

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF GRAYSON	)	
RURAL ELECTRIC COOPERATIVE	)	
CORPORATION FOR PASS-THROUGH OF EAST	)	CASE NO.
KENTUCKY POWER COOPERATIVE, INC.'S	)	2025-00223
WHOLESALE RATE ADJUSTMENT USING	)	
ELECTRONIC FILING PROCEDURES	)	

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

Grayson Rural Electric Cooperative Corporation (Grayson 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 Grayson 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.

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

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

a. Confirm that Grayson 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 Grayson 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 \$0.01179 per kWh FAC roll-in incorporated in Exhibit 4 and Grayson 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 Grayson RECC's semi-annual filings.

c. Confirm that Grayson 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.

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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 Grayson RECC's current tariff.<sup>3</sup>
  - a. Describe how Grayson 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 9. Refer also to Exhibit 2, Strike Through Tariffs, Large Industrial Service – HLF 5,000 to 9,999 kVA. The billing analysis

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

shows a proposed customer charge of \$1,265.32. However, the tariff shows a proposed customer charge of \$1,265.35. Explain and reconcile the discrepancy.

7. Refer to Exhibit 4, Billing Analysis, page 9. Refer also to Exhibit 2, Strike Through Tariffs, Large Industrial Service – HLF 10,000 kVA and over. The billing analysis shows a proposed energy charge of \$0.05926 per kWh. However, the tariff shows a proposed energy charge of \$0.06036 per kWh. Explain and reconcile the discrepancy.

8. Refer to Exhibit 4, Billing Analysis, page 7. Refer also to Exhibit 2, Strike Through Tariffs, Large Industrial Service – MLF 1,000 to 4,999 kVA. The billing analysis shows a proposed in excess of contract demand charge of \$11.74 per kW. However, the tariff shows a proposed in excess of contract demand charge of \$11.75. Explain and reconcile the discrepancy.

9. Refer to Exhibit 4, Billing Analysis, pages 6-7.

a. Explain why the Large Industrial MLF 1,000 – 4,999 kVA appears twice.

b. Additionally, reconcile the correct number of billing units for that rate.

10. Refer to Exhibit 4, Billing Analysis. Refer also to Exhibit 2, Proposed Tariffs. Residential Prepay Metering Program, General Service Prepay Metering Program, Residential Net Metering, Net Metering Large Power, and Net Metering Small Commercial were all included in the billing analysis without a proposed tariff associated with the proposed rate changes. Provide an updated tariff to support the changes made to these rates.

11. Refer to Exhibit 6, Customer Notice, page 26G and 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.



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Linda C. Bridwell, PE  
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DATED SEP 9 2025

cc: Parties of Record

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