

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF INTER-COUNTY)	
ENERGY COOPERATIVE CORPORATION FOR)	CASE NO.
PASS-THROUGH OF EAST KENTUCKY POWER)	2021-00111
COOPERATIVE, INC. WHOLESALE RATE)	
ADJUSTMENT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO INTER-COUNTY ENERGY COOPERATIVE CORPORATION

Inter-County Energy Cooperative Corporation (Inter-County 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 May 28, 2021. The Commission directs Inter-County 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. 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

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.

Inter-County Energy shall make timely amendment to any prior response if Inter-County 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 Inter-County Energy fails or refuses to furnish all or part of the requested information, Inter-County 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, Inter-County 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. Refer to the Application of Case No. 2021-000103,² the Direct Testimony of Isaac S. Scott, page 38, line 17. Mr. Scott states that there has not been any concerns

² Case No. 2021-00103, *Electronic Application of East Kentucky Power Cooperative, Inc. for a General Adjustment of Rates, Approval of Depreciation Study, Amortization of Certain Regulatory Assets, and Other General Relief* (filed Apr. 6, 2021).

raised by the owner-members concerning East Kentucky Power Cooperative's (EKPC) Demand Side Management (DSM) cost recovery approach.

a. Confirm that Inter-County Energy has not raised any concerns to date to EKPC.

b. List any concerns that Inter-County Energy has not expressed to EKPC but may have regarding EKPC's DSM cost recovery approach.

2. Refer to the Application, Exhibit 6, the Direct Testimony of John Wolfram (Wolfram Testimony), page 5, lines 1–4. Explain what “self-evidently unreasonable” implies.

3. Refer to the Wolfram Testimony, page 5, lines 15–17, and page 6, lines 1–2.

a. Explain why Inter-County Energy did not seek a deviation from the proportional flow through ratemaking guidelines ordered in Case No. 2020-00095.³

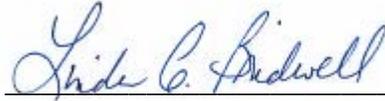
b. Explain the specific Inter-County Energy circumstances that would necessitate such a deviation.

c. Provide a list of active members, or billing determinants, for the last Commission-approved rate Order and a list of 2019 active members, or billing determinants, by rate class in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

4. Refer to the Wolfram Testimony, page 6, lines 3–21. Provide the analysis based upon the allocation method described in the 2020-00095 final Order as an Excel spreadsheet with all rows, columns, and formulas unhidden and accessible.

³ Case No. 2020-00095, *Electronic Application of Kenergy Corp. for a Declaratory Order* (Ky. PSC Mar. 11, 2021).

5. Refer to the Application, Exhibit 3. Provide in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED MAY 12 2021

cc: Parties of Record

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