## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF JACKSON	)	
ENERGY COOPERATIVE CORPORATION FOR	)	CASE NO.
PASS-THROUGH OF EAST KENTUCKY POWER	)	2025-00215
COOPERATIVE, INC.'S WHOLESALE RATE	)	
ADJUSTMENT	)	

## 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 September 16, 2025. The Commission directs Jackson Energy to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

<sup>&</sup>lt;sup>1</sup> 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 filling 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 Exhibit 4 of the Application.
- a. Provide the billing analysis in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

- b. Reconcile Jackson Energy's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC<sup>2</sup> to Jackson Energy and explain any variance shown in Exhibit 4.
  - 2. Refer to the Direct Testimony of John Wolfram, Exhibit 7.
- a. Confirm that Jackson Energy's proposed rates reflect a strict proportional pass-through of EKPC's wholesale increase in accordance with KRS 278.455. If not confirmed, explain the variance.
- b. If Jackson Energy considered any deviation from strict proportionality pass-through of the wholesale rate increase, Identify and explain why no such deviation was proposed.
- c. Provide the class billing determinants used to support the proportional pass-through of the wholesale rate increase.
- 3. Refer to Case No. 2023-00014,<sup>3</sup> which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery.
- a. Provide a reconciliation between the \$0.01182 per kWh FAC roll-in incorporated in Exhibit 4 and Jackson Energy's FAC Form A filings filed after the August 30, 2024 Order in Case No. 2023-00014. Identify any differences between the billing analysis in Exhibit 4 and the FAC recovery amounts reported in Jackson Energy's semi-annual filings.

<sup>&</sup>lt;sup>2</sup> Case No. 2025-00208, Electronic Application of East Kentucky Power Cooperative, Inc. for a General Adjustment of Rates, Approval of Depreciation Study, Amortization of Certain Regulatory Assets, and Other General Relief (filed Aug 1, 2025).

<sup>&</sup>lt;sup>3</sup> Case No. 2023-00014, An Electronic Examination of the Application of the Fuel Adjustment Clause of East Kentucky Power Cooperative, Inc. Cooperatives from November 1, 2020 through October 31, 2022 (Ky. PSC Aug. 30, 2024), Order.

- b. Confirm that Jackson Energy will continue to apply monthly FAC adjustments filed under 807 KAR 5:056 on customer bills following implementation of the proposed pass-through rates. If not confirmed, explain the response.
- 4. Describe how bills will be calculated for service periods that straddle the effective date of the new retail rates, consistent with its current billing cycle and tariff provisions.
- a. State whether any portion of the bill will be prorated, and identify which components (customer, energy, demand, lighting) are prorated and which are not.
- b. Describe the allocation method used to split usage/charges between the pre- and post-effective-date portions (e.g., by calendar days, meter-read splits, interval-data allocation), and provide the formulas used.
- c. Identify any tariff provisions, internal policies/procedures, or billingsystem constraints relied upon in calculating the billing calculations described.
- 5. Refer to Schedule OL (Outdoor Lighting Service) of Jackson Energy's current tariff.<sup>4</sup>
- a. Confirm that service under Schedule OL is un-metered and billed on a per-light, per-month basis. If not confirmed, explain the response.
- b. Provide the assumed monthly kWh per fixture by type used in the billing analysis and show how those assumptions translate into the proposed monthly charges.
  - c. Explain how the FAC roll-in is reflected for Schedule OL.

<sup>&</sup>lt;sup>4</sup> Jackson Energy Cooperative Corporation Tariff (last changed July 1, 2025).

- 6. Refer to Exhibit 4, Billing Analysis, page 2, Commercial Off Peak ETS. Refer also to Exhibit 2, Proposed Tariffs, Schedule 22 Commercial Service Off Peak Retail Marketing Rate, and Exhibit 3, Present and Proposed Rates. The Billing Analysis shows an All kWh charge of \$0.061873 per kWh. However, the Proposed Tariff and Exhibit 3 show \$0.06187 per kWh. Explain and reconcile the discrepancy.
- 7. Refer to Exhibit 4, Billing Analysis, page 3, Large Power Loads 50 kW + energy charge. Refer also to Exhibit 2, Proposed Tariffs, Schedule 40 Large Power Loads 50 kW and Over, and Exhibit 3, page 1. The billing analysis shows a proposed energy charge of \$0.079010 per kWh while Exhibits 2 and 3 state \$0.07901 per kWh. Explain why the last 0 was not included in Exhibits 2 and 3.
- 8. Refer to Exhibit 4, Billing Analysis, page 2, Large Power Rate 500 kW +. Refer also to Exhibit 2, Proposed Tariffs, Schedule 48 Large Power Rate 500 kW and Over, and Exhibit 3, Present and Proposed Rates. The Billing Analysis shows an energy charge of \$0.064734 per kWh. However, the Proposed Tariff and Exhibit 3 show \$0.06473 per kWh. Explain and reconcile the discrepancy.
- 9. Refer to Exhibit 4, Billing Analysis, page 2, Schools Churches Halls Parts rate. Refer also to Exhibit 2, Proposed Tariffs, Schedule 50 Schools, Churches, Community Halls, and Community Parks, and Exhibit 3, Present and Proposed Rates. The Billing Analysis shows an energy charge of \$0.110413 per kWh. However, the Proposed Tariff and Exhibit 3 show \$0.11041 per kWh. Explain and reconcile the discrepancy.
- 10. Refer to Exhibit 4, Billing Analysis, page 2, All Electric Schools AES. Refer also to Exhibit 2, Proposed Tariffs, Schedule 52 All Electric Schools (A.E.S.), and

Exhibit 3, Present and Proposed Rates. The Billing Analysis shows an energy charge of \$0.093191 per kWh. However, the Proposed Tariff and Exhibit 3 show \$0.09319 per kWh. Explain and reconcile the discrepancy.

Linda C. Bridwell, PE

Executive Director

Public Service Commission

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DATED SEP 03 2025

cc: Parties of Record

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