

Mark David Goss mdgoss@gosssamfordlaw.com (859) 368-7740

January 22, 2018

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JAN 2 2 2018

PUBLIC SERVICE COMMISSION

VIA HAND DELIVERY

Gwen R. Pinson, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

Re: IN THE MATTER OF: APPLICATION OF BIG SANDY RURAL ELECTRIC COOPERATIVE CORPORATION FOR A GENERAL ADJUSTMENT OF EXISTING RATES - Case No. 2017-00374

Ms. Pinson:

Please find enclosed and accept for filing on behalf of Big Sandy Rural Electric Cooperative Corporation: (i) an original and ten (10) copies of Big Sandy's Response to Commission Staff's Third Request for Information propounded January 8, 2018; (ii) an original and ten (10) copies of Big Sandy's Second Supplemental Response to Commission Staff's First Request for Information, Item 34, propounded September 27, 2017; and (iii) an original and ten (10) copies of Big Sandy's Motion to Schedule Public Hearing.

Please return a filed-stamped copy of each of these items to me. I appreciate your assistance with this matter, and please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,

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Mark David Goss

Enclosures

COMMONWEALTH OF KENTUCKY

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BEFORE THE PUBLIC SERVICE COMMISSION

JAN 2 2 2018

PUBLIC SERVICE COMMISSION

In the Matter of:	COMMISSION
APPLICATION OF BIG SANDY RURAL ELECTRIC COOPERATIVE CORPORATION FOR A GENERAL ADJUSTMENT OF EXISTING RATES)) Case No. 2017-00374)
BIG SANDY RURAL ELECTRIC COOPERATI RESPONSE TO COMMISSION STAFF'S THIRD REC	

Filed: January 22, 2018

Item 1
Page 1 of 2
Witness: John Wolfram

Big Sandy Rural Electric Cooperative Corporation Case No. 2017-00374 Commission Staff's Third Request for Information

1. Provide each rate class's contribution towards times interest earned ratio ("TIER") and Operating TIER at current rates, and at proposed rates.

Response:

Please see Page 2 of this response.

BIG SANDY RECC ESTIMATED CLASS CONTRIBUTION TO TIER & OTIER

				Comm. &				
		Tatal	Farm &	Small	Large	Large	I	1 lash4lasa
		Total	Home	Power	Power	Power	Industrial	Lighting
#	Case	System	A1	A2	LP	LPR	IND-1B	YL
1	At Present Rates							
2								
3	OTIER	(0.09)	(3.27)	5.61	1.68	(5.36)	(18.78)	4.94
4	TIER	0.26	(2.91)	5.96	2.04	(5.00)	(18.42)	5.29
5	TIER excluding GTCC	0.26	(2.91)	5.96	2.04	(5.00)	(18.42)	5.29
6								
7	At Proposed Rates							
8								
9	OTIER	1.64	(1.44)	5.63	1.74	(4.47)	(17.32)	4.94
10	TIER	2.00	(1.08)	5.99	2.10	(4.11)	(16.96)	5.29
11	TIER excluding GTCC	2.00	(1.08)	5.99	2.10	(4.11)	(16.96)	5.29

<u>Notes</u>

Source for Total System amounts is Big Sandy RECC Revised Exhibit JW-2, Page 1 of 38 , Rows 34-36, with Present Rates from Column 5 and Proposed Rates from Column 6.

Big Sandy Rural Electric Cooperative Corporation Case No. 2017-00374 Commission Staff's Third Request for Information

2. Explain how the residential customer charge of \$21.25 was determined.

Response:

The cost of service study indicates that the cost-based customer charge for the residential class is approximately \$37 per month. The current customer charge is \$15.00. Big Sandy's goal is to gradually move towards cost-of-service, in order to balance the aim of charging cost-based rates with the aim of avoiding member rate shock. Because the difference between the current charge and the cost-based charge is approximately \$22, the proposed charge represents an increase of about \$6.25 and would eliminate 28%, or between one-fourth and one-third, of that difference. Thus, Big Sandy determined the residential customer charge of \$21.25 in order to move the current charge between one-fourth and one-third of the way closer to the charge that represents Big Sandy's actual costs.

Big Sandy Rural Electric Cooperative Corporation Case No. 2017-00374 Commission Staff's Third Request for Information

- 3. Refer to Big Sandy's response to Commission Staff's second request for information, Item 8, Big Sandy_COS_2017-FILED PSC2-8 Response.xls, tab Summary of Returns.
 - a. Provide a similar table noting the rate base and rate of return on rate base at the proposed rates.
 - b. Big Sandy is proposing that the majority of the rate increase be allocated to the rate class A 1- Farm & Home ("Residential"), yet the pro forma rate of return on rate base for rate class IND 1-B-Industrial ("Industrial") and rate class LRP Large Power ("Large Power") is being subsidized to a greater degree than the Residential Rate Class. Explain why a larger proportion of the proposed revenue increase was not allocated to the Large Power and Industrial rate classes.

Response:

- a. Please see Page 2 of this response.
- b. The IND 1-B and LPR rate classes contribute a much smaller portion of Big Sandy's total revenue than does the Residential class; in the test year, LPR contributed only 2.97% and IND 1-B, which is comprised of only one member, contributed just 1.75% of Big Sandy's total revenue. To have any significant impact on revenues, the increase to each of these classes would have to be quite large. For this reason and for economic development reasons, a larger portion of the proposed revenue increase was not allocated to the LPR and IND 1-B rate classes.

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Current Rates

	<u>Current Rates</u>									
<u>#</u>	Rate	Code		Pro Forma Operating Revenue		Pro Forma Operating Expenses	Margin	Rate Base	Pro Forma Rate of Return on Rate Base	Unitized Rate of Return on Rate Base
_			_				3			
1	A1 - Farm & Home	A1	\$	16,284,237	\$	16,736,809	\$ (452,572)	\$ 27,314,361	-1.66%	(3.48)
2	A2 - Commercial & Small Power	A2	\$	1,390,295	\$	1,101,305	\$ 288,990	\$ 1,769,619	16.33%	34.28
3	LP - Large Power	LP	\$	2,412,854	\$	2,224,905	\$ 187,949	\$ 1,809,910	10.38%	21.80
4	LPR - Large Power	LPR	\$	644,358	\$	673,024	\$ (28,666)	\$ 588,152	- 4.87%	(10.23)
5	IND 1-B - Industrial	IND-1B	\$	378,811	\$	435,498	\$ (56,687)	\$ 192,708	-29.42%	(61.74)
6	Lighting	YL	\$	874,214	\$	651,033	\$ 223,181	\$ 2,369,267	9.42%	`19.77 [°]
7	Total		\$	21,984,769	\$	21,822,575	\$ 162,194	\$ 34,044,017	0.48%	1.00
8							 			
9	Proposed Rates									
10	roposou nates									
11	A1 - Farm & Home	A 1	\$	17,194,289	\$	16,736,809	\$ 457,480	\$ 27,314,361	1.67%	0.52
12	A2 - Commercial & Small Power	A2	\$	1,391,105	\$	1,101,305	\$ 289,799	\$ 1,769,619	16.38%	5.12
13	LP - Large Power	LP	\$	2,414,826	\$	2,224,905	\$ 189,921	\$ 1,809,910	10.49%	3.28
14	LPR - Large Power	LPR	\$	653,977	\$	673,024	\$ (19,048)	\$ 588,152	-3.24%	(1.01)
15	IND 1-B - Industrial	IND-1B	\$	384,001	\$	435,498	\$ (51,498)	\$ 192,708	-26.72%	(8.35)
16	Lighting	YL	\$	874,214	\$	651,033	\$ 223,181	\$ 2,369,267	9.42%	2.94
17	Total		\$	22,912,411	\$	21,822,575	\$ 1,089,836	\$ 34,044,017	3.20%	1.00
18					_					
19	<u>Increase (Decrease)</u>									
20										
21	A1 - Farm & Home	A1	\$	910,052	\$	-	\$ 910,052	\$ -	3.33%	4.00
22	A2 - Commercial & Small Power	A2	\$	810	\$	-	\$ 810	\$ -	0.05%	(29.16)
23	LP - Large Power	LP	\$	1,973	\$	-	\$ 1,973	\$ -	0.11%	(18.52)
24	LPR - Large Power	LPR	\$	9,618	\$	-	\$ 9,618	\$ -	1.64%	9.22
25	IND 1-B - Industrial	IND-1B	\$	5,189	\$	-	\$ 5,189	\$ -	2.69%	53.40
26	Lighting	YL	\$	-	\$		\$ -	\$ 	0.00%	(16.83)
27	Total		\$	927,642	\$	_	\$ 927,642	\$ -	2.72%	-

Witnesses: Brian Frasure & John Wolfram

Big Sandy Rural Electric Cooperative Corporation Case No. 2017-00374 Commission Staff's Third Request for Information

4. Refer to the Application, Exhibit JW-9, page 7 of 9. Provide the cost justification for each individual light listed.

Response:

Please see Page 2 of this response. Exhibit JW-9, page 7 of 9 includes a 500 Watt and 1,500 Watt light in the list, but none of these lights are in the field or in inventory so no cost justification is provided. Also, the 150 Watt HPS lamp in the listing refers to eight (8) light fixtures that are unique to the City of Prestonsburg. The city purchased the fixtures because they are a non-standard decorative lighting fixture, so the listed "Cost of Light Including Installation" represents installation costs only. Big Sandy does not keep this fixture in stock. Big Sandy supplies the energy and maintains these lights.

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			-	17	'5 W Catego	ory				400 W C	Category		400 W	Flood
		150W	70W	60W	65W	80/85	MH	MV	145W	250W	мн		400W	250W
<u>#</u>	<u>ltem</u>	HPS	LED	LED	LED	IND	100	175	LED	HPS	250	MV 400	Flood	Flood
1	Input Watts	150	70	60	65	85	100	175	145	250	250	400	400	200
2	Lumens	13,000	6,650	6,498	6,498	6,400	6,400	6,800	17,499	25,000	17,000	20,000	20,000	17,000
3	Cost of Light Including Installation	\$ 146.55	\$ 436.53	\$ 396.63	\$ 411.95	\$ 424.93	\$ 226.51	\$ 159.45	\$ 642.70	\$ 465.18	\$ 496.18	\$ 405.00	\$ 414.80	\$ 396.45
4	Annual Carrying Cost (16.59%)	24.32	72.43	65.81	68.35	70.51	37.58	26.46	106.64	<i>7</i> 7.19	82.33	67.20	68.83	65.78
5	Annual Energy Usage	720	290	248	269	352	600	840	600	1,190	1,190	1,800	1,800	1,190
6	Annual Energy Cost	\$ 78.34	\$ 31.55	\$ 26.98	\$ 29.27	\$ 38.30	\$ 65.28	\$ 91.39	\$ 65.28	\$ 129.47	\$ 129.47	\$ 195.84	\$ 195.84	\$ 129.47
7	Annual Est. Maintenance cost	\$ 24.88	\$ 5.45	\$ 5.45	\$ 5.45	\$ 5.45	\$ 32.65	\$ 21.26	\$ 9.32	\$ 26.28	\$ 28.85	\$ 24.28	\$ 24.28	\$ 28.85
8	Annual Interest Expense (3.25%)	\$ 4.86	\$ 14.49	\$ 13.17	\$ 13.67	\$ 14.10	\$ 7.52	\$ 5.29	\$ 21.33	\$ 15.44	\$ 16.47	\$ 13.44	\$ 13.77	\$ 13.16
9	Total Annual Cost	\$ 132.40	\$ 123.92	\$ 111.41	\$ 116.75	\$ 128.36	\$ 143.03	\$ 144.40	\$ 202.58	\$ 248.38	\$ 257.12	\$ 300.76	\$ 302.72	\$ 237.26
10	Monthly Cost	\$ 11.03	\$ 10.33	\$ 9.28	\$ 9.73	\$ 10.70	\$ 11.92	\$ 12.03	\$ 16.88	\$ 20.70	\$ 21.43	\$ 25.06	\$ 25.23	\$ 19.77
11	Proposed Monthly Charge	\$ 9.31	\$ 9.31	\$ 9.31	\$ 9.31	\$ 9.31	\$ 9.31	\$ 9.31	\$ 13.89	\$ 13.89	\$ 13.89	\$ 13.89	\$ 18.90	\$ 18.90
12	Cost less Charge	\$ 1.72	\$ 1.02	\$ (0.03)	\$ 0.42	\$ 1.39	\$ 2.61	\$ 2.72	\$ 2.99	\$ 6.81	\$ 7.54	\$ 11.17	\$ 6.33	\$ 0.87

Notes

- 1,2 From manufacturer
- 3 Cost of light plus installation cost based on 2 hrs of lineman labor, plus overheads, plus bucket truck transportation
- 4 Based on applicable costs as percentage of test year rate base (incl. Cust Acct, Cust Serv, A&G, Depr, and Return on Rate Base)
- 5 Based on 4,140 hours of usage annually
- 6 Based on proposed all-in retail rate of \$0.1088/kWh
- 7 Based on estimates for bulb life, parts and labor per fixture
- 8 Based on test year Interest on long term debt (\$701,164 / \$ 21,123,844)
- 9 Sum of Lines 4, 6, 7, and 8.

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:
APPLICATION OF BIG SANDY RURAL ELECTRIC COOPERATIVE CORPORATION FOR A GENERAL ADJUSTMENT OF EXISTING RATES Case No. 2017-00374)
VERIFICATION OF BILLY O'BRIAN (BRIAN) FRASURE
COMMONWEALTH OF KENTUCKY) COUNTY OF <u>JOHNSON</u>)
Billy O'Brian (Brian) Frasure, being duly sworn, states that he has supervised the preparation of certain of the responses of Big Sandy Rural Electric Cooperative Corporation to Commission Staff's Third Request for Information in the above-referenced case and that the matters and things set forth in his responses are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.
Billy O'Brian (Brian) Frasure
The foregoing Verification was signed, acknowledged and sworn to before me this day of January, 2018, by Billy O'Brian (Brian) Frasure.
NOTARY PUBLIC Commission expiration: 6-19-18

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:
APPLICATION OF BIG SANDY RURAL ELECTRIC COOPERATIVE CORPORATION FOR A GENERAL ADJUSTMENT OF EXISTING RATES) Case No. 2017-00374
VERIFICATION OF JOHN WOLFRAM
COMMONWEALTH OF KENTUCKY) COUNTY OF COOK)
John Wolfram, being duly sworn, states that he has supervised the preparation of certain of the responses of Big Sandy Rural Electric Cooperative Corporation to Commission Staff's Third Request for Information in the above-referenced case and that the matters and things set forth in his responses 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 day of January, 2018, by John Wolfram. Commission expiration:
EMILY M. EDWARDS Notary Public State at Large Kentucky My Commission Expires Feb. 19, 2018