expense										
500 OPERATION SUPV AND ENGINEERING	LB500	PPROD	-	-	-	-	-	-	-	-
501 FUEL	LB501	F017	-	-	-	-	-	-	-	-
502 STEAM EXPENSES	LB502	F016	-	-	-	-	-	-	-	-
503 STEAM FROM OTHER SOURCES	LB503	F016	-	-	-	-	-	-	-	-
504 STEAM TRANSFERRED - CREDIT	LB504	F016	-	-	-	-	-	-	-	-
505 ELECTRIC EXPENSES	LB505	F016	-	-	-	-	-	-	-	-
506 MISC STEAM POWER EXPENSES	LB506	F016	-	-	-	-	-	-	-	-
507 RENTS	LB507	F016	-	-	-	-	-	-	-	-
509 ALLOWANCES	LB509	F017	-	-	-	-	-	-	-	-
Total Steam Production Operation Expense	LBPO		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Steam Power Production Maintenance Expense										
510 MAINENANCE SUPV AND ENGINEERING	LB510	F017	-	-	-	-	-	-	-	-
511 MAINTENANCE OF STRUCTURES	LB511	F016	-	-	-	-	-	-	-	-
512 MAINTENANCE OF BOILER PLANT	LB512	F017	-	-	-	-	-	-	-	-
513 MAINTENANCE OF ELECTRIC PLANT	LB513	F017	-	-	-	-	-	-	-	-
514 MAINTENANCE OF MISC STEAM PLANT	LB514	F016	-	-	-	-	-	-	-	-
Total Steam Production Maintenance Expense	LBPM		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Steam Production Operation and Maintenance Expenses	LBP		-	-	-	-	-	-	-	-

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Labor Expenses (Continued)							
Purchased Power							
555 PURCHASED POWER	LB555	OMPP	$ -	-	-	-	-
557 OTHER EXPENSES	LB557	OMPP		-	-	-	-
Total Purchased Power Labor	LBPP		$ -	$ -	$ -	$ -	$ -
Transmission Labor Expenses							
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	$ -	-	-	-	-
561 LOAD DISPATCHING	LB561	PTRAN	-	-	-	-	-
562 STATION EXPENSES	LB562	PTRAN	-	-	-	-	-
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	-	-	-	-	-
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	-	-	-	-	-
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	-	-	-	-	-
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	-	-	-	-	-
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	-	-	-	-	-
Total Transmission Labor Expenses			$ -	$ -	$ -	$ -	$ -
Distribution Operation Labor Expense							
580 OPERATION SUPERVISION AND ENGI	LB580	PDIST	$ 87,530	-	-	-	325
581 LOAD DISPATCHING	LB581	P362	-	-	-	-	-
582 STATION EXPENSES	LB582	P362	-	-	-	-	-
583 OVERHEAD LINE EXPENSES	LB583	P365	95,325	-	-	-	-
584 UNDERGROUND LINE EXPENSES	LB584	P367	-	-	-	-	-
585 STREET LIGHTING EXPENSE	LB585	P371	-	-	-	-	-
586 METER EXPENSES	LB586	P370	315,136	-	-	-	-
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	F012	-	-	-	-	-
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	P369	731	-	-	-	-
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	418,387	-	-	-	1,555
589 RENTS	LB589	PDIST	-	-	-	-	-
Total Distribution Operation Labor Expense	LBDO		$ 917,109	$ -	$ -	$ -	$ 1,880

CLARK ENERGY COOPERATIVE
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12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Labor Expenses (Continued)										
Purchased Power										
555 PURCHASED POWER	LB555	OMPP	-	-	-	-	-	-	-	-
557 OTHER EXPENSES	LB557	OMPP	-	-	-	-	-	-	-	-
Total Purchased Power Labor	LBPP		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Transmission Labor Expenses										
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	-	-	-	-	-	-	-	-
561 LOAD DISPATCHING	LB561	PTRAN	-	-	-	-	-	-	-	-
562 STATION EXPENSES	LB562	PTRAN	-	-	-	-	-	-	-	-
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	-	-	-	-	-	-	-	-
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	-	-	-	-	-	-	-	-
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	-	-	-	-	-	-	-	-
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	-	-	-	-	-	-	-	-
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	-	-	-	-	-	-	-	-
Total Transmission Labor Expenses			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Distribution Operation Labor Expense										
580 OPERATION SUPERVISION AND ENGI	LB580	PDIST	24,472	46,031	-	9,560	4,197	2,944	-	-
581 LOAD DISPATCHING	LB581	P362	-	-	-	-	-	-	-	-
582 STATION EXPENSES	LB582	P362	-	-	-	-	-	-	-	-
583 OVERHEAD LINE EXPENSES	LB583	P365	38,365	56,960	-	-	-	-	-	-
584 UNDERGROUND LINE EXPENSES	LB584	P367	-	-	-	-	-	-	-	-
585 STREET LIGHTING EXPENSE	LB585	P371	-	-	-	-	-	-	-	-
586 METER EXPENSES	LB586	P370	-	-	-	-	315,136	-	-	-
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	F012	-	-	-	-	-	-	-	-
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	P369	-	-	-	731	-	-	-	-
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	116,972	220,026	-	45,698	20,063	14,074	-	-
589 RENTS	LB589	PDIST	-	-	-	-	-	-	-	-
Total Distribution Operation Labor Expense	LBDO		$ 179,808	$ 323,017	$ -	$ 55,990	$ 339,396	$ 17,018	$ -	$ -

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Labor Expenses (Continued)								
Distribution Maintenance Labor Expense								
590 MAINTENANCE SUPERVISION AND EN	LB590	PDIST	$	213,894	-	-	-	795
592 MAINTENANCE OF STATION EQUIPME	LB592	P362		-	-	-	-	-
593 MAINTENANCE OF OVERHEAD LINES	LB593	P365		1,578,121	-	-	-	-
594 MAINTENANCE OF UNDERGROUND LIN	LB594	P367		-	-	-	-	-
595 MAINTENANCE OF LINE TRANSFORME	LB595	P368		-	-	-	-	-
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	P373		-	-	-	-	-
597 MAINTENANCE OF METERS	LB597	P370		-	-	-	-	-
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST		159	-	-	-	1
Total Distribution Maintenance Labor Expense	LBDM		$	1,792,174	$ -	$ -	$ -	$ 796
Total Distribution Operation and Maintenance Labor Expenses				2,709,283	-	-	-	2,676
Transmission and Distribution Labor Expenses				2,709,283	-	-	-	2,676
Purchased Power, Transmission and Distribution Labor Expenses	LBSUB		$	2,709,283	$ -	$ -	$ -	$ 2,676
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	LB901	F009	$	114,759	-	-	-	-
902 METER READING EXPENSES	LB902	F009		120,342	-	-	-	-
903 RECORDS AND COLLECTION	LB903	F009		778,665	-	-	-	-
904 UNCOLLECTIBLE ACCOUNTS	LB904	F009		-	-	-	-	-
905 MISC CUST ACCOUNTS	LB903	F009		-	-	-	-	-
Total Customer Accounts Labor Expense	LBCA		$	1,013,766	$ -	$ -	$ -	$ -
Customer Service Expense								
907 SUPERVISION	LB907	F010	$	43,952	-	-	-	-
908 CUSTOMER ASSISTANCE EXPENSES	LB908	F010		239,822	-	-	-	-
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	F012		-	-	-	-	-
909 INFORMATIONAL AND INSTRUCTIONA	LB909	F010		550	-	-	-	-
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	F012		-	-	-	-	-
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	F010		-	-	-	-	-
911 SUPERVISION	LB911	F010		-	-	-	-	-
912 DEMONSTRATION AND SELLING EXP	LB912	F012		1,445	-	-	-	-
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	F012		-	-	-	-	-
915 MDSE-JOBBING-CONTRACT	LB915	F012		-	-	-	-	-
916 MISC SALES EXPENSE	LB916	F012		-	-	-	-	-
Total Customer Service Labor Expense	LBCS		$	285,769	$ -	$ -	$ -	$ -
Sub-Total Trans, Distr, Cust Acct and Cust Service Labor Exp	LBSUB2			4,008,818	-	-	-	2,676

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Labor Expenses (Continued)										
Distribution Maintenance Labor Expense										
590 MAINTENANCE SUPERVISION AND EN	LB590	PDIST	59,800	112,485	-	23,363	10,257	7,195	-	-
592 MAINTENANCE OF STATION EQUIPME	LB592	P362	-	-	-	-	-	-	-	-
593 MAINTENANCE OF OVERHEAD LINES	LB593	P365	635,146	942,975	-	-	-	-	-	-
594 MAINTENANCE OF UNDERGROUND LIN	LB594	P367	-	-	-	-	-	-	-	-
595 MAINTENANCE OF LINE TRANSFORME	LB595	P368	-	-	-	-	-	-	-	-
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	P373	-	-	-	-	-	-	-	-
597 MAINTENANCE OF METERS	LB597	P370	-	-	-	-	-	-	-	-
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	44	84	-	17	8	5	-	-
Total Distribution Maintenance Labor Expense	LBDM		$ 694,990	$ 1,055,543	$ -	$ 23,380	$ 10,264	$ 7,200	$ -	$ -
Total Distribution Operation and Maintenance Labor Expenses			874,799	1,378,560	-	79,370	349,660	24,219	-	-
Transmission and Distribution Labor Expenses			874,799	1,378,560	-	79,370	349,660	24,219	-	-
Purchased Power, Transmission and Distribution Labor Expenses	LBSUB		$ 874,799	$ 1,378,560	$ -	$ 79,370	$ 349,660	$ 24,219	$ -	$ -
Customer Accounts Expense										
901 SUPERVISION/CUSTOMER ACCTS	LB901	F009	-	-	-	-	-	-	114,759	-
902 METER READING EXPENSES	LB902	F009	-	-	-	-	-	-	120,342	-
903 RECORDS AND COLLECTION	LB903	F009	-	-	-	-	-	-	778,665	-
904 UNCOLLECTIBLE ACCOUNTS	LB904	F009	-	-	-	-	-	-	-	-
905 MISC CUST ACCOUNTS	LB903	F009	-	-	-	-	-	-	-	-
Total Customer Accounts Labor Expense	LBCA		$ -	$ -	$ -	$ -	$ -	$ -	$ 1,013,766	$ -
Customer Service Expense										
907 SUPERVISION	LB907	F010	-	-	-	-	-	-	43,952	-
908 CUSTOMER ASSISTANCE EXPENSES	LB908	F010	-	-	-	-	-	-	239,822	-
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	F012	-	-	-	-	-	-	-	-
909 INFORMATIONAL AND INSTRUCTIONA	LB909	F010	-	-	-	-	-	-	550	-
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	F012	-	-	-	-	-	-	-	-
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	F010	-	-	-	-	-	-	-	-
911 SUPERVISION	LB911	F010	-	-	-	-	-	-	-	-
912 DEMONSTRATION AND SELLING EXP	LB912	F012	-	-	-	-	-	-	-	1,445
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	F012	-	-	-	-	-	-	-	-
915 MDSE-JOBBING-CONTRACT	LB915	F012	-	-	-	-	-	-	-	-
916 MISC SALES EXPENSE	LB916	F012	-	-	-	-	-	-	-	-
Total Customer Service Labor Expense	LBCS		$ -	$ -	$ -	$ -	$ -	$ -	$ 284,324	$ 1,445
Sub-Total Trans, Distr, Cust Acct and Cust Service Labor Exp	LBSUB2		874,799	1,378,560	-	79,370	349,660	24,219	1,298,090	1,445

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Labor Expenses (Continued)								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	LB920	OMSUB2	$	551,765	-	-	-	823
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB2		-	-	-	-	-
923 OUTSIDE SERVICES EMPLOYED	LB923	OMSUB2		-	-	-	-	-
924 PROPERTY INSURANCE	LB924	NTPLANT		-	-	-	-	-
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB2		78,656	-	-	-	53
926 EMPLOYEE BENEFITS	LB926	LBSUB2		473,906	-	-	-	316
928 REGULATORY COMMISSION EXPENSES	LB928	OMSUB2		-	-	-	-	-
929 DUPLICATE CHARGES-CR	LB929	OMSUB2		-	-	-	-	-
930 MISCELLANEOUS GENERAL EXPENSES	LB930	OMSUB2		12,527	-	-	-	19
931 RENTS AND LEASES	LB931	NTPLANT		-	-	-	-	-
932 GENERAL	LB932	PGP		109,722	-	-	-	408
950 PAYROLL GENERAL LEDGER DEFAULT	LB950	PGP		-	-	-	-	-
Total Administrative and General Expense	LBAG		$	1,226,576	$ -	$ -	$ -	$ 1,618
Total Operation and Maintenance Expenses	TLB		$	5,235,394	$ -	$ -	$ -	$ 4,294
Operation and Maintenance Expenses Less Purchase Power	LBLPP		$	5,235,394	$ -	$ -	$ -	$ 4,294

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant Demand	Pri & Sec. Distr Plant Customer	Customer Services Demand	Customer Services Customer	Meters Customer	Lighting Customer	Meter Reading Billing and Cust Acct Service Customer	Load Management Customer
Labor Expenses (Continued)										
Administrative and General Expense										
920 ADMIN. & GEN. SALARIES-	LB920	OMSUB2	145,364	245,718	-	15,321	28,842	2,345	112,790	561
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB2	-	-	-	-	-	-	-	-
923 OUTSIDE SERVICES EMPLOYED	LB923	OMSUB2	-	-	-	-	-	-	-	-
924 PROPERTY INSURANCE	LB924	NTPLANT	-	-	-	-	-	-	-	-
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB2	17,164	27,048	-	1,557	6,861	475	25,469	28
926 EMPLOYEE BENEFITS	LB926	LBSUB2	103,415	162,968	-	9,383	41,335	2,863	153,455	171
928 REGULATORY COMMISSION EXPENSES	LB928	OMSUB2	-	-	-	-	-	-	-	-
929 DUPLICATE CHARGES-CR	LB929	OMSUB2	-	-	-	-	-	-	-	-
930 MISCELLANEOUS GENERAL EXPENSES	LB930	OMSUB2	3,300	5,579	-	348	655	53	2,561	13
931 RENTS AND LEASES	LB931	NTPLANT	-	-	-	-	-	-	-	-
932 GENERAL	LB932	PGP	30,676	57,702	-	11,984	5,261	3,691	-	-
950 PAYROLL GENERAL LEDGER DEFAULT	LB950	PGP	-	-	-	-	-	-	-	-
Total Administrative and General Expense	LBAG		$ 299,919	$ 499,015	$ -	$ 38,594	$ 82,954	$ 9,428	$ 294,275	$ 773
Total Operation and Maintenance Expenses	TLB		$ 1,174,718	$ 1,877,575	$ -	$ 117,963	$ 432,615	$ 33,646	$ 1,592,365	$ 2,218
Operation and Maintenance Expenses Less Purchase Power	LBLPP		$ 1,174,718	$ 1,877,575	$ -	$ 117,963	$ 432,615	$ 33,646	$ 1,592,365	$ 2,218

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Power Supply Demand	Power Supply Energy	Transmission Demand	Station Equipment Demand
Functional Vectors							
Station Equipment	F001		1.000000	0.000000	0.000000	0.000000	1.000000
Poles, Towers and Fixtures	F002		1.000000	0.000000	0.000000	0.000000	0.000000
Overhead Conductors and Devices	F003		1.000000	0.000000	0.000000	0.000000	0.000000
Underground Conductors and Devices	F004		1.000000	0.000000	0.000000	0.000000	0.000000
Line Transformers	F005		1.000000	0.000000	0.000000	0.000000	0.000000
Services	F006		1.000000	0.000000	0.000000	0.000000	0.000000
Meters	F007		1.000000	0.000000	0.000000	0.000000	0.000000
Street Lighting	F008		1.000000	0.000000	0.000000	0.000000	0.000000
Meter Reading	F009		1.000000	0.000000	0.000000	0.000000	0.000000
Billing	F010		1.000000	0.000000	0.000000	0.000000	0.000000
Transmission	F011		1.000000	0.000000	0.000000	1.000000	0.000000
Load Management	F012		1.000000	0.000000	0.000000	0.000000	0.000000
Purchased Power Expenses	OMPP		1.000000	0.295910	0.704090	-	-
Intallations on Customer Premises - Plant in Service	F013		1.00000	-	-	-	-
Intallations on Customer Premises - Accum Depr	F014		1.00000	-	-	-	-
Mapping	F015		1.000000	0.000000	0.000000	0.000000	0.000000
Production - Demand	F016		1.000000	1.000000	0.000000	0.000000	0.000000
Production - Energy	F017		1.000000	0.000000	1.000000	0.000000	0.000000

CLARK ENERGY COOPERATIVE
Cost of Service Study
Functionalization and Classification

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Pri & Sec. Distr Plant		Customer Services		Meters	Lighting	Meter Reading Billing and Cust Acct Service	Load Management
			Demand	Customer	Demand	Customer	Customer	Customer	Customer	Customer
Functional Vectors										
Station Equipment	F001		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Poles, Towers and Fixtures	F002		0.402470	0.597530	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Overhead Conductors and Devices	F003		0.402470	0.597530	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Underground Conductors and Devices	F004		0.121220	0.878780	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Line Transformers	F005		0.239219	0.760781	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Services	F006		0.000000	0.000000	0.000000	1.000000	0.000000	0.000000	0.000000	0.000000
Meters	F007		0.000000	0.000000	0.000000	0.000000	1.000000	0.000000	0.000000	0.000000
Street Lighting	F008		0.000000	0.000000	0.000000	0.000000	0.000000	1.000000	0.000000	0.000000
Meter Reading	F009		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000	0.000000
Billing	F010		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000	0.000000
Transmission	F011		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Load Management	F012		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000
Purchased Power Expenses	OMPP		-	-	-	-	-	-	-	-
Intallations on Customer Premises - Plant in Service	F013		-	-	-	-	-	1.00000	-	-
Intallations on Customer Premises - Accum Depr	F014		-	-	-	-	-	1.00000	-	-
Mapping	F015		0.000000	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Production - Demand	F016		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Production - Energy	F017		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

Exhibit JW-5
COSS: Allocation to Rate Classes & Returns

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Plant in Service								
Production & Purchase Power								
Demand	PLPPD	PPDA	$	-	-	-	-	-
Energy	PLPPE	PPEA		-	-	-	-	-
Total Purchase Power	PLPPT		$	-	$ -	$ -	$ -	$ -
Transmission								
Demand	PLTD	TA1	$	-	-	-	-	-
Station Equipment								
Demand	PLSED	SA1	$	606,628	461,852	348	48,463	5,177
Primary & Secondary Distribution Plant								
Demand	PLDPD	DA1	$	45,632,177	38,275,093	38,751	2,990,137	340,697
Customer	PLDPC	C01		85,835,052	77,681,569	3,023	6,143,178	949,290
Total Primary Distribution Plant	PLD		$	131,467,230	$ 115,956,662	$ 41,774	$ 9,133,315	$ 1,289,987
Customer Services								
Demand	PLCSD	CSA	$	-	-	-	-	-
Customer	PLCSC	SERV		17,827,500	15,207,027	592	2,201,201	226,633
Total Customer Services			$	17,827,500	$ 15,207,027	$ 592	$ 2,201,201	$ 226,633
Meters								
Customer	PLMC	C03	$	7,826,660	6,959,133	271	685,740	85,043
Lighting Systems								
Customer	PLLSC	C04	$	5,490,429	-	-	-	-
Meter Reading, Billing and Customer Service								
Customer	PLMRBC	C05	$	-	-	-	-	-
Load Management								
Customer	PLCSC	C06	$	-	-	-	-	-
Total	PLT		$	163,218,446	$ 138,584,674	$ 42,985	$ 12,068,719	$ 1,606,840

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Plant in Service						
Production & Purchase Power						
Demand	PLPPD	PPDA	-	-	-	-
Energy	PLPPE	PPEA	-	-	-	-
Total Purchase Power	PLPPT		$ -	$ -	$ -	$ -
Transmission						
Demand	PLTD	TA1	-	-	-	-
Station Equipment						
Demand	PLSED	SA1	48,425	30,608	8,784	2,971
Primary & Secondary Distribution Plant						
Demand	PLDPD	DA1	2,419,514	1,085,862	311,619	170,504
Customer	PLDPC	C01	359,763	24,186	3,023	671,020
Total Primary Distribution Plant	PLD		$ 2,779,277	$ 1,110,048	$ 314,642	$ 841,524
Customer Services						
Demand	PLCSD	CSA	-	-	-	-
Customer	PLCSC	SERV	181,222	9,303	1,523	-
Total Customer Services			$ 181,222	$ 9,303	$ 1,523	$ -
Meters						
Customer	PLMC	C03	88,503	7,085	886	-
Lighting Systems						
Customer	PLLSC	C04	-	-	-	5,490,429
Meter Reading, Billing and Customer Service						
Customer	PLMRBC	C05	-	-	-	-
Load Management						
Customer	PLCSC	C06	-	-	-	-
Total	PLT		$ 3,097,428	$ 1,157,043	$ 325,834	$ 6,334,924

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Net Utility Plant								
Production & Purchase Power								
Demand	NPPPD	PPDA	$	-	-	-	-	-
Energy	NPPPE	PPEA		-	-	-	-	-
Total Purchase Power	NPPPT			-	$ -	$ -	$ -	$ -
Transmission								
Demand	NPTD	TA1	$	-	-	-	-	-
Station Equipment								
Demand	NPSED	SA1	$	405,266	308,546	233	32,377	3,458
Primary Distribution Plant								
Demand	NPDPD	DA1	$	30,485,186	25,570,188	25,888	1,997,601	227,607
Customer	NPDPC	C01		57,343,254	51,896,211	2,020	4,104,032	634,186
Total Primary Distribution Plant			$	87,828,441	$ 77,466,399	$ 27,908	$ 6,101,633	$ 861,793
Customer Services								
Demand	NPCSD	CSA	$	-	-	-	-	-
Customer	NPCSC	SERV		11,909,900	10,159,258	395	1,470,542	151,405
Total Customer Services			$	11,909,900	$ 10,159,258	$ 395	$ 1,470,542	$ 151,405
Meters								
Customer	NPMC	C03	$	5,228,705	4,649,142	181	458,118	56,814
Lighting Systems								
Customer	NPLSC	C04	$	3,667,955	-	-	-	-
Meter Reading, Billing and Customer Service								
Customer	NPMRBC	C05	$	-	-	-	-	-
Load Management								
Customer	NPCSC	C06	$	-	-	-	-	-
Total	NPT		$	109,040,266	$ 92,583,344	$ 28,717	$ 8,062,669	$ 1,073,471
					0.85			

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Net Utility Plant						
Production & Purchase Power						
Demand	NPPPD	PPDA	-	-	-	-
Energy	NPPPE	PPEA	-	-	-	-
Total Purchase Power	NPPPT		$ -	$ -	$ -	$ -
Transmission						
Demand	NPTD	TA1	-	-	-	-
Station Equipment						
Demand	NPSED	SA1	32,351	20,448	5,868	1,985
Primary Distribution Plant						
Demand	NPDPD	DA1	1,616,389	725,425	208,181	113,908
Customer	NPDPC	C01	240,344	16,158	2,020	448,284
Total Primary Distribution Plant			$ 1,856,733	$ 741,583	$ 210,201	$ 562,192
Customer Services						
Demand	NPCSD	CSA	-	-	-	-
Customer	NPCSC	SERV	121,068	6,215	1,017	-
Total Customer Services			$ 121,068	$ 6,215	$ 1,017	$ -
Meters						
Customer	NPMC	C03	59,126	4,733	592	-
Lighting Systems						
Customer	NPLSC	C04	-	-	-	3,667,955
Meter Reading, Billing and Customer Service						
Customer	NPMRBC	C05	-	-	-	-
Load Management						
Customer	NPCSC	C06	-	-	-	-
Total	NPT		$ 2,069,278	$ 772,978	$ 217,678	$ 4,232,131

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Net Cost Rate Base								
Production & Purchase Power								
Demand	RBPPD	PPDA	$	-	-	-	-	-
Energy	RBPPE	PPEA		-	-	-	-	-
Total Purchase Power	RBPPT			-	$ -	$ -	$ -	$ -
Transmission								
Demand	RBTD	TA1	$	-	-	-	-	-
Station Equipment								
Demand	RBSED	SA1	$	408,929	311,335	235	32,669	3,490
Primary Distribution Plant								
Demand	RBDPD	DA1	$	30,960,247	25,968,657	26,291	2,028,730	231,154
Customer	RBDPC	C01		58,170,300	52,644,696	2,049	4,163,223	643,333
Total Primary Distribution Plant			$	89,130,548	$ 78,613,352	$ 28,340	$ 6,191,954	$ 874,487
Customer Services								
Demand	RBCSD	CSA	$	-	-	-	-	-
Customer	RBCSC	SERV		11,996,799	10,233,383	398	1,481,272	152,510
Total Customer Services			$	11,996,799	$ 10,233,383	$ 398	$ 1,481,272	$ 152,510
Meters								
Customer	RBMC	C03	$	5,320,627	4,730,875	184	466,171	57,813
Lighting Systems								
Customer	RBLSC	C04	$	3,689,165	-	-	-	-
Meter Reading, Billing and Customer Service								
Customer	RBMRBC	C05	$	272,237	246,377	10	19,484	3,011
Load Management								
Customer	RBCSC	C06	$	1,322	890	0	70	11
Total	RBT		$	110,819,626	$ 94,136,213	$ 29,167	$ 8,191,620	$ 1,091,321
				1.00	0.85	0.00	0.07	0.01

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Net Cost Rate Base						
Production & Purchase Power						
Demand	RBPPD	PPDA	-	-	-	-
Energy	RBPPE	PPEA	-	-	-	-
Total Purchase Power	RBPPT		$ -	$ -	$ -	$ -
Transmission						
Demand	RBTD	TA1	-	-	-	-
Station Equipment						
Demand	RBSED	SA1	32,643	20,633	5,921	2,003
Primary Distribution Plant						
Demand	RBDPD	DA1	1,641,578	736,729	211,425	115,683
Customer	RBDPC	C01	243,811	16,391	2,049	454,749
Total Primary Distribution Plant			$ 1,885,388	$ 753,120	$ 213,474	$ 570,432
Customer Services						
Demand	RBCSD	CSA	-	-	-	-
Customer	RBCSC	SERV	121,951	6,260	1,025	-
Total Customer Services			$ 121,951	$ 6,260	$ 1,025	$ -
Meters						
Customer	RBMC	C03	60,165	4,816	602	-
Lighting Systems						
Customer	RBLSC	C04	-	-	-	3,689,165
Meter Reading, Billing and Customer Service						
Customer	RBMRBC	C05	1,141	77	10	2,128
Load Management						
Customer	RBCSC	C06	4	0	0	346
Total	RBT		$ 2,101,293	$ 784,906	$ 221,032	$ 4,264,073
			0.02	0.01	0.00	0.04

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Operation and Maintenance Expenses								
Production & Purchase Power								
Demand	OMPPD	PPDA	$	11,589,879	8,806,531	6,645	924,093	98,711
Energy	OMPPE	PPEA		27,577,090	20,463,239	20,833	2,042,134	232,385
Total Purchase Power	OMPPT			39,166,969	$ 29,269,771	$ 27,478	$ 2,966,227	$ 331,096
Transmission								
Demand	OMTD	TOMA	$	-	-	-	-	-
Station Equipment								
Demand	OMSED	SOMA	$	17,235	13,121	10	1,377	147
Primary Distribution Plant								
Demand	OMDPD	DOM	$	2,892,766	2,426,378	2,457	189,554	21,598
Customer	OMDPC	C01		4,908,925	4,442,625	173	351,330	54,290
Total Primary Distribution Plant			$	7,801,691	$ 6,869,003	$ 2,629	$ 540,884	$ 75,888
Customer Services								
Demand	OMCSD	SERV	$	-	-	-	-	-
Customer	OMCSC	SERV		340,564	290,504	11	42,050	4,329
Total Customer Services			$	340,564	$ 290,504	$ 11	$ 42,050	$ 4,329
Meters								
Customer	OMMC	C03	$	579,688	515,434	20	50,790	6,299
Lighting Systems								
Customer	OMLSC	C04	$	60,464	-	-	-	-
Meter Reading, Billing and Customer Service								
Customer	OMMRBC	C05	$	2,177,898	1,971,019	77	155,871	24,086
Load Management								
Customer	OMCSC	C06	$	10,575	7,121	0	563	87
Total	OMT		$	50,155,083	$ 38,935,973	$ 30,226	$ 3,757,762	$ 441,933

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Operation and Maintenance Expenses						
Production & Purchase Power						
Demand	OMPPD	PPDA	923,365	583,622	190,264	56,648
Energy	OMPPE	PPEA	2,705,916	1,352,271	506,972	253,339
Total Purchase Power	OMPPT		$ 3,629,281	$ 1,935,893	$ 697,236	$ 309,987
Transmission						
Demand	OMTD	TOMA	-	-	-	-
Station Equipment						
Demand	OMSED	SOMA	1,376	870	250	84
Primary Distribution Plant						
Demand	OMDPD	DOM	153,381	68,836	19,754	10,809
Customer	OMDPC	C01	20,575	1,383	173	38,376
Total Primary Distribution Plant			$ 173,955	$ 70,219	$ 19,927	$ 49,185
Customer Services						
Demand	OMCSD	SERV	-	-	-	-
Customer	OMCSC	SERV	3,462	178	29	-
Total Customer Services			$ 3,462	$ 178	$ 29	$ -
Meters						
Customer	OMMC	C03	6,555	525	66	-
Lighting Systems						
Customer	OMLSC	C04	-	-	-	60,464
Meter Reading, Billing and Customer Service						
Customer	OMMRBC	C05	9,128	614	77	17,026
Load Management						
Customer	OMCSC	C06	33	2	0	2,768
Total	OMT		$ 3,823,790	$ 2,008,301	$ 717,585	$ 439,513

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Labor Expenses								
Production & Purchase Power								
Demand	LBPPD	PPDA	$	-	-	-	-	-
Energy	LBPPE	PPEA		-	-	-	-	-
Total Purchase Power	LBPPT			-	$ -	$ -	$ -	$ -
Transmission								
Demand	LBTD	TOMA	$	-	-	-	-	-
Station Equipment								
Demand	LBSED	SOMA	$	4,294	3,269	2	343	37
Primary Distribution Plant								
Demand	LBDPD	DOM	$	1,174,718	985,323	998	76,976	8,771
Customer	LBDPC	C01		1,877,575	1,699,224	66	134,377	20,765
Total Primary Distribution Plant			$	3,052,293	$ 2,684,547	$ 1,064	$ 211,353	$ 29,536
Customer Services								
Demand	LBCSD	SERV	$	-	-	-	-	-
Customer	LBCSC	SERV		117,963	100,624	4	14,565	1,500
Total Customer Services			$	117,963	$ 100,624	$ 4	$ 14,565	$ 1,500
Meters								
Customer	LBMC	C03	$	432,615	384,662	15	37,904	4,701
Lighting Systems								
Customer	LBLSC	C04	$	33,646	-	-	-	-
Meter Reading, Billing and Customer Service								
Customer	LBMRBC	C05	$	1,592,365	1,441,106	56	113,965	17,611
Load Management								
Customer	LBCSC	C06	$	2,218	1,494	0	118	18
Total	LBT		$	5,235,394	$ 4,615,702	$ 1,141	$ 378,248	$ 53,402

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Labor Expenses						
Production & Purchase Power						
Demand	LBPPD	PPDA	-	-	-	-
Energy	LBPPE	PPEA	-	-	-	-
Total Purchase Power	LBPPT		$ -	$ -	$ -	$ -
Transmission						
Demand	LBTD	TOMA	-	-	-	-
Station Equipment						
Demand	LBSED	SOMA	343	217	62	21
Primary Distribution Plant						
Demand	LBDPD	DOM	62,286	27,954	8,022	4,389
Customer	LBDPC	C01	7,870	529	66	14,678
Total Primary Distribution Plant			$ 70,156	$ 28,483	$ 8,088	$ 19,067
Customer Services						
Demand	LBCSD	SERV	-	-	-	-
Customer	LBCSC	SERV	1,199	62	10	-
Total Customer Services			$ 1,199	$ 62	$ 10	$ -
Meters						
Customer	LBMC	C03	4,892	392	49	-
Lighting Systems						
Customer	LBLSC	C04	-	-	-	33,646
Meter Reading, Billing and Customer Service						
Customer	LBMRBC	C05	6,674	449	56	12,448
Load Management						
Customer	LBCSC	C06	7	0	0	581
Total	LBT		$ 83,270	$ 29,602	$ 8,266	$ 65,764

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Depreciation Expenses								
Production & Purchase Power								
Demand	DPPPD	PPDA	$	-	-	-	-	-
Energy	DPPPE	PPEA		-	-	-	-	-
Total Purchase Power	DPPPT			- $	- $	- $	- $	-
Transmission								
Demand	DPTD	TA1	$	-	-	-	-	-
Station Equipment								
Demand	DPSED	SA1	$	23,437	17,844	13	1,872	200
Primary Distribution Plant								
Demand	DPDPD	DA1	$	1,762,985	1,478,747	1,497	115,523	13,163
Customer	DPDPC	C01		3,316,211	3,001,204	117	237,340	36,676
Total Primary Distribution Plant			$	5,079,196 $	4,479,950 $	1,614 $	352,863 $	49,838
Customer Services								
Demand	DPCSD	SERV	$	-	-	-	-	-
Customer	DPCSC	SERV		688,760	587,519	23	85,043	8,756
Total Customer Services			$	688,760 $	587,519 $	23 $	85,043 $	8,756
Meters								
Customer	DPMC	C03	$	302,381	268,864	10	26,493	3,286
Lighting Systems								
Customer	DPLSC	C04	$	212,121	-	-	-	-
Meter Reading, Billing and Customer Service								
Customer	DPMRBC	C05	$	-	-	-	-	-
Load Management								
Customer	DPCSC	C06	$	-	-	-	-	-
Total	DPT		$	6,305,895 $	5,354,177 $	1,661 $	466,271 $	62,080

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Depreciation Expenses						
Production & Purchase Power						
Demand	DPPPD	PPDA	-	-	-	-
Energy	DPPPE	PPEA	-	-	-	-
Total Purchase Power	DPPPT		$ -	$ -	$ -	$ -
Transmission						
Demand	DPTD	TA1	-	-	-	-
Station Equipment						
Demand	DPSED	SA1	1,871	1,183	339	115
Primary Distribution Plant						
Demand	DPDPD	DA1	93,477	41,952	12,039	6,587
Customer	DPDPC	C01	13,899	934	117	25,925
Total Primary Distribution Plant			$ 107,377	$ 42,886	$ 12,156	$ 32,512
Customer Services						
Demand	DPCSD	SERV	-	-	-	-
Customer	DPCSC	SERV	7,001	359	59	-
Total Customer Services			$ 7,001	$ 359	$ 59	$ -
Meters						
Customer	DPMC	C03	3,419	274	34	-
Lighting Systems						
Customer	DPLSC	C04	-	-	-	212,121
Meter Reading, Billing and Customer Service						
Customer	DPMRBC	C05	-	-	-	-
Load Management						
Customer	DPCSC	C06	-	-	-	-
Total	DPT		$ 119,668	$ 44,702	$ 12,589	$ 244,748

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System		Residential R		Resid TOU D		General Power Service < 50kW C		Public Facilities E
Property Taxes												
Production & Purchase Power												
Demand	PTPPD	PPDA	$	-		-		-		-		-
Energy	PTPPE	PPEA		-		-		-		-		-
Total Purchase Power	PTPPT			-	$	-	$	-	$	-	$	-
Transmission												
Demand	PTTD	TOMA	$	-		-		-		-		-
Station Equipment												
Demand	PTSED	SOMA	$	-		-		-		-		-
Primary Distribution Plant												
Demand	PTDPD	DOM	$	-		-		-		-		-
Customer	PTDPC	C01		-		-		-		-		-
Total Primary Distribution Plant			$	-	$	-	$	-	$	-	$	-
Customer Services												
Demand	PTCSD	SERV	$	-		-		-		-		-
Customer	PTCSC	SERV		-		-		-		-		-
Total Customer Services			$	-	$	-	$	-	$	-	$	-
Meters												
Customer	PTMC	C03	$	-		-		-		-		-
Lighting Systems												
Customer	PTLSC	C04	$	-		-		-		-		-
Meter Reading, Billing and Customer Service												
Customer	PTMRBC	C05	$	-		-		-		-		-
Load Management												
Customer	PTCSC	C06	$	-		-		-		-		-
Total	PTT		$	-	$	-	$	-	$	-	$	-

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Property Taxes						
Production & Purchase Power						
Demand	PTPPD	PPDA	-	-	-	-
Energy	PTPPE	PPEA	-	-	-	-
Total Purchase Power	PTPPT		$ -	$ -	$ -	$ -
Transmission						
Demand	PTTD	TOMA	-	-	-	-
Station Equipment						
Demand	PTSED	SOMA	-	-	-	-
Primary Distribution Plant						
Demand	PTDPD	DOM	-	-	-	-
Customer	PTDPC	C01	-	-	-	-
Total Primary Distribution Plant			$ -	$ -	$ -	$ -
Customer Services						
Demand	PTCSD	SERV	-	-	-	-
Customer	PTCSC	SERV	-	-	-	-
Total Customer Services			$ -	$ -	$ -	$ -
Meters						
Customer	PTMC	C03	-	-	-	-
Lighting Systems						
Customer	PTLSC	C04	-	-	-	-
Meter Reading, Billing and Customer Service						
Customer	PTMRBC	C05	-	-	-	-
Load Management						
Customer	PTCSC	C06	-	-	-	-
Total	PTT		$ -	$ -	$ -	$ -

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Other Taxes								
Production & Purchase Power								
Demand	OTPPD	PPDA	$	-	-	-	-	-
Energy	OTPPE	PPEA		-	-	-	-	-
Total Purchase Power	OTPPT			- $	- $	- $	- $	-
Transmission								
Demand	OTTD	TOMA	$	-	-	-	-	-
Station Equipment								
Demand	OTSED	SOMA	$	201	153	0	16	2
Primary Distribution Plant								
Demand	OTDPD	DOM	$	15,120	12,682	13	991	113
Customer	OTDPC	C01		28,441	25,739	1	2,036	315
Total Primary Distribution Plant			$	43,561 $	38,422 $	14 $	3,026 $	427
Customer Services								
Demand	OTCSD	SERV	$	-	-	-	-	-
Customer	OTCSC	SERV		5,907	5,039	0	729	75
Total Customer Services			$	5,907 $	5,039 $	0 $	729 $	75
Meters								
Customer	OTMC	C03	$	2,593	2,306	0	227	28
Lighting Systems								
Customer	OTLSC	C04	$	1,819	-	-	-	-
Meter Reading, Billing and Customer Service								
Customer	OTMRBC	C05	$	-	-	-	-	-
Load Management								
Customer	OTCSC	C06	$	-	-	-	-	-
Total	OTT		$	54,082 $	45,919 $	14 $	3,999 $	532

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Other Taxes						
Production & Purchase Power						
Demand	OTPPD	PPDA	-	-	-	-
Energy	OTPPE	PPEA	-	-	-	-
Total Purchase Power	OTPPT		$ -	$ -	$ -	$ -
Transmission						
Demand	OTTD	TOMA	-	-	-	-
Station Equipment						
Demand	OTSED	SOMA	16	10	3	1
Primary Distribution Plant						
Demand	OTDPD	DOM	802	360	103	56
Customer	OTDPC	C01	119	8	1	222
Total Primary Distribution Plant			$ 921	$ 368	$ 104	$ 279
Customer Services						
Demand	OTCSD	SERV	-	-	-	-
Customer	OTCSC	SERV	60	3	1	-
Total Customer Services			$ 60	$ 3	$ 1	$ -
Meters						
Customer	OTMC	C03	29	2	0	-
Lighting Systems						
Customer	OTLSC	C04	-	-	-	1,819
Meter Reading, Billing and Customer Service						
Customer	OTMRBC	C05	-	-	-	-
Load Management						
Customer	OTCSC	C06	-	-	-	-
Total	OTT		$ 1,026	$ 383	$ 108	$ 2,099

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Cost of Service Summary -- Unadjusted Results								
Operating Revenues								
Total Sales of Electric Energy	REVUC	R01	$	56,631,025	42,005,562	24,044	4,669,690	522,504
Other Electric Revenues		MISCSERV	$	1,459,768	1,245,196	48	180,241	18,557
Total Operating Revenues	TOR		$	58,090,793	$ 43,250,758	$ 24,092	$ 4,849,930	$ 541,062
Operating Expenses								
Operation and Maintenance Expenses			$	50,155,083	$ 38,935,973	$ 30,226	$ 3,757,762	$ 441,933
Depreciation and Amortization Expenses				6,305,895	5,354,177	1,661	466,271	62,080
Property Taxes		NPT		-	-	-	-	-
Other Taxes				54,082	45,919	14	3,999	532
Total Operating Expenses	TOE		$	56,515,059	$ 44,336,069	$ 31,901	$ 4,228,033	$ 504,545
Utility Operating Margin	TOM		$	1,575,733	$ (1,085,311)	$ (7,808)	$ 621,898	$ 36,517
Net Cost Rate Base			$	110,819,626	$ 94,136,213	$ 29,167	$ 8,191,620	$ 1,091,321
Rate of Return				**1.42%**	**-1.15%**	**-26.77%**	**7.59%**	**3.35%**
Unitized Rate of Return				**1.00**	**(0.81)**	**(18.83)**	**5.34**	**2.35**

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Cost of Service Summary -- Unadjusted Results						
Operating Revenues						
Total Sales of Electric Energy	REVUC	R01	5,150,171	2,213,582	857,826	1,187,646
Other Electric Revenues		MISCSERV	14,839	762	125	-
Total Operating Revenues	TOR		$ 5,165,010	$ 2,214,344	$ 857,950	$ 1,187,646
Operating Expenses						
Operation and Maintenance Expenses			$ 3,823,790	$ 2,008,301	$ 717,585	$ 439,513
Depreciation and Amortization Expenses			119,668	44,702	12,589	244,748
Property Taxes		NPT	-	-	-	-
Other Taxes			1,026	383	108	2,099
Total Operating Expenses	TOE		$ 3,944,485	$ 2,053,386	$ 730,281	$ 686,360
Utility Operating Margin	TOM		$ 1,220,525	$ 160,957	$ 127,669	$ 501,286
Net Cost Rate Base			$ 2,101,293	$ 784,906	$ 221,032	$ 4,264,073
Rate of Return			**58.08%**	**20.51%**	**57.76%**	**11.76%**
Unitized Rate of Return			**40.85**	**14.42**	**40.62**	**8.27**

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Cost of Service Summary -- Adjusted Results							
Operating Revenues							
Total Operating Revenue -- Actual			$ 58,090,793	$ 43,250,758	$ 24,092	$ 4,849,930	$ 541,062
Pro-Forma Adjustments:							
1.01 Fuel Adjustment Clause		R01	$ (2,826,503)	$ (2,096,534)	$ (1,200)	$ (233,068)	$ (26,079)
1.02 Environmental Surcharge		R01	$ (5,766,680)	$ (4,277,384)	$ (2,448)	$ (475,510)	$ (53,206)
1.04 Year-End Customer Normalization			$ 205,043	$ 173,492	$ 45,987	$ (1,631)	$ (12,806)
15 Rate Increase			$ -	$ -	$ -	$ -	$ -
Total Pro Forma Adjustments			$ (8,388,140)	$ (6,200,425)	$ 42,339	$ (710,208)	$ (92,091)
Total Pro-Forma Operating Revenue			$ 49,702,653	$ 37,050,333	$ 66,431	$ 4,139,722	$ 448,971
Operating Expenses							
Total Operating Expenses -- Actual	TOE		$ 56,515,059	$ 44,336,069	$ 31,901	$ 4,228,033	$ 504,545
Pro-Forma Adjustments:							
1.01 Fuel Adjustment Clause		E01	$ (2,826,503)	$ (2,104,136)	$ (2,142)	$ (204,599)	$ (23,282)
1.02 Environmental Surcharge		12CP	$ (5,766,680)	$ (4,390,421)	$ (3,313)	$ (460,699)	$ (49,211)
1.03 Rate Case Expenses		E01	$ 16,667	$ 12,407	$ 13	$ 1,206	$ 137
1.04 Year-End Customer Normalization			$ 112,375	$ 97,790	$ -	$ 23,398	$ (845)
1.05 GTCC			$ -	$ -	$ -	$ -	$ -
1.06 Non-Recurring Items		RBT	$ (77,500)	$ (65,833)	$ (20)	$ (5,729)	$ (763)
1.07 Depreciation Expense Normalization		DPT	$ 120,319	$ 102,159	$ 32	$ 8,897	$ 1,185
1.08 Advertising & Donations		RBT	$ (198,428)	$ (168,555)	$ (52)	$ (14,667)	$ (1,954)
1.09 Directors Expense		RBT	$ (10,800)	$ (9,174)	$ (3)	$ (798)	$ (106)
1.10 Interest		RBT	$ -	$ -	$ -	$ -	$ -
1.11 Life Insurance Premiums		LBT	$ (31,743)	$ (27,986)	$ (7)	$ (2,293)	$ (324)
1.12 Wages		LBT	$ 340,995	$ 300,633	$ 74	$ 24,636	$ 3,478
Total Pro Forma Adjustments			$ (8,321,298)	$ (6,253,115)	$ (5,419)	$ (630,648)	$ (71,686)
Total Pro-forma Operating Expenses			$ 48,193,761	$ 38,082,955	$ 26,482	$ 3,597,385	$ 432,859
Utility Operating Margin -- Pro-Forma			$ 1,508,891	$ (1,032,622)	$ 39,949	$ 542,337	$ 16,112
Net Cost Rate Base			$ 110,819,626	$ 94,136,213	$ 29,167	$ 8,191,620	$ 1,091,321
Pro-forma Rate Base Adjustments							
<reserved>		RBT	$ -	-	-	-	-
Pro-forma Rate Base			$ 110,819,626	$ 94,136,213	$ 29,167	$ 8,191,620	$ 1,091,321
Rate of Return			**1.36%**	**-1.10%**	**136.97%**	**6.62%**	**1.48%**
Unitized Rate of Return			**1.00**	**(0.81)**	**100.59**	**4.86**	**1.08**

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Cost of Service Summary -- Adjusted Results						
Operating Revenues						
Total Operating Revenue -- Actual			$ 5,165,010	$ 2,214,344	$ 857,950	$ 1,187,646
Pro-Forma Adjustments:						
1.01 Fuel Adjustment Clause		R01	$ (257,049)	$ (110,482)	$ (42,815)	$ (59,276)
1.02 Environmental Surcharge		R01	$ (524,437)	$ (225,407)	$ (87,352)	$ (120,937)
1.04 Year-End Customer Normalization			$ -	$ -	$ -	$ -
15 Rate Increase			$ -	$ -	$ -	$ -
Total Pro Forma Adjustments			$ (781,486)	$ (335,889)	$ (130,166)	$ (180,213)
Total Pro-Forma Operating Revenue			$ 4,383,524	$ 1,878,455	$ 727,784	$ 1,007,433
Operating Expenses						
Total Operating Expenses -- Actual	TOE		$ 3,944,485	$ 2,053,386	$ 730,281	$ 686,360
Pro-Forma Adjustments:						
1.01 Fuel Adjustment Clause		E01	$ (271,102)	$ (135,482)	$ (59,710)	$ (26,050)
1.02 Environmental Surcharge		12CP	$ (460,336)	$ (290,960)	$ (83,499)	$ (28,241)
1.03 Rate Case Expenses		E01	$ 1,599	$ 799	$ 352	$ 154
1.04 Year-End Customer Normalization			$ (7,968)	$ -	$ -	$ -
1.05 GTCC			$ -	$ -	$ -	$ -
1.06 Non-Recurring Items		RBT	$ (1,470)	$ (549)	$ (155)	$ (2,982)
1.07 Depreciation Expense Normalization		DPT	$ 2,283	$ 853	$ 240	$ 4,670
1.08 Advertising & Donations		RBT	$ (3,762)	$ (1,405)	$ (396)	$ (7,635)
1.09 Directors Expense		RBT	$ (205)	$ (76)	$ (22)	$ (416)
1.10 Interest		RBT	$ -	$ -	$ -	$ -
1.11 Life Insurance Premiums		LBT	$ (505)	$ (179)	$ (50)	$ (399)
1.12 Wages		LBT	$ 5,424	$ 1,928	$ 538	$ 4,283
Total Pro Forma Adjustments			$ (736,042)	$ (425,072)	$ (142,701)	$ (56,615)
Total Pro-forma Operating Expenses			$ 3,208,443	$ 1,628,314	$ 587,580	$ 629,744
Utility Operating Margin -- Pro-Forma			$ 1,175,081	$ 250,141	$ 140,204	$ 377,688
Net Cost Rate Base			$ 2,101,293	$ 784,906	$ 221,032	$ 4,264,073
Pro-forma Rate Base Adjustments						
<reserved>		RBT	-	-	-	-
Pro-forma Rate Base			$ 2,101,293	$ 784,906	$ 221,032	$ 4,264,073
Rate of Return			**55.92%**	**31.87%**	**63.43%**	**8.86%**
Unitized Rate of Return			**41.07**	**23.41**	**46.59**	**6.51**

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Allocation Factors							
Energy Allocation Factors							
Energy Usage by Class	E01	Energy	1.000000	0.744431	0.000758	0.072386	0.008237
Demand Allocation Factors							
Purchase Power -- Average 12 CP	D01	12CP	1.000000	0.761343	0.000574	0.079890	0.008534
Station Equipment -- Maximum Class Demand	D02	NCP	1.000000	0.816471	0.001598	0.064814	0.009115
Primary Distribution Plant -- Maximum Class Demand	D03	NCP	1.000000	0.816471	0.001598	0.064814	0.009115
Services	SERV		1.000000	0.853009	0.000033	0.123472	0.012713
Misc. Service Revenue	MISCSERV		1.000000	0.853009	0.000033	0.123472	0.012713
Residential & Commercial Rev	RCRev		47,221,800	42,005,562	24,044	4,669,690	522,504
Customer Allocation Factors							
Primary Distribution Plant -- Average Number of Customers	C01	Cust03	1.000000	0.905010	0.000035	0.071570	0.011059
Customer Services -- Average Number of Customers	C02	Cust02	1.000000	0.673384	0.000026	0.053252	0.008229
Meter Costs -- Weighted Cost of Meters	C03		1.000000	0.889157	0.000035	0.087616	0.010866
Lighting Systems -- Lighting Customers	C04	Cust04	1.000000	-	-	-	-
Meter Reading and Billing -- Weighted Cost	C05	Cust05	1.000000	0.905010	0.000035	0.071570	0.011059
Load Management	C06	Cust06	1.000000	0.673384	0.000026	0.053252	0.008229
Other Allocation Factors							
Rev	R01		56,631,025	42,005,562	24,044	4,669,690	522,504
Energy	E01		434,733,146	321,373,036	327,183	32,071,501	3,649,587
Loss Factor			0.050	0.050	0.050	0.025	0.025
Energy Including Losses	Energy		454,424,255	338,287,406	344,403	32,893,847	3,743,166
Customers (Monthly Bills)			457,896	308,340	12	24,384	3,768
Average Customers (Bills/12)	Cust01		38,158	25,695	1	2,032	314
Average Customers (Lighting = Lights)	Cust02		38,158	25,695	1	2,032	314
Average Customers (Lighting =45 Lights per Cust)	Cust03		28,392	25,695	1	2,032	314
Lighting	Cust04		3,978,657	-	-	-	-
Average Customers	Cust05		28,392	25,695	1	2,032	314
Load Management	Cust06		38,158	25,695	1	2,032	314
Winter CP Demands	WCP		840,799	646,386	623	63,683	6,661
Summer CP Demands	SCP		260,838	192,338	10	24,326	2,740
12 Month Sum of Coincident Demands	12CP		1,101,637	838,724	633	88,010	9,401
Class Maximum Demands	NCP		175,935	143,646	281	11,403	1,604
Sum of the Individual Customer Demands	SICD		2,919,793	2,449,047	2,479	191,325	21,800

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Allocation Factors						
Energy Allocation Factors						
Energy Usage by Class	E01	Energy	0.095914	0.047933	0.021125	0.009216
Demand Allocation Factors						
Purchase Power -- Average 12 CP	D01	12CP	0.079827	0.050455	0.014480	0.004897
Station Equipment -- Maximum Class Demand	D02	NCP	0.056531	0.036227	0.009633	0.005612
Primary Distribution Plant -- Maximum Class Demand	D03	NCP	0.056531	0.036227	0.009633	0.005612
Services	SERV		0.010165	0.000522	0.000085	-
Misc. Service Revenue	MISCSERV		0.010165	0.000522	0.000085	-
Residential & Commercial Rev	RCRev		-	-	-	-
Customer Allocation Factors						
Primary Distribution Plant -- Average Number of Customers	C01	Cust03	0.004191	0.000282	0.000035	0.007818
Customer Services -- Average Number of Customers	C02	Cust02	0.003119	0.000210	0.000026	0.261754
Meter Costs -- Weighted Cost of Meters	C03		0.011308	0.000905	0.000113	-
Lighting Systems -- Lighting Customers	C04	Cust04	-	-	-	1.000000
Meter Reading and Billing -- Weighted Cost	C05	Cust05	0.004191	0.000282	0.000035	0.007818
Load Management	C06	Cust06	0.003119	0.000210	0.000026	0.261754
Other Allocation Factors						
Rev	R01		5,150,171	2,213,582	857,826	1,187,646
Energy	E01		42,496,124	21,237,280	9,599,778	3,978,657
Loss Factor			0.025	0	-	0.050
Energy Including Losses	Energy		43,585,768	21,781,826	9,599,778	4,188,060
Customers (Monthly Bills)			1,428	96	12	119,856
Average Customers (Bills/12)	Cust01		119	8	1	9,988
Average Customers (Lighting = Lights)	Cust02		119	8	1	9,988
Average Customers (Lighting =45 Lights per Cust)	Cust03		119	8	1	222
Lighting	Cust04		-	-	-	3,978,657
Average Customers	Cust05		119	8	1	222
Load Management	Cust06		119	8	1	9,988
Winter CP Demands	WCP		64,896	41,166	11,989	5,395
Summer CP Demands	SCP		23,044	14,418	3,962	-
12 Month Sum of Coincident Demands	12CP		87,940	55,583	15,951	5,395
Class Maximum Demands	NCP		9,946	6,374	1,695	987
Sum of the Individual Customer Demands	SICD		154,814	69,479	19,939	10,910

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System		Residential R		Resid TOU D		General Power Service < 50kW C		Public Facilities E
Allocation Factors (continued)												
Transmission Residual Demand Allocator	TRDA			1,101,637		838,724		633		88,010		9,401
Transmission Plant In Service			$	-								
Customer Specific Assignment												
Transmission Residual		TRDA	$	-		-		-		-		-
Transmission Total	TA1		$	-	$	-	$	-	$	-	$	-
Transmission Plant Allocator	T01	TA1		-		-		-		-		-
Transmission Residual Demand Allocator	TOMDA			1,101,637		838,724		633		88,010		9,401
Transmission Plant In Service			$	-								
Customer Specific Assignment			$	-		-		-		-		-
Transmission Residual		TOMDA	$	-		-		-		-		-
Transmission Total	TOMA		$	-	$	-	$	-	$	-	$	-
Transmission O&M Allocator	T02	TOMA		-		-		-		-		-
Distribution Residual Demand Allocator	DDA			2,919,793		2,449,047		2,479		191,325		21,800
Distribution Plant In Service			$	41,817,728								
Customer Specific Assignment												
Distribution Residual		DOMDA	$	41,817,728		35,075,631		35,512		2,740,188		312,218
Distribution Total	DT1		$	41,817,728	$	35,075,631.1	$	35,512	$	2,740,188	$	312,218
Distribution Plant Allocator	DA1	DT1		1.000000		1		0		0		0
Distribution Residual Demand Allocator	DOMDA			2,919,793		2,449,047.00		2,479		191,325		21,800
Distribution Plant In Service			$	41,817,728								
Customer Specific Assignment												
Distribution Residual		DOMDA	$	41,817,728		35,075,631		35,512		2,740,188		312,218
Distribution Total	DOMA		$	41,817,728	$	35,075,631.1	$	35,512	$	2,740,188	$	312,218
Distribution O&M Allocator	DOM	DOMA		1.000000		1		0		0		0
Substation Residual Demand Allocator	SDA			1,101,637		838,724		633		88,010		9,401
Substation Plant In Service			$	555,919								
Customer Specific Assignment						-		-		-		-
Substation Residual		SDA	$	555,919		423,245		319		44,412		4,744
Substation Total	ST1		$	555,919	$	423,245	$	319	$	44,412	$	4,744
Substation Plant Allocator	SA1	ST1		1.000000		1		0		0		0
Substation Residual Demand Allocator	SOMDA		$	1,101,637		838,724		633		88,010		9,401
Substation Plant In Service			$	555,919								
Customer Specific Assignment												
Substation Residual		SOMDA	$	555,919		423,245		319		44,412		4,744
Substation Total	STOM		$	555,919	$	423,245	$	319	$	44,412	$	4,744
Substation O&M Allocator	SOMA	STOM		1.000000		1		0		0		0

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Allocation Factors (continued)						
Transmission Residual Demand Allocator	TRDA		87,940	55,583	15,951	5,395
Transmission Plant In Service						
Customer Specific Assignment						-
Transmission Residual		TRDA	-	-	-	-
Transmission Total	TA1		$ -	$ -	$ -	$ -
Transmission Plant Allocator	T01	TA1	-	-	-	-
Transmission Residual Demand Allocator	TOMDA		87,940	55,583	15,951	5,395
Transmission Plant In Service						
Customer Specific Assignment			-	-	-	-
Transmission Residual		TOMDA	-	-	-	-
Transmission Total	TOMA		$ -	$ -	$ -	$ -
Transmission O&M Allocator	T02	TOMA	-	-	-	-
Distribution Residual Demand Allocator	DDA		154,814	69,479	19,939	10,910
Distribution Plant In Service						
Customer Specific Assignment						-
Distribution Residual		DOMDA	2,217,264	995,094	285,570	156,252
Distribution Total	DT1		$ 2,217,264	$ 995,094	$ 285,570	$ 156,252
Distribution Plant Allocator	DA1	DT1	0	0	0	0
Distribution Residual Demand Allocator	DOMDA		154,814	69,479	19,939	10,910
Distribution Plant In Service						
Customer Specific Assignment						-
Distribution Residual		DOMDA	2,217,264	995,094	285,570	156,252
Distribution Total	DOMA		$ 2,217,264	$ 995,094	$ 285,570	$ 156,252
Distribution O&M Allocator	DOM	DOMA	0	0	0	0
Substation Residual Demand Allocator	SDA		87,940	55,583	15,951	5,395
Substation Plant In Service						
Customer Specific Assignment			-	-	-	-
Substation Residual		SDA	44,377	28,049	8,049	2,723
Substation Total	ST1		$ 44,377	$ 28,049	$ 8,049	$ 2,723
Substation Plant Allocator	SA1	ST1	0	0	0	0
Substation Residual Demand Allocator	SOMDA		87,940	55,583	15,951	5,395
Substation Plant In Service						
Customer Specific Assignment						-
Substation Residual		SOMDA	44,377	28,049	8,049	2,723
Substation Total	STOM		$ 44,377	$ 28,049	$ 8,049	$ 2,723
Substation O&M Allocator	SOMA	STOM	0	0	0	0

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Allocation Factors (continued)								
Customer Services Demand	CSD			2,919,793	2,449,047	2,479	191,325	21,800
Customer Services Allocator	CSA	CSD		1.000000	1	0	0	0
Purchased Power Residual Demand Allocator	PPDRA			1,085,686	838,724	633	88,010	9,401
Purchased Power Demand Costs			$	11,589,879				
Customer Specific Assignment			$	190,263.60	$ -	$ -	$ -	$ -
Purchased Power Demand Residual		PPDRA	$	11,399,615.449	8,806,531	6,645	924,093	98,711
Purchased Power Demand Total	PPDT		$	11,589,879	$ 8,806,531	$ 6,645	$ 924,093	$ 98,711
Purchased Power Demand Allocator	PPDA	PPDT		1.000000	1	0	0	0
Purchased Power Residual Energy Allocator	PPERA			425,133,368	321,373,036	327,183	32,071,501	3,649,587
Purchased Power Energy Costs			$	27,577,090				
Customer Specific Assignment			$	506,972	-	-	-	-
Purchased Power Energy Residual		PPERA	$	27,070,118	20,463,239	20,833	2,042,134	232,385
Purchased Power Energy Total	PPET		$	27,577,090	$ 20,463,239	$ 20,833	$ 2,042,134	$ 232,385
Purchased Power Energy Allocator	PPEA	PPET		1.000000	1	0	0	0

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Allocation Factors (continued)						
Customer Services Demand	CSD		154,814	69,479	19,939	10,910
Customer Services Allocator	CSA	CSD	0	0	0	0
Purchased Power Residual Demand Allocator	PPDRA		87,940	55,583	-	5,395
Purchased Power Demand Costs						
Customer Specific Assignment			$ -	$ -	$ 190,264	$ -
Purchased Power Demand Residual		PPDRA	923,365	583,622	-	56,648
Purchased Power Demand Total	PPDT		$ 923,365	$ 583,622	$ 190,264	$ 56,648
Purchased Power Demand Allocator	PPDA	PPDT	0	0	0	0
Purchased Power Residual Energy Allocator	PPERA		42,496,124	21,237,280	-	3,978,657
Purchased Power Energy Costs						
Customer Specific Assignment			-	-	506,972	-
Purchased Power Energy Residual		PPERA	2,705,916	1,352,271	-	253,339
Purchased Power Energy Total	PPET		$ 2,705,916	$ 1,352,271	$ 506,972	$ 253,339
Purchased Power Energy Allocator	PPEA	PPET	0	0	0	0

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Operating Expenses								
Purchased Power Demand			$	11,589,879	$ 8,806,531	$ 6,645	$ 924,093	$ 98,711
Purchased Power Energy			$	27,577,090	$ 20,463,239	$ 20,833	$ 2,042,134	$ 232,385
Transmission Demand			$	-	$ -	$ -	$ -	$ -
Distribution Demand		0.27	$	4,711,744	$ 3,948,924	$ 3,990	$ 309,333	$ 35,222
Distribution Customer		0.73	$	12,636,346	$ 11,117,374	$ 433	$ 952,472	$ 138,227
Total			$	56,515,059	$ 44,336,069	$ 31,901	$ 4,228,033	$ 504,545
Pro-Forma Operating Expenses								
Purchased Power Demand			$	5,823,199	$ 4,416,110	$ 3,332	$ 463,395	$ 49,499
Purchased Power Energy			$	24,767,254	$ 18,371,511	$ 18,704	$ 1,838,742	$ 209,240
Transmission Demand			$	-	$ -	$ -	$ -	$ -
Distribution Demand			$	4,868,485	$ 4,085,340	$ 4,019	$ 324,857	$ 36,268
Distribution Customer			$	12,734,823	$ 11,209,993	$ 427	$ 970,391	$ 137,851
Total			$	48,193,761	$ 38,082,955	$ 26,482	$ 3,597,385	$ 432,859
		Total PFAs:	$	(8,321,298)				
Rate Base		Variance:	$	-				
Production & Purchased Power Demand			$	-	$ -	$ -	$ -	$ -
Production & Purchased Power Energy			$	-	$ -	$ -	$ -	$ -
Transmission Demand			$	-	$ -	$ -	$ -	$ -
Distribution Demand			$	31,369,176	$ 26,279,991	$ 26,526	$ 2,061,400	$ 234,644
Distribution Customer			$	79,450,450	$ 67,856,222	$ 2,641	$ 6,130,221	$ 856,677
Total			$	110,819,626	$ 94,136,213	$ 29,167	$ 8,191,620	$ 1,091,321
Revenue Requirement Calculated at a Rate of Return of	**3.65%**							
Production & Purchased Power Demand			$	5,823,199	$ 4,416,110	$ 3,332	$ 463,395	$ 49,499
Production & Purchased Power Energy			$	24,767,254	$ 18,371,511	$ 18,704	$ 1,838,742	$ 209,240
Transmission Demand			$	-	$ -	$ -	$ -	$ -
Distribution Demand			$	6,012,361	$ 5,043,639	$ 4,987	$ 400,026	$ 44,824
Distribution Customer			$	15,631,979	$ 13,684,367	$ 523	$ 1,193,929	$ 169,090
Total			$	52,234,793	$ 41,515,626	$ 27,546	$ 3,896,092	$ 472,654
		Target		52,234,793				
		Variance	$	-				

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector		General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Operating Expenses							
Purchased Power Demand			$	923,365	$ 583,622	$ 190,264	$ 56,648
Purchased Power Energy			$	2,705,916	$ 1,352,271	$ 506,972	$ 253,339
Transmission Demand			$	-	$ -	$ -	$ -
Distribution Demand		0.27	$	250,922	$ 113,210	$ 32,489	$ 17,653
Distribution Customer		0.73	$	64,282	$ 4,282	$ 556	$ 358,720
Total			$	3,944,485	$ 2,053,386	$ 730,281	$ 686,360
Pro-Forma Operating Expenses							
Purchased Power Demand			$	463,029	$ 292,662	$ 106,765	$ 28,407
Purchased Power Energy			$	2,436,412	$ 1,217,588	$ 447,614	$ 227,443
Transmission Demand			$	-	$ -	$ -	$ -
Distribution Demand			$	250,914	$ 113,987	$ 32,706	$ 20,393
Distribution Customer			$	58,087	$ 4,076	$ 495	$ 353,502
Total			$	3,208,443	$ 1,628,314	$ 587,580	$ 629,744
		Total PFAs:					
Rate Base		Variance:					
Production & Purchased Power Demand			$	-	$ -	$ -	$ -
Production & Purchased Power Energy			$	-	$ -	$ -	$ -
Transmission Demand			$	-	$ -	$ -	$ -
Distribution Demand			$	1,674,221	$ 757,362	$ 217,346	$ 117,685
Distribution Customer			$	427,072	$ 27,544	$ 3,685	$ 4,146,388
Total			$	2,101,293	$ 784,906	$ 221,032	$ 4,264,073
Revenue Requirement Calculated at a Rate of Return of	**3.65%**						
Production & Purchased Power Demand			$	463,029	$ 292,662	$ 106,765	$ 28,407
Production & Purchased Power Energy			$	2,436,412	$ 1,217,588	$ 447,614	$ 227,443
Transmission Demand			$	-	$ -	$ -	$ -
Distribution Demand			$	311,965	$ 141,604	$ 40,632	$ 24,684
Distribution Customer			$	73,660	$ 5,081	$ 630	$ 504,700
Total			$	3,285,066	$ 1,656,935	$ 595,640	$ 785,234
		Target Variance					

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Operating Expenses-Unit Costs							
Production & Purchased Power Demand (per KWH or KW)				0.01374	0.01018	0.01445	2.27
Purchased Power Energy (per KWH)				0.05717	0.05717	0.05733	0.05733
Transmission Demand (per KWH or KW)				-	-	-	-
Distribution Demand (per KWH or KW)				0.01271	0.01229	0.01013	1.66
Distribution Customer (per Customer)				36.36	35.57	39.80	36.58
Rate Base-Unit Costs							
Production & Purchased Power Demand (per KWH or KW)				-	-	-	-
Purchased Power Energy (per KWH)				-	-	-	-
Transmission Demand (per KWH or KW)				-	-	-	-
Distribution Demand (per KWH or KW)				0.08177	0.08107	0.06428	10.76
Distribution Customer (per Customer)				220.07	220.07	251.40	227.36

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Operating Expenses-Unit Costs						
Production & Purchased Power Demand (per KWH or KW)			2.99	4.21	5.35	
Purchased Power Energy (per KWH)			0.05733	0.05733	0.04663	
Transmission Demand (per KWH or KW)			-	-	-	
Distribution Demand (per KWH or KW)			1.62	1.64	1.64	
Distribution Customer (per Customer)			40.68	42.46	41.26	
Rate Base-Unit Costs						
Production & Purchased Power Demand (per KWH or KW)			-	-	-	
Purchased Power Energy (per KWH)			-	-	-	
Transmission Demand (per KWH or KW)			-	-	-	
Distribution Demand (per KWH or KW)			10.81	10.90	10.90	
Distribution Customer (per Customer)			299.07	286.92	307.11	

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Unit Revenue Requirement @ Current Class Revenues	Various			-1.10%	136.97%	6.62%	1.48%
Production & Purchased Power							
Production & Purchased Power Demand (Per KWH or KW)				0.013741	0.010184	0.014449	2.27
Production & Purchased Power Demand Margin (Per KWH or KW)				-	-	-	-
Production & Purchased Power Energy (Per KWH)				0.057166	0.057166	0.057333	0.057333
Production & Purchased Power Energy Margin (Per KWH)				-	-	-	-
Transmission Demand							
Transmission Demand (Per KWH or KW)				-	-	-	-
Transmission Demand Margin (Per KWH or KW)				-	-	-	-
Total Transmission Demand (Per KWH or KW)				-	-	-	-
Distribution Demand							
Distribution Demand (Per KWH or KW)				0.012712	0.012285	0.010129	1.66
Distribution Demand Margin (Per KWH or KW)				(0.000897)	0.111046	0.004255	0.00
Total Distribution Demand (Per KWH or KW)				0.011815	0.123331	0.014385	1.66
Distribution Customer							
Distribution Customer (Per Customer Per Month)				36.36	35.57	39.80	36.58
Distribution Customer Margin (Per Customer Per Month)				(2.41)	301.42	16.64	3.36
Total Distribution Customer (Per Customer Per Month)				33.94	336.99	56.44	39.94

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Unit Revenue Requirement @ Current Class Revenues	Various		55.92%	31.87%	63.43%	
Production & Purchased Power						
Production & Purchased Power Demand (Per KWH or KW)			2.99	4.21	5.35	
Production & Purchased Power Demand Margin (Per KWH or KW)			-	-	-	
Production & Purchased Power Energy (Per KWH)			0.057333	0.057333	0.046628	
Production & Purchased Power Energy Margin (Per KWH)			-	-	-	
Transmission Demand						
Transmission Demand (Per KWH or KW)			-	-	-	
Transmission Demand Margin (Per KWH or KW)			-	-	-	
Total Transmission Demand (Per KWH or KW)			-	-	-	
Distribution Demand						
Distribution Demand (Per KWH or KW)			1.62	1.64	1.64	
Distribution Demand Margin (Per KWH or KW)			0.02	0.01	0.01	
Total Distribution Demand (Per KWH or KW)			1.64	1.65	1.65	
Distribution Customer						
Distribution Customer (Per Customer Per Month)			40.68	42.46	41.26	
Distribution Customer Margin (Per Customer Per Month)			167.25	91.44	194.80	
Total Distribution Customer (Per Customer Per Month)			207.92	133.90	236.07	

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Unit Revenue Requirement @ Total System Rate of Return	1.36%			1.36%	1.36%	1.36%	1.36%
Production & Purchased Power							
Production & Purchased Power Demand (Per KWH or KW)				0.013741	0.010184	0.014449	2.27
Production & Purchased Power Demand Margin (Per KWH or KW)				-	-	-	-
Production & Purchased Power Energy (Per KWH)				0.057166	0.057166	0.057333	0.057333
Production & Purchased Power Energy Margin (Per KWH)				-	-	-	-
Transmission Demand							
Transmission Demand (Per KWH or KW)				-	-	-	-
Transmission Demand Margin (Per KWH or KW)				-	-	-	-
Total Transmission Demand (Per KWH or KW)				-	-	-	-
Distribution Demand							
Distribution Demand (Per KWH or KW)				0.012712	0.012285	0.010129	1.66
Distribution Demand Margin (Per KWH or KW)				0.001113	0.001104	0.000875	0.15
Total Distribution Demand (Per KWH or KW)				0.013826	0.013389	0.011004	1.81
Distribution Customer							
Distribution Customer (Per Customer Per Month)				36.36	35.57	39.80	36.58
Distribution Customer Margin (Per Customer Per Month)				3.00	3.00	3.42	3.10
Total Distribution Customer (Per Customer Per Month)				39.35	38.56	43.22	39.68

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Unit Revenue Requirement @ Total System Rate of Return	1.36%		1.36%	1.36%	1.36%	
Production & Purchased Power						
Production & Purchased Power Demand (Per KWH or KW)			2.99	4.21	5.35	
Production & Purchased Power Demand Margin (Per KWH or KW)			-	-	-	
Production & Purchased Power Energy (Per KWH)			0.057333	0.057333	0.046628	
Production & Purchased Power Energy Margin (Per KWH)			-	-	-	
Transmission Demand						
Transmission Demand (Per KWH or KW)			-	-	-	
Transmission Demand Margin (Per KWH or KW)			-	-	-	
Total Transmission Demand (Per KWH or KW)			-	-	-	
Distribution Demand						
Distribution Demand (Per KWH or KW)			1.62	1.64	1.64	
Distribution Demand Margin (Per KWH or KW)			0.15	0.15	0.15	
Total Distribution Demand (Per KWH or KW)			1.77	1.79	1.79	
Distribution Customer						
Distribution Customer (Per Customer Per Month)			40.68	42.46	41.26	
Distribution Customer Margin (Per Customer Per Month)			4.07	3.91	4.18	
Total Distribution Customer (Per Customer Per Month)			44.75	46.37	45.44	

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Unit Revenue Requirement @ Specified Rate of Return	3.65%			3.65%	3.65%	3.65%	3.65%
Production & Purchased Power							
Production & Purchased Power Demand (Per KWH or KW)				0.013741	0.010184	0.014449	2.27
Production & Purchased Power Demand Margin (Per KWH or KW)				-	-	-	-
Production & Purchased Power Energy (Per KWH)				0.057166	0.057166	0.057333	0.057333
Production & Purchased Power Energy Margin (Per KWH)				-	-	-	-
Transmission Demand							
Transmission Demand (Per KWH or KW)				-	-	-	-
Transmission Demand Margin (Per KWH or KW)				-	-	-	-
Total Transmission Demand (Per KWH or KW)				-	-	-	-
Distribution Demand							
Distribution Demand (Per KWH or KW)				0.012712	0.012285	0.010129	1.66
Distribution Demand Margin (Per KWH or KW)				0.002982	0.002956	0.002344	0.39
Total Distribution Demand (Per KWH or KW)				0.015694	0.015242	0.012473	2.06
Distribution Customer							
Distribution Customer (Per Customer Per Month)				36.36	35.57	39.80	36.58
Distribution Customer Margin (Per Customer Per Month)				8.02	8.02	9.17	8.29
Total Distribution Customer (Per Customer Per Month)				44.38	43.59	48.96	44.88

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Unit Revenue Requirement @ Specified Rate of Return	3.65%		3.65%	3.65%	3.65%	
Production & Purchased Power						
Production & Purchased Power Demand (Per KWH or KW)			2.99	4.21	5.35	
Production & Purchased Power Demand Margin (Per KWH or KW)			-	-	-	
Production & Purchased Power Energy (Per KWH)			0.057333	0.057333	0.046628	
Production & Purchased Power Energy Margin (Per KWH)			-	-	-	
Transmission Demand						
Transmission Demand (Per KWH or KW)			-	-	-	
Transmission Demand Margin (Per KWH or KW)			-	-	-	
Total Transmission Demand (Per KWH or KW)			-	-	-	
Distribution Demand						
Distribution Demand (Per KWH or KW)			1.62	1.64	1.64	
Distribution Demand Margin (Per KWH or KW)			0.39	0.40	0.40	
Total Distribution Demand (Per KWH or KW)			2.02	2.04	2.04	
Distribution Customer						
Distribution Customer (Per Customer Per Month)			40.68	42.46	41.26	
Distribution Customer Margin (Per Customer Per Month)			10.91	10.46	11.20	
Total Distribution Customer (Per Customer Per Month)			51.58	52.93	52.46	

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	Total System	Residential R	Resid TOU D	General Power Service < 50kW C	Public Facilities E
Summary of Cost-Based Charges							
At Current Class Rate of Return			1.42%	-1.15%	-26.77%	7.59%	3.35%
Customer Charge ($/month)				33.94	336.99	56.44	39.94
Energy Charge ($/kWh)				0.082722	0.190681	0.086166	0.057333
Demand Charge ($/kW)				-	-	-	3.94
At Current Total System Rate of Return			1.36%	1.36%	1.36%	1.36%	1.36%
Customer Charge ($/month)				39.35	38.56	43.22	39.68
Energy Charge ($/kWh)				0.084733	0.080739	0.082786	0.057333
Demand Charge ($/kW)				-	-	-	4.08
At Specified Total System Rate of Return			3.65%	3.65%	3.65%	3.65%	3.65%
Customer Charge ($/month)				44.38	43.59	48.96	44.88
Energy Charge ($/kWh)				0.086601	0.082592	0.084254	0.057333
Demand Charge ($/kW)				-	-	-	4.33

CLARK ENERGY COOPERATIVE
Cost of Service Study
Class Allocation

12 Months Ended December 31, 2024

Description	Name	Allocation Vector	General Power Service 50-500kW L	General Power Service 500+kW P	Large Industrial Rate B-1	Lighting S,T,O
Summary of Cost-Based Charges						
At Current Class Rate of Return			58.08%	20.51%	57.76%	
Customer Charge ($/month)			207.92	133.90	236.07	
Energy Charge ($/kWh)			0.057333	0.057333	0.046628	
Demand Charge ($/kW)			4.63	5.86	7.01	
At Current Total System Rate of Return			1.36%	1.36%	1.36%	
Customer Charge ($/month)			44.75	46.37	45.44	
Energy Charge ($/kWh)			0.057333	0.057333	0.046628	
Demand Charge ($/kW)			4.76	6.00	7.14	
At Specified Total System Rate of Return			3.65%	0.00%	0.00%	
Customer Charge ($/month)			51.58	52.93	52.46	
Energy Charge ($/kWh)			0.057333	0.057333	0.046628	
Demand Charge ($/kW)			5.01	6.25	7.39	

Exhibit JW-6
COSS: Billing Determinants

CLARK ENERGY COOPERATIVE
Summary of Billing Determinants and Demand Analysis

Rate Class	Code	Average Customers	kWh	Revenue	12 - Month Individual Customer Demand	Sum of Individual Customer Max Demand	Class Demand During Peak Month	Sum of Coincident Demands	Summer Coincident Demands	Winter Coincident Demands
Residential	R	25,695	321,373,036	$ 42,005,562	2,449,047	332,433	143,646	838,724	192,338	646,386
Resid TOU	D	1	327,183	$ 24,044	2,479	651	281	633	10	623
General Power Service < 50kW	C	2,032	32,071,501	$ 4,669,690	191,325	19,831	11,403	88,010	24,326	63,683
Public Facilities	E	314	3,649,587	$ 522,504	21,800	2,789	1,604	9,401	2,740	6,661
General Power Service 50-500kW	L	119	42,496,124	$ 5,150,171	154,814	13,708	9,946	87,940	23,044	64,896
General Power Service 1000-5000kW	M	-	-	$ -	-	-	-	-	-	-
General Power Service 500+kW	P	8	21,237,280	$ 2,213,582	69,479	6,374	6,374	55,583	14,418	41,166
Large Industrial Rate	B-1	1	9,599,778	$ 857,826	19,939	1,695	1,695	15,951	3,962	11,989
Lighting	S,T,O	9,988	3,978,657	$ 1,187,646	10,910	987	987	5,395	-	5,395
Total		38,158	434,733,146	$ 56,631,025	2,919,793	378,467	175,935	1,101,637	260,838	840,799
Total Excluding Lighting		28,169								
		28,347	434,732,946	$ 56,421,579	< Reported	2024				
		(178)	200	209,446	< Variance					
		-0.63%	0.00%	0.37%	< Variance					

CLARK ENERGY COOPERATIVE
Summary of Billing Determinants and Demand Analysis

Rate Class	Code	Average Customers	kWh	% KWH		Revenue	% Revenue
Residential	R	25,695	321,373,036	73.92%	$	42,005,562	74.17%
Resid TOU	D	1	327,183	0.08%	$	24,044	0.04%
General Power Service < 50kW	C	2,032	32,071,501	7.38%	$	4,669,690	8.25%
Public Facilities	E	314	3,649,587	0.84%	$	522,504	0.92%
General Power Service 50-500kW	L	119	42,496,124	9.78%	$	5,150,171	9.09%
General Power Service 1000-5000kW	M	-	-	0.00%	$	-	0.00%
General Power Service 500+kW	P	8	21,237,280	4.89%	$	2,213,582	3.91%
Large Industrial Rate	B-1	1	9,599,778	2.21%	$	857,826	1.51%
Lighting	S,T,O	9,988	3,978,657	0.92%	$	1,187,646	2.10%
Total		38,158	434,733,146	100.00%	$	56,631,025	100.00%
Total Excluding Lighting		28,169					

CLARK ENERGY COOPERATIVE
Summary of Billing Determinants and Demand Analysis

Rate Schedule	Code	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Residential	**R**	25,559	25,633	25,567	25,582	25,649	25,691	25,692	25,767	25,768
Energy Usage (kWh)		36,533,128	43,083,272	26,224,613	22,323,081	19,792,652	22,454,753	27,158,849	28,955,314	25,646,435
Average Demand		49,104	59,838	35,248	31,004	26,603	30,181.12	40,414.95	38,918	35,620
Diversified Load Factor		59.09%	41.66%	37.33%	43.27%	45.92%	50.17%	54.74%	48.82%	46.53%
Non-Coincident Demand		83,105	143,646	94,415	71,651	57,938	60,155	73,835	79,718	76,552
Coincidence Factor		90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%
Coincident Demand		74,794	129,281	84,974	64,486	52,145	54,140	66,452	71,746	68,897
Individual Customer Load Factor		18.00%	18.00%	18.00%	18.00%	18.00%	18.00%	18.00%	18.00%	18.00%
Sum of Individual Customer Demands		272,798	332,433	195,823	172,246	147,795	167,673	224,528	216,214	197,889
Resid TOU	**D**	1	1	1	1	1	1	1	1	1
Energy Usage (kWh)		71,784	84,312	48,693	38,132	15,150	2,435	1,920	1,159	732
Average Demand		96	117	65	53	20	3.27	2.86	2	1
Diversified Load Factor		59.09%	41.66%	37.33%	43.27%	45.92%	50.17%	54.74%	48.82%	46.53%
Non-Coincident Demand		163	281	175	122	44	7	5	3	2
Coincidence Factor		65.00%	65.00%	65.00%	65.00%	65.00%	65.00%	65.00%	65.00%	65.00%
Coincident Demand		106	183	114	80	29	4	3	2	1
Individual Customer Load Factor		18.00%	18.00%	18.00%	18.00%	18.00%	18.00%	18.00%	18.00%	18.00%
Sum of Individual Customer Demands		536	651	364	294	113	18	16	9	6
General Power Service < 50kW	**C**	1,983	1,999	1,996	2,017	2,016	2,033	2,056	2,048	2,049
Energy Usage (kWh)		2,624,432	3,284,062	2,430,828	2,255,986	2,365,892	2,557,796	2,852,136	3,333,777	2,927,069
Average Demand		3,527	4,561	3,267	3,133	3,180	3,437.90	4,244.25	4,481	4,065
Diversified Load Factor		40.00%	40.00%	40.00%	40.00%	40.00%	40.00%	40.00%	40.00%	40.00%
Non-Coincident Demand		8,819	11,403	8,168	7,833	7,950	8,595	10,611	11,202	10,163
Coincidence Factor		80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%
Coincident Demand		7,055	9,122	6,534	6,267	6,360	6,876	8,489	8,962	8,131
Individual Customer Load Factor		23.00%	23.00%	23.00%	23.00%	23.00%	23.00%	23.00%	23.00%	23.00%
Sum of Individual Customer Demands		15,337	19,831	14,205	13,623	13,826	14,947	18,453	19,482	17,676

CLARK ENERGY COOPERATIVE
Summary of Billing Determinants and Demand Analysis

Rate Schedule	Code	Oct	Nov	Dec	Total	SIC Max Demand	Class Demand During Peak Month	Sum of Coin Demand	Summer Coin Demand	Winter Coin Demand
Residential	**R**	25,798	25,817	25,811	25,695					
Energy Usage (kWh)		19,716,989	19,751,055	29,732,895	321,373,036					
Average Demand		26,501	27,432	39,964	36,686					
Diversified Load Factor		44.96%	54.18%	49.14%						
Non-Coincident Demand		58,938	50,627	81,334	931,915		143,646			
Coincidence Factor		90.00%	90.00%	90.00%						
Coincident Demand		53,044	45,565	73,201	838,724			838,724	192,338	646,386
Individual Customer Load Factor		18.00%	18.00%	18.00%						
Sum of Individual Customer Demands		147,230	152,400	222,020	2,449,047	332,433				
Resid TOU	**D**	1	1	1	1					
Energy Usage (kWh)		3,800	16,730	42,336	327,183					
Average Demand		5	23	57	37					
Diversified Load Factor		44.96%	54.18%	49.14%						
Non-Coincident Demand		11	43	116	974		281			
Coincidence Factor		65.00%	65.00%	65.00%						
Coincident Demand		7	28	75	633			633	10	623
Individual Customer Load Factor		18.00%	18.00%	18.00%						
Sum of Individual Customer Demands		28	129	316	2,479	651				
General Power Service < 50kW	**C**	2,063	2,069	2,054	2,032					
Energy Usage (kWh)		2,577,372	2,406,811	2,455,340	32,071,501					
Average Demand		3,464	3,343	3,300	3,661					
Diversified Load Factor		40.00%	40.00%	40.00%						
Non-Coincident Demand		8,661	8,357	8,250	110,012		11,403			
Coincidence Factor		80.00%	80.00%	80.00%						
Coincident Demand		6,928	6,686	6,600	88,010			88,010	24,326	63,683
Individual Customer Load Factor		23.00%	23.00%	23.00%						
Sum of Individual Customer Demands		15,062	14,534	14,349	191,325	19,831				

CLARK ENERGY COOPERATIVE
Summary of Billing Determinants and Demand Analysis

Rate Schedule	Code	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Public Facilities	**E**	312	309	309	314	315	321	319	318	315
Energy Usage (kWh)		378,941	461,840	280,562	227,496	212,215	272,077	377,365	397,544	323,625
Average Demand		509	641	377	316	285	366	562	534	449
Diversified Load Factor		40.00%	40.00%	40.00%	40.00%	40.00%	40.00%	40.00%	40.00%	40.00%
Non-Coincident Demand		1,273	1,604	943	790	713	914	1,404	1,336	1,124
Coincidence Factor		75.00%	75.00%	75.00%	75.00%	75.00%	75.00%	75.00%	75.00%	75.00%
Coincident Demand		955	1,203	707	592	535	686	1,053	1,002	843
Individual Customer Load Factor		23.00%	23.00%	23.00%	23.00%	23.00%	23.00%	23.00%	23.00%	23.00%
Sum of Individual Customer Demands		2,214	2,789	1,640	1,374	1,240	1,590	2,442	2,323	1,954
General Power Service 50-500kW	**L**	119	119	120	118	119	120	119	120	121
Energy Usage (kWh)		3,445,347	3,900,940	3,256,831	3,256,035	3,127,430	3,492,557	3,814,760	4,217,179	4,044,368
Average Demand		4,631	5,243	4,377	4,376	4,204	4,694	5,127	5,668	5,436
Diversified Load Factor		51.56%	56.55%	52.43%	50.69%	49.21%	51.48%	52.56%	57.08%	54.66%
Non-Coincident Demand		8,981	9,272	8,349	8,634	8,542	9,118	9,756	9,931	9,946
Coincidence Factor		80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%
Coincident Demand		7,185	7,418	6,679	6,907	6,834	7,295	7,805	7,945	7,957
Individual Customer Load Factor		36.56%	41.55%	37.43%	35.69%	34.21%	36.48%	37.56%	42.08%	39.66%
Sum of Individual Customer Demands		12,665	12,620	11,694	12,263	12,288	12,868	13,653	13,471	13,708
General Power Service 500+kW	**P**	8	8	8	8	8	8	8	8	8
Energy Usage (kWh)		1,270,960	1,515,820	1,078,920	1,881,160	1,733,560	1,631,260	1,946,400	2,151,940	2,194,160
Average Demand		1,708.28	2,037.39	1,450.16	2,528.44	2,330.05	2,192.55	2,616.13	2,892.39	2,949.14
Diversified Load Factor		31.26%	41.54%	30.18%	44.59%	39.48%	37.94%	43.53%	46.41%	46.27%
Non-Coincident Demand		5,465	4,905	4,805	5,670	5,903	5,779	6,010	6,233	6,374
Coincidence Factor		80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%
Coincident Demand		4,372	3,924	3,844	4,536	4,722	4,623	4,808	4,986	5,099
Individual Customer Load Factor		31.26%	41.54%	30.18%	44.59%	39.48%	37.94%	43.53%	46.41%	46.27%
Sum of Individual Customer Demands		5,465	4,905	4,805	5,670	5,903	5,779	6,010	6,233	6,374
Large Industrial Rate	**B-1**	1	1	1	1	1	1	1	1	1
Energy Usage (kWh)		539,608	583,736	688,271	959,957	584,903	973,619	906,443	1,011,925	1,080,415
Average Demand		725.28	784.59	925.10	1,290.26	786.16	1,308.63	1,218.34	1,360.11	1,452.17
Diversified Load Factor		59.08%	63.06%	71.52%	91.54%	61.94%	93.99%	88.95%	97.53%	102.35%
Non-Coincident Demand		1,645	1,632	1,637	1,686	1,675	1,657	1,648	1,648	1,662
Coincidence Factor		80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%	80.00%
Coincident Demand		1,316	1,306	1,309	1,349	1,340	1,325	1,318	1,318	1,330
Individual Customer Load Factor		44.08%	48.06%	56.52%	76.54%	46.94%	78.99%	73.95%	82.53%	87.35%
Sum of Individual Customer Demands		1,645	1,632	1,637	1,686	1,675	1,657	1,648	1,648	1,662
Lighting	**S,T,O**	9,944	9,967	9,926	9,976	10,013	9,995	10,007	10,021	10,015
Kwh's		335,143	334,941	332,625	333,105	333,613	332,990	331,773	331,961	330,368
Average Demand		450	465.20	447	463	448	447.57	493.71	446	459
Diversified Load Factor		50.00%	50.00%	50.00%	50.00%	50.00%	50.00%	50.00%	50.00%	50.00%
Non-Coincident Demand		901	930	894	925	897	895	987	892	918
Coincidence Factor		100.00%	100.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Coincident Demand		901	930	894	-	-	-	-	-	-
Individual Customer Load Factor		50.00%	50.00%	50.00%	50.00%	50.00%	50.00%	50.00%	50.00%	50.00%
Sum of Individual Customer Demands		901	930	894	925	897	895	987	892	918

CLARK ENERGY COOPERATIVE
Summary of Billing Determinants and Demand Analysis

Rate Schedule	Code	Oct	Nov	Dec	Total	SIC Max Demand	Class Demand During Peak Month	Sum of Coin Demand	Summer Coin Demand	Winter Coin Demand
Public Facilities	**E**	312	312	313	314					
Energy Usage (kWh)		221,258	197,058	299,606	3,649,587					
Average Demand		297	274	403	417					
Diversified Load Factor		40.00%	40.00%	40.00%						
Non-Coincident Demand		743	684	1,007	12,535		1,604			
Coincidence Factor		75.00%	75.00%	75.00%						
Coincident Demand		558	513	755	9,401			9,401	2,740	6,661
Individual Customer Load Factor		23.00%	23.00%	23.00%						
Sum of Individual Customer Demands		1,293	1,190	1,751	21,800	2,789				
General Power Service 50-500kW	**L**	120	118	119	119					
Energy Usage (kWh)		3,479,985	3,403,225	3,057,467	42,496,124					
Average Demand		4,677	4,574	4,109	4,851					
Diversified Load Factor		50.08%	49.22%	46.89%						
Non-Coincident Demand		9,340	9,293	8,764	109,925		9,946			
Coincidence Factor		80.00%	80.00%	80.00%						
Coincident Demand		7,472	7,434	7,011	87,940			87,940	23,044	64,896
Individual Customer Load Factor		35.08%	34.22%	31.89%						
Sum of Individual Customer Demands		13,333	13,366	12,885	154,814	13,708				
General Power Service 500+kW	**P**	8	8	8	8					
Energy Usage (kWh)		1,910,220	2,147,040	1,775,840	21,237,280					
Average Demand		2,567.50	2,885.81	2,386.88	2,424					
Diversified Load Factor		40.32%	47.83%	40.22%						
Non-Coincident Demand		6,368	6,033	5,935	69,479		6,374			
Coincidence Factor		80.00%	80.00%	80.00%						
Coincident Demand		5,094	4,827	4,748	55,583			55,583	14,418	41,166
Individual Customer Load Factor		40.32%	47.83%	40.22%						
Sum of Individual Customer Demands		6,368	6,033	5,935	69,479	6,374				
Large Industrial Rate	**B-1**	1	1	1	1					
Energy Usage (kWh)		733,226	1,062,247	475,428	9,599,778					
Average Demand		985.52	1,427.75	639.02	1,096					
Diversified Load Factor		73.96%	99.25%	52.97%						
Non-Coincident Demand		1,672	1,695	1,683	19,939		1,695			
Coincidence Factor		80.00%	80.00%	80.00%						
Coincident Demand		1,337	1,356	1,346	15,951			15,951	3,962	11,989
Individual Customer Load Factor		58.96%	84.25%	37.97%						
Sum of Individual Customer Demands		1,672	1,695	1,683	19,939	1,695				
Lighting	**S,T,O**	9,975	10,036	9,977	9,988					
Kwh's		327,718	328,716	325,704	3,978,657					
Average Demand		440	457	438	454					
Diversified Load Factor		50.00%	50.00%	50.00%						
Non-Coincident Demand		881	913	876	10,910		987			
Coincidence Factor		100.00%	100.00%	100.00%						
Coincident Demand		881	913	876	5,395			5,395	-	5,395
Individual Customer Load Factor		50.00%	50.00%	50.00%						
Sum of Individual Customer Demands		881	913	876	10,910	987				

CLARK ENERGY COOPERATIVE
Summary of Billing Determinants and Demand Analysis

Rate Schedule	Code	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Sales		45,199,343	53,248,923	34,341,343	31,274,952	28,165,415	31,717,487	37,389,646	40,400,799	36,547,172
Metered CP		96,684	153,367	105,056	84,216	71,964	74,949	89,928	95,961	92,257
Purchases		44,030,958	57,697,821	39,302,830	35,792,477	29,894,829	30,965,301	38,553,659	42,836,835	40,358,371
Calculated CP		96,684	153,367	105,056	84,216	71,964	74,949	89,928	95,961	92,257
Difference		(0)	0	0	(0)	(0)	(0)	(0)	(0)	(0)

CLARK ENERGY COOPERATIVE
Summary of Billing Determinants and Demand Analysis

Rate Schedule	Code	Oct	Nov	Dec	Total	SIC Max Demand	Class Demand During Peak Month	Sum of Coin Demand	Summer Coin Demand	Winter Coin Demand
Sales		28,970,568	29,312,882	38,164,616	434,733,146					
Metered CP		75,322	67,321	94,612	1,101,637					
Purchases		31,215,324	30,380,390	33,731,182	454,759,977	96%				
Calculated CP		75,322	67,321	94,612	1,101,637	100%				
Difference		(0)	(0)	(0)	(0)					

Exhibit JW-7
COSS: Purchased Power, Meters, & Services

CLARK ENERGY COOPERATIVE
Purchased Power

#	Item	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
1	***Total***													
2	Billing Demand (kW)	96,684	153,367	105,056	84,216	71,964	74,949	89,928	95,961	92,257	75,322	67,321	94,612	1,101,637
3	Energy (kWh)	44,030,958	57,697,821	39,302,830	35,792,477	29,894,829	30,965,301	38,553,659	42,836,835	40,358,371	31,215,324	30,380,390	33,731,182	454,759,977
4	Demand Charge	631,348	1,002,119	687,631	552,253	470,173	491,376	587,299	627,933	603,984	493,521	442,162	618,894	7,208,693
5	Energy Charge	2,045,776	2,678,277	1,823,770	1,660,247	1,390,030	1,475,329	1,846,442	2,050,895	1,933,528	1,842,411	1,752,484	1,948,590	22,447,779
6	Metering Point	3,926	3,926	4,077	3,926	3,926	3,926	3,926	3,926	3,926	3,926	3,926	3,926	47,263
7	Sub/Wheeling Charge	72,902	72,902	73,617	72,902	72,902	72,902	72,902	72,902	72,902	72,902	72,902	72,902	875,539
8	Fuel Adjustment Clause	278,273	499,662	578,144	385,127	74,737	272,495	304,578	256,591	307,533	207,894	(138,840)	(199,691)	2,826,503
9	Environmental Surcharge	544,175	705,691	485,123	289,304	296,842	412,137	606,800	594,014	511,328	470,932	383,315	467,019	5,766,680
10	**SUBTOTAL**	**3,576,400**	**4,962,577**	**3,652,362**	**2,963,759**	**2,308,610**	**2,728,165**	**3,421,947**	**3,606,261**	**3,433,201**	**3,091,586**	**2,515,949**	**2,911,640**	**39,172,457**
11	Direct Load Total Charge	(615)	(622)	(644)	(659)	(659)	(659)	(683)	-	-	-	(732)	(761)	(6,034)
12	Green Power Charge	48	48	45	45	45	45	45	45	45	45	45	45	546
	Electric Vehicle Credit					(5)	(9)	(18)	(15)	(19)	(21)	(19)	(25)	(131)
13	Panel Production Credit	(50)	(36)	(29)	(57)	(67)	(72)	(87)	(95)	(110)	(110)	(83)	(82)	(878)
	Earnings Mechanism									(51,873)				(51,873)
14	**TOTAL**	**3,575,783**	**4,961,967**	**3,651,734**	**2,963,088**	**2,307,924**	**2,727,470**	**3,421,204**	**3,606,196**	**3,381,244**	**3,091,500**	**2,515,160**	**2,910,817**	**39,114,087**
15														
16	***Rate B***													
17	Billing Demand (kW)	1,000	1,346	1,490	1,635	1,000	1,470	1,000	1,305	1,403	1,327	1,653	1,278	15,907
18	Energy (kWh)	539,608	583,736	688,271	959,957	584,903	973,618	906,443	1,011,925	1,080,415	733,226	1,062,247	475,428	9,599,777
19	Demand Charge	7,490	10,943	12,380	13,827	7,490	12,181	7,490	10,534	11,512	10,753	14,007	10,264	128,871
20	Energy Charge	21,522	23,282	27,451	38,287	23,328	38,832	36,153	40,360	43,091	37,493	54,317	24,311	408,427
21	Metering Point	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Sub/Wheeling Charge	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Fuel Adjustment Clause	3,410	5,055	10,124	10,329	1,462	8,568	7,161	6,061	8,233	4,883	(4,854)	(2,815)	57,617
24	Environmental Surcharge	5,820	6,513	7,653	6,756	4,765	10,605	10,953	11,232	10,996	9,547	11,412	6,069	102,321
25	**SUBTOTAL**	**38,242**	**45,793**	**57,608**	**69,199**	**37,045**	**70,186**	**61,757**	**68,187**	**73,832**	**62,676**	**74,882**	**37,829**	**697,236**
26														
27	***Rate E***													
28	Billing Demand (kW)	95,684	152,021	103,566	82,581	70,964	73,479	88,928	94,656	90,854	73,995	65,668	93,334	1,085,730
29	Energy (kWh)	43,491,350	57,114,085	38,614,559	34,832,520	29,309,926	29,991,683	37,647,216	41,824,910	39,277,956	30,482,098	29,318,143	33,255,754	445,160,200
30	Demand Charge	623,858	991,176	675,251	538,426	462,683	479,195	579,809	617,399	592,472	482,768	428,155	608,630	7,079,822
31	Energy Charge	2,024,254	2,654,995	1,796,319	1,621,960	1,366,702	1,436,497	1,810,289	2,010,535	1,890,437	1,804,918	1,698,167	1,924,279	22,039,352
32	Metering Point	3,926	3,926	4,077	3,926	3,926	3,926	3,926	3,926	3,926	3,926	3,926	3,926	47,263
33	Sub/Wheeling Charge	72,902	72,902	73,617	72,902	72,902	72,902	72,902	72,902	72,902	72,902	72,902	72,902	875,539
34	Fuel Adjustment Clause	274,863	494,607	568,020	374,798	73,275	263,927	297,417	250,530	299,300	203,011	(133,986)	(196,876)	2,768,886
35	Environmental Surcharge	538,355	699,178	477,470	282,548	292,077	401,532	595,847	582,782	500,332	461,385	371,903	460,950	5,664,359
36	**SUBTOTAL**	**3,538,158**	**4,916,784**	**3,594,754**	**2,894,560**	**2,271,565**	**2,657,979**	**3,360,190**	**3,538,074**	**3,359,369**	**3,028,910**	**2,441,067**	**2,873,811**	**38,475,221**
37	Direct Load Total Charge	(615)	(622)	(644)	(659)	(659)	(659)	(683)	-	-	-	(732)	(761)	(6,034)
38	Green Power Charge	48	48	45	45	45	45	45	45	45	45	45	45	546
39	Panel Production Credit	(50)	(36)	(29)	(57)	(67)	(72)	(87)	(95)	(110)	(110)	(83)	(82)	(878)
40	**TOTAL**	**3,537,541**	**4,916,174**	**3,594,126**	**2,893,889**	**2,270,884**	**2,657,293**	**3,359,465**	**3,538,024**	**3,359,304**	**3,028,845**	**2,440,297**	**2,873,013**	**38,468,855**
41														
42														
43	SubTotal Demand $	$ 1,034,681	$ 1,502,362	$ 1,056,399	$ 802,663	$ 725,106	$ 815,486	$ 1,028,207	$ 1,061,169	$ 987,609	$ 852,908	$ 748,979	$ 975,933	11,591,503
44	SubTotal Energy $	$ 2,541,719	$ 3,460,215	$ 2,595,963	$ 2,161,096	$ 1,583,504	$ 1,912,679	$ 2,393,740	$ 2,545,092	$ 2,445,592	$ 2,238,678	$ 1,766,970	$ 1,935,707	27,580,954
45	SubTotal $	$ 3,576,400	$ 4,962,577	$ 3,652,362	$ 2,963,759	$ 2,308,610	$ 2,728,165	$ 3,421,947	$ 3,606,261	$ 3,433,201	$ 3,091,586	$ 2,515,949	$ 2,911,640	39,172,457
46	Variance $	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	-
47	SubTotal Demand %	0.29	0.30	0.29	0.27	0.31	0.30	0.30	0.29	0.29	0.28	0.30	0.34	**0.30**
48	SubTotal Energy %	0.71	0.70	0.71	0.73	0.69	0.70	0.70	0.71	0.71	0.72	0.70	0.66	**0.70**
49														
50	Rate B Demand $	$ 10,982	$ 14,851	$ 16,972	$ 17,881	$ 10,349	$ 18,544	$ 14,062	$ 17,273	$ 18,110	$ 16,481	$ 20,854	$ 13,905	$ 190,264
51	Rate B Energy $	$ 27,260	$ 30,942	$ 40,636	$ 51,318	$ 26,696	$ 51,642	$ 47,695	$ 50,914	$ 55,722	$ 46,195	$ 54,028	$ 23,924	$ 506,972
52	Rate B Subtotal $	$ 38,242	$ 45,793	$ 57,608	$ 69,199	$ 37,045	$ 70,186	$ 61,757	$ 68,187	$ 73,832	$ 62,676	$ 74,882	$ 37,829	$ 697,236
53	Variance $	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
54														
55	Estimated ES Demand Share	60%	60%	60%	60%	60%	60%	60%	60%	60%	60%	60%	60%	**60%**
56	Estimated ES Energy Share	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	**40%**
57														
58	Reconciliation												Total	39,114,087
59													Acct 555	39,114,087
60													Variance	-

CLARK ENERGY COOPERATIVE
Meter Costs

#	Rate	Rate Code	Installed Meters	Avg Meter Cost	Total Cost	Allocation Factor
1	Residential	R	25,695	$ 63	$ 1,618,785	88.92%
2	Resid TOU	D	1	$ 63	$ 63	0.00%
3	General Power Service < 50kW	C	2,032	$ 79	$ 159,512	8.76%
4	Public Facilities	E	314	$ 63	$ 19,782	1.09%
5	General Power Service 50-500kW	L	119	$ 173	$ 20,587	1.13%
6	General Power Service 500+kW	P	8	$ 206	$ 1,648	0.09%
7	Large Industrial Rate	B-1	1	$ 206	$ 206	0.01%
8	Lighting	S,T,O	9,988	$ -	$ -	0.00%
9	Total		38,158	$ 47.71	$ 1,820,583	100.00%

CLARK ENERGY COOPERATIVE
Service Costs

#	Rate	Rate Code	Average Number of Services		Average Service Cost		Total Cost	Allocation Factor
1	Residential	R	25,695	$	3,600	$	92,513,730	85.30%
2	Resid TOU	D	1	$	3,600	$	3,600	0.00%
3	General Power Service < 50kW	C	2,032	$	6,590	$	13,391,266	12.35%
4	Public Facilities	E	314	$	4,391	$	1,378,749	1.27%
5	General Power Service 50-500kW	L	119	$	9,265	$	1,102,486	1.02%
6	General Power Service 500+kW	P	8	$	7,074	$	56,594	0.05%
7	Large Industrial Rate	B-1	1	$	9,265	$	9,265	0.01%
8	Lighting	S,T,O	9,988	$	-	$	-	0.00%
9	Total		38,158	$	2,842.28	$	108,455,689	100.00%

Exhibit JW-8
COSS: Zero Intercept Analysis

CLARK ENERGY COOPERATIVE
Zero Intercept & Minimum System Analyses

Account 365 - Overhead Conductors and Devices

Description	Size	Cost	Quantity	Actual Unit Cost ($ per Unit)	Linear Regression Inputs y*n^0.5	n^0.5	xn^0.5
WIRE 2 TPX	66.37	$ 1,055,892.30	502,753	2.10	1,489.16	709.05	47,059.70
WIRE 2 HDBC	66.37	$ 6,151.98	43,539	0.14	29.48	208.66	13,848.76
WIRE 397.5 ALUM	397.50	$ 470,092.34	447,599	1.05	702.65	669.03	265,938.79
WIRE-2 WP	66.37	$ 170.15	1,700	0.10	4.13	41.23	2,736.51
WIRE 1/0 QUADRUPLEX	105.53	$ 24,337.04	10,633	2.29	236.02	103.12	10,881.88
WIRE 1/0 BARE COPPER	105.53	$ 44,278.74	295,068	0.15	81.51	543.20	57,324.07
WIRE 6 DPX	26.25	$ 230,547.49	297,457	0.78	422.72	545.40	14,317.20
WIRE 4/0 QUADRUPLEX	211.60	$ 24,097.66	5,343	4.51	329.67	73.10	15,467.08
WIRE 6 HDBC WIRE	26.25	$ 8,129.55	62,673	0.13	32.47	250.35	6,571.83
WIRE 1/0 ACSR	105.53	$ 1,559,079.12	2,793,506	0.56	932.81	1,671.38	176,380.57
WIRE 8 ACWC	16.51	$ 156,317.58	2,084,009	0.08	108.28	1,443.61	23,832.55
WIRE 6 ACWC	26.25	$ 322,159.37	3,391,367	0.09	174.94	1,841.57	48,342.96
WIRE-2 ACSR	66.37	$ 9,024,372.52	7,918,307	1.14	3,207.01	2,813.95	186,761.77
WIRE 1/0 TPX	105.53	$ 1,060,352.28	741,194	1.43	1,231.64	860.93	90,853.55
WIRE 2 ACWC	66.37	$ 17,221.70	139,774	0.12	46.06	373.86	24,813.33
WIRE 2/0 COPPER WP	133.07	$ 174.51	390	0.45	8.84	19.75	2,627.96
WIRE 4 COPPER WP	41.74	$ 457.15	6,565	0.07	5.64	81.02	3,381.97
WIRE 4/0 ACSR	211.60	$ 1,263,553.35	1,223,701	1.03	1,142.24	1,106.21	234,074.08
WIRE 2 COPPER WP	66.37	$ 169.33	1,128	0.15	5.04	33.59	2,229.08
WIRE 300 MCM COPPER	300.00	$ 806.85	600	1.34	32.94	24.49	7,348.47
WIRE 4 ACSR	41.74	$ 1,435,021.18	7,410,367	0.19	527.16	2,722.20	113,624.58
WIRE 4 TPX	41.74	$ 128,155.68	97,405	1.32	410.63	312.10	13,026.96
WIRE 500 MCM COPPER	500.00	$ 6,335.35	666	9.51	245.49	25.81	12,903.49
WIRE 4/0 TPX	211.60	$ 26,206.91	6,246	4.20	331.60	79.03	16,723.09
750 MCM	750.00	$ 6,620.75	1,868	3.54	153.19	43.22	32,415.27
WIRE 336 SPACER CABLE	336.00	$ 79,338.88	6,426	12.35	989.73	80.16	26,934.54
WIRE 336.4 ACSR	336.40	$ 1,865,179.11	1,456,163	1.28	1,545.67	1,206.72	405,939.19
WIRE 052 MESSENGER	52.00	$ 18,201.12	6,473	2.81	226.23	80.45	4,183.66
WIRE 250 MCM	250.00	$ 1,683.30	711	2.37	63.13	26.66	6,666.15
WIRE 350 MCM	350.00	$ 21,524.17	2,295	9.38	449.30	47.91	16,767.16
TOTAL		$ 18,856,627.46	28,955,926				

Zero Intercept Linear Regression Results

		LINEST Array	
Size Coefficient ($ per MCM)	0.00322	0.00322	0.38912
Zero Intercept ($ per Unit)	0.38912	0.00112	0.13055
R-Square	0.6713	0.67128	500.66255

Plant Classification

Total Number of Units		28,955,926
Zero Intercept ($/Unit)	$	0.39
Minimum System ($/Unit)	$	0.07
Use Min System (M) or Zero Intercept (Z)?		Z
Zero Intercept or Min System Cost ($)	$	11,267,405
Total Cost of Sample	$	18,856,627
Percentage of Total		0.5975
Percentage Classified as Customer-Related		59.75%
Percentage Classified as Demand-Related		40.25%

CLARK ENERGY COOPERATIVE
Zero Intercept & Minimum System Analyses

Account 367 - Underground Conductors and Devices

Description	Size		Cost	Quantity	Actual Unit Cost ($ per Unit)	Linear Regression Inputs y*n^0.5	n^0.5	xn^0.5
WIRE 1/0 STRANDED	105.53	$	4,505,851.07	836,407	5.39	4,926.83	914.55	96,512.77
2 TPX UG	66.37	$	40,639.43	4,732	8.59	590.78	68.79	4,565.56
WIRE 350 MCM TPX UG	350.00	$	82,287.91	12,635	6.51	732.06	112.41	39,341.93
WIRE 250 MCM TPX UG	250.00	$	9,121.22	5,084	1.79	127.92	71.30	17,825.54
WIRE 2 SOLID UG	66.37	$	9,054.11	17,170	0.53	69.10	131.03	8,696.75
WIRE 2/0 TPX UG	133.07	$	1,446.13	1,668	0.87	35.41	40.84	5,434.81
WIRE 1/0 SOLID UG	105.53	$	101,079.18	109,008	0.93	306.15	330.16	34,842.16
WIRE 4/0 TPX UG	211.60		86,401.99	16,739	5.16	667.82	129.38	27,376.66
TOTAL		$	4,835,881.04	1,003,443				

Zero Intercept Linear Regression Results

		LINEST Array	
Size Coefficient ($ per MCM)	0.00530	0.00530	4.23509
Zero Intercept ($ per Unit)	4.23509	0.01935	2.22544
R-Square	0.9073	0.90726	630.53627

Plant Classification

Total Number of Units		1,003,443
Zero Intercept ($/Unit)	$	4.24
Minimum System ($/Unit)	$	0.53
Use Min System (M) or Zero Intercept (Z)?		Z
Zero Intercept or Min System Cost ($)	$	4,249,673
Total Cost of Sample	$	4,835,881
Percentage of Total		0.8788
Percentage Classified as Customer-Related		87.88%
Percentage Classified as Demand-Related		12.12%

CLARK ENERGY COOPERATIVE
Zero Intercept & Minimum System Analyses

Account 368 - Line Transformers

Description	Size	Cost	Quantity	Actual Unit Cost ($ per Unit)	Linear Regression Inputs			NARUC CAM	
					y*n^0.5	n^0.5	xn^0.5	Incl?	Qty
TRANS 100 CONV 7.2	100.00	$ 123,192.17	80	1,539.90	13,773.30	8.94	894.43	0	-
TRANS 15 CONV 14.4	15.00	$ 2,835,199.75	2,695	1,052.02	54,614.04	51.91	778.70	1	2,695
TRANS 1000 PAD 7.2	1,000.00	$ 126,895.78	9	14,099.53	42,298.59	3.00	3,000.00	0	-
TRANS 75 CONV 7.2	75.00	$ 15,787.17	7	2,255.31	5,966.99	2.65	198.43	0	-
TRANS 15 PAD 7.2	15.00	$ 142,919.72	92	1,553.48	14,900.41	9.59	143.87	1	92
TRANS 50 CONV 14.4	50.00	$ 194,529.68	143	1,360.35	16,267.39	11.96	597.91	1	143
TRANS 167 CONV 7.2	167.00	$ 101,964.74	44	2,317.38	15,371.76	6.63	1,107.75	0	-
TRANS 50 PAD 7.2	50.00	$ 152,759.97	85	1,797.18	16,569.15	9.22	460.98	1	85
TRANS 25 PAD 7.2	25.00	$ 699,243.70	423	1,653.06	33,998.39	20.57	514.17	1	423
TRANS 15 CONV 7.2	15.00	$ 3,347,499.34	3,568	938.20	56,041.28	59.73	895.99	1	3,568
TRANS 10 CONV 7.2	10.15	$ 764,225.94	1,145	667.45	22,584.94	33.84	343.45	1	1,145
TRANS 15 CSP 7.2	15.00	$ 844,170.04	2,066	408.60	18,572.26	45.45	681.80	1	2,066
TRANS 10 CSP 7.2	10.00	$ 194,624.70	698	278.83	7,366.65	26.42	264.20	1	698
TRANS 25 SP 14.4	25.00	$ 6,129.12	14	437.79	1,638.08	3.74	93.54	1	14
TRANS 10 CSP 14.4	10.00	$ 553,745.11	1,157	478.60	16,279.58	34.01	340.15	1	1,157
TRANS 10 PAD 7.2	10.00	$ 2,519.95	3	839.98	1,454.89	1.73	17.32	1	3
TRANS 50 CONV 7.2	50.00	$ 456,557.80	388	1,176.70	23,178.21	19.70	984.89	1	388
TRANS 10 SP 14.4	10.00	$ 3,428.15	11	311.65	1,033.63	3.32	33.17	1	11
TRANS 1500 PAD 7.2	1,500.00	$ 58,257.07	3	19,419.02	33,634.74	1.73	2,598.08	0	-
TRANS 1500 PAD 14.4	1,500.00	$ 61,619.00	2	30,809.50	43,571.21	1.41	2,121.32	0	-
TRANS 25 CSP 14.4	25.00	$ 126,222.26	187	674.99	9,230.29	13.67	341.87	1	187
TRANS 15 CSP 14.4	15.00	$ 920,969.19	1,564	588.85	23,287.71	39.55	593.21	1	1,564
TRANS 25 CSP 7.2	25.00	$ 210,004.55	373	563.01	10,873.62	19.31	482.83	1	373
TRANS 10 CONV 14.4	10.00	$ 436,085.30	406	1,074.10	21,642.55	20.15	201.49	1	406
TRANS 25 CONV 7.2	25.00	$ 1,370,283.83	1,343	1,020.32	37,391.47	36.65	916.17	1	1,343
TRANS 37.5 CONV 7.2	37.50	$ 4,164.43	8	520.55	1,472.35	2.83	106.07	1	8
TRANS 37.5 PAD 14.4	37.50	$ 5,625.00	3	1,875.00	3,247.60	1.73	64.95	1	3
TRANS 250 CONV 7.2	250.00	$ 72,049.49	24	3,002.06	14,707.04	4.90	1,224.74	0	-
TRANS 5 CONV 14.4	5.00	$ 12,467.01	29	429.90	2,315.07	5.39	26.93	1	29
TRANS 5 CSP 14.4	5.00	$ 8,120.66	17	477.69	1,969.55	4.12	20.62	1	17
TRANS 100 PAD 7.2	100.00	$ 41,620.12	12	3,468.34	12,014.69	3.46	346.41	0	-
TRANS 75 PAD 7.2	75.00	$ 72,702.67	20	3,635.13	16,256.81	4.47	335.41	0	-
TRANS 25 CONV 14.4	25.00	$ 1,024,109.13	879	1,165.08	34,542.34	29.65	741.20	1	879
TRANS 333 CONV 7.2	333.00	$ 39,903.20	6	6,650.53	16,290.41	2.45	815.68	0	-
TRANS 100 CONV 14.4	100.00	$ 84,318.08	35	2,409.09	14,252.36	5.92	591.61	0	-
TRANS 167 CONV 14.4	167.00	$ 2,004.40	1	2,004.40	2,004.40	1.00	167.00	0	-
TRANS 250 CONV 14.4	250.00	$ 58,556.30	13	4,504.33	16,240.60	3.61	901.39	0	-
TRANS 25 PAD 14.4	25.00	$ 739,080.25	429	1,722.80	35,683.13	20.71	517.81	1	429
TRANS 50 PAD 14.4	50.00	$ 400,252.73	210	1,905.97	27,620.06	14.49	724.57	1	210
TRANS 25 PAD DUAL	25.00	$ 609,118.07	343	1,775.85	32,889.28	18.52	463.01	1	343
TRANS 50 PAD DUAL	50.00	$ 228,126.27	115	1,983.71	21,272.88	10.72	536.19	1	115
TRANS 500 PAD	500.00	$ 110,138.78	12	9,178.23	31,794.33	3.46	1,732.05	0	-
TRANS 15 PAD 14.4	15.00	$ 94,727.02	56	1,691.55	12,658.43	7.48	112.25	1	56
TRANS 10 CONV DUAL	10.00	$ 474,433.65	803	590.83	16,742.40	28.34	283.37	1	803
TRANS 15 CONV DUAL	15.00	$ 1,205,151.48	1,619	744.38	29,951.47	40.24	603.55	1	1,619
TRANS 300 PAD	300.00	$ 57,400.10	8	7,175.01	20,294.00	2.83	848.53	0	-
TRANS 25 CONV DUAL	25.00	$ 218,439.33	255	856.62	13,679.20	15.97	399.22	1	255
TRANS 225 PAD 14.4	225.00	$ 5,143.00	1	5,143.00	5,143.00	1.00	225.00	0	-
TRANS 45 PAD 7.2 3PH	45.00	$ 4,513.00	1	4,513.00	4,513.00	1.00	45.00	1	1
TRANS 50 CONV DUAL	50.00	$ 21,977.20	19	1,156.69	5,041.92	4.36	217.94	1	19

CLARK ENERGY COOPERATIVE
Zero Intercept & Minimum System Analyses

TRANS 100 CONV DUAL	100.00	$ 13,246.00	6	2,207.67	5,407.66	2.45	244.95	0	-
TRANS 250 PAD 14.4	250.00	$ 3,564.00	1	3,564.00	3,564.00	1.00	250.00	0	-
TRANS 150 PAD DUAL	150.00	$ 24,378.00	4	6,094.50	12,189.00	2.00	300.00	0	-
TRANS 2500 PAD 3-PH	2,500.00	$ 146,117.18	11	13,283.38	44,055.99	3.32	8,291.56	0	-
TRANS 750 PAD	750.00	$ 56,356.00	5	11,271.20	25,203.17	2.24	1,677.05	0	-
TRANS 1000 PAD DUAL	1,000.00	$ 8,347.00	1	8,347.00	8,347.00	1.00	1,000.00	0	-
TRANS 75 PADMOUNT DUAL	75.00	$ 21,810.00	5	4,362.00	9,753.73	2.24	167.71	0	-
TRANS 300 PAD DUAL	300.00	$ 6,374.00	1	6,374.00	6,374.00	1.00	300.00	0	-
TRANS 1.5 CONV 7.2	1.50	$ 207,827.71	179	1,161.05	15,533.77	13.38	20.07	1	179
TRANS 1.5 CONV 14.4	1.50	$ 45,972.40	57	806.53	6,089.19	7.55	11.32	1	57
TRANS 75 PAD 14.4	75.00	$ 54,070.54	12	4,505.88	15,608.82	3.46	259.81	0	-
TRANS 750 PAD DUAL	750.00	$ 27,648.90	3	9,216.30	15,963.10	1.73	1,299.04	0	-
TRANS 100 PAD DUAL	100.00	$ 14,599.80	3	4,866.60	8,429.20	1.73	173.21	0	-
TRANS 167 PADMOUNT 7200	167.00	$ 5,189.00	1	5,189.00	5,189.00	1.00	167.00	0	-
TRANS 1000 PAD 14.4	1,000.00	$ 33,663.00	2	16,831.50	23,803.34	1.41	1,414.21	0	-
TRANS 500 CON 7.2	500.00	$ 94,644.79	17	5,567.34	22,954.73	4.12	2,061.55	0	-
TRANS 100 PAD 14.4	100.00	$ 2,560.00	1	2,560.00	2,560.00	1.00	100.00	0	-
TRANS 2500 PAD 7.2	2,500.00	$ 62,861.00	1	62,861.00	62,861.00	1.00	2,500.00	0	-
TRANS 167 PAD 14.4	167.00	$ 7,895.00	1	7,895.00	7,895.00	1.00	167.00	0	-
TRANS 167 PAD DUAL	167.00	$ 8,187.00	1	8,187.00	8,187.00	1.00	167.00	0	-
TOTAL		$ 20,188,286.72	21,736						21,383

Zero Intercept Linear Regression Results

Size Coefficient ($ per MCM)	9.48304	718.27443
Zero Intercept ($ per Unit)	718.27443	0.98685
R-Square	0.8100	0.81001	10,007.46747

LINEST Array

Plant Classification

Total Number of Units	*		21,383
Zero Intercept ($/Unit)		$	718.27
Minimum System ($/Unit)		$	278.83
Use Min System (M) or Zero Intercept (Z)?			Z
Zero Intercept or Min System Cost ($)		$	15,358,862
Total Cost of Sample		$	20,188,287
Percentage of Total			0.7608
Percentage Classified as Customer-Related			76.08%
Percentage Classified as Demand-Related			23.92%

* Only single-phase up to 50 KVA should be included in the Customer-related component per NARUC CAM

Descripton	Acct	Demand	Customer	Method
Overhead Conductors and Devices	365	0.4025	0.5975	Z
Underground Conductors and Devices	367	0.1212	0.8788	Z
Line Transformers	368	0.2392	0.7608	Z

Exhibit JW-9
Present & Proposed Rates

Clark Energy Cooperative
Present and Proposed Rates

#	Classification	Code	Billing Unit	Present Rate	Proposed Rate	Incr (Decr) Over Pres	Present Revenue	Proposed Revenue	Increase $	Increase %	Increase Avg Bill
	(1)	(2)	(3)	(5)	(6)	(7)	(9)	(10)	(11)	(12)	(13)
	Rate Class			**Rates**			**Revenues**				
1	Residential	R	Facility Charge (per month)	18.62	33.00	14.38	$ 42,136,796	$ 44,957,346	$ 2,820,550	6.69%	$ 9.15
			Energy Charge (per kWh)	0.10123	0.09621	(0.00502)					
2	Time Of Use Marketing Service	D	Facility Charge (per month)	-	-	-	$ 27,157	$ 27,157	$ -	0.00%	$ -
			Energy Charge On Pk (per kWh)	-	-	-					
			Energy Charge Off Pk (per kWh)	0.07656	0.07656	-					
3	General Power Service < 50kW	C	Facility Charge 1Ph (per month)	26.20	40.58	14.38	$ 4,959,836	$ 4,959,836	$ -	0.00%	$ -
			Facility Charge 3Ph (per month)	51.85	51.85	-					
			Energy Charge (per kWh)	0.10976	0.10009	(0.00967)					
4	Public Facilities	E	Facility Charge (per month)	18.62	33.00	14.38	$ 557,039	$ 557,039	$ -	0.00%	$ -
			Energy Charge (per kWh)	0.11030	0.09545	(0.01485)					
5	General Power Service 50-500kW	L	Facility Charge (per month)	65.99	65.99	-	$ 5,533,674	$ 5,533,674	$ -	0.00%	$ -
			Energy Charge (per kWh)	0.08129	0.07743	(0.00386)					
			Demand Charge (per kW)	6.69	7.75	1.06					
7	General Power Service 500+kW	P	Facility Charge (per month)	89.85	89.85	-	$ 2,395,043	$ 2,395,043	$ -	0.00%	$ -
			Energy Charge (per kWh)	0.07078	0.06643	(0.00435)					
			Demand Charge (per kW)	6.42	7.75	1.33					
8	Large Industrial Rate	B-1	Facility Charge (per month)	868.72	868.72	-	$ 944,130	$ 944,130	$ -	0.00%	$ -
			Demand Charge (per kW) Contract	7.41	9.25	1.84					
			Demand Charge (per kW) Excess	10.32	10.75	0.43					
			Energy Charge (per kWh)	0.062436	0.059780	(0.00)					
8	Lighting	S,T,O	Various Charges per Light & Pole		-		$ 1,391,569	$ 1,391,569	$ -	0.00%	$ -
9	TOTAL						$ 57,945,245	$ 60,765,795	$ 2,820,550	4.87%	
								Target Increase>	$ 2,821,079		
								Variance>	$ (529)		
									-0.019%		

Clark Energy Cooperative
Residential
R

	Test Year Rate			Present Rate		Proposed Rates				
	Billing Units	Rate	Calculated Billings	Rate	Calculated Billings	Billing Units	Rate	Calculated Billings	Increase	%
Facility Charge						**Customer Charge**				
	Customers	*per Customer*		*per Customer*		*Customers*	*per Customer*			
All Members	308,334	$ 18.62	$ 5,741,179	$ 18.62	$ 5,741,179	Annual	308,334	$ 33.00	$ 10,175,022	$ 4,433,843	77.2%
Energy Charge						**Energy Charge**				
	kWh	*Per kWh*		*Per kWh*		*kWh*	*Per kWh*			
All Hours	321,373,036	$0.09240	$ 29,693,262	$0.10123	$ 32,532,592	All Hours	321,373,036	$0.09621	$ 30,919,300	$ (1,613,293)	-5.0%
Other						**Other**				
FAC			$ 2,281,315		$ (558,015)	FAC			$ (558,015)	$ -	0.0%
ES			$ 4,406,840		$ 4,406,840	ES			$ 4,406,840	$ -	0.0%
Prepay Chg	2,840	$ 5.00	$ 14,200		$ 14,200	Prepay Chg			$ 14,200	$ -	0.0%
Total Rate Revenue			$ 42,136,796		$ 42,136,796	**Total Rate Revenue**			$ 44,957,346	$ 2,820,550	6.7%
Revenue Per Books			$ 42,005,562			**Difference from Present Rates**			$ 2,820,550		
Difference			$ 131,234		$ -	**Percent Change from Present Rates**			6.69%		
Percent Difference			0.31%		0.00%	**Avg Incr/(Decr) Per Customer Per Month**			$ 9.15		

Clark Energy Cooperative
Time Of Use Marketing Service
D

	Test Year Rate			Present Rate			Proposed Rates				
	Billing Units	Rate	Calculated Billings	Rate	Calculated Billings		Billing Units	Rate	Calculated Billings	Increase	%
Customer Charge						**Customer Charge**					
	Customers	*per Customer*		*per Customer*			*Customers*	*per Customer*			
Test Year	12	$ -	$ -	$ -	$ -	Annual	12	$ -	$ -	$ -	0.0%
Energy Charge						**Energy Charge**					
	kWh	*Per kWh*		*Per kWh*			*kWh*	*Per kWh*			
On Peak		$0.00000	$ -	$0.00000	$ -	All Hours	-	$0.00000	$ -	$ -	0.0%
Off Peak	327,183	$0.06773	$ 22,158	$0.07656	$ 25,049	All Hours	327,183	$0.07656	$ 25,049	$ -	0.0%
Other						**Other**					
FAC			$ 2,108		$ 2,108	FAC			$ 2,108	$ -	0.0%
ES			$ -		$ -	ES			$ -	$ -	0.0%
Total Rate Revenue			$ 24,266		$ 27,157	**Total Rate Revenue**			$ 27,157	$ -	0.0%
Revenue Per Books			$ 24,044			**Difference from Present Rates**			$ -		
Difference			$ 222		$ 2,891	**Percent Change from Present Rates**			0%		
Percent Difference			0.93%		12.02%	**Avg Incr/(Decr) Per Customer Per Month**			$ -		

Clark Energy Cooperative
General Power Service < 50kW
C

	Test Year Rate			Present Rate			Proposed Rates				
	Billing Units	Rate	Calculated Billings	Rate	Calculated Billings		Billing Units	Rate	Calculated Billings	Increase	%
Customer Charge						**Customer Charge**					
	Customers	*per Customer*		*per Customer*			*Customers*	*per Customer*			
Single Phase	21,562	$ 26.20	$ 564,924	$ 26.20	$ 564,924	Single Phase	21,562	$ 40.58	$ 874,986	$ 310,062	54.9%
Three Phase	2,821	$ 51.85	$ 146,269	$ 51.85	$ 146,269	Three Phase	2,821	$ 51.85	$ 146,269	$ -	0.0%
Energy Charge						**Energy Charge**					
	kWh	*Per kWh*		*Per kWh*			*kWh*	*Per kWh*			
All Hours	32,071,501	$0.10093	$ 3,236,816	$0.10976	$ 3,520,168	All Hours	32,071,501	$0.10009	$ 3,210,106	$ (310,062)	-8.8%
Other						**Other**					
FAC			$ 238,824		$ 238,824	FAC			$ 238,824	$ -	0.0%
ES			$ 489,651		$ 489,651	ES			$ 489,651	$ -	0.0%
Total Rate Revenue			$ 4,676,484		$ 4,959,836	**Total Rate Revenue**			$ 4,959,836	$ -	0.0%
Revenue Per Books			$ 4,669,690			**Difference from Present Rates**			$ -		
Difference			$ 6,795		$ 283,352	**Percent Change from Present Rates**			0%		
Percent Difference			0.15%		6.07%	**Avg Incr/(Decr) Per Customer Per Month**			$ -		

Clark Energy Cooperative
General Power Service 50-500kW
E

	Test Year Rate			Present Rate			Proposed Rates				
	Billing Units	Rate	Calculated Billings	Rate	Calculated Billings		Billing Units	Rate	Calculated Billings	Increase	%
Customer Charge						**Customer Charge**					
	Customers	*per Customer*		*per Customer*			*Customers*	*per Customer*			
Test Year	3,769	$ 18.62	$ 70,179	$ 18.62	$ 70,179	Annual	3,769	$ 33.00	$ 124,377	$ 54,198	77.2%
Energy Charge						**Energy Charge**					
	kWh	*Per kWh*		*Per kWh*			*kWh*	*Per kWh*			
All Hours	3,649,587	$0.10147	$ 370,305	$0.11030	$ 402,549	All Hours	3,649,587	$0.09545	$ 348,351	$ (54,198)	-13.5%
Other						**Other**					
FAC			$ 26,296		$ 26,296	FAC			$ 26,296	$ -	0.0%
ES			$ 58,015		$ 58,015	ES			$ 58,015	$ -	0.0%
Total Rate Revenue			$ 524,795		$ 557,039	**Total Rate Revenue**			$ 557,039	$ -	0.0%
Revenue Per Books			$ 522,504			**Difference from Present Rates**			$ -		
Difference			$ 2,291		$ 32,244	**Percent Change from Present Rates**			0%		
Percent Difference			0.44%		6.17%	**Avg Incr/(Decr) Per Customer Per Month**			$ -		

Clark Energy Cooperative
General Power Service 1000-5000kW
L

	Test Year Rate			Present Rate		Proposed Rates				
	Billing Units	Rate	Calculated Billings	Rate	Calculated Billings	Billing Units	Rate	Calculated Billings	Increase	%
Customer Charge						**Customer Charge**				
	Customers	*per Customer*		*per Customer*		*Customers*	*per Customer*			
Test Year	1,432	$ 65.99	$ 94,498	$ 65.99	$ 94,498	Annual	1,432	$ 65.99	$ 94,498	$ - 0.0%
Energy Charge						**Energy Charge**				
	kWh	*Per kWh*		*Per kWh*		*kWh*	*Per kWh*			
All Hours	42,496,124	$0.07246	$ 3,079,057	$0.08129	$ 3,454,510	All Hours	42,496,124	$0.07743	$ 3,290,407	$ (164,103) -4.8%
Demand Charge						**Demand Charge**				
	kW	*Per kW*		*Per kW*		*kW*	*Per kW*			
NCP	154,814	$6.69	$ 1,035,704	$6.69	$ 1,035,704	NCP	154,814	$7.75	$ 1,199,807	$ 164,103 15.8%
Other						**Other**				
FAC			$ 321,705		$ 321,705	FAC			$ 321,705	$ - 0.0%
ES			$ 530,751		$ 530,751	ES			$ 530,751	$ - 0.0%
DEMAND UPCHARGE			$ 55,410		$ 55,410	DEMAND UPCHARGE			$ 55,410	$ - 0.0%
RATE MINIMUM UPCHARGE			$ 41,096		$ 41,096	RATE MINIMUM UPCHARGE			$ 41,096	$ - 0.0%
Total Rate Revenue			$ 5,158,221		$ 5,533,674	**Total Rate Revenue**			$ 5,533,674	$ - 0.0%
Revenue Per Books			$ 5,150,171			**Difference from Present Rates**			$ -	
Difference			$ 8,050		$ 375,453	**Percent Change from Present Rates**			0%	
Percent Difference			0.16%		7.29%	**Avg Incr/(Decr) Per Customer Per Month**			$ -	

Clark Energy Cooperative
General Power Service 500+kW
P

	Test Year Rate			Present Rate		Proposed Rates				
	Billing Units	Rate	Calculated Billings	Rate	Calculated Billings	Billing Units	Rate	Calculated Billings	Increase	%
Customer Charge						**Customer Charge**				
	Customers	*per Customer*		*per Customer*			*Customers*	*per Customer*		
Test Year	96	$ 89.85	$ 8,626	$ 89.85	$ 8,626	Annual	96	$ 89.85	$ 8,626	$ - 0.0%
Energy Charge						**Energy Charge**				
	kWh	*Per kWh*		*Per kWh*			*kWh*	*Per kWh*		
All Hours	21,237,280	$0.06195	$ 1,315,543	$0.07078	$ 1,503,175	All Hours	21,237,280	$0.06643	$ 1,410,767	$ (92,408) -6.1%
Demand Charge						**Demand Charge**				
	kW	*Per kW*		*Per kW*			*kW*	*Per kW*		
NCP	69,480	$6.42	$ 446,059	$6.42	$ 446,059	NCP	69,480	$7.75	$ 538,466	$ 92,408 20.7%
Other						**Other**				
FAC			$ 162,912		$ 162,912	FAC			$ 162,912	$ - 0.0%
ES			$ 227,431		$ 227,431	ES			$ 227,431	$ - 0.0%
DEMAND UPCHARGE			$ 26,657		$ 26,657	DEMAND UPCHARGE			$ 26,657	$ - 0.0%
RATE MINIMUM UPCHARGE			$ 20,184		$ 20,184				$ 20,184	$ - 0.0%
Total Rate Revenue			$ 2,207,412		$ 2,395,043	**Total Rate Revenue**			$ 2,395,043	$ - 0.0%
Revenue Per Books			$ 2,213,582			**Difference from Present Rates**			$ -	
Difference			$ (6,170)		$ 187,631	**Percent Change from Present Rates**			0%	
Percent Difference			-0.28%		8.48%	**Avg Incr/(Decr) Per Customer Per Month**			$ -	

Clark Energy Cooperative
Large Industrial Rate
B-1

	Test Year Rate			Present Rate		Proposed Rates				
	Billing Units	Rate	Calculated Billings	Rate	Calculated Billings	Billing Units	Rate	Calculated Billings	Increase	%
Customer Charge						**Customer Charge**				
	Customers	*per Customer*		*per Customer*		*Customers*	*per Customer*			
Test Year	12	$ 868.72	$ 10,425	$ 868.72	$ 10,425	Annual	12	$ 868.72	$ 10,425	$ - 0.0%
Energy Charge						**Energy Charge**				
	kWh	*Per kWh*		*Per kWh*		*kWh*	*Per kWh*			
All Hours	9,599,778	$0.05360	$ 514,586	$0.06244	$ 599,372	All Hours	9,599,778	$0.05978	$ 573,878	$ (25,494) -4.3%
Demand Charge						**Demand Charge**				
	kW	*Per kW*		*Per kW*		*kW*	*Per kW*			
Contract	12,000	$7.41	$ 88,920	$7.41	$ 88,920	Contract	12,000	$9.25	$ 111,000	$ 22,080 24.8%
Excess	7,939	$10.32	$ 81,930	$10.32	$ 81,930	Excess	7,939	$10.75	$ 85,344	$ 3,414 4.2%
Other						**Other**				
FAC			$ 75,899		$ 75,899	FAC			$ 75,899	$ - 0.0%
ES			$ 87,584		$ 87,584	ES			$ 87,584	$ - 0.0%
Other					$ -	Other			$ -	$ - 0.0%
Total Rate Revenue			$ 859,345		$ 944,130	**Total Rate Revenue**			$ 944,130	$ - 0.0%
Revenue Per Books			$ 857,826			**Difference from Present Rates**			$ -	
Difference			$ 1,519		$ 84,785	**Percent Change from Present Rates**			0%	
Percent Difference			0.18%		9.88%	**Avg Incr/(Decr) Per Customer Per Month**			$ -	

Clark Energy Cooperative
Lighting
S,T,O

Description		Test Year Rate Billing Units	Test Year Rate Rate	Test Year Rate Calculated Billings	Present Rate Rate	Present Rate Calculated Billings	Proposed Rates Billing Units	Proposed Rates Rate	Proposed Rates Calculated Billings	Increase	%
Lights	Annual kWh	*Annual Lights*	*Per Light*		Per Light		*Annual Lights*	*Per Light*			
Rate T - Outdoor Lights											
400 W	295,372	1,918	17.28	$ 33,143	$ 19.42	$ 37,248	1,918	$ 19.42	$ 37,248	$ -	0.0%
Rate S - Outdoor Lights											
175 W	1,709,610	24,626	9.45	$ 232,716	$ 10.48	$ 258,080	24,626	$ 10.48	$ 258,080	$ -	0.0%
Rate O - LED Outdoor Lighting Facilities											
o Open Bottom Light (4,800-6,800 Lumens)	1,380,791	81,223	9.52	$ 773,243	$ 10.01	$ 813,042	81,223	$ 10.01	$ 813,042	$ -	0.0%
o2 Cobra Head Light (7,200 - 10,000 Lumens)	85,824	3,376	14.66	$ 49,492	$ 15.52	$ 52,396	3,376	$ 15.52	$ 52,396	$ -	0.0%
o3 Directional Flood Light (15,00 - 18,000 Lumens)	389,376	5,408	21.93	$ 118,597	$ 23.41	$ 126,601	5,408	$ 23.41	$ 126,601	$ -	0.0%
o4 Ornamental Light w/Pole (4,80 - 6,800 Lumens)	22,997	793	20.23	$ 16,042	$ 21.21	$ 16,820	793	$ 21.21	$ 16,820	$ -	0.0%
o5 Open Bottom Light w/Pole	36,295	2,135	20.23	$ 43,191	$ 10.01	$ 21,371	2,135	$ 10.01	$ 21,371	$ -	0.0%
o6 Cobra Head Light w/Pole	4,320	120	20.23	$ 2,428	$ 15.52	$ 1,862	120	$ 15.52	$ 1,862	$ -	0.0%
o7 Directional Flood Light w/Pole	18,360	255	20.23	$ 5,159	$ 23.41	$ 5,970	255	$ 23.41	$ 5,970	$ -	0.0%
Additional Pole (30' Wood / if no existing pole available)	-	1,228	5.54	$ 6,803	$ 5.73	$ 7,036	1,228	$ 5.73	$ 7,036	$ -	0.0%
	3,942,945	121,082									
Other											
FAC				$ 30,512		$ 30,512			$ 30,512	$ -	0.0%
ES				$ 20,631		$ 20,631			$ 20,631	$ -	0.0%
Total Rate Revenue				$ 1,331,957		$ 1,391,569	**Total Rate Revenue**		$ 1,391,569	$ -	0.0%
Revenue Per Books				$ 1,187,646			**Difference from Present Rates**		$ -		
Difference				$ 144,311		$ 59,612	**Percent Change from Present Rates**		0%		
Percent Difference				12.151%		5.02%	**Avg Incr/(Decr) Per Light Per Month**		$ -		

Clark Energy Cooperative
Estimated Monthly Increase by KWH
Residential

#	Monthly kWh	Present Base Rates				Proposed Base Rates				Increase	
		Customer	Energy	Riders	SubTotal	Customer	Energy	Riders	SubTotal	$	%
		$ 18.62	*$ 0.10123*	*$ 0.01198*		*$ 33.00*	*$ 0.09621*	*$ 0.01198*			
1	-	$ 18.62	$ -	$ -	$ 18.62	$ 33.00	$ -	$ -	$ 33.00	$ 14.38	77.2%
2	100	$ 18.62	$ 10.12	$ 1.20	$ 29.94	$ 33.00	$ 9.62	$ 1.20	$ 43.82	$ 13.88	46.4%
2	200	$ 18.62	$ 20.25	$ 2.40	$ 41.26	$ 33.00	$ 19.24	$ 2.40	$ 54.64	$ 13.38	32.4%
3	300	$ 18.62	$ 30.37	$ 3.59	$ 52.58	$ 33.00	$ 28.86	$ 3.59	$ 65.46	$ 12.87	24.5%
4	400	$ 18.62	$ 40.49	$ 4.79	$ 63.90	$ 33.00	$ 38.48	$ 4.79	$ 76.27	$ 12.37	19.4%
2	500	$ 18.62	$ 50.62	$ 5.99	$ 75.22	$ 33.00	$ 48.11	$ 5.99	$ 87.09	$ 11.87	15.8%
3	600	$ 18.62	$ 60.74	$ 7.19	$ 86.54	$ 33.00	$ 57.73	$ 7.19	$ 97.91	$ 11.37	13.1%
4	700	$ 18.62	$ 70.86	$ 8.38	$ 97.86	$ 33.00	$ 67.35	$ 8.38	$ 108.73	$ 10.87	11.1%
5	800	$ 18.62	$ 80.98	$ 9.58	$ 109.18	$ 33.00	$ 76.97	$ 9.58	$ 119.55	$ 10.36	9.5%
6	900	$ 18.62	$ 91.11	$ 10.78	$ 120.51	$ 33.00	$ 86.59	$ 10.78	$ 130.37	$ 9.86	8.2%
7	1,000	$ 18.62	$ 101.23	$ 11.98	$ 131.83	$ 33.00	$ 96.21	$ 11.98	$ 141.19	$ 9.36	7.1%
8	1,100	$ 18.62	$ 111.35	$ 13.17	$ 143.15	$ 33.00	$ 105.83	$ 13.17	$ 152.00	$ 8.86	6.2%
9	1,200	$ 18.62	$ 121.48	$ 14.37	$ 154.47	$ 33.00	$ 115.45	$ 14.37	$ 162.82	$ 8.36	5.4%
10	1,300	$ 18.62	$ 131.60	$ 15.57	$ 165.79	$ 33.00	$ 125.07	$ 15.57	$ 173.64	$ 7.85	4.7%
11	1,400	$ 18.62	$ 141.72	$ 16.77	$ 177.11	$ 33.00	$ 134.69	$ 16.77	$ 184.46	$ 7.35	4.2%
12	1,500	$ 18.62	$ 151.85	$ 17.96	$ 188.43	$ 33.00	$ 144.32	$ 17.96	$ 195.28	$ 6.85	3.6%
13	1,600	$ 18.62	$ 161.97	$ 19.16	$ 199.75	$ 33.00	$ 153.94	$ 19.16	$ 206.10	$ 6.35	3.2%
14	1,700	$ 18.62	$ 172.09	$ 20.36	$ 211.07	$ 33.00	$ 163.56	$ 20.36	$ 216.92	$ 5.85	2.8%
15	1,800	$ 18.62	$ 182.21	$ 21.56	$ 222.39	$ 33.00	$ 173.18	$ 21.56	$ 227.74	$ 5.34	2.4%
16	1,900	$ 18.62	$ 192.34	$ 22.75	$ 233.71	$ 33.00	$ 182.80	$ 22.75	$ 238.55	$ 4.84	2.1%
17	2,000	$ 18.62	$ 202.46	$ 23.95	$ 245.03	$ 33.00	$ 192.42	$ 23.95	$ 249.37	$ 4.34	1.8%
18	2,100	$ 18.62	$ 212.58	$ 25.15	$ 256.35	$ 33.00	$ 202.04	$ 25.15	$ 260.19	$ 3.84	1.5%
19	2,200	$ 18.62	$ 222.71	$ 26.35	$ 267.67	$ 33.00	$ 211.66	$ 26.35	$ 271.01	$ 3.34	1.2%
20	2,300	$ 18.62	$ 232.83	$ 27.55	$ 278.99	$ 33.00	$ 221.28	$ 27.55	$ 281.83	$ 2.83	1.0%
21	2,400	$ 18.62	$ 242.95	$ 28.74	$ 290.31	$ 33.00	$ 230.90	$ 28.74	$ 292.65	$ 2.33	0.8%
22	2,500	$ 18.62	$ 253.08	$ 29.94	$ 301.64	$ 33.00	$ 240.53	$ 29.94	$ 303.47	$ 1.83	0.6%
23	2,600	$ 18.62	$ 263.20	$ 31.14	$ 312.96	$ 33.00	$ 250.15	$ 31.14	$ 314.28	$ 1.33	0.4%
24	2,700	$ 18.62	$ 273.32	$ 32.34	$ 324.28	$ 33.00	$ 259.77	$ 32.34	$ 325.10	$ 0.83	0.3%
25	2,800	$ 18.62	$ 283.44	$ 33.53	$ 335.60	$ 33.00	$ 269.39	$ 33.53	$ 335.92	$ 0.32	0.1%
26	2,900	$ 18.62	$ 293.57	$ 34.73	$ 346.92	$ 33.00	$ 279.01	$ 34.73	$ 346.74	$ (0.18)	-0.1%
27	3,000	$ 18.62	$ 303.69	$ 35.93	$ 358.24	$ 33.00	$ 288.63	$ 35.93	$ 357.56	$ (0.68)	-0.2%
AVG	1,042	$ 18.62	$ 105.51	$ 12.48	$ 136.61	$ 33.00	$ 100.28	$ 12.48	$ 145.76	$ 9.15	6.7%