

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CLARK)	
ENERGY COOPERATIVE, INC. FOR PASS-)	CASE NO.
THROUGH OF EAST KENTUCKY POWER)	2025-00219
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CLARK ENERGY COOPERATIVE, INC.

Clark Energy Cooperative, Inc. (Clark 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 22, 2025. The Commission directs Clark 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.

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

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

a. Confirm that Clark 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 Clark Energy considered any deviation from strict proportionality, 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. 2023-00014,² which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery.

a. Provide a reconciliation between the \$0.01178 per kWh FAC roll-in incorporated in Exhibit 4 and Clark 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 Clark Energy's semi-annual filings.

c. Confirm that Clark 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. Refer to Clark Energy's current tariff.³

² 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.

³ Clark Energy Cooperative, Inc. Tariff (last changed June 26, 2025).

a. Describe how Clark Energy 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.

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

5. Clark Energy has filed an alternative rate adjustment application in Case No. 2025-00230.⁴ Provide Clark Energy's contingency plan and timeline for updating the pass-through exhibits should a final Order in Case No. 2025-00230 be issued during the pendency of this pass-through proceeding.

6. Refer to Exhibit 4 of the Application.

a. From the lighting schedules included in Exhibit 4 of the billing analysis, identify which are billed on a per-light, per-month basis.

b. For each such schedule, 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 Case No. 2025-00230, *Electronic Application of Clark Energy Cooperative, Inc. for an Alternative Rate Adjustment Pursuant to 807 KAR 5:078* (filed Aug. 12, 2025).

c. Explain how the FAC is reflected for these unmetered lighting accounts.

7. Refer to Exhibit 4, Billing Analysis, page 3. Refer also to Exhibit 2, "Present Tariffs", Schedule B-1 and Exhibit 6, Customer Notice. The tariff and customer notice show a present energy charge of \$0.062436 per kWh. However, the billing analysis shows a present energy charge of \$0.06244 per kWh. Explain and reconcile the discrepancy.

8. Refer to Exhibit 4, Billing Analysis, page 1. Refer also to Exhibit 6, Customer Notice. The billing analysis shows a revenue increase of \$69,780 for the lighting classes. However, the customer notice shows a revenue increase of \$69,835. Explain and reconcile the discrepancy.

9. Refer to Exhibit 4, Billing Analysis, page 4. Refer also to Exhibit 6, Customer Notice. The billing analysis shows a 4.93 percent bill impact for the lighting classes. However, the customer notice shows a 4.91 percent. Explain and reconcile the discrepancy.



Linda C. Bridwell, PE
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DATED SEP 9 2025

cc: Parties of Record

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