

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF FARMERS	)	
RURAL ELECTRIC COOPERATIVE	)	CASE NO.
CORPORATION FOR PASS-THROUGH OF EAST	)	2025-00221
KENTUCKY POWER COOPERATIVE, INC.'S	)	
WHOLESALE RATE ADJUSTMENT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION

Farmers Rural Electric Cooperative Corporation (Farmers RECC), 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 Farmers RECC 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>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.

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

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

a. Confirm that Farmers RECC'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 Farmers RECC 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,<sup>2</sup> which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery.

a. Provide a reconciliation between the \$0.01185 per kWh FAC roll-in incorporated in Exhibit 4 and Farmers RECC'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 Farmers RECC's semi-annual filings.

c. Confirm that Farmers RECC 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 Farmers RECC's current tariff.<sup>3</sup>

---

<sup>2</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.

<sup>3</sup> Farmers Rural Electric Cooperative Corporation Tariff (last changed June 26, 2025).

a. Describe how Farmers RECC 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 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.

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

6. Refer to Exhibit 4, Billing Analysis, page 6. Refer also to Exhibit 2, Proposed Tariffs, Schedule OL – Outdoor Lighting Service. The billing analysis shows a rate for LED Light 105 Watt, yet the proposed tariff shows a rate for LED Lighting 104 Watts. Confirm whether these represent the same rate and reconcile the discrepancy.

7. Refer to Exhibit 2, Proposed Tariffs. Refer also to Exhibit 3, Current and Proposed Rates, and Exhibit 4, Billing Analysis. Exhibit 3 and Exhibit 4 both include the proposed Net Metering rate. However, Net Metering was not included in the proposed tariffs. Explain and reconcile the discrepancy.

8. Refer to Exhibit 6, Customer Notice, page 26H. Refer also to Exhibit 4, Billing Analysis, page 1. Explain why the overall revenue increase was excluded in the table outlining the dollar and percentage change in revenue for each class.

9. Refer to Exhibit 6, Customer Notice, page 26H. Refer also to Exhibit 4, Billing Analysis, page 5. The TOD Three Phase – Schedule C rate shows a dollar amount bill impact of \$25.81 on the billing analysis. However, on the customer notice, it lists \$0.05. 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

\*Farmers R.E.C.C.  
504 South Broadway  
P. O. Box 1298  
Glasgow, KY 42141-1298

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

\*Jennie G Phelps  
Farmers R.E.C.C.  
504 South Broadway  
P. O. Box 1298  
Glasgow, KY 42141-1298

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

\*Tobias Moss  
President  
Farmers R.E.C.C.  
504 South Broadway  
P. O. Box 1298  
Glasgow, KY 42141-1298