

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CUMBERLAND)	
VALLEY ELECTRIC, INC. FOR PASS-THROUGH)	CASE NO.
OF EAST KENTUCKY POWER COOPERATIVE,)	2025-00218
INC.'S WHOLESALE RATE ADJUSTMENT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CUMBERLAND VALLEY ELECTRIC, INC.

Cumberland Valley Electric, Inc. (Cumberland Valley Electric), 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 Cumberland Valley Electric 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.

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

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

a. Confirm that Cumberland Valley Electric's proposed rates reflect a strict proportional pass-through of EKPC's wholesale increase in accordance with KRS 278.455.

b. If Cumberland Valley Electric considered any deviation from strict proportionality, provide a description of each deviation and explain why no such deviation was proposed.

c. Provide the class billing determinants used to support the proportional pass-through.

3. Refer to Case No. 2023-00014,³ which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery.

a. Provide a reconciliation between the \$0.01179 per kWh FAC roll-in incorporated in Exhibit 4 and Cumberland Valley Electric'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 Cumberland Valley Electric's semi-annual filings.

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 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.

c. Confirm that Cumberland Valley Electric will continue to apply monthly FAC adjustments filed under 807 KAR 5:056 on customer bills following implementation of the proposed pass-through rates.

4. Refer to Cumberland Valley Electric's current tariff.⁴

a. Describe how Cumberland Valley will implement the new rates for bills with service periods that straddle the effective date, consistent with its current billing cycle and tariff provisions.

b. State whether any portion of the bill will be prorated, and if so, identify which components (customer, energy, demand, lighting) are prorated and which are not.

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

5. Confirm whether Cumberland Valley's unmetered lighting schedules (e.g., Schedule VI or similar) are billed on a per-light, per-month basis. If not confirmed, explain how unmetered lighting schedules are billed and identify which schedules would not be billed on a per-light, per-month manner.

a. 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.

⁴ Cumberland Valley Electric, Inc. Tariff (last changed June 26, 2025).

b. Explain how the FAC roll-in is reflected for unmetered lighting accounts.

6. Provide the line loss percentage currently being used for FAC calculations and explain how it reconciles with the Commission's May 6, 2024 Order in Case No. 2023-00014. In this response, confirm that Cumberland Valley's proposed pass-through rates incorporate the corrected methodology approved in that Order.

7. Refer to Exhibit 6 and Exhibit 4 of the Application.

a. Confirm whether the average bill increase reflected for the Large Power class(es) is correct. If not confirmed, explain the response.

b. Reconcile this figure with the detailed billing analysis.

8. Refer to Exhibit 4, page 3. Refer also to Exhibit 2, Present Tariffs, All Three Phase Schools and Churches. The present energy charge is \$0.09027 per kWh on the tariff. However, the billing analysis shows a present energy charge of \$0.09030 per kWh. Explain and reconcile the discrepancy.

9. Refer to Exhibit 4, page 5. Refer also to Exhibit 2, Present Tariffs, Large Power Rate – 1,000 KW to 2,500 KW. The proposed energy charge is \$0.06993 per kWh on the tariff. However, the billing analysis shows a proposed energy charge of \$0.0699 per kWh. Explain and reconcile the discrepancy.

10. Refer to Exhibit 4, page 4. Refer also to Exhibit 2, Present Tariffs, Large Power Rate – Industrial Schedule V-B.

a. The present energy charge is \$0.05154 per kWh on the tariff. However, the billing analysis shows a present energy charge of \$0.051570 per kWh. Explain and reconcile the discrepancy.

b. The proposed energy charge is \$0.056868 per kWh on the tariff. However, the billing analysis shows a proposed energy charge of \$0.05687 per kWh. Explain and reconcile the discrepancy.

11. Refer to Exhibit 4, page 4. Refer also to Exhibit 2, Present Tariffs, Large Power Rate – Industrial Schedule V-C.

a. The proposed demand charge is \$8.45 per kW on the tariff. However, the billing analysis shows a proposed demand charge of \$8.45326 per kW. Explain and reconcile the discrepancy.

b. The present energy charge is \$0.054640 per kWh on the tariff. However, the billing analysis shows a present energy charge of \$0.054674 per kWh. Explain and reconcile the discrepancy.

c. The proposed energy charge is \$0.061710 per kWh on the tariff. However, the billing analysis shows a present energy charge of \$0.06171 per kWh. Explain and reconcile the discrepancy.

12. Refer to Exhibit 4, page 4, Lighting. Refer also to Exhibit 2, Present Tariffs, Outdoor Lighting – Security Lights.

a. Refer to the 100 Watt Open Bottom rate. The present charge is \$10.20 per lamp per month on the tariff. However, the billing analysis shows a present charge of \$10.21 per lamp per month. Explain and reconcile the discrepancy.


b. Refer to the 100 Watt Colonial Post rate. The present charge is \$11.42 per lamp per month on the tariff. However, the billing analysis shows a present charge of \$11.43 per lamp per month. Explain and reconcile the discrepancy.

c. Refer to the 100 Watt Directional Flood rate. The present charge is \$12.26 per lamp per month on the tariff. However, the billing analysis shows a present charge of \$12.27 per lamp per month. Explain and reconcile the discrepancy.

d. Refer to the 175 Watt Mercury Vapor Lamp rate. The present charge is \$10.18 per lamp per month on the tariff. However, the billing analysis shows a present charge of \$10.19 per lamp per month. Explain and reconcile the discrepancy.

13. Refer to Exhibit 2, Prepay Service tariff. Refer also to Exhibit 4, Billing Analysis, generally. The Prepay Service rate changes are not included in the billing analysis. Provide an updated billing analysis showing the impact of the Prepay Service rate.

14. Refer to Exhibit 4, Billing Analysis, page 4. Refer also to Exhibit 2, Present Tariffs, Outdoor Lighting – Security Lights. The billing analysis shows a lighting option labeled “400W MH Dir” for \$20.78 per light per month. Confirm whether this lighting option is the same as the 400 Watt Directional Flood option in the tariff. If confirmed, explain and reconcile the billing units for that lighting option. If not confirmed, provide the correct corresponding tariff information.



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DATED SEP 03 2025

cc: Parties of Record

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