

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CITIPOWER,)	CASE NO.
LLC FOR A RATE ADJUSTMENT FOR SMALL)	2020-00342
UTILITIES PURSUANT TO 807 KAR 5:076)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO CITIPOWER, LLC

Citipower, LLC (Citipower), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on February 12, 2021. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, (Citipower) SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Citipower shall make timely amendment to any prior response if Citipower obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Citipower fails or refuses to furnish all or part of the requested information, Citipower shall provide a written explanation of the specific grounds for its 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, Citipower shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Citipower's response to Commission Staff's First Request for Information (Staff's First Request), Item 2(a). Explain if Citipower considered allocating the rate increase differently between the customer charge and usage rate for any rate class.

- a. If so, provide the considered rates and allocations.

b. If not, explain why Citipower did not consider allocating the rate increase differently between the customer charge and usage rate for any of the rate classes.

2. Refer to Citipower's response to Staff's First Request, Item 4, Excel spreadsheet attachment, 'ComparisonSummary' tab.

a. Explain why there are rows of data in the spreadsheet that were hidden and why Citipower chose to hide this information.

b. Explain how the hidden data influences the visible data.

3. Refer to Citipower's response to Staff's First Request, Item 4, Excel spreadsheet attachment, 'RateWorkSheet' tab.

a. Explain why there are rows of data in the spreadsheet that were hidden and why Citipower chose to hide this information.

b. Explain how the hidden data influences the visible data.

4. Refer to Citipower's response to Staff's First Request, Item 4, Excel spreadsheet attachment, 'Actual2019Activity' tab.

a. Explain why there are rows of data in the spreadsheet that were hidden and why Citipower chose to hide this information.

b. Explain how the hidden data influences the visible data.

5. Refer to Citipower's response to Staff's First Request, Item 4, Excel spreadsheet attachment, 'Actual2019Activity' tab, Column S, Row 18. This cell contains a formula with a value of 299523. Explain where this value comes from and why this calculation was performed.

6. Refer to Refer to Citipower's response to Staff's First Request, Item 8, page 2 of 3. Provide the basis for the \$15.00 expense included in the cost justification, for Field Truck included in each nonrecurring charge.

7. Refer to Citipower's 2019 Annual Report on file with the Commission and the 2019 Trial Balance.

a. The Depreciation Expense in the Annual Report is \$85,110.00, while in the Trial Balance Depreciation Expense is \$72,378.00. Reconcile the difference

b. The Amortization Expense in the Annual Report is \$13,188, while in the Trial Balance Amortization Expense is \$0. Reconcile the difference.

8. Explain if Citipower has completed a Cost of Service Study (COSS). If so, explain why it was not filed and provide the COSS.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JAN 28 2021

cc: Parties of Record

*CitiPower, L.L.C.
37 Court Street
P. O. Box 1309
Whitley City, KY 42653

*Adam Forsberg
Controller
Citipower L.L.C.
2122 Enterprise Road
Greensboro, NORTH CAROLINA 27408

*L Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504