

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF JACKSON)	
PURCHASE ENERGY CORPORATION FOR A)	CASE NO.
GENERAL ADJUSTMENT OF RATES AND)	2021-00358
OTHER GENERAL RELIEF)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO JACKSON PURCHASE ENERGY COPORATION

Jackson Purchase Energy Corporation (Jackson Purchase), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than March 8, 2022. The Commission directs Jackson Purchase to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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

Jackson Purchase shall make timely amendment to any prior response if Jackson Purchase 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 Jackson Purchase fails or refuses to furnish all or part of the requested information, Jackson Purchase 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, Jackson Purchase 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 Jackson Purchase's payroll for the calendar years ended December 31, 2019 and December 31, 2021 expressed as the total payroll, amount of payroll expensed, payroll capitalized, and any payroll classified as other.

2. Provide the number of regular, overtime, and other hours worked for the calendar year ended December 31, 2021.

3. Provide the salaries expense for accounts 580, 590, 901, 910, and 920 for the calendar years 2016 through 2021.

4. Provide the number of full-time equivalents for the calendar years 2016 through 2021.

5. Provide an itemized list of contractual services expense for the calendar years 2016 through 2021.

6. Refer to Jackson Purchase's response to the Attorney General's First Request for Information, Item 14(g), page 6 of 6. Provide an updated version of the schedule of electric expense attributable to Jackson Purchase's headquarters building to include November and December 2021, and January 2022, separated by month.

7. Refer to Jeff R. Williams' February 24, 2022 hearing video testimony, beginning at 2:51:01. Provide the amount of proceeds from the November 2021 RUS note not related to the new headquarters building in excess of the amount used to pay of a line-of-credit agreement (Excess Proceeds).

8. Provide an itemized list of projected expenditures with the Excess Proceeds from the November 2021 RUS note that are not related to the new headquarters building.

9. Refer to the Direct Testimony of Jeff R. Williams, Exhibit JRW-1. Provide an updated version of Exhibit JRW-1 that includes the information for calendar years 2005, 2006, and 2007.

10. Refer to the Williams Direct Testimony, Exhibit JRW-1. Provide the same information for calendar year 2021, broken out by month.

11. Provide cost support for Jackson Purchase's Meter Test Request Fee.

12. Explain whether the current contract between Jackson Purchase and Townsend Tree Service includes any remedy available to Jackson Purchase for customer

outages related to Townsend Tree Service's failure to meet the contractual obligation regarding the number of miles of right-of-way to clear.

13. Provide the number of hot spot trimming events and hot spot trimming mileage per circuit for past five calendar years, and indicate when the right-of-way for that circuit was last cleared and when the circuit was scheduled to be cleared based upon Jackson Purchase's right-of-way plan.

14. Provide the frequency that Jackson Purchases charges customers the meter pole perpetual lease fee. For example, whether it is a one-time fee, annual fee, or monthly fee.

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DATED FEB 25 2022

cc: Parties of Record

Case No. 2021-00358

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