

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF JACKSON)	
PURCHASE ENERGY CORPORATION FOR)	CASE NO.
A GENERAL ADJUSTMENT IN EXISTING)	2019-00053
RATES)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
JACKSON PURCHASE ENERGY CORPORATION

Jackson Purchase Energy Corporation (Jackson Purchase Energy), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on May 13, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Jackson Purchase Energy shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Jackson Purchase Energy fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Jackson Purchase Energy shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide a cross-tab of the usage and income from Jackson Purchase Energy's last Residential End-Use Survey.
2. Provide the average monthly use for customers receiving assistance.
3. Provide the employment contract, if any, for Jackson Purchase Energy's Chief Executive Officer.
4. Refer to the Excel spreadsheet Jackson Purchase Energy provided with its application named JPEC-RevReq-FILED.xlsx, Tab 1.12 Wages. The pro forma adjustment for the Salary Employee identified as S02 is \$111,864 over test-year wages. Provide an explanation for the increase in pro forma wages.

5. Refer to the Excel spreadsheet Jackson Purchase Energy provided with its application named JPEC-RevReq-FILED.xlsx, Tab 1.14 Depr. The columns for Test Year Expense and Pro Forma Adj for Jackson Purchase Energy's Distribution Plant have blank values. Provide the information for these columns.

6. Provide the most recent loan agreement or contract for Jackson Purchase Energy's CFC Line of Credit.

7. Provide a statement or supporting documentation that reflects the current balance of Jackson Purchase Energy's CFC Line of Credit.

8. Refer to the Application, page 2, paragraph 4. Provide all cost-containment activity by Jackson Purchase Energy's management since the last rate case. Include a description of the activity and a quantification of the savings.

9. Refer to the Direct Testimony of Greg Grissom (Grissom Testimony), page 4, line 23. Provide a detailed explanation of the Advanced Metering Infrastructure pilot program.

10. Refer to the Grissom Testimony, page 6. Mr. Grissom states the 10 percent contribution from bargaining employees is the total contribution for medical, dental, and vision.

a. Provide the contribution percentage for the medical premium and supporting calculations.

b. Provide the contribution percent for the dental premium and supporting calculations.

c. Provide the contribution for the vision premium and supporting calculations.

11. Refer to the Direct Testimony of Jeffrey R. Williams (Williams Testimony), page 5, line 15. Mr. Williams states that Jackson Purchase Energy's residential customers comprise 59 percent of its energy usage. Refer to page 7 of the Direct Testimony of John Wolfram (Wolfram Testimony), line 9. Mr. Wolfram states that Jackson Purchase Energy's residential customers contribute 57 percent of the energy purchase. Reconcile this difference.

12. Refer to the Williams Testimony, page 5, line 16. Mr. Williams states that Jackson Purchase Energy's residential customers comprise 62 percent of its total revenue. Refer to page 7 of the Wolfram Testimony, line 9. Mr. Wolfram states that Jackson Purchase Energy's residential customers contribute 60 percent to total revenue. Reconcile this difference.

13. Refer to the Wolfram Testimony, Exhibit 35.

a. Confirm that the non-bargaining employees are contributing a total of 5 percent towards health, dental and vision benefits.

b. Provide the contribution percentage for the medical premium and supporting calculations.

c. Provide the contribution percent for the dental premium and supporting calculations.

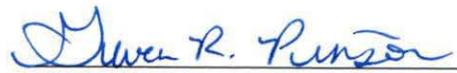
d. Provide the contribution for the vision premium and supporting calculations.

14. Provide the date that Jackson Purchase Energy employees began contributing to the cost of their healthcare plans.

15. Refer to Schedule C-1-Small Commercial Single Phase.

a. Confirm the Schedule C-1-Small Commercial Single Phase (C-1) Facilities Charge is \$13.86 per month.

b. Explain why the proposed Residential Facilities Charge of \$16.78 per month should be higher than the monthly C-1 Facilities Charge.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED APR 26 2019

cc: Parties of Record

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