

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF OWEN)	
ELECTRIC COOPERATIVE, INC. FOR PASS-)	CASE NO.
THROUGH OF EAST KENTUCKY POWER)	2025-00217
COOPERATIVE, INC.'S WHOLESALE RATE)	
ADJUSTMENT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO OWEN ELECTRIC COOPERATIVE, INC.

Owen Electric Cooperative, Inc. (Owen Electric), 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 16, 2025. The Commission directs Owen Electric 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.

Owen Electric shall make timely amendment to any prior response if Owen Electric 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 Owen Electric fails or refuses to furnish all or part of the requested information, Owen Electric 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, Owen Electric 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 Owen Electric's allocation of the East Kentucky Power Cooperative, Inc. (EKPC) wholesale increase to the allocation assigned by EKPC² to Owen Electric and explain any variance shown in Exhibit 4.

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

a. Confirm that Owen Electric's proposed rates reflect a strict proportional pass-through of EKPC's wholesale increase in accordance with KRS 278.455.

b. If Owen Electric considered any deviation from strict proportionality, identify and explain why no such deviation was proposed.

c. Provide the class billing determinants used to support the proportional pass-through.

3. Refer to Exhibit 4 and Owen Electric's tariff,³ Section A, Special Contract Customer.

a. Identify any special contract customers served by Owen Electric and cite the Commission case number and Order approving the current special contract.

b. Confirm that no portion of EKPC's wholesale increase allocated in this case is being applied to service under a special contract except as permitted by the contract and KRS 278.455 and explain how the proposed increase interacts with the contract terms (e.g., pass-through provisions or margins).

² Case No. 2025-00208, *Electronic Application of East Kentucky Power Cooperative, Inc. for a General Adjustment of Rates, Approval of Depreciation Study, Amortization of Certain Regulatory Assets, and Other General Relief* (filed Aug 1, 2025).

³ Owen Electric Cooperative, Inc. Tariff (last changed June 27, 2025).

c. Reconcile the “Special Contract” block in Exhibit 4 with the EKPC allocation and provide the supporting calculations and billing determinants used for that block.

4. Refer to Owen Electric’s Outdoor Lighting schedules in its current tariff, specifically Schedule I, OLS (Outdoor Lighting Service) and Schedules II & III, SOLS (Special Outdoor Lighting Service).

a. Explain how the unmetered, per-light monthly charges (and any embedded energy components where applicable) were treated in Exhibit 4.

b. Provide the counts of lights by type used as billing units for each lighting schedule and show the calculation that ties to Exhibit 4.

5. Refer to Case No. 2023-00014,⁴ which examined EKPC’s fuel adjustment clause (FAC) adjustments and recovery.

a. Provide a reconciliation between the \$0.01165/kWh FAC roll-in incorporated in Exhibit 4 with Owen Electric’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 Owen Electric’s semi-annual filings.

b. Confirm that Owen Electric 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 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.

6. Refer to Owen Electric's current tariff, Rules & Regulations, Section 12 (Billing).

a. Describe how Owen Electric will implement the new rates for bills with service periods that straddle the eventual effective date of the retail pass-through, consistent with Section 12.

b. Provide a worked example (example dates and usage) identifying which components are prorated and which are not (e.g., customer/facility charge, lighting charge, energy, and demand), and how any FAC in effect at that time will be applied.

c. Identify any tariff provisions, internal policies/procedures, or billing-system constraints relied upon in calculating the billing calculations described.

7. Refer to Exhibit 4, Billing Analysis, page 3. Refer also Exhibit 2, generally. The ETS Off-Peak – Special Contract rates specified in the billing analysis are not included on the proposed or strike through tariff sheets.

a. Explain why ETS Off-Peak – Special Contract rates were not included in Exhibit 2.

b. Provide an update to Exhibit 2 to include the changes made to the ETS Off-Peak – Special Contract rates.

8. Refer to Exhibit 4, Billing Analysis, page 5. Refer also Exhibit 2, generally. The Schedule NM – Net Metering – Residential rates specified in the billing analysis are not included on the proposed or strike through tariff sheets.

a. Explain Schedule NM – Net Metering – Residential rates were not included in Exhibit 2.

b. Provide an update to Exhibit 2 to include the changes made to the Schedule NM – Net Metering - Residential rates.

9. Refer to Exhibit 4, Billing Analysis, page 6. Refer also Exhibit 2, generally. Schedule NM – Net Metering - Small Commercial, Schedule NM - Net Metering - Large Commercial, Prepay Metering Program, and Prepay Metering Program Inclining Block rates specified in the billing analysis are not included on the proposed or strike through tariff sheets.

a. Explain why rates were not included in Exhibit 2.

b. Provide an update to Exhibit 2 to include the changes made to the rates.

10. Refer to Exhibit 6, Customer Notice, page 26G. Refer also to Exhibit 4, Billing Analysis, generally. Explain why the Net Metering rates were not included in the customer notice.

11. Refer to Exhibit 6, Customer Notice, page 26G and 26H. Refer also to Exhibit 4, Billing Analysis, page 1. Explain why the total revenue increase was not included in the table describing the overall percentage and dollar amount of revenue increase requested in the customer notice.

12. Refer to Exhibit 6, Customer Notice, page 26h. Refer also to Exhibit 4, Billing Analysis, page 1. Explain why the line item 17, Prepay Metering Program rates, were not included in the table describing the overall percentage and dollar amount of revenue increase requested in the customer notice.

13. Refer to Exhibit 6, Customer Notice, page 26H. Refer also to Exhibit 4, Billing Analysis, page 3. The ETS Off-Peak – Special Contract rate shows a \$0.00 bill

increase on the customer notice. However, the billing analysis shows a \$31.00 bill increase. Explain and reconcile the discrepancy.

14. Refer to Exhibit 6, Customer Notice, page 26H. Refer also to Exhibit 4, Billing Analysis, page 6. The billing analysis shows a bill impact of \$7.05 for the Prepay Metering Program – Inclining Block rate. However, the customer notice does not include the bill impact for this specific rate. Explain why the Prepay Metering Program – Inclining Block bill impact was not included in the customer notice.



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DATED SEP 03 2025

cc: Parties of Record

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