COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

)	
)	
)	
)	CASE NO.
)	2025-00266
)	
)	
)	
)))))))

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO EAST KENTUCKY POWER COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc. (EKPC), or its member cooperatives, pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on December 12, 2025. The Commission directs EKPC 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

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).

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 response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

EKPC and the member Cooperatives shall make timely amendment to any prior response if EKPC or the member Cooperatives obtain 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 EKPC and the member Cooperatives fail or refuse to furnish all or part of the requested information, EKPC and the member Cooperatives 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 filling a paper containing personal information, EKPC and the member Cooperatives shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. This question is addressed to the Licking Valley Rural Electric Cooperative Corporation (Licking Valley RECC). Refer to Licking Valley RECC's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 2.

Licking Valley RECC stated that the requested information (the calculation of over- or under-recovery amount) was provided in file PSC 1-7.xlsx. File PSC 1-7.xlsx does not provide the over- or under-recovery amount. It only has one tab which states the kWh Average Usage and the calculation of the Average Residential monthly bill. Submit new documentation that clearly states what the over- or under-recovery is for the review period, in the same manner as the other co-op submissions, matching to the value submitted by EKPC. If the recovery differs from the value submitted by EKPC, explain why.

- This question is addressed to the Cumberland Valley Electric, Inc.
 (Cumberland Valley Electric). Refer to Cumberland Valley Electric's response to Staff's Second Request, Item 3.
- a. The response is unresponsive. Cumberland Valley Electric stated that the requested information providing the calculation of over- or under-recovery amount was provided in files PSC 1-7.1.xlsx and PSC 1-7 Pass Through Mechanism.xlsx. File PSC 1-7.1.xlsx does not state what the over- or under-recovery is, it only has one tab which states the Average Monthly Residential usage, the calculation of the total bill amount, and the dollar impact. File PSC 1-7 Pass Through Mechanism.xlsx also does not clearly state what the over- or under- recovery is for the requested review period. In the Recovery tab at column 9 labeled Amortization of (Over) / Under Recovery at highlighted row Mar-25, there is a value of \$73,830. The value \$73,830 does not match the value submitted by EKPC, which is a (\$442,980) over-recovery. Clarify whether Cumberland Valley Electric intends for the under-recovery to be \$73,830 for the review period.

b. If the under-recovery is not \$73,830, submit new clear presentation of Cumberland Valley Electric's over- or under-recovery amount in the same manner as the other member cooperative's submissions.

Linda C. Bridwell, PE Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED **DEC 01 2025**

cc: Parties of Record

*Alan Q. Zaring Attorney at Law Zaring & Sullivan Law Office, PSC P.O. Box 226 New Castle, KY 40050 *Nolin R.E.C.C. Nolin R.E.C.C. 411 Ring Road Elizabethtown, KY 42701-6767

*East Kentucky Power Cooperative, Inc. 4775 Lexington Road P. O. Box 707 Winchester, KY 40392-0707

*L. Allyson Honaker Honaker Law Office, PLLC 1795 Alysheba Way Suite 1203 Lexington, KY 40509 *South Kentucky R.E.C.C. South Kentucky R.E.C.C. 200 Electric Avenue Somerset, KY 42501 *Inter-County Energy Cooperative Corp Inter-County Energy Cooperative Corporation 1009 Hustonville Road P. O. Box 87 Danville, KY 40423-0087

*Clayton O Oswald Taylor, Keller & Oswald, PLLC 1306 West Fifth Street, Suite 100 Post Office Box 3440 London, KY 40743-3440 *Meredith L. Cave Honaker Law Office, PLLC 1795 Alysheba Way Suite 1203 Lexington, KY 40509 *Jackson Energy Cooperative Corporati Jackson Energy Cooperative Corporation 115 Jackson Energy Lane McKee, KY 40447

*Eric G. Farris Dinsmore & Shohl, LLP 101 South Fifth Street Suite 2500 Louisville, KY 40202

*Big Sandy R.E.C.C. Big Sandy R.E.C.C. 504 11th Street Paintsville, KY 41240 *Licking Valley R.E.C.C. Licking Valley R.E.C.C. P. O. Box 605 271 Main Street West Liberty, KY 41472

*Farmers R.E.C.C. Farmers R.E.C.C. 504 South Broadway P. O. Box 1298 Glasgow, KY 42141-1298 *Jeff Prater Big Sandy R.E.C.C. 504 11th Street Paintsville, KY 41240 *Owen Electric Cooperative, Inc. Owen Electric Cooperative, Inc. 8205 Highway 127 North P. O. Box 400 Owenton, KY 40359

*Heather Temple Honaker Law Office, PLLC 1795 Alysheba Way Suite 1203 Lexington, KY 40509 *Clark Energy Cooperative, Inc. Clark Energy Cooperative, Inc. 2640 Ironworks Road P. O. Box 748 Winchester, KY 40392-0748 *Shelby Energy Cooperative, Inc. Shelby Energy Cooperative, Inc. 620 Old Finchville Road Shelbyville, KY 40065

*Fleming-Mason Energy Cooperative, In Fleming-Mason Energy Cooperative, Inc. 1449 Elizaville Road P. O. Box 328 Flemingsburg, KY 41041

*Cumberland Valley Electric, Inc. Cumberland Valley Electric, Inc. Highway 25E P. O. Box 440 Gray, KY 40734 *Salt River Electric Cooperative Corp Salt River Electric Cooperative Corp. 111 West Brashear Avenue P. O. Box 609 Bardstown, KY 40004 *Blue Grass Energy Cooperative Corp. Blue Grass Energy Cooperative Corp. 1201 Lexington Road P. O. Box 990 Nicholasville, KY 40340-0990

*Grayson R.E.C.C. Grayson R.E.C.C. 109 Bagby Park Grayson, KY 41143

*Taylor County R.E.C.C. Taylor County R.E.C.C. 625 West Main Street P. O. Box 100 Campbellsville, KY 42719