

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENERGY)	CASE NO.
CORP. FOR A GENERAL ADJUSTMENT OF)	2023-00276
RATES)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO KENERGY CORP.

Kenergy Corp. (Kenergy), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on January 29, 2024. The Commission directs Kenergy 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.

Kenergy shall make timely amendment to any prior response if Kenergy obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Kenergy fails or refuses to furnish all or part of the requested information, Kenergy shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Kenergy 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, Exhibit 3, page 24 of 30, Calculations for Monthly Billing, which states that billings will be based on the past 11 months kWh usage, along with the current month's kWh usage. Also refer to Kenergy's response to Commission Staff's Second Request for Information, Item 4(c), Attachment, which shows the levelized payment being based on a customer's average monthly bill over the past 12 months plus or minus the levelized adjustment. Explain whether Kenergy will determine the levelized

payment based on a straight average of the past 12 month's bills, not taking into account any rate changes, or whether Kenergy will determine the average monthly usage over the past 12 months and apply that result to the then effective rates.

2. Refer to the Application, Exhibit 3, page 26 of 30.
 - a. Explain what Kenergy considers to be a satisfactory payment or credit record.
 - b. The tariff states that "[s]atisfactory credit for customers will be determined by utilizing independent credit sources". Provide a list of the independent credit sources used by Kenergy to assess if a customer requires a deposit.
 - c. Explain how a customer could become a new or greater credit risk and how Kenergy would determine whether to require a new or increased deposit.
 - d. Confirm that Kenergy would not require an additional deposit from a residential customer who has maintained a satisfactory payment record. If not confirmed, explain why not.
3. Refer to the Application, Exhibit 10, Exhibit JW-2, page 15.
 - a. Explain why the expenses assigned to broadband services are not recorded to account 417.1, Expenses of Nonutility Operations.
 - b. Explain why the net income from broadband activities should not be included in the revenue requirement.
4. Refer to the Application, Exhibit 10, Exhibit JW-2, page 19. Provide the calculation of average wage rates used in this exhibit in Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible.

5. Refer to the Application, Exhibit 10, Exhibit JW-2, page 19. Provide the wages and hours per employee used in this exhibit in Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible. If the wages and hours are not based on the test year, provide the test year wages and hours per employee in Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible. Employee numbers or other identifiers should be used instead of employee names. Identify all employees terminated during the test year (along with the month in which the termination occurred) and those employees who replaced terminated employees or were otherwise added to the payroll during the test year.

6. Refer to Kenergy's response to Commission Staff's Third Request for Information, Item 8.

a. For calendar years 2021 and 2023, provide the number of complaints Kenergy received from budget billing customers regarding the amount of the true-up and the average true-up amount for those customers.

b. For calendar years 2021, 2022, and 2023, provide the average true-up amounts of all budget billing customers.

c. Explain whether Kenergy currently makes any adjustments during the budget billing year to the budget bill of customers enrolled in the Fixed Budget Billing Plan. If so, explain how Kenergy determines an adjustment is needed and how the adjustment is calculated.



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Public Service Commission
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DATED JAN 19 2024

cc: Parties of Record

Case No. 2023-00276

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