

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BIG SANDY)	
RURAL ELECTRIC COOPERATIVE)	CASE NO.
CORPORATION FOR A GENERAL)	2024-00287
ADJUSTMENT OF RATES)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE ATTORNEY GENERAL OF THE COMMONWEALTH OF KENTUCKY, BY
AND THROUGH THE OFFICE OF RATE INTERVENTION

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General), 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 31, 2025. The Commission directs the Attorney General 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.

The Attorney General shall make timely amendment to any prior response if the Attorney General 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 the Attorney General fails or refuses to furnish all or part of the requested information, the Attorney General 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, the Attorney General 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 Greg R. Meyer, page 25, lines 2 through 5. Explain how a TIER of 1.85 would be more than sufficient for Big Sandy Rural Electric Cooperative Corporation (Big Sandy RECC) rather than the proposed TIER of 2.00.

2. Refer to the Direct Testimony of Greg R. Meyer, page 8 through 13.

a. Explain why a five-year kWh average usage per customer was used for the Attorney General's proposed \$349,801 increase to Big Sandy RECC's test year revenues.

b. Explain why using a five-year kWh average usage per customer is more reasonable than using a 20 or 30-year kWh average usage per customer.



c. State whether any other range of average usage per customer was considered prior to using the five-year average. If so, provide those averages.

3. Refer to the Direct Testimony of Greg R. Meyer, page 28. Explain why the maximum right of way mileage was increased by 10 percent.

a. State whether any other mileage increases were considered. If so, provide those calculations.

b. State whether any other increases to the current cost of right-of-way clearing per mile were considered. If not, explain.

4. Refer to the Direct Testimony of Greg R. Meyer, page 20, lines 1-12. Provide support for calculating overtime costs using the five-year average of overtime wages, rather than using the five-year average of overtime hours multiplied by the pro forma wage rate.

 
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DATED JAN 16 2025

cc: Parties of Record

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