

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF BLUE GRASS)	
ENERGY COOPERATIVE CORPORATION FOR)	CASE NO.
PASS-THROUGH OF EAST KENTUCKY POWER)	2025-00220
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO BLUE GRASS ENERGY COOPERATIVE CORPORATION

Blue Grass Energy Cooperative Corporation (Blue Grass 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 Blue Grass 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.

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

2. Refer to the Direct Testimony of John Wolfram, Exhibit 7 of the Application.
 - a. Confirm that Blue Grass 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 Blue Grass 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 \$0.01181 per kWh FAC roll-in incorporated in Exhibit 4 and Blue Grass 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 Blue Grass Energy's semi-annual filings.
 - c. Confirm that Blue Grass 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 Blue Grass 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 Blue Grass Energy Cooperative Corporation Tariff (last changed Aug. 21, 2025).

a. Describe how Blue Grass 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. Refer to Exhibit 6 of the Application. The footnote contained in the customer notice notes that the reflected amounts may differ based on the timing of the decision in Case No. 2025-00103.⁴ Reconcile the figures in the customer notice with the figures in the billing analysis in Exhibit 4 and confirm that any differences are the result of the final Order in Case No. 2025-00103. If not, explain the reason for any differences.

6. Refer to Exhibit 4 of the Application.

a. Regarding 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. 2025-00103, *Electronic Application of an Alternative Rate Adjustment for Blue Grass Energy Cooperative Pursuant to 807 KAR 5:0708*.

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

7. Refer to Exhibit 4, Billing Analysis, page 2. Refer also to Exhibit 2, Strike Through Tariffs, GS-2. The tariff shows a present customer charge of \$14.36 per meter, per month. However, the billing analysis shows a present customer charge of \$18.64 per meter, per month. Explain and reconcile the discrepancy.

8. Refer to Exhibit 4, Billing Analysis, page 2. Refer also to Exhibit 2, Strike Through Tariffs, GS-3. The tariff shows a present on peak energy charge of \$0.11357 per kWh. However, the billing analysis shows a present on peak energy charge of \$0.17036 per kWh. Explain and reconcile the discrepancy.

9. Refer to Exhibit 4, Billing Analysis, page 5. Refer also to Exhibit 2, Proposed Tariffs, Schedule G1, and Exhibit 6, Customer Notice. The tariff and customer notice show a proposed energy charge of \$0.05478 per kWh. However, the billing analysis shows a proposed energy charge of \$0.054777 per kWh. Explain and reconcile the discrepancy.

10. Refer to Exhibit 6, Customer Notice. Refer also to Exhibit 4, Billing Analysis, page 2, GS-1.

a. The customer notice shows a present customer charge of \$17.10. However, the billing analysis shows a present customer charge of \$21.38. Explain and reconcile the discrepancy.

b. The customer notice shows a present energy charge of \$0.09598 per kWh. However, the billing analysis shows a present energy charge of \$0.09578 per kWh. Explain and reconcile the discrepancy.

11. Refer to Exhibit 6, Customer Notice. Refer also to Exhibit 4, Billing Analysis, page 2, GS-2.

a. The customer notice shows a present customer charge of \$14.36. However, the billing analysis shows a present customer charge of \$18.64. Explain and reconcile the discrepancy.

b. The customer notice shows a proposed first 200 energy charge of \$0.09324 per kWh. However, the billing analysis shows a proposed first 200 energy charge of \$0.09310 per kWh. Explain and reconcile the discrepancy.

c. The customer notice shows a proposed next 300 energy charge of \$0.10967 per kWh. However, the billing analysis shows a proposed next 300 energy charge of \$0.10951 per kWh. Explain and reconcile the discrepancy.

d. The customer notice shows a proposed over 500 energy charge of \$0.12062 per kWh. However, the billing analysis shows a proposed over 500 energy charge of \$0.12044 per kWh. Explain and reconcile the discrepancy.

12. Refer to Exhibit 6, Customer Notice. Refer also to Exhibit 4, Billing Analysis, page 2, GS-3.

a. The customer notice shows a proposed customer charge of \$27.38. However, the billing analysis shows a proposed customer charge of \$27.34. Explain and reconcile the discrepancy.

b. The customer notice shows a present on peak energy charge of \$0.011357 per kWh. However, the billing analysis shows a present on peak energy charge of \$0.017036 per kWh. Explain and reconcile the discrepancy.

c. The customer notice shows a proposed on peak energy charge of \$0.012001 per kWh. However, the billing analysis shows a proposed on peak energy charge of \$0.17975 per kWh. Explain and reconcile the discrepancy.

d. The customer notice shows a proposed off peak energy charge of \$0.06972 per kWh. However, the billing analysis shows a proposed off peak energy charge of \$0.06962 per kWh. Explain and reconcile the discrepancy.

13. Refer to Exhibit 6, Customer Notice. Refer also to Exhibit 4, Billing Analysis, page 3, SC-1.

a. The customer notice shows a proposed customer charge of \$35.60. However, the billing analysis shows a proposed customer charge of \$35.55. Explain and reconcile the discrepancy.

b. The customer notice shows a proposed energy charge of \$0.10190 per kWh. However, the billing analysis shows a proposed energy charge of \$0.101760 per kWh. Explain and reconcile the discrepancy.

c. The customer notice shows a proposed demand charge of \$8.52 per kW. However, the billing analysis shows a proposed demand charge of \$8.50 per kW. Explain and reconcile the discrepancy.

14. Refer to Exhibit 6, Customer Notice. Refer also to Exhibit 4, Billing Analysis, page 3, SC-2.

a. The customer notice shows a proposed customer charge of \$43.81. However, the billing analysis shows a proposed customer charge of \$43.75. Explain and reconcile the discrepancy.

b. The customer notice shows a proposed on peak energy charge of \$0.14988 per kWh. However, the billing analysis shows a proposed on peak energy charge of \$0.14966 per kWh. Explain and reconcile the discrepancy.

c. The customer notice shows a proposed off peak energy charge of \$0.08466 per kWh. However, the billing analysis shows a proposed off peak energy charge of \$0.08454 per kWh. Explain and reconcile the discrepancy.

15. Refer to Exhibit 6, Customer Notice. Refer also to Exhibit 4, Billing Analysis, page 3, LP-1.

a. The customer notice shows a proposed customer charge of \$60.86. However, the billing analysis shows a proposed customer charge of \$60.78. Explain and reconcile the discrepancy.

b. The customer notice shows a proposed energy charge of \$0.06941 per kWh. However, the billing analysis shows a proposed energy charge of \$0.06931 per kWh. Explain and reconcile the discrepancy.

c. The customer notice shows a proposed demand charge of \$9.13 per kW. However, the billing analysis shows a proposed demand charge of \$9.12 per kW. Explain and reconcile the discrepancy.

16. Refer to Exhibit 6, Customer Notice. Refer also to Exhibit 4, Billing Analysis, page 6, LP-1 TOD.

a. The customer notice shows a proposed customer charge of \$61.10. However, the billing analysis shows a proposed customer charge of \$61.01. Explain and reconcile the discrepancy.

b. The customer notice shows a proposed on peak energy charge of \$0.11309 per kWh. However, the billing analysis shows a proposed on peak energy charge of \$0.11293 per kWh. Explain and reconcile the discrepancy.

c. The customer notice shows a proposed off peak energy charge of \$0.07945 per kWh. However, the billing analysis shows a proposed off peak energy charge of \$0.07934 per kWh. Explain and reconcile the discrepancy.

17. Refer to Exhibit 6, Customer Notice. Refer also to Exhibit 4, Billing Analysis, page 3, LP-2.

a. The customer notice shows a proposed customer charge of \$121.73. However, the billing analysis shows a proposed customer charge of \$121.55. Explain and reconcile the discrepancy.

b. The customer notice shows a proposed energy charge of \$0.06941 per kWh. However, the billing analysis shows a proposed energy charge of \$0.06931 per kWh. Explain and reconcile the discrepancy.

c. The customer notice shows a proposed demand charge of \$9.13 per kW. However, the billing analysis shows a proposed demand charge of \$9.12 per kW. Explain and reconcile the discrepancy.

18. Refer to Exhibit 6, Customer Notice. Refer also to Exhibit 4, Billing Analysis, page 5, Lighting. The present and proposed rates outlined in the customer notice do not match those filed in the billing analysis. Explain and reconcile the discrepancy.

19. Refer to Exhibit 6, Customer Notice. Refer also to Exhibit 4, Billing Analysis, page 1. The following revenue increases do not match those filed in the billing

analysis: GS-1, GS-2, GS-3, SC-1, SC-2, LP-1, LP-1, LP-2, Lighting, and the total revenue increase. Explain and reconcile the discrepancy.

20. Refer to Exhibit 6, Customer Notice. Refer also to Exhibit 4, Billing Analysis. The following dollar amount and percent bill impacts do not match those filed in the billing analysis: GS-1, GS-2, GS-3, SC-1, SC-2, LP-1, LP-1, and LP-2. Explain and reconcile the discrepancy.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED SEP 9 2025

cc: Parties of Record

*L. Allyson Honaker
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

*Heather Temple
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

*Lauren Logan
Blue Grass Energy Cooperative Corp.
1201 Lexington Road
P. O. Box 990
Nicholasville, KY 40340-0990

*Meredith L. Cave
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

*Michael Williams
Senior Vice President
Blue Grass Energy Cooperative Corp.
1201 Lexington Road
P. O. Box 990
Nicholasville, KY 40340-0990

*Blue Grass Energy Cooperative Corp.
1201 Lexington Road
P. O. Box 990
Nicholasville, KY 40340-0990