

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF FLEMING-)	
MASON ENERGY COOPERATIVE, INC. FOR)	CASE NO.
PASS-THROUGH OF EAST KENTUCKY)	2021-00109
POWER COOPERATIVE, INC. WHOLESALE)	
RATE ADJUSTMENT)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO FLEMING-MASON ENERGY COOPERATIVE, INC.

Fleming-Mason Energy Cooperative, Inc. (Fleming-Mason Energy), 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 June 28, 2021. The Commission directs Fleming-Mason Energy to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. 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

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.

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.

Fleming-Mason Energy shall make timely amendment to any prior response if Fleming-Mason Energy 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 Fleming-Mason Energy fails or refuses to furnish all or part of the requested information, Fleming-Mason Energy 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, Fleming-Mason 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 the monthly usage and revenue for AppHarvest Morehead Farm, LLC (AppHarvest Morehead) for 2020 and 2021 to date.
2. Explain whether a pro forma adjustment for the additional revenue received from AppHarvest Morehead should be applied to Fleming-Mason Energy's 2019 test-year revenues.

a. If a pro formal adjustment is made, provide the adjustment and an update to Fleming-Mason Energy's Response to Commission Staff's First Request for Information, Item 5.

b. If Fleming-Mason Energy disagrees with such an adjustment, explain whether the current allocation of Fleming-Mason Energy's portion of East Kentucky Power Cooperative, Inc.'s (EKPC) rate increase will result in additional revenues for Fleming-Mason Energy and whether the other rate classes will pay more than their fair share of the pass-through.

c. Explain whether a pro forma adjustment should be made to EKPC's test-year pro forma revenues.

d. If an adjustment should be made to EKPC's test-year pro forma revenues, explain whether this adjustment should then be applied to the calculation of Fleming-Mason Energy's rate increase.



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Public Service Commission
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DATED JUN 15 2021

cc: Parties of Record

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