

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION INTER-COUNTY)	
ENERGY COOPERATIVE CORPORATION FOR)	CASE NO.
PASS-THROUGH OF EAST KENTUCKY POWER)	2025-00216
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO INTER-COUNTY ENERGY COOPERATIVE CORPORATION

Inter-County Energy Cooperative Corporation (Inter-County 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 Inter-County 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.

Inter-County Energy shall make timely amendment to any prior response if Inter-County 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 Inter-County Energy fails or refuses to furnish all or part of the requested information, Inter-County 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, Inter-County 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 Inter-County Energy's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC² to Inter-County Energy and explain any variance shown in Exhibit 4.

2. Refer to the Direct Testimony of John Wolfram, Exhibit 7.

a. Confirm that Inter-County 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 response.

b. If Inter-County 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 Exhibit 4 and Inter-County Energy's tariff.³ Identify any special-contract or EKPC Rate G / Schedule IND-G or similar arrangements reflected in revenues or rates.

a. Identify the Commission case number and Order approving each contract or rider.

b. Confirm that the pass-through treatment for such load is consistent with KRS 278.455(3) (i.e., special contracts are governed by the contract terms rather

² 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).

³ Inter-County Energy Cooperative Corporation Tariff (last changed July 14, 2025).

than the general proportional pass-through) and explain how the increase is handled for those customers.

4. Refer to Case No. 2023-00014,⁴ which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery.

a. Provide a reconciliation between the \$0.01194/kWh FAC roll-in incorporated in Exhibit 4 with Inter-County Energy's FAC Form A filings filed after the August 30, 2024 Order in Case No. 2023-00014.

b. Identify any differences between the billing analysis in Exhibit 4 and the FAC recovery amounts reported in Inter-County Energy's semi-annual filings.

c. Confirm that Inter-County 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.

5. Refer to Inter-County Energy's current tariff, Rules & Regulations, Section 10 (Billing).

a. Describe how Inter-County Energy will implement the new rates for bills with service periods that straddle the effective date, consistent with Section 10.

b. Provide a worked example (example dates and usage) identifying which components are prorated and which are not (e.g., customer/facility charge, lighting charge, energy, and demand), and how any FAC in effect at that time will be applied.

c. Identify any tariff provisions, internal policies/procedures, or billing-system constraints relied upon in calculating the billing calculations described.

⁴ 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.

6. Identify the tariff schedule(s) governing unmetered, per-light, per-month charges (e.g., Outdoor Lighting Service – Security Lights, Schedule 6) and confirm that the proposed lighting charges in Exhibit 4 are derived from that schedule. Provide the kWh/fixture and other assumptions used to reflect EKPC's increase (and FAC/Environmental Surcharge (ES) treatment, if applicable).

7. Refer to Exhibit 6 of the Application, Customer Notice. For Schedule 5 – All Electric School Rate, a 5.06 percent increase is listed in the bill impact table. Reconcile this number with the 4.55 percent total revenue and average increase listed in Exhibit 4 of the Billing Analysis.

8. Refer to Exhibit 4, Billing Analysis, page 4, line items 115 and 116. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

a. Explain why there are duplicative rates with varying billing units.

b. Provide the correct number of billing units for the 170,800 Lumen Directional Floodlight rate for the Billing Analysis.

9. Refer to Exhibit 4, Billing Analysis, page 4, line items 113 and 114. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

a. Explain why there are duplicative rates with varying billing units.

b. Provide the correct number of billing units for the 50,000 Lumen Directional Floodlight rate for the Billing Analysis.

10. Refer to Exhibit 4, Billing Analysis, page 4, line items 111 and 112. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 27,500 Lumen Directional Floodlight rate for the Billing Analysis.

11. Refer to Exhibit 4, Billing Analysis, page 4, line items 117 and 118. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 27,500 Lumen Cobra Head rate for the Billing Analysis.

12. Refer to Exhibit 4, Billing Analysis, page 4, line items 103 and 105. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there are duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 9,500 Lumen Security Light rate for the Billing Analysis.

13. Refer to Exhibit 4, Billing Analysis, Page 4, line item 119. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6. Confirm that line item 119 is the 7,000 Lumen Security Light on the tariff. If not confirmed, identify the line item by name of customer class and location in the tariff.

14. Refer to Exhibit 4, Billing Analysis, page 4, line items 107 and 108. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there at duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 4,000 Lumen Decorative Colonial Post rate for the Billing Analysis.

15. Refer to Exhibit 4, Billing Analysis, page 4, line items 109 and 110. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there at duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 9,550 Lumen Decorative Colonial Post rate for the Billing Analysis.

16. Refer to Exhibit 4, Billing Analysis, page 4, line items 120 and 121. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there at duplicative rates with varying billing units.
- b. Provide the correct number of billing units for the 6,000 Lumen Security LED Light rate for the Billing Analysis.

17. Refer to Exhibit 4, Billing Analysis, page 4, line items 104 and 106. Refer also to Exhibit 2, Proposed Tariffs, Outdoor Lighting Service – Security Lights – Schedule 6.

- a. Explain why there at duplicative rates with varying billing units.

b. Provide the correct number of billing units for the Pole Charge for the Billing Analysis.

18. Refer to Exhibit 4, Billing Analysis, page 2. Refer also to Exhibit 2, generally. The Schedule NM – Net Metering rates specified in the billing analysis are not included on the proposed or strike through Tariff sheets. Explain why the Net Metering rates were not included in Exhibit 2. Additionally, provide an update to Exhibit 2 to include the changes made to the Net Metering rate.



Linda C. Bridwell, PE
Executive Director
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DATED SEP 03 2025

cc: Parties of Record

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