

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF TAYLOR)	
COUNTY RURAL ELECTRIC COOPERATIVE)	CASE NO.
CORPORATION FOR PASS-THROUGH OF EAST)	2025-00209
KENTUCKY POWER COOPERATIVE, INC.'S)	
WHOLESALE RATE ADJUSTMENT)	

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

Taylor County Rural Electric Cooperative Corporation (Taylor 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 10, 2025. The Commission directs Taylor RECC 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.

Taylor RECC shall make timely amendment to any prior response if Taylor 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 Taylor RECC fails or refuses to furnish all or part of the requested information, Taylor 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, Taylor 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 Taylor RECC's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC to Taylor RECC and explain the variance of approximately \$(890) shown in Exhibit 4.

2. Refer to the Direct Testimony of John Wolfram, Exhibit 7.
 - a. Confirm that Taylor 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 variance.
 - b. If Taylor RECC considered any deviation from strict proportionality pass-through of the wholesale rate increase, explain why no such deviation was proposed.
 - c. Provide the class billing determinants used to support the proportional pass-through of the wholesale rate increase.
3. Refer to Exhibit 4 of the Application, which shows revenues associated with the Tennessee Gas/Kinder Morgan special contract.
 - a. Identify the Commission case number and Order approving this special contract.
 - b. Confirm that no portion of EKPC's wholesale increase being allocated to this load is inconsistent with the terms of the contract and the statutory provisions governing pass-through adjustments for special contracts. If not confirmed, explain the response.
4. Refer to Case No. 2023-00014,² which examined EKPC's fuel adjustment clause (FAC) adjustments and recovery.
 - a. Provide a reconciliation between the \$0.01194/kWh FAC roll-in incorporated in Exhibit 4 and Taylor RECC's FAC Form A filings filed after the

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.

August 30, 2024 Order in Case No. 2023-00014. Identify any differences between the billing analysis in Exhibit 4 and the FAC recovery amounts reported in Taylor RECC's semi-annual filings.

b. Confirm that Taylor 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.

5. Refer to Exhibit 4 of the Application, page 2.

a. Confirm whether the change in the Residential ETS Customer Charge from the present rate of \$17.01 to a proposed rate of \$17.95 is correct. If not confirmed, explain the response.

b. Reconcile the figures in Item 5(a) with the figure in the Customer Notice in Exhibit 6.

6. Refer to Exhibit 2, Exhibit 3, Exhibit 4, and Exhibit 6 of the Application, generally. Confirm that any discrepancies in the energy charges for rate schedules A, B2, B3, and C3 from the billing analysis are due to rounding. If not confirmed, explain any discrepancies.



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DATED **AUG 26 2025**

cc: Parties of Record

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