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March 31, 2023

VIA E-MAIL TRANSMISSION

Ms. Linda C. Bridwell, P.E.
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

Re: PSC Case Nos. 2014-00034 and 2016-00316 – Economic Development
Rate Contract Reports

Dear Ms. Bridwell:

Pursuant to the Commission's June 20, 2014 Order in Case No. 2014-00034 and its November 21, 2016 Order in Case No. 2016-00316, please find enclosed for filing the 2022 Economic Development Rate Contract Reports for East Kentucky Power Cooperative, Inc. ("EKPC").

In Case No. 2016-00316, the Commission approved EKPC's first special contract incorporating the Economic Development Rider ("EDR") since the approval of that Rider in Case No. 2014-00034. The Commission clarified that two annual reports would be required and both would be due by March 31 of each year. During 2022 EKPC had five active EDR contracts:

- EKPC, South Kentucky RECC, and Kroger contract, effective December 1, 2016. The EDR discount for Kroger ended with the November 2021 billing; however, pursuant to the final Order in Case No. 2016-00316, EKPC is required to include information on this customer through the end of the term of the EDR contract.
- EKPC, Owen Electric Cooperative, Inc. ("Owen"), and Wayfair LLC contract, effective March 1, 2017. During the last 48 months of the EDR discount period, Wayfair could have missed the 60% load factor requirement a total of eight times and still receive the EDR discount. Wayfair missed the 60% load factor requirement for the eighth time with the May 2020 billing. The EDR discount for Wayfair ended with the February 2022 billing. Wayfair missed the 60% load factor requirement in January and February 2022, and no EDR discount was applied to the bills for those months.

- EKPC, Owen, and Safran Landings contract, effective February 1, 2020. Safran Landings was an existing customer of Owen that undertook an expansion of its operations, which qualified for the EDR. All monthly demand over 9,600 kW is eligible for the EDR discount. It should be noted that Safran Landings is also an interruptible service customer. As shown in the report and supporting spreadsheet, based on the billed revenues, the difference in the marginal cost – demand was lower than the difference in the marginal cost – energy, resulting in an overall failure to cover marginal costs. However, EKPC believes the impact of the interruptible service demand credit is the reason for this result rather than the application of the EDR Credit. The report and supporting spreadsheet include an analysis of the impact of the interruptible service demand credit.
- EKPC, Fleming-Mason Energy Cooperative, and AppHarvest Morehead Farm, LLC (“AppHarvest”) contract. This contract was effective July 1, 2019 but AppHarvest did not commence operations until October 2020. AppHarvest is also an interruptible service customer. The marginal cost analysis for 2022 for AppHarvest was impacted by both the interruptible service demand credit and minimum energy billings. The report and supporting spreadsheet include an analysis of these factors.
- EKPC, Inter-County Energy Cooperative, and Diageo Americas Supply, Inc. (“Diageo”) contract, effective November 16, 2020. While the special contract was effective November 16, 2020, the EDR did not become effective until July 1, 2022. Under the provisions of the contract, Diageo is allowed to miss the required 60% load factor 10 times during the 60 months of the EDR discount period. During 2022, Diageo missed the 60% load factor requirement each month after the EDR became effective on July 1, 2022. As shown in the supporting spreadsheet, the difference in the marginal cost – demand was lower than the difference in the marginal cost – energy, resulting in an overall failure to cover marginal costs. This situation existed because of significant levels of additional energy incorporated into the analysis due to minimum energy billings. EKPC believes the impact of minimum energy billings should not be included in the marginal cost analysis, as no energy was actually secured and provided to Diageo for the minimum energy billing. The supporting spreadsheet includes an analysis of the impact of the minimum energy billings.

EKPC would note that on October 31, 2022 the Commission in Case No. 2022-00355 approved a special contract between EKPC, Jackson Energy Cooperative Corporation, and UMine, LLC (“UMine”). The special contract was effective November 1, 2022. This special contract is the sixth EDR contract EKPC has entered into since the adoption of the EDR tariff. However, UMine did not begin operations during 2022 and it is not reflected in the enclosed report.

The undersigned hereby certifies that the electronic filing was transmitted to the Commission on March 31, 2022; there are currently no parties that the Commission has

Ms. Linda C. Bridwell

March 31, 2023

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excused from participation by electronic means in this proceeding; and, pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of this filing will be filed.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Allyson Honaker". The signature is fluid and cursive, with a large initial "L" and a long, sweeping tail.

L. Allyson Honaker

*Counsel for East Kentucky Power
Cooperative, Inc.*

Enc.

1 EDR Analysis CY 2022.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2022

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 5 **Cooperative:** South Kentucky RECC
 6 **Customer:** Kroger Limited Partnership

Month	Billed Units		Billed Revenues			Marginal Cost - Demand			Marginal Cost - Energy		
	Demand (kW)	Energy (kWh)	Demand	Energy	FAC	\$ / kW-month	Monthly Cost	Difference	Purchase Cost	Monthly Cost	Difference
January 2022	500	221,548	\$3,745	\$8,836	\$1,741	\$4.26	\$2,130	\$1,615	\$0.039633	\$8,781	\$1,796
February	500	205,442	\$3,745	\$8,194	\$2,042	\$4.26	\$2,130	\$1,615	\$0.057034	\$11,717	(\$1,481)
March	500	238,299	\$3,745	\$9,504	\$2,385	\$4.26	\$2,130	\$1,615	\$0.046394	\$11,056	\$833
April	500	237,162	\$3,745	\$9,459	\$1,762	\$4.26	\$2,130	\$1,615	\$0.041905	\$9,938	\$1,283
May	500	278,939	\$3,745	\$11,125	\$1,972	\$4.26	\$2,130	\$1,615	\$0.055876	\$15,586	(\$2,489)
June	585	304,865	\$4,593	\$12,159	\$2,799	\$1.52	\$889	\$3,704	\$0.059784	\$18,226	(\$3,268)
July	531	330,700	\$4,054	\$13,190	\$5,450	\$1.52	\$807	\$3,247	\$0.065019	\$21,502	(\$2,862)
August	542	334,705	\$4,164	\$13,349	\$4,974	\$1.52	\$824	\$3,340	\$0.063613	\$21,292	(\$2,969)
September	550	283,995	\$4,244	\$11,327	\$5,592	\$1.52	\$836	\$3,408	\$0.079208	\$22,495	(\$5,576)
October	500	250,213	\$3,745	\$9,979	\$5,325	\$1.52	\$760	\$2,985	\$0.068729	\$17,197	(\$1,893)
November	500	232,899	\$3,745	\$9,289	\$3,542	\$1.52	\$760	\$2,985	\$0.055437	\$12,911	(\$80)
December 2022	500	231,886	\$3,745	\$9,249	\$3,557	\$1.52	\$760	\$2,985	\$0.053016	\$12,294	\$512
Totals	6,208	3,150,653	\$47,015	\$125,660	\$41,141		\$16,286	\$30,729		\$182,995	(\$16,194)
Net Billed Revenues - Energy					<u>\$166,801</u>						

Notes: The EDR discount ended with the November 2021 bill; however, the term of the EDR contract will not end until November 2026. EKPC is required to include this customer in the reporting until the end of the term of the EDR contract.

1 EDR Analysis CY 2022.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2022

33 **Cooperative:** Owen Electric
 34 **Customer:** Wayfair LLC

Month	Billed Units		Billed Revenues			Marginal Cost - Demand			Marginal Cost - Energy		
	Demand (kW)	Energy (kWh)	Demand	Energy	FAC	\$/ kW-month	Monthly Cost	Difference	Purchase Cost	Monthly Cost	Difference
January 2022	500	200,000	\$3,745	\$7,347	\$1,383	\$4.26	\$2,130	\$1,615	\$0.039633	\$7,927	\$803
February	500	200,000	\$3,745	\$6,755	\$1,525	\$4.26	\$2,130	\$1,615	\$0.057034	\$11,407	(\$3,127)
March	500	200,000	\$3,745	\$7,413	\$1,787	\$4.26	\$2,130	\$1,615	\$0.046394	\$9,279	(\$79)
April	500	200,000	\$3,745	\$7,547	\$1,364	\$4.26	\$2,130	\$1,615	\$0.041905	\$8,381	\$530
May	500	218,270	\$3,745	\$8,705	\$1,543	\$4.26	\$2,130	\$1,615	\$0.055876	\$12,196	(\$1,948)
June	500	233,454	\$3,745	\$9,311	\$2,143	\$1.52	\$760	\$2,985	\$0.059784	\$13,957	(\$2,503)
July	500	237,291	\$3,745	\$9,464	\$3,911	\$1.52	\$760	\$2,985	\$0.065019	\$15,428	(\$2,053)
August	500	235,286	\$3,745	\$9,384	\$3,496	\$1.52	\$760	\$2,985	\$0.063613	\$14,967	(\$2,087)
September	500	210,481	\$3,745	\$8,395	\$4,144	\$1.52	\$760	\$2,985	\$0.079208	\$16,672	(\$4,133)
October	500	200,000	\$3,745	\$7,165	\$3,598	\$1.52	\$760	\$2,985	\$0.068729	\$13,746	(\$2,983)
November	500	200,000	\$3,745	\$7,033	\$2,495	\$1.52	\$760	\$2,985	\$0.055437	\$11,087	(\$1,559)
December 2022	500	200,000	\$3,745	\$7,000	\$2,497	\$1.52	\$760	\$2,985	\$0.053016	\$10,603	(\$1,106)
Totals	6,000	2,534,782	\$44,940	\$95,519	\$29,886		\$15,970	\$28,970		\$145,650	(\$20,245)
				Net Billed Revenues - Energy	\$125,405						
Marginal Cost - Energy Analysis excluding Minimum Energy Billings:											
Totals		2,322,199		\$92,618	\$29,886					\$134,264	(\$11,760)
				Net Revenues - Energy	\$122,504						

Please see the detailed Wayfair billing analysis for the Marginal Cost - Energy analysis exclusive of the minimum energy requirement reflected in the billed energy totals.

Notes: During the last 48 months of the discount period, Wayfair is permitted to miss the 60% load factor requirement 8 times and still receive the EDR discount. Wayfair missed the 60% load factor for the 8th time with the May 2020 billing. During 2022 Wayfair failed to achieved a 60% load factor January and February, so no EDR credit was applied to the billing. The EDR discount ended with the February 2022 bill; consequently, none of the billings in 2022 included an EDR credit. The term of the EDR contract will not end until February 2027. EKPC is required to include this customer in the reporting until the end of the term of the EDR contract. The billing analysis above includes 212,583 kWh of billed energy that reflects minimum energy requirements per the contract. As EKPC did not have to provide or purchase this minimum energy requirement, its should not be included in the Marginal Cost - Energy analysis.

1 EDR Analysis CY 2022.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2022

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73 **Cooperative:** Owen Electric
 74 **Customer:** Safran Landings

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Month	Billed Units		Billed Revenues			Marginal Cost - Demand			Marginal Cost - Energy			
	Demand (kW)	Energy (kWh)	Demand	Energy	FAC	\$/ kW-month	Monthly Cost	Difference	Purchase Cost	Monthly Cost	Difference	
80 January 2022	13,500	6,843,764	\$56,167	\$273,694	\$53,792	\$4.26	\$57,510	(\$1,343)	\$0.039633	\$271,239	\$56,247	
81 February	15,000	7,598,848	\$58,888	\$303,231	\$75,533	\$4.26	\$63,900	(\$5,012)	\$0.057034	\$433,393	(\$54,629)	
82 March	15,000	8,894,408	\$58,888	\$355,971	\$89,033	\$4.26	\$63,900	(\$5,012)	\$0.046394	\$412,647	\$32,357	
83 April	15,000	6,714,603	\$58,888	\$268,391	\$49,890	\$4.26	\$63,900	(\$5,012)	\$0.041905	\$281,375	\$36,906	
84 May	15,000	8,891,159	\$58,888	\$379,209	\$62,860	\$4.26	\$63,900	(\$5,012)	\$0.055876	\$496,802	(\$54,733)	
85 June	16,000	9,538,085	\$60,211	\$478,499	\$87,560	\$1.52	\$24,320	\$35,891	\$0.059784	\$570,225	(\$4,166)	
86 July	16,000	9,415,423	\$60,211	\$396,736	\$155,166	\$1.52	\$24,320	\$35,891	\$0.065019	\$612,181	(\$60,279)	
87 August	16,000	8,228,029	\$60,211	\$346,059	\$122,269	\$1.52	\$24,320	\$35,891	\$0.063613	\$523,410	(\$55,082)	
88 September	16,000	9,192,119	\$60,211	\$372,271	\$180,993	\$1.52	\$24,320	\$35,891	\$0.079208	\$728,089	(\$174,825)	
89 October	16,000	8,795,742	\$60,211	\$350,809	\$187,173	\$1.52	\$24,320	\$35,891	\$0.068729	\$604,523	(\$66,541)	
90 November	16,000	8,421,215	\$60,211	\$335,872	\$128,087	\$1.52	\$24,320	\$35,891	\$0.055437	\$466,847	(\$2,888)	
91 December 2022	13,500	8,207,861	\$56,904	\$355,399	\$125,909	\$1.52	\$20,520	\$36,384	\$0.053016	\$435,148	\$46,160	
92												
93 Totals	183,000	100,741,256	\$709,889	\$4,216,141	\$1,318,265		\$479,550	\$230,339		\$5,835,879	(\$301,473)	
94												
95			Net Billed Revenues - Energy		\$5,534,406							
96												
97	Marginal Cost - Demand Analysis excluding Interruptible Service Credit:											
98												
99 Totals	183,000		\$1,215,401				\$479,550	\$735,851				

100 **Marginal Cost - Demand Analysis excluding Interruptible Service Credit:**

99 Totals	183,000	\$1,215,401	\$479,550	\$735,851
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Please see the detailed Safran billing analysis for the Marginal Cost - Demand analysis exclusive of the interruptible service credit reflected in the billed demand totals.

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103 Notes: Safran Landings is an existing customer who expanded operations and the EDR is applicable only to monthly demand in excess of 9,600 kW; if demand is lower than 9,600 kW, no EDR credit for the month.
 104 Safran Landings is also an interruptible service customer; the EDR discount is applied to demand charges after the interruptible demand credit has been applied to the bill.
 105 Billing analysis is for total company operations and reflects any applicable interruptible demand credits; the expanded operations are not separately metered.
 106 The Billed Revenues - Demand reflects the net demand charges; EKPC believes the failure to cover the marginal demand cost in the first five months is due to the impact of the interruptible credits.
 107 New contract started in February 2020; January 2022 a 40% discount factor; from February 2022 to December 2022 a 30% discount factor.
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1 EDR Analysis CY 2022.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2022
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110 **Cooperative:** Fleming-Mason Energy
 111 **Customer:** AppHarvest Morehead Farm
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Month	Billed Units		Billed Revenues			Marginal Cost - Demand			Marginal Cost - Energy - Billed Basis			
	Demand (kW)	Energy (kWh)	Demand	Energy	FAC	\$ / kW-month	Monthly Cost	Difference	Purchase Cost	Monthly Cost	Difference	
117 January 2022	10,000	8,044,111	\$35,297	\$320,831	\$63,227	\$4.26	\$42,600	(\$7,303)	\$0.039633	\$318,812	\$65,246	
118 February	10,000	6,446,792	\$35,297	\$257,124	\$64,081	\$4.26	\$42,600	(\$7,303)	\$0.057034	\$367,686	(\$46,481)	
119 March	10,000	4,120,202	\$35,297	\$164,330	\$41,243	\$4.26	\$42,600	(\$7,303)	\$0.046394	\$191,153	\$14,420	
120 April	7,916	1,551,203	\$44,013	\$61,868	\$11,525	\$4.26	\$33,722	\$10,291	\$0.041905	\$65,003	\$8,390	
121 May	580	341,077	\$2,726	\$13,604	\$2,411	\$4.26	\$2,471	\$255	\$0.055876	\$19,058	(\$3,043)	
122 June	500	327,369	\$2,247	\$13,057	\$3,005	\$1.52	\$760	\$1,487	\$0.059784	\$19,571	(\$3,509)	
123 July	500	278,201	\$2,247	\$11,096	\$4,585	\$1.52	\$760	\$1,487	\$0.065019	\$18,088	(\$2,407)	
124 August	500	200,000	\$2,247	\$7,598	\$2,758	\$1.52	\$760	\$1,487	\$0.063613	\$12,723	(\$2,367)	
125 September	500	237,719	\$2,247	\$9,481	\$4,681	\$1.52	\$760	\$1,487	\$0.079208	\$18,829	(\$4,667)	
126 October	10,000	4,000,000	\$41,180	\$120,477	\$53,444	\$1.52	\$15,200	\$25,980	\$0.068729	\$274,916	(\$100,995)	
127 November	10,000	6,907,070	\$41,180	\$275,482	\$105,057	\$1.52	\$15,200	\$25,980	\$0.055437	\$382,907	(\$2,368)	
128 December 2022	10,000	9,009,774	\$41,180	\$362,857	\$138,210	\$1.52	\$15,200	\$25,980	\$0.053016	\$477,662	\$23,405	
129 Totals	70,496	41,463,518	\$285,158	\$1,617,805	\$494,227		\$212,633	\$72,525		\$2,166,408	(\$54,376)	
130	Net Billed Revenues - Energy					\$2,112,032						
131	Marginal Cost - Demand Analysis excluding Interruptible Service Credit and Marginal Cost - Energy Analysis excluding Minimum Energy Billings:											
132	Totals	70,496	39,960,542	\$350,478	\$1,597,298	\$494,227		\$212,633	\$137,845		\$2,063,184	\$28,341
133	Net Revenues - Energy					\$2,091,525						

Please see the detailed AppHarvest billing analysis for the Marginal Cost - Demand analysis exclusive of the interruptible service credit reflected in the billed demand totals and Marginal Cost - Energy analysis exclusive of the minimum energy requirement reflected in the billed energy totals.

Notes: AppHarvest started operations in October 2020. During the first 12 months of the EDR discount period, the 60% load factor requirement is waived. During the remaining 48 months of the discount period, AppHarvest is permitted to miss the 60% load factor requirement 8 times and still receive the EDR discount. During 2022 AppHarvest failed to meet the 60% load factor requirement in four months; consequently, a total five months counted against the eight allowed misses in the last 48. AppHarvest is also an interruptible service customer; the EDR discount is applied to demand charges after the interruptible demand credit has been applied to the bill. The billing analysis above reflects the total company operations as billed and any applicable interruptible demand credits. However, the billing analysis includes 1,502,976 kWh of billed energy that reflects minimum energy requirements per the contract. As EKPC did not have to provide or purchase this minimum energy requirement, it should not be included in the Marginal Cost - Energy analysis. Contract started in October 2020; from January 2022 to September 2022 a 40% discount factor; from October 2022 to December 2022 a 30% discount factor. Billed demand in April and May through September was greater than contract demand; excess demand billed at \$9.98 per kW times 40% discount, after the interruptible credit.

1 EDR Analysis CY 2022.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2022
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154 **Cooperative:** Inter-County Energy
 155 **Customer:** Diageo Americas Supply, Inc.
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Month	Units		Revenues			Marginal Cost - Demand			Marginal Cost - Energy - Excluding Minimum			
	Demand (kW)	Energy (kWh)	Demand	Energy	FAC	\$ / kW-month	Monthly Cost	Difference	Purchase Cost	Monthly Cost	Difference	
161 January 2022	0	0	\$0	\$0	\$0	\$4.26	\$0	\$0	\$0.039633	\$0	\$0	
162 February	0	0	\$0	\$0	\$0	\$4.26	\$0	\$0	\$0.057034	\$0	\$0	
163 March	0	0	\$0	\$0	\$0	\$4.26	\$0	\$0	\$0.046394	\$0	\$0	
164 April	0	0	\$0	\$0	\$0	\$4.26	\$0	\$0	\$0.041905	\$0	\$0	
165 May	0	0	\$0	\$0	\$0	\$4.26	\$0	\$0	\$0.055876	\$0	\$0	
166 June	0	0	\$0	\$0	\$0	\$1.52	\$0	\$0	\$0.059784	\$0	\$0	
167 July	32,000	12,800,000	\$116,800	\$253,152	\$66,221	\$1.52	\$48,640	\$68,160	\$0.065019	\$832,243	(\$512,870)	
168 August	32,000	12,800,000	\$116,800	\$276,564	\$72,970	\$1.52	\$48,640	\$68,160	\$0.063613	\$814,246	(\$464,712)	
169 September	32,000	12,800,000	\$116,800	\$339,997	\$144,287	\$1.52	\$48,640	\$68,160	\$0.079208	\$1,013,862	(\$529,578)	
170 October	32,000	12,800,000	\$116,800	\$324,335	\$143,237	\$1.52	\$48,640	\$68,160	\$0.068729	\$879,731	(\$412,159)	
171 November	32,000	12,800,000	\$116,800	\$264,886	\$67,920	\$1.52	\$48,640	\$68,160	\$0.055437	\$709,594	(\$376,788)	
172 December 2022	32,000	12,800,000	\$116,800	\$311,252	\$95,606	\$1.52	\$48,640	\$68,160	\$0.053016	\$678,605	(\$271,747)	
174 Totals	192,000	76,800,000	\$700,800	\$1,770,186	\$590,241		\$291,840	\$408,960		\$4,928,281	(\$2,567,854)	
176			Net Billed Revenues - Energy		\$2,360,427							
178	<u>Marginal Cost Analysis excluding Minimum Energy Billings:</u>											
180 Totals		33,685,744		\$1,272,647	\$590,241					\$2,194,661	(\$331,773)	
182			Net Revenues - Energy		\$1,862,888							

183
 184 Please see the detailed Diageo Americas billing analysis for the Marginal Cost - Energy analysis exclusive of the minimum energy requirement reflected in the billed energy totals.
 185

186 Notes: Diageo's EDR credit did not begin until July 2022.
 187 Did not meet load factor requirement of 60% in any month of 2022; contract allows 10 failures
 188 The billing analysis above includes 43,114,256 kWh of billed energy that reflects minimum energy requirements per the contract. As EKPC did not have to provide or purchase this minimum energy
 189 requirement, its should not be included in the Marginal Cost - Energy analysis.
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1 EDR Analysis CY 2022.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2022
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 192 **Recap:**

193	Total Billed Demand, all EDR customers	457,704	kW
194	2021 Reported Cumulative Demand, all EDR customers	<u>456,766</u>	kW
195	Total Cumulative Demand for 2022, all EDR customers	<u>914,470</u>	kW
196			
197	Total Billed Energy, all EDR customers	224,690,209	kWh
198	2021 Reported Cumulative Energy, all EDR customers	<u>237,245,423</u>	kWh
199	Total Cumulative Energy for 2022, all EDR customers	<u>461,935,632</u>	kWh

200			
201	Total Billed Energy, exclusive of Minimum Energy, all EDR customers	179,860,394	kWh
202	2021 Cumulative Energy, exclusive of Minimum Energy, all EDR customers	<u>227,707,859</u>	kWh
203	Total Cumulative Energy for 2022, exclusive of Minimum Energy, all EDR customers	<u>407,568,253</u>	kWh

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 205 **Margin Cost:**
 206 Demand -
 207 PJM BRA Results 2021-2022 Delivery Year - Conversion to \$ / kW-month:
 208 \$140.00 / MW-day x 365 days ÷ 1,000 ÷ 12 = \$4.26 / kW-month
 209 PJM BRA Results 2022-2023 Delivery Year - Conversion to \$ / kW-month:
 210 \$50.00 / MW-day x 365 days ÷ 1,000 ÷ 12 = \$1.52 / kW-month
 211

212 Energy - Purchase Cost is the Cost of Market Purchases taken from the applicable EKPC FAC monthly reports. The Difference compares the billed Energy and FAC revenues with the monthly marginal energy cost.
 213

Expense Month	Billing Month	Purchases \$	Purchases kWh	Purchase Cost	
216	December 2021	January 2022	\$20,390,578	514,489,367	\$0.039633
217	January 2022	February	\$28,370,427	497,427,462	\$0.057034
218	February	March	\$16,914,302	364,580,915	\$0.046394
219	March	April	\$15,600,421	372,276,749	\$0.041905
220	April	May	\$6,827,479	122,190,237	\$0.055876
221	May	June	\$5,995,455	100,284,999	\$0.059784
222	June	July	\$15,577,873	239,588,963	\$0.065019
223	July	August	\$8,668,473	136,269,134	\$0.063613
224	August	September	\$11,839,550	149,474,268	\$0.079208
225	September	October	\$16,662,253	242,434,668	\$0.068729
226	October	November	\$17,368,214	313,295,787	\$0.055437
227	November 2022	December 2022	\$26,515,978	500,151,566	\$0.053016

Note: Prior years' analysis matched the FAC expense month with the EKPC billing month. However, this approach ignored the lag in the FAC mechanism. To determine if the marginal costs are covered, it is necessary to recognize that market purchases in a given FAC expense month are reflected in the FAC factor billed to the Members in the following month. The analysis used in this review will be adjusted to reflect this timing difference to get a more accurate determination of whether marginal energy costs were covered.

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 4 **Wayfair**

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 6 **Energy Charges:**

Month	Energy (kWh)			Energy Rates (\$ per kWh)			Energy Charges			
	Actual Use	Minimum Added	Total	Actual	Minimum Billing	FAC Factor	Actual Use	Minimum Added	FAC	Net Energy
January	175,998	24,002	200,000	\$0.039884	\$0.013644	\$0.007860	\$7,020	\$327	\$1,383	\$8,730
February	153,442	46,558	200,000	\$0.039884	\$0.013644	\$0.009940	\$6,120	\$635	\$1,525	\$8,280
March	178,502	21,498	200,000	\$0.039884	\$0.013644	\$0.010010	\$7,119	\$293	\$1,787	\$9,199
April	183,616	16,384	200,000	\$0.039884	\$0.013644	\$0.007430	\$7,323	\$224	\$1,364	\$8,911
May	218,270	0	218,270	\$0.039884	\$0.013644	\$0.007070	\$8,705	\$0	\$1,543	\$10,248
June	233,454	0	233,454	\$0.039884	\$0.013644	\$0.009180	\$9,311	\$0	\$2,143	\$11,454
July	237,291	0	237,291	\$0.039884	\$0.013644	\$0.016480	\$9,464	\$0	\$3,911	\$13,375
August	235,286	0	235,286	\$0.039884	\$0.013644	\$0.014860	\$9,384	\$0	\$3,496	\$12,880
September	210,481	0	210,481	\$0.039884	\$0.013644	\$0.019690	\$8,395	\$0	\$4,144	\$12,539
October	169,069	30,931	200,000	\$0.039884	\$0.013644	\$0.021280	\$6,743	\$422	\$3,598	\$10,763
November	164,018	35,982	200,000	\$0.039884	\$0.013644	\$0.015210	\$6,542	\$491	\$2,495	\$9,528
December	162,772	37,228	200,000	\$0.039884	\$0.013644	\$0.015340	\$6,492	\$508	\$2,497	\$9,497
Totals	2,322,199	212,583	2,534,782				\$92,618	\$2,900	\$29,886	\$125,404

27 **Energy Marginal Cost Analysis - Exclusive of Minimum Energy Billings:**

Month	Energy Charges			Marginal Cost - Exclusive of Minimum Energy Billings			
	Actual Use	FAC	Net Energy	Actual Use - kWh	Purchase Cost	Monthly Cost	Difference
January	\$7,020	\$1,383	\$8,403	175,998	\$0.039633	\$6,975	\$1,428
February	\$6,120	\$1,525	\$7,645	153,442	\$0.057034	\$8,751	(\$1,106)
March	\$7,119	\$1,787	\$8,906	178,502	\$0.046394	\$8,281	\$625
April	\$7,323	\$1,364	\$8,687	183,616	\$0.041905	\$7,694	\$993
May	\$8,705	\$1,543	\$10,248	218,270	\$0.055876	\$12,196	(\$1,948)
June	\$9,311	\$2,143	\$11,454	233,454	\$0.059784	\$13,957	(\$2,503)
July	\$9,464	\$3,911	\$13,375	237,291	\$0.065019	\$15,428	(\$2,053)
August	\$9,384	\$3,496	\$12,880	235,286	\$0.063613	\$14,967	(\$2,087)
September	\$8,395	\$4,144	\$12,539	210,481	\$0.079208	\$16,672	(\$4,133)
October	\$6,743	\$3,598	\$10,341	169,069	\$0.068729	\$11,620	(\$1,279)
November	\$6,542	\$2,495	\$9,037	164,018	\$0.055437	\$9,093	(\$56)
December	\$6,492	\$2,497	\$8,989	162,772	\$0.053016	\$8,630	\$359
Totals	\$92,618	\$29,886	\$122,504	2,322,199		\$134,264	(\$11,760)

Notes: Pursuant to EKPC's Rate B tariff, a minimum level of energy is to be billed based on the product of the contract demand multiplied by 400 hours. If the actual energy usage for a billing period is less than the required minimum, the incremental difference between the actual and minimum is priced at EKPC's energy charge for Rate B minus the fuel base per kWh established in the FAC. This incremental amount of energy is not generated or purchased for the customer and it is not provided to the customer for the customer's use. As this incremental amount of energy is only needed to meet the minimum energy requirement of the tariff, it should not be reflected in the determination of the marginal cost associated with energy.

54 **AppHarvest Morehead**

55 **Energy Charges:**

Month	Energy (kWh)			Energy Rates (\$ per kWh)			Energy Charges			
	Actual Use	Minimum Added	Total	Actual	Minimum Billing	FAC Factor	Actual Use	Minimum Added	FAC	Net Energy
61 January	8,044,111	0	8,044,111	\$0.039884	\$0.013644	\$0.007860	\$320,831	\$0	\$63,227	\$384,058
62 February	6,446,792	0	6,446,792	\$0.039884	\$0.013644	\$0.009940	\$257,124	\$0	\$64,081	\$321,205
63 March	4,120,202	0	4,120,202	\$0.039884	\$0.013644	\$0.010010	\$164,330	\$0	\$41,243	\$205,573
64 April	1,551,203	0	1,551,203	\$0.039884	\$0.013644	\$0.007430	\$61,868	\$0	\$11,525	\$73,393
65 May	341,077	0	341,077	\$0.039884	\$0.013644	\$0.007070	\$13,604	\$0	\$2,411	\$16,015
66 June	327,369	0	327,369	\$0.039884	\$0.013644	\$0.009180	\$13,057	\$0	\$3,005	\$16,062
67 July	278,201	0	278,201	\$0.039884	\$0.013644	\$0.016480	\$11,096	\$0	\$4,585	\$15,681
68 August	185,569	14,431	200,000	\$0.039884	\$0.013644	\$0.014860	\$7,401	\$197	\$2,758	\$10,356
69 September	237,719	0	237,719	\$0.039884	\$0.013644	\$0.019690	\$9,481	\$0	\$4,681	\$14,162
70 October	2,511,455	1,488,545	4,000,000	\$0.039884	\$0.013644	\$0.021280	\$100,167	\$20,310	\$53,444	\$173,921
71 November	6,907,070	0	6,907,070	\$0.039884	\$0.013644	\$0.015210	\$275,482	\$0	\$105,057	\$380,539
72 December	9,009,774	0	9,009,774	\$0.039884	\$0.013644	\$0.015340	\$362,857	\$0	\$138,210	\$501,067
73										
74 Totals	39,960,542	1,502,976	41,463,518				\$1,597,298	\$20,507	\$494,227	\$2,112,032

December includes buy-through charges and credits

77 **Energy Marginal Cost Analysis - Exclusive of Minimum Energy Billings:**

Month	Energy Charges			Marginal Cost - Exclusive of Minimum Energy Billings			
	Actual Use	FAC	Net Energy	Actual Use - kWh	Purchase Cost	Monthly Cost	Difference
82 January	\$320,831	\$63,227	\$384,058	8,044,111	\$0.039633	\$318,812	\$65,246
83 February	\$257,124	\$64,081	\$321,205	6,446,792	\$0.057034	\$367,686	(\$46,481)
84 March	\$164,330	\$41,243	\$205,573	4,120,202	\$0.046394	\$191,153	\$14,420
85 April	\$61,868	\$11,525	\$73,393	1,551,203	\$0.041905	\$65,003	\$8,390
86 May	\$13,604	\$2,411	\$16,015	341,077	\$0.055876	\$19,058	(\$3,043)
87 June	\$13,057	\$3,005	\$16,062	327,369	\$0.059784	\$19,571	(\$3,509)
88 July	\$11,096	\$4,585	\$15,681	278,201	\$0.065019	\$18,088	(\$2,407)
89 August	\$7,401	\$2,758	\$10,159	185,569	\$0.063613	\$11,805	(\$1,646)
90 September	\$9,481	\$4,681	\$14,162	237,719	\$0.079208	\$18,829	(\$4,667)
91 October	\$100,167	\$53,444	\$153,611	2,511,455	\$0.068729	\$172,610	(\$18,999)
92 November	\$275,482	\$105,057	\$380,539	6,907,070	\$0.055437	\$382,907	(\$2,368)
93 December	\$362,857	\$138,210	\$501,067	9,009,774	\$0.053016	\$477,662	\$23,405
94							
95 Totals	\$1,597,298	\$494,227	\$2,091,525	39,960,542		\$2,063,184	\$28,341

Notes: Pursuant to EKPC's Rate B tariff, a minimum level of energy is to be billed based on the product of the contract demand multiplied by 400 hours. If the actual energy usage for a billing period is less than the required minimum, the incremental difference between the actual and minimum is priced at EKPC's energy charge for Rate B minus the fuel base per kWh established in the FAC. This incremental amount of energy is not generated or purchased for the customer and it is not provided to the customer for the customer's use. As this incremental amount of energy is only needed to meet the minimum energy requirement of the tariff, it should not be reflected in the determination of the marginal cost associated with energy.

104 **Diageo Americas**

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107 **Energy Charges:**

Month	Energy (kWh)			Energy Rates (\$ per kWh)			FAC Factor	Energy Charges			Net Energy
	Actual Use	Minimum Added	Total	Actual	Minimum Billing	Actual Use		Minimum Added	FAC		
111											
112	January	0	0	0	\$0.037780	\$0.011540	\$0.007860	\$0	\$0	\$0	\$0
113	February	0	0	0	\$0.037780	\$0.011540	\$0.009940	\$0	\$0	\$0	\$0
114	March	0	0	0	\$0.037780	\$0.011540	\$0.010010	\$0	\$0	\$0	\$0
115	April	0	0	0	\$0.037780	\$0.011540	\$0.007430	\$0	\$0	\$0	\$0
116	May	0	0	0	\$0.037780	\$0.011540	\$0.007070	\$0	\$0	\$0	\$0
117	June	0	0	0	\$0.037780	\$0.011540	\$0.009180	\$0	\$0	\$0	\$0
118	July	4,018,291	8,781,709	12,800,000	\$0.037780	\$0.011540	\$0.016480	\$151,811	\$101,341	\$66,221	\$319,373
119	August	4,910,510	7,889,490	12,800,000	\$0.037780	\$0.011540	\$0.014860	\$185,519	\$91,045	\$72,970	\$349,534
120	September	7,327,947	5,472,053	12,800,000	\$0.037780	\$0.011540	\$0.019690	\$276,850	\$63,147	\$144,287	\$484,284
121	October	6,731,078	6,068,922	12,800,000	\$0.037780	\$0.011540	\$0.021280	\$254,300	\$70,035	\$143,237	\$467,572
122	November	4,465,467	8,334,533	12,800,000	\$0.037780	\$0.011540	\$0.015210	\$168,705	\$96,181	\$67,920	\$332,806
123	December	6,232,451	6,567,549	12,800,000	\$0.037780	\$0.011540	\$0.015340	\$235,462	\$75,790	\$95,606	\$406,858
124											
125	Totals	33,685,744	43,114,256	76,800,000				\$1,272,647	\$497,539	\$590,241	\$2,360,427
126											
127											

128 **Energy Marginal Cost Analysis - Exclusive of Minimum Energy Billings:**

Month	Energy Charges			Marginal Cost - Exclusive of Minimum Energy Billings				
	Actual Use	FAC	Net Energy	Actual Use - kWh	Purchase Cost	Monthly Cost	Difference	
132								
133	January	\$0	\$0	\$0	0	\$0.039633	\$0	\$0
134	February	\$0	\$0	\$0	0	\$0.057034	\$0	\$0
135	March	\$0	\$0	\$0	0	\$0.046394	\$0	\$0
136	April	\$0	\$0	\$0	0	\$0.041905	\$0	\$0
137	May	\$0	\$0	\$0	0	\$0.055876	\$0	\$0
138	June	\$0	\$0	\$0	0	\$0.059784	\$0	\$0
139	July	\$151,811	\$66,221	\$218,032	4,018,291	\$0.065019	\$261,265	(\$43,233)
140	August	\$185,519	\$72,970	\$258,489	4,910,510	\$0.063613	\$312,372	(\$53,883)
141	September	\$276,850	\$144,287	\$421,137	7,327,947	\$0.079208	\$580,432	(\$159,295)
142	October	\$254,300	\$143,237	\$397,537	6,731,078	\$0.068729	\$462,620	(\$65,083)
143	November	\$168,705	\$67,920	\$236,625	4,465,467	\$0.055437	\$247,552	(\$10,927)
144	December	\$235,462	\$95,606	\$331,068	6,232,451	\$0.053016	\$330,420	\$648
145								
146	Totals	\$1,272,647	\$590,241	\$1,862,888	33,685,744		\$2,194,661	(\$331,773)
147								
148								

Notes: Pursuant to EKPC's Rate G tariff, a minimum level of energy is to be billed based on the product of the contract demand multiplied by 400 hours. If the actual energy usage for a billing period is less than the required minimum, the incremental difference between the actual and minimum is priced at EKPC's energy charge for Rate G minus the fuel base per kWh established in the FAC. This incremental amount of energy is not generated or purchased for the customer and it is not provided to the customer for the customer's use. As this incremental amount of energy is only needed to meet the minimum energy requirement of the tariff, it should not be reflected in the determination of the marginal cost associated with energy.

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1 EDR Analysis CY 2022.xlsx
 2 Detailed Analysis of Customer Billing - Exclusion of Impact of Interruptible Demand Credit on Billed Demand Revenues
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5 **Safran Landing**

6
 7 Firm Load 6,000 kW
 8 ED Base Load 9,600 kW - Because the ED Base Load is larger than the Firm Load, any EDR credit will be based on Interruptible Demand
 9

10 As Billed:

11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28
Month	Total Demand	Firm Load	Interruptible	Demand Charge	Interruptible Credit	Net Demand Charge	EDR Credit Percentage	EDR Credit Rate	EDR Eligible Demand	EDR Credit	Demand	Interruptible	Total Net Demand Charges	Marginal Cost - Demand	Difference		
14 January 2022	13,500	6,000	7,500	\$7.49	(\$5.60)	\$1.89	40.00%	(\$0.756)	3,900	(\$2,948)	\$101,115	(\$42,000)	\$56,167	\$57,510	(\$1,343)		
15 February	15,000	6,000	9,000	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	5,400	(\$3,062)	\$112,350	(\$50,400)	\$58,888	\$63,900	(\$5,012)		
16 March	15,000	6,000	9,000	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	5,400	(\$3,062)	\$112,350	(\$50,400)	\$58,888	\$63,900	(\$5,012)		
17 April	15,000	6,000	9,000	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	5,400	(\$3,062)	\$112,350	(\$50,400)	\$58,888	\$63,900	(\$5,012)		
18 May	15,000	6,000	9,000	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	5,400	(\$3,062)	\$112,350	(\$50,400)	\$58,888	\$63,900	(\$5,012)		
19 June	16,000	6,000	10,000	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	6,400	(\$3,629)	\$119,840	(\$56,000)	\$60,211	\$24,320	\$35,891		
20 July	16,000	6,000	10,000	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	6,400	(\$3,629)	\$119,840	(\$56,000)	\$60,211	\$24,320	\$35,891		
21 August	16,000	6,000	10,000	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	6,400	(\$3,629)	\$119,840	(\$56,000)	\$60,211	\$24,320	\$35,891		
22 September	16,000	6,000	10,000	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	6,400	(\$3,629)	\$119,840	(\$56,000)	\$60,211	\$24,320	\$35,891		
23 October	16,000	6,000	10,000	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	6,400	(\$3,629)	\$119,840	(\$56,000)	\$60,211	\$24,320	\$35,891		
24 November	16,000	6,000	10,000	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	6,400	(\$3,629)	\$119,840	(\$56,000)	\$60,211	\$24,320	\$35,891		
25 December 2022	13,500	6,000	7,500	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	3,900	(\$2,211)	\$101,115	(\$42,000)	\$56,904	\$20,520	\$36,384		
27 Totals	183,000	72,000	111,000							(\$39,181)	\$1,370,670	(\$621,600)	\$709,889	\$479,550	\$230,339		

29 Billing Excluding Interruptible:

30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47
Month	Total Demand	Firm Load	Interruptible	Demand Charge	Interruptible Credit	Net Demand Charge	EDR Credit Percentage	EDR Credit Rate	EDR Eligible Demand	EDR Credit	Demand	Interruptible	Total Net Demand Charges	Marginal Cost - Demand	Difference		
33 January 2022	13,500	6,000	0	\$7.49	\$0.00	\$7.49	40.00%	(\$2.996)	3,900	(\$11,684)	\$101,115	\$0	\$89,431	\$57,510	\$31,921		
34 February	15,000	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	5,400	(\$12,134)	\$112,350	\$0	\$100,216	\$63,900	\$36,316		
35 March	15,000	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	5,400	(\$12,134)	\$112,350	\$0	\$100,216	\$63,900	\$36,316		
36 April	15,000	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	5,400	(\$12,134)	\$112,350	\$0	\$100,216	\$63,900	\$36,316		
37 May	15,000	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	5,400	(\$12,134)	\$112,350	\$0	\$100,216	\$63,900	\$36,316		
38 June	16,000	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	6,400	(\$14,381)	\$119,840	\$0	\$105,459	\$24,320	\$81,139		
39 July	16,000	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	6,400	(\$14,381)	\$119,840	\$0	\$105,459	\$24,320	\$81,139		
40 August	16,000	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	6,400	(\$14,381)	\$119,840	\$0	\$105,459	\$24,320	\$81,139		
41 September	16,000	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	6,400	(\$14,381)	\$119,840	\$0	\$105,459	\$24,320	\$81,139		
42 October	16,000	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	6,400	(\$14,381)	\$119,840	\$0	\$105,459	\$24,320	\$81,139		
43 November	16,000	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	6,400	(\$14,381)	\$119,840	\$0	\$105,459	\$24,320	\$81,139		
44 December 2022	13,500	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	3,900	(\$8,763)	\$101,115	\$0	\$92,352	\$20,520	\$71,832		
46 Totals	183,000	72,000	0							(\$155,269)	\$1,370,670	\$0	\$1,215,401	\$479,550	\$735,851		

48 Notes: The total demand revenues reflect the combined effects of the interruptible demand credit, the EDR Credit, and the application of the demand charge.
 49 Because Safran's Firm Load is lower than the ED Base Load, all demand in excess of 9,600 kW is also part of the total interruptible demand. The interruptible demand credit has to be taken before the EDR Credit is determined.
 50 EKPC believes that the "failure" in the first five months to cover the marginal demand cost is due to the presence of the interruptible demand credit and not the EDR Credit. As the analysis above shows, had there been no interruptible demand credit, the marginal demand
 51 costs were more than adequately covered by the revenues that would have resulted from the demand charge and EDR Credit.
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1 EDR Analysis CY 2022.xlsx
 2 Detailed Analysis of Customer Billing - Exclusion of Impact of Interruptible Demand Credit on Billed Demand Revenues
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117 Billing Excluding Interruptible:

Month	Total Demand	Firm Load	Interruptible	Demand Charge	Interruptible Credit	Net Demand Charge	EDR Credit Percentage	EDR Credit Rate	EDR Eligible Demand	EDR Credit	Demand	Interruptible	Total Net Demand Charges	Marginal Cost - Demand	Difference
January 2022 -															
Contract	10,000	7,130		\$7.49		\$7.49	40.00%	(\$2.996)	10,000	(\$29,960)					
Interruptible	10,000	7,130	0	\$7.49	\$0.00	\$7.49	40.00%	(\$2.996)	0	\$0					
Total January										(\$29,960)	\$74,900	\$0	\$44,940	\$42,600	\$2,340
February -															
Contract	10,000	7,130		\$7.49		\$7.49	40.00%	(\$2.996)	10,000	(\$29,960)					
Interruptible	10,000	7,130	0	\$7.49	\$0.00	\$7.49	40.00%	(\$2.996)	0	\$0					
Total February										(\$29,960)	\$74,900	\$0	\$44,940	\$42,600	\$2,340
March -															
Contract	10,000	7,130		\$7.49		\$7.49	40.00%	(\$2.996)	10,000	(\$29,960)					
Interruptible	10,000	7,130	0	\$7.49	\$0.00	\$7.49	40.00%	(\$2.996)	0	\$0					
Total March										(\$29,960)	\$74,900	\$0	\$44,940	\$42,600	\$2,340
April -															
Excess Contract	7,416			\$9.98		\$9.98	40.00%	(\$3.992)	7,416	(\$29,605)	\$74,012				
Contract	500	7,130		\$7.49		\$7.49	40.00%	(\$2.996)	500	(\$1,498)	\$3,745				
Interruptible	0	7,130	0	\$9.98	\$0.00	\$9.98	40.00%	(\$3.992)	0	\$0					
Total April										(\$31,103)	\$77,757	\$0	\$46,654	\$33,722	\$12,932
May -															
Excess Contract	80			\$9.98		\$9.98	40.00%	(\$3.992)	80	(\$319)	\$798				
Contract	500	7,130		\$7.49		\$7.49	40.00%	(\$2.996)	500	(\$1,498)	\$3,745				
Interruptible	0	7,130	0	\$0.00	\$0.00	\$0.00	40.00%	\$0.000	0	\$0					
Total May										(\$1,817)	\$4,543	\$0	\$2,726	\$2,471	\$255
June -															
Contract	500	7,130		\$7.49		\$7.49	40.00%	(\$2.996)	500	(\$1,498)					
Interruptible	500	7,130	0	\$0.00	\$0.00	\$0.00	40.00%	\$0.000	0	\$0					
Total June										(\$1,498)	\$3,745	\$0	\$2,247	\$760	\$1,487
July -															
Contract	500	7,130		\$7.49		\$7.49	40.00%	(\$2.996)	500	(\$1,498)					
Interruptible	500	7,130	0	\$0.00	\$0.00	\$0.00	40.00%	\$0.000	0	\$0					
Total July										(\$1,498)	\$3,745	\$0	\$2,247	\$760	\$1,487
August -															
Contract	500	7,130		\$7.49		\$7.49	40.00%	(\$2.996)	500	(\$1,498)					
Interruptible	500	7,130	0	\$0.00	\$0.00	\$0.00	40.00%	\$0.000	0	\$0					
Total August										(\$1,498)	\$3,745	\$0	\$2,247	\$760	\$1,487
September -															
Contract	500	7,130		\$7.49		\$7.49	40.00%	(\$2.996)	500	(\$1,498)					
Interruptible	500	7,130	0	\$0.00	\$0.00	\$0.00	40.00%	\$0.000	0	\$0					
Total August										(\$1,498)	\$3,745	\$0	\$2,247	\$760	\$1,487
October -															
Contract	10,000	7,130		\$7.49		\$7.49	30.00%	(\$2.247)	10,000	(\$22,470)					
Interruptible	10,000	7,130	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	0	\$0					
Total October										(\$22,470)	\$74,900	\$0	\$52,430	\$15,200	\$37,230
November -															
Contract	10,000	7,130		\$7.49		\$7.49	30.00%	(\$2.247)	10,000	(\$22,470)					
Interruptible	10,000	7,130	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	0	\$0					
Total November										(\$22,470)	\$74,900	\$0	\$52,430	\$15,200	\$37,230
December 2022 -															
Contract	10,000	7,130		\$7.49		\$7.49	30.00%	(\$2.247)	10,000	(\$22,470)					
Interruptible	10,000	7,130	0	\$7.49	\$0.00	\$7.49	30.00%	(\$2.247)	0	\$0					
Total December										(\$22,470)	\$74,900	\$0	\$52,430	\$15,200	\$37,230
Total All Months	70,496	85,560	0							(\$196,202)	\$546,680	\$0	\$350,478	\$212,633	\$137,845

174 Notes: The total demand revenues reflect the combined effects of the interruptible demand credit, the EDR Credit, and the application of the demand charge.
 175 The interruptible demand credit has to be taken before the EDR Credit is determined.
 176 EKPC believes that the "failure" in the first three months to cover the marginal demand cost is due to the presence of the interruptible demand credit and not the EDR Credit. As the analysis above shows, had there been no interruptible demand credit, the marginal demand
 177 costs were more than adequately covered by the revenues that would have resulted from the demand charge and EDR Credit.
 178

ECONOMIC DEVELOPMENT RIDER

2022 Report of Revenues Received and Marginal Costs Associated with Serving the Customer

Member Distribution Cooperative: South Kentucky RECC
EDR Customer: Kroger
EKPC Rate Schedule: Rate B

Revenues

Demand Charge Revenues Billed	\$47,015
Energy Charge Revenues Billed	<u>\$166,801</u>
Total Revenues	<u>\$213,816</u>

Marginal Costs

Demand:		
Billed demand (kW)	6,208	
Marginal Demand Cost		\$16,286
(See attached spreadsheet for calculations)		
Energy:		
Billed Energy (kWh)	3,150,653	
Marginal Energy Cost		<u>\$182,995</u>
(See attached spreadsheet for calculations)		
Total Marginal Costs		<u>\$199,281</u>

The EDR discount period ended with the November 2021 bill. There was no EDR discount in effect during 2022. Pursuant to the Commission's November 21, 2016 Order in Case No. 2016-00316, EKPC is required to provide this information throughout the term of the contract. The term of this contract will not end until November 2026.

ECONOMIC DEVELOPMENT RIDER

2022 Report of Revenues Received and Marginal Costs Associated with Serving the Customer

Member Distribution Cooperative: Owen Electric Cooperative, Inc.
EDR Customer: Wayfair LLC
EKPC Rate Schedule: Rate B

Revenues

Demand Charge Revenues Billed	\$44,940
Energy Charge Revenues Billed	
Actual Energy Use & FAC	\$122,504
Minimum Energy Requirement Billed	<u>\$ 2,900</u>
Total Revenues	<u>\$170,344</u>

Marginal Costs

Demand:		
Billed demand (kW)	6,000	
Marginal Demand Cost		\$15,970
(See attached spreadsheet for calculations)		
Energy:		
Billed Energy (kWh)	2,534,782	
Marginal Energy Cost		<u>\$134,264</u>
(See attached spreadsheet for calculations)		
Total Marginal Costs		<u>\$150,234</u>

The Billed Energy reported under "Marginal Costs" includes 212,583 kWh in energy billed to Wayfair to meet minimum energy requirements per the contract and applicable tariffs. EKPC did not have to provide this energy to Wayfair nor was it reflected in any market purchases made by EKPC. The Marginal Energy Cost shown above does not include the 212,583 kWh for the minimum energy requirements.

The EDR discount period ended with the February 2022 bill. However, Wayfair failed to achieve the required 60% load factor in January and February 2022, so no EDR credit was applied to the demand charge revenues.

ECONOMIC DEVELOPMENT RIDER

2022 Report of Revenues Received and Marginal Costs Associated with Serving the Customer

Member Distribution Cooperative: Owen Electric Cooperative, Inc.
EDR Customer: Safran Landings
EKPC Rate Schedule: Rate B with Interruptible Service

Revenues

Demand Charge Revenues Billed	\$709,889
Energy Charge Revenues Billed	<u>\$5,534,406</u>
Total Revenues	<u>\$6,244,295</u>

Marginal Costs

Demand:		
Billed demand (kW)	183,000	
Marginal Demand Cost (See attached spreadsheet for calculations)		\$479,550
Energy:		
Billed Energy (kWh)	100,741,256	
Marginal Energy Cost (See attached spreadsheet for calculations)		<u>\$5,835,879</u>
Total Marginal Costs		<u>\$6,315,429</u>

As noted above, Safran also is an interruptible service customer. The Demand Charge Revenues Billed include the interruptible demand credits Safran received. EKPC believes the failure of Total Revenues covering Total Marginal Costs is related to the interruptible service credit and not the EDR credit. Had Safran not been an interruptible service customer, Total Revenues would have exceeded Total Marginal Costs. Please see the attached spreadsheet for an analysis of the impact of the interruptible service credit.

ECONOMIC DEVELOPMENT RIDER

2022 Report of Revenues Received and Marginal Costs Associated with Serving the Customer

Member Distribution Cooperative: Fleming-Mason Energy Cooperative
EDR Customer: AppHarvest Morehead Farm, LLC
EKPC Rate Schedule: Rate B with Interruptible Service

Revenues

Demand Charge Revenues Billed	\$285,158
Energy Charge Revenues Billed –	
Actual Energy Use, Buy-through & FAC	\$2,091,525
Minimum Energy Requirement Billed	\$ 20,507
Total Revenues	<u>\$2,397,190</u>

Marginal Costs

Demand:		
Billed demand (kW)	70,496	
Marginal Demand Cost		\$212,633
(See attached spreadsheet for calculations)		
Energy:		
Billed Energy (kWh)	41,463,518	
Marginal Energy Cost		<u>\$2,063,184</u>
(See attached spreadsheet for calculations)		
Total Marginal Costs		<u>\$2,275,817</u>

The Billed Energy reported under “Marginal Costs” includes 1,502,976 kWh in energy billed to AppHarvest to meet minimum energy requirements per the contract and applicable tariffs. EKPC did not have to provide this energy to AppHarvest nor was it reflected in any market purchases made by EKPC. The Marginal Energy Cost shown above does not include the 1,502,976 kWh for the minimum energy requirements.

Like Safran, AppHarvest is an interruptible service customer. Please see the attached spreadsheet for an analysis of the impact of the interruptible service credit.

ECONOMIC DEVELOPMENT RIDER

2022 Report of Revenues Received and Marginal Costs Associated with Serving the Customer

Member Distribution Cooperative: Inter-County Energy Cooperative
EDR Customer: Diageo Americas Supply, Inc.
EKPC Rate Schedule: Rate G

Revenues

Demand Charge Revenues Billed	\$700,800
Energy Charge Revenues Billed – Actual Energy Use & FAC	<u>\$1,862,888</u>
Minimum Energy Requirement Billed	<u>\$ 497,539</u>
Total Revenues	<u>\$3,061,227</u>

Marginal Costs

Demand:		
Billed demand (kW)	192,000	
Marginal Demand Cost (See attached spreadsheet for calculations)		\$291,840
Energy:		
Billed Energy (kWh)	76,800,000	
Marginal Energy Cost (See attached spreadsheet for calculations)		<u>\$2,194,661</u>
Total Marginal Costs		<u>\$2,486,501</u>

The EDR credit did not begin for Diageo until July 2022. The Billed Energy reported under “Marginal Costs” includes 43,114,256 kWh in energy billed to Diageo to meet minimum energy requirements per the contract and applicable tariffs. EKPC did not have to provide this energy to Diageo nor was it reflected in any market purchases made by EKPC. The Marginal Energy Cost shown above does not include the 43,114,256 kWh for the minimum energy requirements.

ECONOMIC DEVELOPMENT RATE CONTRACT REPORT

UTILITY: East Kentucky Power Cooperative, Inc.

YEAR: 2022

		<u>Current Reporting Period</u>	<u>Cumulative</u>
1)	Number of EDR Contracts –		
	Total:	1	5
	Existing Customers:	0	1
	New Customers:	1	4
2)	Number of Jobs Created –		
	Total:	30	895
	Existing Customers:	0	80
	New Customers:	30	815
3)	Amount of Capital Investment –		
	Total:	\$130.0M	\$345.7M
	Existing Customers:	\$0	\$100.0M
	New Customers:	\$130.0M	\$245.7M
4)	Consumption –		
		<u>Current Reporting Period</u>	<u>Cumulative</u>
(A)	DEMAND		
	Total:	457,404 kW	914,470 kW
	Existing Customers:	183,000 kW	407,109 kW
	New Customers:	274,404 kW	507,361 kW
(B)	ENERGY/CONSUMPTION		
	Total:	224,690,209 kWh	461,935,632 kWh
	Existing Customers:	100,741,256 kWh	242,691,898 kWh
	New Customers:	123,948,953 kWh	219,243,734 kWh