

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION FOR AN)	
ALTERNATIVE RATE ADJUSTMENT FOR)	CASE NO.
JACKSON ENERGY COOPERATIVE PURSUANT)	2024-00324
TO 807 KAR 5:078)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO JACKSON ENERGY COOPERATIVE CORPORATION

Jackson Energy Cooperative Corporation (Jackson Energy), 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 30, 2025. The Commission directs Jackson 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 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 Energy shall make timely amendment to any prior response if Jackson Energy 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 Jackson Energy fails or refuses to furnish all or part of the requested information, Jackson 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 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, Jackson 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 the Direct Testimony of John Wolfram (Wolfram Direct Testimony), page 21.
 - a. Explain why Jackson Energy proposed to primarily increase rates for residential rate classes.
 - b. Explain whether Jackson Energy considered other rate increase allocations. If so, provide the allocations that were considered. If not, explain why not.

2. Provide the number of disconnections and reconnections for 2021, 2022, and per month for 2023 and 2024.
3. Refer to the Wolfram Direct Testimony, page 23, lines 11 through 13. Explain whether an allocation including the other subsidized rate classes would also provide revenues that achieve the targeted revenue increase.
4. State the TIER and OTIER requirements for each of Jackson Energy's debt covenants.
5. Refer to the Wolfram Direct Testimony, Exhibit JW-2, page 8.
 - a. Provide the total test year amount of Donations, Promotional Advertising and Dues.
 - b. Provide the line items for each amount removed from the test year.
6. Refer to the Wolfram Direct Testimony, Exhibit JW-2, page 7. Provide the calculation of the total premium amount \$35,011.
7. Provide the number of employees Jackson Energy needs to be fully staffed.
8. Refer to the Wolfram Direct Testimony, Exhibit JW-2, page 11. Provide the proforma calculation of the average wage for regular time, overtime, and other hours.
9. State if Jackson Energy has had any increase in Right of Way Expense since the test year. If so, state the reason(s) for any increase.
10. Provide the number of miles of right-of-way maintenance, cost per mile, and total cost expended, individually, for each calendar year 2020, 2021, 2022, 2023, and 2024.
11. Provide the annual number of miles and describe the cycle over which right-of-way maintenance is routinely conducted.

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