

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF SOUTH	)	
KENTUCKY RURAL ELECTRIC COOPERATIVE	)	CASE NO.
CORPORATION FOR PASS-THROUGH OF EAST	)	2025-00210
KENTUCKY POWER COOPERATIVE, INC.'S	)	
WHOLESALE RATE ADJUSTMENT	)	

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

South Kentucky Rural Electric Cooperative Corporation (South Kentucky 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 South Kentucky 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

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<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).

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.

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

2. 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 \$0.01125/kWh FAC roll-in incorporated in Exhibit 4 and South Kentucky RECC's FAC Form A filings filed after the 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 South Kentucky RECC's semi-annual filings.

b. Confirm that South Kentucky 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.

3. Refer to Exhibit 4 of the Application.

a. Provide spreadsheets and narrative explanations showing how the billing determinants (customer counts, kWh sales, and kW billing demand) were derived for each rate schedule.

b. Identify whether the determinants are based on historical test-year data, adjusted for load growth, weather normalization, or other factors, and explain the basis for any such adjustments.

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<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.

4. Refer to Exhibit 4 of the Application, Schedules LP-1, LP-2, and LP-3. Provide a detailed explanation of how the kWh and kW billing determinants for each of these schedules were developed, including the basis for any escalation or adjustment percentages.

5. Refer to Exhibit 4, Billing Analysis, pages 2 and 4. Refer also to Exhibit 2, Exhibit 3, and Exhibit 6, generally. The following energy charges have an extra zero at the end in Exhibits 2, 3, and 6: Schedule A, Schedule A-ETS, Schedule AES, Schedule B, Schedule B-ETS, and Schedule OPS. Explain why the zero at the end is not also included in the Billing Analysis for those rate schedules.

6. Refer to Exhibit 4, Billing Analysis, page 5. "Sodium Cobra w 30' Aluminum Pole" and "250 W Cobra Head HPS @ 106KWH w/30' Alu" appear to be the same rate. Refer also to Exhibit 2, Proposed Tariff, Schedule DSTL. Provide the following:

a. Confirm that both rates listed above are the "250 Watt Cobra Head HPS @ 106 Kwh w/30' Aluminum Pole" listed on the tariff. If not confirmed, explain the response.

b. Provide the correct number of billing units for the "250 Watt Cobra Head HPS @ 106 Kwh w/30' Aluminum Pole" rate for the Billing Analysis.

7. Refer to Exhibit 4, Billing Analysis, page 5, line items 157, 158, and 160. Refer also to Exhibit 2, Proposed Tariff, Schedule DSTL.

a. Confirm the metered and unmetered rates for the "100 Watt Metal Halide Lexington Lamp @ 44 kWh Mo." If not confirmed, explain the response.

b. Explain why there are duplicative rates with varying billing units.

c. Provide the correct number of billing units for the metered and unmetered “100 Watt Metal Halide Lexington Lamp @ 44 kWh Mo” rate for the Billing Analysis.

8. Refer to Exhibit 4, Billing Analysis, page 5, line item 160. Refer also to Exhibit 2, Proposed Tariff, Schedule DSTL. The “Metal Halide Lexington 100-Watt” rate appears to be the “Metal Halide Lamp or Sodium 100 Watt Acorn @ 44 kWh Mo.” rate in the tariff. Confirm that the two are synonymous and explain whether the different designations were intentional or in error. If intentional, explain why.

9. Refer to Exhibit 4, Billing Analysis, page 5, line items 156 and 161. Both line items appear to be the same rate. Provide the correct number of billing units for the unmetered 400-Watt Metal Halide Galleria rate.

10. Refer to Exhibit 4, Billing Analysis, page 5, DSTL. List which rates have zero billing units.

11. Refer to Exhibit 2, Strike Through Tariff, Schedule LP-1. The Substation Charges are missing. Provide a corrected Strike Through of Schedule LP-1.

12. Refer to Exhibit 2, Strike Through Tariff, Schedule LP-3. The Substation Charges are missing. Provide a corrected Strike Through of Schedule LP-3.

13. Refer to Exhibit 4, Billing Analysis, page 6, Outdoor Lighting/Security Lights. Confirm that the associated tariff is Schedule OL. If not confirmed, identify the correct tariff.

14. Refer to Exhibit 4, Billing Analysis, page 6, line items 173, 174, 175, and 176. Refer also to Exhibit 2, Proposed Tariff, Schedule OL.

a. Explain why there are duplicative rates with varying billing units.

b. Provide the correct number of billing units for the metered and unmetered “Mercury Vapor 7,000-10,000 Lumens” rates.

15. Refer to Exhibit 4, Billing Analysis, page 6, line items 177 and 178. Refer also to Exhibit 2, Proposed Tariff, Schedule OL.

a. Explain why there are duplicative rates with varying billing units.

b. Provide the correct number of billing units for the unmetered “Sodium 7,000-10,000 Lumens” rate.

16. Refer to Exhibit 4, Billing Analysis, page 6, line items 190, 191, 192, and 193. Refer also to Exhibit 2, Proposed Tariff, Schedule OL.

a. Explain why there are duplicative rates with varying billing units.

b. Provide the correct number of billing units for the unmetered “400 Watt Metal Halide @ 167 KWH per Mo.” rates.

17. Refer to Exhibit 4, Billing Analysis, page 6, line items 194 and 196. Refer also to Exhibit 2, Proposed Tariff, Schedule OL.

a. Explain why there are duplicative rates with varying billing units.

b. Provide the correct number of billing units for the unmetered “1000 Watt Metal Halide @ 395 KWH per Mo.” rate.

18. Refer to Exhibit 6, Customer Notice. Schedule LP-2 is missing the current Substation 7500-14799 kW charge. Explain whether this was in error or a purposeful exclusion from the notice.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
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DATED **AUG 26 2025**

cc: Parties of Record

Case No. 2025-00210

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