COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION OF MEADE)	
COUNTY RURAL ELECTRIC COOPERATIVE)	CASE NO.
CORPORATION FOR AN ALTERNATIVE RATE)	2025-00159
ADJUSTMENT PURSUANT TO 807 KAR 5:078)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

Meade County Rural Electric Cooperative Corporation (Meade County RECC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on August 29, 2025. The Commission directs Meade County 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.

Meade County RECC shall make timely amendment to any prior response if Meade County 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 Meade County RECC fails or refuses to furnish all or part of the requested information, Meade County 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 filling a paper containing personal information, Meade County 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 the Direct Testimony of John Wolfram, (Wolfram Direct Testimony), Exhibit JW-3 at 2 and Exhibit JW-9 at 1. The cost of service study (COSS) supports an increase of the residential energy charge; yet Meade County RECC did not choose to make an adjustment to that charge. Explain the reasoning for Meade County RECC's decision to only increase the residential customer charge.

- 2. Refer to the Wolfram Direct Testimony, Exhibit JW-3 at 2 and Exhibit JW-9 at 1. The COSS references a customer charge of \$35.06; yet Meade County RECC proposed a customer charge of \$25.85. Recognizing Meade County RECC did not propose a rate adjustment to its residential energy charge, explain the reasoning for Meade County RECC's decision not to propose a larger increase in its residential customer charge.
- 3. Provide Meade County RECC's actual number of miles of right-of-way maintenance completed, cost per mile, total actual cost expended, the budgeted number of miles, and the budgeted expense, separately for each calendar year 2020, 2021, 2022, 2023, and 2024. Provide the expected cost of right-of-way maintenance in 2025. As part of the response, please include an explanation of any variance between the actual amounts and the budgeted amounts in any given year.
- 4. Refer to Exhibit 13. Explain the 37 percent increase in President/CEO salary from 2022 to 2023. Include any quantitative or qualitative evaluations to support the response.
 - 5. Refer to Reference Schedule 1.13.
- a. Explain the regular hours not paid column and why it is not included in the calculation of the test year wages total amount but is included in the pro forma wages total amount.
- b. Explain why Meade County RECC is requesting a \$402,394 increase to wages and salaries but no changes in payroll tax expense.
- c. Explain the circumstances under which an employee may receive double-time hours.

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- d. Provide an explanation for each employee wage rate increase above10 percent from the test year.
- 6. Refer to the Direct Testimony of Ana Swanson (Swanson Direct Testimony), page 11. Provide the wage study that was conducted by a third party.
- 7. Refer to the Swanson Direct Testimony, page 8, lines 20-21. Refer also to the Reference Schedule 1.11: 401(k). Confirm that only nine employees of Meade County RECC's 78 total employees participated in multiple benefit packages and received Retirement & Security plan contributions in the test period.

Linda C. Bridwell, PE Executive Director

Public Service Commission

P.O. Box 615

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DATED ____ AUG 12 2025

cc: Parties of Record

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