

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 THIRD REQUEST FOR INFORMATION  
TO JACKSON PURCHASE ENERGY CORPORATION

Jackson Purchase Energy Corporation (Jackson Purchase), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on January 3, 2022. The Commission directs Jackson Purchase to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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 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 Jackson Purchase's responses to the Attorney General's First Request for Information (Attorney General's First Request), Item 15.b.

a. In addition to the journal entries included in this response, provide the journal entries to remove from Jackson Purchase's books of original entry the assets sold.

b. If not otherwise provided, include all journal entries subsequent to the transaction, but specific to the disposition of the office building, that had an effect on account 421.11, Loss on Disposition of Property.

2. Refer to Jackson Purchase's response to the Attorney General's First Request, Item 17. Jackson Purchase indicates that for 2021, only 81 miles of right of way (ROW) are to be cleared. Provide the number of miles of ROW expected to be cleared in 2022, 2023, and 2024.

3. Refer to Jackson Purchase's response to Staff's First Request for Information (Staff's First Request), Item 19. Explain why maintenance cost per distribution mile increased 34.3 percent between 2019 and 2020.

4. Refer to Jackson Purchase's response to Staff's First Request, Item 29.

a. State whether the rate case amortization approved in Case No. 2019-00053<sup>2</sup> was included in test period expenses, and the amount.

b. Provide the balance remaining as of November 30, 2021 on the rate case amortization approved in Case No. 2019-00053.

c. State whether Jackson Purchase amortizes its rate case amortization monthly, quarterly, or annually, and provide the corresponding journal entries entered for the test period ended December 31, 2019, and the calendar year ended December 31, 2020.

5. Refer to Jackson Purchase's response to Staff's Second Request for Information (Staff's Second Request), Item 7. Provide the number of manual meter

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<sup>2</sup> Case No. 2019-00053, *Electronic Application of Jackson Purchase Energy Corporation for a General Adjustment in Existing Rates*, (Ky. PSC June. 20, 2019).

readings performed by outside contractors and by in-house employees for the 2019, 2020, and to date in 2021.

6. Refer to Jackson Purchase's response to Staff's Second Request, Item 14.

a. Regarding the Collection Fee, provide the following:

(1) Explain whether the meter reader is contracted labor or in-house labor.

(2) Explain when a collection fee occurs.

(3) State whether Jackson Purchase field employees accept checks, cash, or credit card numbers from customers who pay an overdue bill amount while the employee is onsite to disconnect service for nonpayment, or whether customers must call Jackson Purchase customer service to pay the overdue amount.

(4) If Jackson Purchase field employees accept checks, cash, or credit card number from customers for the field collection charge, describe the internal control in place to track the money collected.

(5) If Jackson Purchase field employees accept checks, cash, or credit card numbers from customers for field collection charge, describe how the payment is recorded in and credited to the customer's account.

(6) Provide the statement of procedures for the collection fee.

b. Regarding the Connection/Reconnection Fee, provide the following:

(1) Explain whether the meter reader is contracted labor or in-house labor.

(2) Explain whether or not a reconnection fee is issued if a collection fee is also issued.

(3) Explain whether or not the reconnection fee is waived if the customer provides documentation or receives bill assistance.

c. Regarding the Connection/Reconnection Fee – After Hours, explain whether the meter reader is contracted labor or in-house labor.

7. Refer to Jackson Purchase’s response to Staff’s Second Request, Item 29. Provide a revised revenue requirement including the appropriate rate case amortization from Case No. 2019-00053.

8. Compile and provide a chart with a list of all of the residential customer charges for each electric utility in the Commonwealth of Kentucky.

9. For the test year, provide the itemized number and itemized total revenue for all two and three party pole charges, anchor charges, and grounding attachment charges.



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DATED DEC 13 2021

cc: Parties of Record

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