COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KATRINA MARIE TRUSTY

COMPLAINANT

V.

CLARK ENERGY COOPERATIVE, INC.

DEFENDANT

CASE NO. 2022-00298

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO CLARK ENERGY COOPERATIVE, INC.

Clark Energy Cooperative, Inc. (Clark Energy), 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 October 31, 2022. The Commission directs Clark Energy 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

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 mandated electronic filing, with exception to *pro se* formal complaints filed against utilities). *Pro se* parties in formal complaint cases may submit responses by U.S. Mail at P.O. Box 615, Frankfort, Kentucky 40602-0615, or by electronic email sent to <u>PSCED@ky.gov</u>. Responses filed using electronic email should include the case number in the subject line of the message and a read receipt to ensure the Commission received the message and documents.

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

Clark Energy shall make timely amendment to any prior response if Clark 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 Clark Energy fails or refuses to furnish all or part of the requested information, Clark 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, Clark 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 Answer, paragraph 1. State the terms of the payment agreement with Geneva Trusty.

2. Refer to Answer, paragraph 5. State the terms of the payment agreement with Geneva Trusty and Katrina Trusty.

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3. Refer to Answer, paragraph 4. Explain why Katrina Trusty's account would be required to remain current while the balance of Geneva Trusty's account was being paid.

4. Refer to Answer, paragraph 18.

a. Identify any provisions of federal or state law or any tariff provisions that prohibit Geneva Trusty from using Low-Income Home Energy Assistance Program (LIHEAP) vouchers in a household for which she is not the electric utility accountholder.

b. Identify any provisions of federal or state law or any tariff provisions that permit Clark Energy to transfer Geneva Trusty's balance to another account-holder on the basis that she applied LIHEAP vouchers to the other account holder's account.

c. Identify any other provisions of federal or state law or any other tariff provisions that permit Clark Energy to transfer Geneva Trusty's balance to another account holder.

5. Refer to Answer, paragraph 20. Identify any provisions of federal or state law or any tariff provisions that would prohibit Katrina Trusty from establishing a new account.

6. Refer to Answer, Exhibit 1 and Exhibit 2.

a. Explain what the column titled "Address 1" refers to.

b. Explain whether the column titled "Address 1" is inputted by Clark Energy or by the customer when the account is first created.

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7. Refer to Answer, Exhibit 8. Explain whether the delinquent balance referenced from Geneva Trusty's account is only for charges to Geneva Trusty's account. If the delinquent balance is just from Geneva Trusty's account, explain why the letter is addressed to Katrina Trusty.

8. Provide all correspondence between Clark Energy and Geneva Trusty or Katrina Trusty.

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

DATED <u>OCT 07 2022</u>

cc: Parties of Record

Katrina Trusty 5803 Furnace Road Stanton, KENTUCKY 40380

*Chris Brewer Clark Energy Cooperative, Inc. 2640 Ironworks Road P. O. Box 748 Winchester, KY 40392-0748

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