

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LICKING)	
VALLEY RURAL ELECTRIC COOPERATIVE)	CASE NO.
CORPORATION FOR A GENERAL)	2024-00211
ADJUSTMENT OF RATES AND OTHER)	
GENERAL RELIEF)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO LICKING VALLEY RURAL ELECTRIC COOPERATIVE CORPORATION

Licking Valley Rural Electric Cooperative Corporation (Licking Valley RECC), 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 February 24, 2025. The Commission directs Licking Valley RECC 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

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).

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.

Licking Valley RECC shall make timely amendment to any prior response if Licking Valley RECC 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 Licking Valley RECC fails or refuses to furnish all or part of the requested information, Licking Valley RECC 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, Licking Valley RECC 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 Licking Valley RECC's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 4.

- a. Explain why Licking Valley RECC allocates the general liability insurance to different accounts.

b. Calculate the revenue requirement and proposed rates with the general liability insurance allocated as a general operating expense.

2. Provide Board meeting minutes reflecting discussions and approval of the 2020 Paycheck Protection Program (PPP) loan from the United States Small Business Administration through Bank of the Mountains.

3. Provide usage comparisons, by month, for the years 2020 through 2024 between the average kWh used by customers enrolled in the Low-Income Home Energy Assistance Program (LIHEAP) and the average kWh used by a residential customer in Licking Valley RECC's service area.

4. Refer to Licking Valley RECC's response to Staff's Third Request, Item 13, Attachment 3-13.

a. Explain the methodology behind increasing the uncollectable accounts by \$1,000 or \$5,000 per entry in the general ledger.

b. Explain why actuals for uncollectable accounts were not used. Refer to Civil Case No. 23-CI-00249 in Magoffin Circuit Court.

5. Refer to Civil Case No. 23-CI-00249 in Magoffin Circuit Court.

a. Given that the customer is now deceased, state whether Licking Valley RECC has initiated the process for filing a creditor claim against the estate.


b. If not, state whether Licking Valley RECC intends to pursue a claim against the estate.

c. If not, explain why.

d. Provide the total current amount owed to the utility broken down in the following amounts associated with this lawsuit: late fees, outstanding usage charge amount, and attorneys' fees associated with the suit.

6. Explain whether the customer was being billed monthly during the time of non-payment. If not, explain the attempts to collect the money due and owing on this account. If yes, explain how the utility complied with Licking Valley RECC Second Revised Tariff Sheet 7, Second Revised Tariff Sheet 8, and Second Revised Tariff Sheets 12–16.

7. Provide the monthly balance for Licking Valley RECC's revolving line of credit, by month, for the time period beginning July 2021 through January 2025.


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DATED FEB 07 2025

cc: Parties of Record

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