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PUBLIC SERVICE
COMMISSION

March 29, 2024

Ms. Linda C. Bridwell, P.E.
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

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 2023 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 2023 EKPC had six 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 member through the end of the term of the EDR contract.
- EKPC, Owen Electric Cooperative, Inc. ("Owen"), and Wayfair LLC contract, effective March 1, 2017. The EDR discount for Wayfair ended with the February 2022 billing, however, pursuant to the final Order in Case No. 2016-00316, EKPC is required to include information on this member through the end of the term of the EDR contract.
- EKPC, Owen, and Safran Landings contract, effective February 1, 2020. Safran Landings was an existing member 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 member. The report and supporting spreadsheet include an analysis of the impact of the interruptible service demand credit. Marginal analysis shows that revenues were sufficient to cover costs associated with serving Safran Landing.
- EKPC, Fleming-Mason Energy Cooperative, and AppHarvest Morehead Farm, LLC ("AppHarvest") contract was effective July 1, 2019 but AppHarvest did not commence operations until October 2020. This contract has been assumed by Mastronardi Morehead Inc. ("Mastronardi"). Mastronardi is also an interruptible service member. The report and supporting spreadsheet include an analysis of the impact of the interruptible service demand credit. Marginal analysis shows that revenues were sufficient to cover costs associated with serving Mastronardi.

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Ms. Linda C. Bridwell

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- 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 ten times during the 60 months of the EDR discount period. During 2023, Diageo missed the 60% load factor requirement each month exhausting the ten-month waiver in April. Since April, Diageo has not received the EDR credit and will not receive it until their load factor meets or exceeds the 60% minimum. The supporting spreadsheet includes an analysis of the impact of the minimum energy billings. Marginal analysis shows that revenues were sufficient to cover costs associated with serving Diageo.
- EKPC, Jackson Energy Cooperative Corporation, and UMine, LLC (“UMine”) contract, effective November 1, 2022. This contract was assumed by Big Sur Group, Inc (“Big Sur”). Operation did not begin until May of 2023. The supporting spreadsheet includes an analysis of the impact of the minimum energy billings. Marginal analysis shows that revenues were sufficient to cover costs associated with serving Big Sur.

The undersigned hereby certifies that the electronic filing was transmitted to the Commission on March 29, 2024; there are currently no parties that the Commission has 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.

If you have any questions, please call me.

Thank You,



Jacob Watson
Manager, Pricing

Enclosures

4775 Lexington Road, POB 707
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ECONOMIC DEVELOPMENT RIDER

2023 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	\$45,799
Energy Charge Revenues Billed	<u>\$157,001</u>
Total Revenues	<u>\$202,800</u>

Marginal Costs

Demand:		
Billed demand (kW)	6,086	
Marginal Demand Cost (See attached spreadsheet for calculations)		\$7,529
Energy:		
Billed Energy (kWh)	3,143,273	
Marginal Energy Cost (See attached spreadsheet for calculations)		<u>\$100,879</u>
Total Marginal Costs		<u>\$108,408</u>

The EDR discount period ended with the November 2021 bill. There was no EDR discount in effect during 2023. 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

2023 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	\$104,152
Minimum Energy Requirement Billed	<u>\$ 4,486</u>
Total Revenues	<u>\$153,578</u>

Marginal Costs

Demand:		
Billed demand (kW)	6,000	
Marginal Demand Cost		\$7,440
(See attached spreadsheet for calculations)		
Energy:		
Billed Energy (kWh)	2,415,047	
Marginal Energy Cost		<u>\$66,953</u>
(See attached spreadsheet for calculations)		
Total Marginal Costs		<u>\$74,393</u>

The Billed Energy reported under “Marginal Costs” includes 328,863 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 328,863 kWh for the minimum energy requirements.

The EDR discount period ended with the February 2022 bill. The term of this contract will not end until February 2027.

ECONOMIC DEVELOPMENT RIDER

2023 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	\$755,824
Energy Charge Revenues Billed	<u>\$5,979,248</u>
Total Revenues	<u>\$6,735,072</u>

Marginal Costs

Demand:		
Billed demand (kW)	204,302	
Marginal Demand Cost (See attached spreadsheet for calculations)		\$251,474
Energy:		
Billed Energy (kWh)	119,706,670	
Marginal Energy Cost (See attached spreadsheet for calculations)		<u>\$3,876,940</u>
Total Marginal Costs		<u>\$4,128,414</u>

As noted above, Safran also is an interruptible service customer. The Demand Charge Revenues Billed include the interruptible demand credits Safran received. Please see the attached spreadsheet for an analysis of the impact of the interruptible service credit.

ECONOMIC DEVELOPMENT RIDER

2023 Report of Revenues Received and Marginal Costs Associated with Serving the Customer

Member Distribution Cooperative: Fleming-Mason Energy Cooperative
EDR Customer: Mastronardi Morehead, Inc., (successor to AppHarvest Morehead Farm, LLC)
EKPC Rate Schedule: Rate B with Interruptible Service

Revenues

Demand Charge Revenues Billed	\$260,736
Energy Charge Revenues Billed	<u>\$2,112,170</u>
Total Revenues	<u>\$2,372,906</u>

Marginal Costs

Demand:		
Billed demand (kW)	72,958	
Marginal Demand Cost (See attached spreadsheet for calculations)		\$91,994
Energy:		
Billed Energy (kWh)	40,842,734	
Marginal Energy Cost (See attached spreadsheet for calculations)		<u>\$1,763,937</u>
Total Marginal Costs		<u>\$1,855,931</u>

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

ECONOMIC DEVELOPMENT RIDER

2023 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	\$2,336,000
Energy Charge Revenues Billed –	
Actual Energy Use & FAC	\$4,101,771
Minimum Energy Requirement Billed	\$ 799,620
Total Revenues	<u>\$7,237,391</u>

Marginal Costs

Demand:		
Billed demand (kW)	384,000	
Marginal Demand Cost		\$476,160
(See attached spreadsheet for calculations)		
Energy:		
Billed Energy (kWh)	153,600,000	
Marginal Energy Cost		<u>\$2,845,202</u>
(See attached spreadsheet for calculations)		
Total Marginal Costs		<u>\$3,321,362</u>

The Billed Energy reported under “Marginal Costs” includes 69,291,342 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 69,291,342 kWh for the minimum energy requirements. The EDR credit did not begin for Diageo until July 2022. Diageo did not meet the 60% minimum load factor required to receive EDR credits. Contract allows for the minimum load factor to be missed for ten months. In April 2023 Diageo exhausted the last of the minimum load factor waivers. Diageo will not receive the EDR credit until the load factor meets or exceeds the 60% minimum specified in the contract.

ECONOMIC DEVELOPMENT RIDER

2023 Report of Revenues Received and Marginal Costs Associated with Serving the Customer

Member Distribution Cooperative: Jackson Energy Cooperative Corporation

EDR Customer: Big Sur Group, Inc. (successor to UMine, LLC)

EKPC Rate Schedule: Rate C

Revenues

Demand Charge Revenues Billed		\$14,904
Energy Charge Revenues Billed –		
Actual Energy Use & FAC		\$408,130
Minimum Energy Requirement Billed		<u>\$ 2,099</u>
Total Revenues		<u>\$425,133</u>

Marginal Costs

Demand:		
Billed demand (kW)	12,216	
Marginal Demand Cost		\$13,185
(See attached spreadsheet for calculations)		
Energy:		
Billed Energy (kWh)	8,550,117	
Marginal Energy Cost		<u>\$231,282</u>
(See attached spreadsheet for calculations)		
Total Marginal Costs		<u>\$244,467</u>

Like Safran, and Mastronardi, Big Sur is an interruptible service customer. Please see the attached spreadsheet for an analysis of the impact of the interruptible service credit.

ECONOMIC DEVELOPMENT RATE CONTRACT REPORT

UTILITY: East Kentucky Power Cooperative, Inc.

YEAR: 2023

		<u>Current Reporting Period</u>	<u>Cumulative</u>
1)	Number of EDR Contracts –		
	Total:	1	6
	Existing Customers:	0	1
	New Customers:	1	5
2)	Number of Jobs Created –		
	Total:	3	898
	Existing Customers:	0	80
	New Customers:	3	818
3)	Amount of Capital Investment –		
	Total:	\$2M	\$347.7M
	Existing Customers:	\$0	\$100.0M
	New Customers:	\$2M	\$247.7M
4)	Consumption –		
		<u>Current Reporting Period</u>	<u>Cumulative</u>
(A)	DEMAND		
	Total:	685,562 kW	1,600,032 kW
	Existing Customers:	204,302 kW	611,411 kW
	New Customers:	481,260 kW	988,621 kW
(B)	ENERGY/CONSUMPTION		
	Total:	328,257,841 kWh	790,193,473 kWh
	Existing Customers:	119,706,670 kWh	362,398,568 kWh
	New Customers:	208,551,171 kWh	427,794,905 kWh

1 EDR Analysis CY 2023.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2023

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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 2023	500	238,735	\$3,745	\$9,522	\$5,383	\$1.52	\$760	\$2,985	\$0.089116	\$21,275	(\$6,370)
February	500	218,826	\$3,745	\$8,728	\$2,512	\$1.52	\$760	\$2,985	\$0.036157	\$7,912	\$3,328
March	500	232,754	\$3,745	\$9,283	\$2,078	\$1.52	\$760	\$2,985	\$0.025660	\$5,972	\$5,389
April	500	238,091	\$3,745	\$9,496	\$2,276	\$1.52	\$760	\$2,985	\$0.026872	\$6,398	\$5,374
May	500	272,870	\$3,745	\$10,883	\$3,053	\$1.52	\$760	\$2,985	\$0.024756	\$6,755	\$7,181
June	500	281,961	\$3,745	\$11,246	\$1,291	\$1.04	\$520	\$3,225	\$0.025834	\$7,284	\$5,253
July	557	323,709	\$4,314	\$12,911	\$2,214	\$1.04	\$579	\$3,735	\$0.025385	\$8,217	\$6,908
August	522	329,709	\$3,965	\$13,150	\$3,683	\$1.04	\$543	\$3,422	\$0.025419	\$8,381	\$8,452
September	507	287,945	\$3,815	\$11,484	\$2,980	\$1.04	\$527	\$3,288	\$0.027690	\$7,973	\$6,491
October	500	256,079	\$3,745	\$10,213	\$2,837	\$1.04	\$520	\$3,225	\$0.025264	\$6,470	\$6,580
November	500	232,383	\$3,745	\$9,268	\$1,873	\$1.04	\$520	\$3,225	\$0.030955	\$7,193	\$3,948
December 2023	500	230,211	\$3,745	\$9,182	\$1,455	\$1.04	\$520	\$3,225	\$0.030618	\$7,049	\$3,588
Totals	6,086	3,143,273	\$45,799	\$125,366	\$31,635		\$7,529	\$38,270		\$100,879	\$56,122
			Net Billed Revenues - Energy		\$157,001						

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 2023.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2023

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 2023	500	200,000	\$3,745	\$6,809	\$3,506	\$1.52	\$760	\$2,985	\$0.089116	\$17,823	(\$7,508)
February	500	200,000	\$3,745	\$6,611	\$1,698	\$1.52	\$760	\$2,985	\$0.036157	\$7,231	\$1,078
March	500	200,000	\$3,745	\$6,719	\$1,358	\$1.52	\$760	\$2,985	\$0.025660	\$5,132	\$2,945
April	500	200,000	\$3,745	\$6,563	\$1,397	\$1.52	\$760	\$2,985	\$0.026872	\$5,374	\$2,586
May	500	200,000	\$3,745	\$7,020	\$1,830	\$1.52	\$760	\$2,985	\$0.024756	\$4,951	\$3,899
June	500	200,000	\$3,745	\$7,648	\$859	\$1.04	\$520	\$3,225	\$0.025834	\$5,167	\$3,340
July	500	200,000	\$3,745	\$7,966	\$1,365	\$1.04	\$520	\$3,225	\$0.025385	\$5,077	\$4,254
August	500	210,675	\$3,745	\$8,403	\$2,353	\$1.04	\$520	\$3,225	\$0.025419	\$5,355	\$5,401
September	500	204,372	\$3,745	\$8,151	\$2,115	\$1.04	\$520	\$3,225	\$0.027690	\$5,659	\$4,607
October	500	200,000	\$3,745	\$7,628	\$2,069	\$1.04	\$520	\$3,225	\$0.025264	\$5,053	\$4,644
November	500	200,000	\$3,745	\$7,172	\$1,365	\$1.04	\$520	\$3,225	\$0.030955	\$6,191	\$2,346
December 2023	500	200,000	\$3,745	\$7,004	\$1,030	\$1.04	\$520	\$3,225	\$0.030618	\$6,124	\$1,910
Totals	6,000	2,415,047	\$44,940	\$87,694	\$20,945		\$7,440	\$37,500		\$79,137	\$29,502

Net Billed Revenues - Energy \$108,639

Marginal Cost - Energy Analysis excluding Minimum Energy Billings:

Totals	<u>2,086,184</u>	<u>\$83,207</u>	<u>\$20,945</u>	<u>\$66,953</u>	<u>\$37,199</u>
		<u>Net Revenues - Energy</u>	<u>\$104,152</u>		

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: The EDR discount ended with the February 2022 bill; however, 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.

1 EDR Analysis CY 2023.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2023

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

78 Month	77 Billed Units		77 Billed Revenues			77 Marginal Cost - Demand			77 Marginal Cost - Energy		
	78 Demand (kW)	78 Energy (kWh)	78 Demand	78 Energy	78 FAC	78 \$ / kW-month	78 Monthly Cost	78 Difference	78 Purchase Cost	78 Monthly Cost	78 Difference
80 January 2023	14,500	9,311,876	\$58,226	\$371,395	\$209,983	\$1.52	\$22,040	\$36,186	\$0.089116	\$829,837	(\$248,459)
81 February	16,500	8,536,139	\$62,176	\$338,766	\$97,995	\$1.52	\$25,080	\$37,096	\$0.036157	\$308,641	\$128,120
82 March	16,500	10,167,647	\$62,177	\$405,526	\$90,797	\$1.52	\$25,080	\$37,097	\$0.025660	\$260,902	\$235,421
83 April	17,250	8,562,746	\$63,311	\$341,517	\$81,860	\$1.52	\$26,220	\$37,091	\$0.026872	\$230,098	\$193,279
84 May	16,500	10,171,879	\$62,177	\$405,695	\$113,823	\$1.52	\$25,080	\$37,097	\$0.024756	\$251,815	\$267,703
85 June	17,500	10,206,618	\$63,689	\$407,081	\$46,746	\$1.04	\$18,200	\$45,489	\$0.025834	\$263,678	\$190,149
86 July	17,500	10,603,261	\$63,689	\$423,833	\$72,526	\$1.04	\$18,200	\$45,489	\$0.025385	\$269,164	\$227,195
87 August	17,500	10,494,172	\$63,689	\$421,111	\$117,220	\$1.04	\$18,200	\$45,489	\$0.025419	\$266,751	\$271,580
88 September	17,500	10,249,940	\$63,689	\$407,955	\$106,087	\$1.04	\$18,200	\$45,489	\$0.027690	\$283,821	\$230,221
89 October	17,500	9,861,681	\$63,689	\$396,450	\$109,267	\$1.04	\$18,200	\$45,489	\$0.025264	\$249,146	\$256,571
90 November	17,500	10,545,012	\$63,689	\$420,577	\$84,993	\$1.04	\$18,200	\$45,489	\$0.030955	\$326,421	\$179,149
91 December 2023	18,052	10,995,699	\$65,623	\$438,552	\$69,493	\$1.04	\$18,774	\$46,849	\$0.030618	\$336,666	\$171,379
93 Totals	<u>204,302</u>	<u>119,706,670</u>	<u>\$755,824</u>	<u>\$4,778,458</u>	<u>\$1,200,790</u>		<u>\$251,474</u>	<u>\$504,350</u>		<u>\$3,876,940</u>	<u>\$2,102,308</u>
			94 Net Billed Revenues - Energy		<u>\$5,979,248</u>						
97 <u>Marginal Cost - Demand Analysis excluding Interruptible Service Credit:</u>											
99 Totals	<u>204,302</u>		<u>\$1,530,222</u>				<u>\$0</u>	<u>\$1,213,316</u>			

100 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.

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. Safran
 104 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. Billing analysis is for total company operations and
 105 reflects any applicable interruptible demand credits; the expanded operations are not separately metered. New contract started in February 2020; January 2023 a 30% discount factor; from February 2023 to
 106 December 2023 a 20% discount factor.

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1 EDR Analysis CY 2023.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2023

110 **Cooperative:** Fleming-Mason Energy
 111 **Customer:** Mastronardi Morehead

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
January 2023	10,000	9,115,084	\$41,180	\$363,546	\$205,545	\$1.52	\$15,200	\$25,980	\$0.089116	\$812,300	(\$243,209)
February	10,000	5,913,318	\$41,180	\$235,847	\$67,885	\$1.52	\$15,200	\$25,980	\$0.036157	\$213,808	\$89,924
March	10,000	5,282,254	\$41,180	\$210,677	\$47,171	\$1.52	\$15,200	\$25,980	\$0.025660	\$135,543	\$122,305
April	2,885	491,466	\$19,283	\$19,602	\$4,698	\$1.52	\$4,385	\$14,898	\$0.026872	\$13,207	\$11,093
May	694	429,814	\$3,977	\$17,143	\$4,810	\$1.52	\$1,055	\$2,922	\$0.024756	\$10,640	\$11,313
June	662	402,244	\$3,753	\$16,043	\$1,842	\$1.04	\$688	\$3,065	\$0.025834	\$10,392	\$7,493
July	515	405,085	\$2,727	\$16,156	\$2,771	\$1.04	\$536	\$2,191	\$0.025385	\$10,283	\$8,644
August	500	333,700	\$2,621	\$13,309	\$3,727	\$1.04	\$520	\$2,101	\$0.025419	\$8,482	\$8,554
September	543	302,895	\$2,922	\$12,081	\$3,135	\$1.04	\$565	\$2,357	\$0.027690	\$8,387	\$6,829
October	9,580	3,270,918	\$36,156	\$130,457	\$36,242	\$1.04	\$9,963	\$26,193	\$0.025264	\$82,636	\$84,063
November	17,579	6,453,630	\$46,157	\$257,397	\$52,016	\$1.04	\$18,282	\$27,875	\$0.030955	\$199,772	\$109,641
December 2023	10,000	8,442,326	\$19,600	\$336,714	\$53,356	\$1.04	\$10,400	\$9,200	\$0.030618	\$258,487	\$131,583
Totals	72,958	40,842,734	\$260,736	\$1,628,972	\$483,198		\$91,994	\$168,742		\$1,763,937	\$348,233
			Net Billed Revenues - Energy		\$2,112,170						

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. Contract started in October 2020; from January 2023 to September 2023 a 30% discount factor; from October 2023 to December 2023 a 20% discount factor. Billed demand in April through November (excluding August) was greater than contract demand; excess demand billed at \$9.98 per kW times 30% discount (20% discount in October), after the interruptible credit.

1 EDR Analysis CY 2023.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2023
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146 **Cooperative:** Inter-County Energy
 147 **Customer:** Diageo Americas Supply, Inc.
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151 Month	152 Units		153 Revenues			154 Marginal Cost - Demand			155 Marginal Cost - Energy - Excluding Minimum		
	156 Demand (kW)	157 Energy (kWh)	158 Demand	159 Energy	160 FAC	161 \$ / kW-month	162 Monthly Cost	163 Difference	164 Purchase Cost	165 Monthly Cost	166 Difference
153 January 2023	32,000	12,800,000	\$116,800	\$357,689	\$180,449	\$1.52	\$48,640	\$68,160	\$0.089116	\$1,140,685	(\$602,547)
154 February	32,000	12,800,000	\$116,800	\$357,151	\$91,630	\$1.52	\$48,640	\$68,160	\$0.036157	\$462,810	(\$14,029)
155 March	32,000	12,800,000	\$116,800	\$381,086	\$79,422	\$1.52	\$48,640	\$68,160	\$0.025660	\$328,448	\$132,060
156 April	32,000	12,800,000	\$116,800	\$411,405	\$96,071	\$1.52	\$48,640	\$68,160	\$0.026872	\$343,962	\$163,514
157 May	32,000	12,800,000	\$233,600	\$294,514	\$62,604	\$1.52	\$48,640	\$184,960	\$0.024756	\$316,877	\$40,241
158 June	32,000	12,800,000	\$233,600	\$153,117	\$943	\$1.04	\$33,280	\$200,320	\$0.025834	\$330,675	(\$176,615)
159 July	32,000	12,800,000	\$233,600	\$265,762	\$30,772	\$1.04	\$33,280	\$200,320	\$0.025385	\$324,928	(\$28,394)
160 August	32,000	12,800,000	\$233,600	\$372,554	\$95,712	\$1.04	\$33,280	\$200,320	\$0.025419	\$325,363	\$142,903
161 September	32,000	12,800,000	\$233,600	\$359,990	\$83,730	\$1.04	\$33,280	\$200,320	\$0.027690	\$354,432	\$89,288
162 October	32,000	12,800,000	\$233,600	\$363,253	\$91,013	\$1.04	\$33,280	\$200,320	\$0.025264	\$323,379	\$130,887
163 November	32,000	12,800,000	\$233,600	\$365,480	\$66,891	\$1.04	\$33,280	\$200,320	\$0.030955	\$396,224	\$36,147
164 December 2023	32,000	12,800,000	\$233,600	\$302,803	\$37,354	\$1.04	\$33,280	\$200,320	\$0.030618	\$391,910	(\$51,753)
165											
166 Totals	384,000	153,600,000	\$2,336,000	\$3,984,804	\$916,591		\$476,160	\$1,859,840		\$5,039,693	(\$138,298)
167											
168			Net Billed Revenues - Energy		\$4,901,395						
169											
170	<u>Marginal Cost Analysis excluding Minimum Energy Billings:</u>										
171											
172 Totals		84,308,658		\$3,185,180	\$916,591					\$2,845,202	\$1,256,569
173											
174			Net Revenues - Energy		\$4,101,771						
175											

176 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.

177
 178 Notes: Diageo's EDR credit did not begin until July 2022. The contract allows 10 failures to meet the 60% minimum load factor. The 10th and final failure was exhausted in April. April was the last month an EDR credit was
 179 provided. EDR credits will not resume until the load factor meets or exceeds the 60% minimum. The billing analysis above includes 69,291,342 kWh of billed energy that reflects minimum energy requirements per
 180 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.
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1 EDR Analysis CY 2023.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2023
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184 **Cooperative:** Jackson Energy
 185 **Customer:** Big Sur Group, Inc.
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188	189	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
191	January 2023	0	0	\$0	\$0	\$0	\$0.00	\$0	\$0	\$0.089116	\$0	\$0
192	February	0	0	\$0	\$0	\$0	\$0.00	\$0	\$0	\$0.036157	\$0	\$0
193	March	0	0	\$0	\$0	\$0	\$0.00	\$0	\$0	\$0.025660	\$0	\$0
194	April	0	0	\$0	\$0	\$0	\$0.00	\$0	\$0	\$0.026872	\$0	\$0
195	May	1,000	400,000	\$1,365	\$11,916	\$2,754	\$1.52	\$1,520	(\$155)	\$0.024756	\$9,902	\$4,768
196	June	1,000	579,972	\$1,365	\$23,132	\$2,656	\$1.04	\$1,040	\$325	\$0.025834	\$14,983	\$10,805
197	July	1,425	962,202	\$1,766	\$38,376	\$6,581	\$1.04	\$1,482	\$284	\$0.025385	\$24,425	\$20,532
198	August	1,425	1,158,683	\$1,766	\$46,213	\$12,943	\$1.04	\$1,482	\$284	\$0.025419	\$29,453	\$29,703
199	September	1,425	1,144,619	\$1,766	\$45,652	\$11,847	\$1.04	\$1,482	\$284	\$0.027690	\$31,695	\$25,804
200	October	1,943	1,427,973	\$2,256	\$56,953	\$15,822	\$1.04	\$2,021	\$235	\$0.025264	\$36,076	\$36,699
201	November	1,999	1,420,373	\$2,310	\$56,650	\$11,448	\$1.04	\$2,079	\$231	\$0.030955	\$43,968	\$24,130
202	December 2023	1,999	1,456,295	\$2,310	\$58,083	\$9,204	\$1.04	\$2,079	\$231	\$0.030618	\$44,589	\$22,698
204	Totals	12,216	8,550,117	\$14,904	\$336,975	\$73,255		\$13,185	\$1,719		\$235,091	\$175,139
206				Net Billed Revenues - Energy		\$410,230						
208	<u>Marginal Cost Analysis excluding Minimum Energy Billings:</u>											
210	Totals		8,396,248		\$334,876	\$73,254					\$231,282	\$176,848
211				Net Revenues - Energy		\$408,130						

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.

Notes: Big Sur's contract was effective November 2022 under the name UMine. Operations did not begin until May 2023. The billing analysis above includes 153,869 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.

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1 EDR Analysis CY 2023.xlsx
 2 Analysis of EDR Customers' Billings for Calendar Year 2023

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222 **Recap:**

223	Total Billed Demand, all EDR customers	685,562	kW
224	2022 Reported Cumulative Demand, all EDR customers	<u>914,470</u>	kW
225	Total Cumulative Demand for 2023, all EDR customers	<u>1,600,032</u>	kW
226			
227	Total Billed Energy, all EDR customers	328,257,841	kWh
228	2022 Reported Cumulative Energy, all EDR customers	<u>461,935,632</u>	kWh
229	Total Cumulative Energy for 2023, all EDR customers	<u>790,193,473</u>	kWh

230			
231	Total Billed Energy, exclusive of Minimum Energy, all EDR customers	258,483,767	kWh
232	2022 Cumulative Energy, exclusive of Minimum Energy, all EDR customers	<u>407,568,253</u>	kWh
233	Total Cumulative Energy for 2023, exclusive of Minimum Energy, all EDR customers	<u>666,052,020</u>	kWh

234

235 **Margin Cost:**

236	Demand -
237	PJM BRA Results 2022-2023 Delivery Year - Conversion to \$ / kW-month:
238	\$50.00 / MW-day x 365 days ÷ 1,000 ÷ 12 = \$1.52 / kW-month
239	PJM BRA Results 2023-2024 Delivery Year - Conversion to \$ / kW-month:
240	\$34.13 / MW-day x 366 days ÷ 1,000 ÷ 12 = \$1.04 / kW-month

241

242 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.

243

244	<u>Expense Month</u>	<u>Billing Month</u>	<u>Purchases \$</u>	<u>Purchases kWh</u>	<u>Purchase Cost</u>
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245					
246	December 2022	January 2023	\$45,000,581	504,967,525	\$0.089116
247	January 2023	February	\$22,715,610	628,253,452	\$0.036157
248	February	March	\$14,415,056	561,777,804	\$0.025660
249	March	April	\$13,511,375	502,809,978	\$0.026872
250	April	May	\$7,959,146	321,499,619	\$0.024756
251	May	June	\$10,384,989	401,996,524	\$0.025834
252	June	July	\$10,063,657	396,441,033	\$0.025385
253	July	August	\$3,501,808	137,764,755	\$0.025419
254	August	September	\$6,140,799	221,766,186	\$0.027690
255	September	October	\$3,524,107	139,489,862	\$0.025264
256	October	November	\$11,463,210	370,323,756	\$0.030955
257	November 2023	December 2023	\$12,968,565	423,561,986	\$0.030618

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259

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.

4 **Wayfair**

6 **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	
11 January	155,497	44,503	200,000	\$0.039884	\$0.013644	\$0.022550	\$6,202	\$607	\$3,506	\$10,315
12 February	147,943	52,057	200,000	\$0.039884	\$0.013644	\$0.011480	\$5,901	\$710	\$1,698	\$8,309
13 March	152,064	47,936	200,000	\$0.039884	\$0.013644	\$0.008930	\$6,065	\$654	\$1,358	\$8,077
14 April	146,114	53,886	200,000	\$0.039884	\$0.013644	\$0.009560	\$5,828	\$735	\$1,397	\$7,960
15 May	163,545	36,455	200,000	\$0.039884	\$0.013644	\$0.011190	\$6,523	\$497	\$1,830	\$8,850
16 June	187,457	12,543	200,000	\$0.039884	\$0.013644	\$0.004580	\$7,477	\$171	\$859	\$8,507
17 July	199,595	405	200,000	\$0.039884	\$0.013644	\$0.006840	\$7,961	\$6	\$1,365	\$9,332
18 August	210,675	0	210,675	\$0.039884	\$0.013644	\$0.011170	\$8,403	\$0	\$2,353	\$10,756
19 September	204,372	0	204,372	\$0.039884	\$0.013644	\$0.010350	\$8,151	\$0	\$2,115	\$10,266
20 October	186,698	13,302	200,000	\$0.039884	\$0.013644	\$0.011080	\$7,446	\$181	\$2,069	\$9,696
21 November	169,318	30,682	200,000	\$0.039884	\$0.013644	\$0.008060	\$6,753	\$419	\$1,365	\$8,537
22 December	162,906	37,094	200,000	\$0.039884	\$0.013644	\$0.006320	\$6,497	\$506	\$1,030	\$8,033
24 Totals	2,086,184	328,863	2,415,047				\$83,207	\$4,486	\$20,945	\$108,638

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
32 January	\$6,202	\$3,506	\$9,708	155,497	\$0.089116	\$13,857	(\$4,149)
33 February	\$5,901	\$1,698	\$7,599	147,943	\$0.036157	\$5,349	\$2,250
34 March	\$6,065	\$1,358	\$7,423	152,064	\$0.025660	\$3,902	\$3,521
35 April	\$5,828	\$1,397	\$7,225	146,114	\$0.026872	\$3,926	\$3,299
36 May	\$6,523	\$1,830	\$8,353	163,545	\$0.024756	\$4,049	\$4,304
37 June	\$7,477	\$859	\$8,336	187,457	\$0.025834	\$4,843	\$3,493
38 July	\$7,961	\$1,365	\$9,326	199,595	\$0.025385	\$5,067	\$4,259
39 August	\$8,403	\$2,353	\$10,756	210,675	\$0.025419	\$5,355	\$5,401
40 September	\$8,151	\$2,115	\$10,266	204,372	\$0.027690	\$5,659	\$4,607
41 October	\$7,446	\$2,069	\$9,515	186,698	\$0.025264	\$4,717	\$4,798
42 November	\$6,753	\$1,365	\$8,118	169,318	\$0.030955	\$5,241	\$2,877
43 December	\$6,497	\$1,030	\$7,527	162,906	\$0.030618	\$4,988	\$2,539
45 Totals	\$83,207	\$20,945	\$104,152	2,086,184		\$66,953	\$37,199

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 **Diageo Americas**

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57 **Energy Charges:**

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Month	Energy (kWh)			Energy Rates (\$ per kWh)		FAC Factor	Energy Charges				
	Actual Use	Minimum Added	Total	Actual	Minimum Billing		Actual Use	Minimum Added	FAC	Net Energy	
61											
62	January	8,002,171	4,797,829	12,800,000	\$0.037780	\$0.011540	\$0.022550	\$302,322	\$55,367	\$180,449	\$538,138
63	February	7,981,664	4,818,336	12,800,000	\$0.037780	\$0.011540	\$0.011480	\$301,547	\$55,604	\$91,630	\$448,781
64	March	8,893,816	3,906,184	12,800,000	\$0.037780	\$0.011540	\$0.008930	\$336,008	\$45,077	\$79,422	\$460,507
65	April	10,049,264	2,750,736	12,800,000	\$0.037780	\$0.011540	\$0.009560	\$379,661	\$31,743	\$96,071	\$507,475
66	May	5,594,597	7,205,403	12,800,000	\$0.037780	\$0.011540	\$0.011190	\$211,364	\$83,150	\$62,604	\$357,118
67	June	205,985	12,594,015	12,800,000	\$0.037780	\$0.011540	\$0.004580	\$7,782	\$145,335	\$943	\$154,060
68	July	4,498,848	8,301,152	12,800,000	\$0.037780	\$0.011540	\$0.006840	\$169,966	\$95,795	\$30,772	\$296,533
69	August	8,568,678	4,231,322	12,800,000	\$0.037780	\$0.011540	\$0.011170	\$323,725	\$48,829	\$95,712	\$468,266
70	September	8,089,845	4,710,155	12,800,000	\$0.037780	\$0.011540	\$0.010350	\$305,634	\$54,355	\$83,730	\$443,719
71	October	8,214,199	4,585,801	12,800,000	\$0.037780	\$0.011540	\$0.011080	\$310,332	\$52,920	\$91,013	\$454,265
72	November	8,299,095	4,500,905	12,800,000	\$0.037780	\$0.011540	\$0.008060	\$313,540	\$51,940	\$66,891	\$432,371
73	December	5,910,496	6,889,504	12,800,000	\$0.037780	\$0.011540	\$0.006320	\$223,299	\$79,505	\$37,354	\$340,158
74											
75	Totals	84,308,658	69,291,342	153,600,000				\$3,185,180	\$799,620	\$916,591	\$4,901,391

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

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Month	Energy Charges			Marginal Cost - Exclusive of Minimum Energy Billings				
	Actual Use	FAC	Net Energy	Actual Use - kWh	Purchase Cost	Monthly Cost	Difference	
82								
83	January	\$302,322	\$180,449	\$482,771	8,002,171	\$0.089116	\$713,121	(\$230,350)
84	February	\$301,547	\$91,630	\$393,177	7,981,664	\$0.036157	\$288,593	\$104,584
85	March	\$336,008	\$79,422	\$415,430	8,893,816	\$0.025660	\$228,215	\$187,215
86	April	\$379,661	\$96,071	\$475,732	10,049,264	\$0.026872	\$270,044	\$205,688
87	May	\$211,364	\$62,604	\$273,968	5,594,597	\$0.024756	\$138,500	\$135,468
88	June	\$7,782	\$943	\$8,725	205,985	\$0.025834	\$5,321	\$3,404
89	July	\$169,966	\$30,772	\$200,738	4,498,848	\$0.025385	\$114,203	\$86,535
90	August	\$323,725	\$95,712	\$419,437	8,568,678	\$0.025419	\$217,807	\$201,630
91	September	\$305,634	\$83,730	\$389,364	8,089,845	\$0.027690	\$224,008	\$165,356
92	October	\$310,332	\$91,013	\$401,345	8,214,199	\$0.025264	\$207,524	\$193,821
93	November	\$313,540	\$66,891	\$380,431	8,299,095	\$0.030955	\$256,898	\$123,533
94	December	\$223,299	\$37,354	\$260,653	5,910,496	\$0.030618	\$180,968	\$79,685
95								
96	Totals	\$3,185,180	\$916,591	\$4,101,771	84,308,658		\$2,845,202	\$1,256,569

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99 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
 100 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
 101 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
 102 not be reflected in the determination of the marginal cost associated with energy.
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105 **Big Sur Group, Inc.**

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107 **Energy Charges:**

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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	
112 January	0	0	0	\$0.039884	\$0.013644	\$0.022550	\$0	\$0	\$0	\$0
113 February	0	0	0	\$0.039884	\$0.013644	\$0.011480	\$0	\$0	\$0	\$0
114 March	0	0	0	\$0.039884	\$0.013644	\$0.008930	\$0	\$0	\$0	\$0
115 April	0	0	0	\$0.039884	\$0.013644	\$0.009560	\$0	\$0	\$0	\$0
116 May	246,131	153,869	400,000	\$0.039884	\$0.013644	\$0.011190	\$9,817	\$2,099	\$2,754	\$14,670
117 June	579,972	0	579,972	\$0.039884	\$0.013644	\$0.004580	\$23,132	\$0	\$2,656	\$25,788
118 July	962,202	0	962,202	\$0.039884	\$0.013644	\$0.006840	\$38,376	\$0	\$6,581	\$44,957
119 August	1,158,683	0	1,158,683	\$0.039884	\$0.013644	\$0.011170	\$46,213	\$0	\$12,942	\$59,155
120 September	1,144,619	0	1,144,619	\$0.039884	\$0.013644	\$0.010350	\$45,652	\$0	\$11,847	\$57,499
121 October	1,427,973	0	1,427,973	\$0.039884	\$0.013644	\$0.011080	\$56,953	\$0	\$15,822	\$72,775
122 November	1,420,373	0	1,420,373	\$0.039884	\$0.013644	\$0.008060	\$56,650	\$0	\$11,448	\$68,098
123 December	1,456,295	0	1,456,295	\$0.039884	\$0.013644	\$0.006320	\$58,083	\$0	\$9,204	\$67,287
124										
125 Totals	8,396,248	153,869	8,550,117				\$334,876	\$2,099	\$73,254	\$410,229

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

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Month	Energy Charges			Marginal Cost - Exclusive of Minimum Energy Billings			
	Actual Use	FAC	Net Energy	Actual Use - kWh	Purchase Cost	Monthly Cost	Difference
133 January	\$0	\$0	\$0	0	\$0.089116	\$0	\$0
134 February	\$0	\$0	\$0	0	\$0.036157	\$0	\$0
135 March	\$0	\$0	\$0	0	\$0.025660	\$0	\$0
136 April	\$0	\$0	\$0	0	\$0.026872	\$0	\$0
137 May	\$9,817	\$2,754	\$12,571	246,131	\$0.024756	\$6,093	\$6,478
138 June	\$23,132	\$2,656	\$25,788	579,972	\$0.025834	\$14,983	\$10,805
139 July	\$38,376	\$6,581	\$44,957	962,202	\$0.025385	\$24,425	\$20,532
140 August	\$46,213	\$12,942	\$59,155	1,158,683	\$0.025419	\$29,453	\$29,702
141 September	\$45,652	\$11,847	\$57,499	1,144,619	\$0.027690	\$31,695	\$25,804
142 October	\$56,953	\$15,822	\$72,775	1,427,973	\$0.025264	\$36,076	\$36,699
143 November	\$56,650	\$11,448	\$68,098	1,420,373	\$0.030955	\$43,968	\$24,130
144 December	\$58,083	\$9,204	\$67,287	1,456,295	\$0.030618	\$44,589	\$22,698
145							
146 Totals	\$334,876	\$73,254	\$408,130	8,396,248		\$231,282	\$176,848

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149 Notes: Pursuant to EKPC's Rate C tariff, a minimum level of energy is to be billed based on the product of the billed demand multiplied by 400 hours. If the actual energy usage for a billing period is less than the required
 150 minimum, the incremental difference between the actual and minimum is priced at EKPC's energy charge for Rate C minus the fuel base per kWh established in the FAC. This incremental amount of energy is not
 151 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
 152 not be reflected in the determination of the marginal cost associated with energy.
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1 EDR Analysis CY 2023.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**

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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

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10 As Billed:

Month	Total Demand	Firm Load	Interruptible	Demand Charge	Interruptible Credit	Net Demand Charge	EDR Credit Percentage	EDR Credit Rate (Interruptible)	EDR Credit Rate (Firm)	EDR Credit (Interruptible)	EDR Credit (Firm)	Total EDR Credit	Demand	Interruptible	Total Net Demand Charges	Marginal Cost - Demand	Difference	
14 January 2023	14,500	6,000	8,500	\$7.49	(\$5.60)	\$1.89	30.00%	(\$0.567)	(\$2.247)	(\$4.820)	(\$13.482)	(\$18.302)	\$108,605	(\$47,600)	\$42,703	\$22,040	\$20,663	
15 February	16,500	6,000	10,500	\$7.49	(\$5.60)	\$1.89	20.00%	(\$0.378)	(\$1.498)	(\$3,969)	(\$8,988)	(\$12,957)	\$123,585	(\$58,800)	\$51,828	\$25,080	\$26,748	
16 March	16,500	6,000	10,500	\$7.49	(\$5.60)	\$1.89	20.00%	(\$0.378)	(\$1.498)	(\$3,969)	(\$8,988)	(\$12,957)	\$123,585	(\$58,800)	\$51,828	\$25,080	\$26,748	
17 April	17,250	6,000	11,250	\$7.49	(\$5.60)	\$1.89	20.00%	(\$0.378)	(\$1.498)	(\$4,253)	(\$8,988)	(\$13,241)	\$129,203	(\$63,000)	\$52,962	\$26,220	\$26,742	
18 May	16,500	6,000	10,500	\$7.49	(\$5.60)	\$1.89	20.00%	(\$0.378)	(\$1.498)	(\$3,969)	(\$8,988)	(\$12,957)	\$123,585	(\$58,800)	\$51,828	\$25,080	\$26,748	
19 June	17,500	6,000	11,500	\$7.49	(\$5.60)	\$1.89	20.00%	(\$0.378)	(\$1.498)	(\$4,347)	(\$8,988)	(\$13,335)	\$131,075	(\$64,400)	\$53,340	\$18,200	\$35,140	
20 July	17,500	6,000	11,500	\$7.49	(\$5.60)	\$1.89	20.00%	(\$0.378)	(\$1.498)	(\$4,347)	(\$8,988)	(\$13,335)	\$131,075	(\$64,400)	\$53,340	\$18,200	\$35,140	
21 August	17,500	6,000	11,500	\$7.49	(\$5.60)	\$1.89	20.00%	(\$0.378)	(\$1.498)	(\$4,347)	(\$8,988)	(\$13,335)	\$131,075	(\$64,400)	\$53,340	\$18,200	\$35,140	
22 September	17,500	6,000	11,500	\$7.49	(\$5.60)	\$1.89	20.00%	(\$0.378)	(\$1.498)	(\$4,347)	(\$8,988)	(\$13,335)	\$131,075	(\$64,400)	\$53,340	\$18,200	\$35,140	
23 October	17,500	6,000	11,500	\$7.49	(\$5.60)	\$1.89	20.00%	(\$0.378)	(\$1.498)	(\$4,347)	(\$8,988)	(\$13,335)	\$131,075	(\$64,400)	\$53,340	\$18,200	\$35,140	
24 November	17,500	6,000	11,500	\$7.49	(\$5.60)	\$1.89	20.00%	(\$0.378)	(\$1.498)	(\$4,347)	(\$8,988)	(\$13,335)	\$131,075	(\$64,400)	\$53,340	\$18,200	\$35,140	
25 December 2023	18,052	6,000	12,052	\$7.49	(\$5.60)	\$1.89	20.00%	(\$0.378)	(\$1.498)	(\$4,556)	(\$8,988)	(\$13,544)	\$135,209	(\$67,491)	\$54,174	\$18,774	\$35,400	
26																		
27 Totals	204,302	72,000	132,302							(\$51,618)	(\$112,350)	(\$163,968)	\$1,530,222	(\$740,891)	\$625,363	\$251,474	\$373,889	

29 Billing Excluding Interruptible:

Month	Total Demand	Firm Load	Interruptible	Demand Charge	Interruptible Credit	Net Demand Charge	EDR Credit Percentage	EDR Credit Rate (Interruptible)	EDR Credit Rate (Firm)	EDR Credit (Interruptible)	EDR Credit (Firm)	Total EDR Credit	Demand	Interruptible	Total Net Demand Charges	Marginal Cost - Demand	Difference	
33 January 2023	14,500	6,000	0	\$7.49	\$0.00	\$7.49	30.00%	\$0.000	(\$2.247)	\$0	(\$32,582)	(\$32,582)	\$108,605	\$0	\$76,023	\$22,040	\$53,983	
34 February	16,500	6,000	0	\$7.49	\$0.00	\$7.49	20.00%	\$0.000	(\$1.498)	\$0	(\$24,717)	(\$24,717)	\$123,585	\$0	\$98,868	\$25,080	\$73,788	
35 March	16,500	6,000	0	\$7.49	\$0.00	\$7.49	20.00%	\$0.000	(\$1.498)	\$0	(\$24,717)	(\$24,717)	\$123,585	\$0	\$98,868	\$25,080	\$73,788	
36 April	17,250	6,000	0	\$7.49	\$0.00	\$7.49	20.00%	\$0.000	(\$1.498)	\$0	(\$25,841)	(\$25,841)	\$129,203	\$0	\$103,362	\$26,220	\$77,142	
37 May	16,500	6,000	0	\$7.49	\$0.00	\$7.49	20.00%	\$0.000	(\$1.498)	\$0	(\$24,717)	(\$24,717)	\$123,585	\$0	\$98,868	\$25,080	\$73,788	
38 June	17,500	6,000	0	\$7.49	\$0.00	\$7.49	20.00%	\$0.000	(\$1.498)	\$0	(\$26,215)	(\$26,215)	\$131,075	\$0	\$104,860	\$18,200	\$86,660	
39 July	17,500	6,000	0	\$7.49	\$0.00	\$7.49	20.00%	\$0.000	(\$1.498)	\$0	(\$26,215)	(\$26,215)	\$131,075	\$0	\$104,860	\$18,200	\$86,660	
40 August	17,500	6,000	0	\$7.49	\$0.00	\$7.49	20.00%	\$0.000	(\$1.498)	\$0	(\$26,215)	(\$26,215)	\$131,075	\$0	\$104,860	\$18,200	\$86,660	
41 September	17,500	6,000	0	\$7.49	\$0.00	\$7.49	20.00%	\$0.000	(\$1.498)	\$0	(\$26,215)	(\$26,215)	\$131,075	\$0	\$104,860	\$18,200	\$86,660	
42 October	17,500	6,000	0	\$7.49	\$0.00	\$7.49	20.00%	\$0.000	(\$1.498)	\$0	(\$26,215)	(\$26,215)	\$131,075	\$0	\$104,860	\$18,200	\$86,660	
43 November	17,500	6,000	0	\$7.49	\$0.00	\$7.49	20.00%	\$0.000	(\$1.498)	\$0	(\$26,215)	(\$26,215)	\$131,075	\$0	\$104,860	\$18,200	\$86,660	
44 December 2023	18,052	6,000	0	\$7.49	\$0.00	\$7.49	20.00%	\$0.000	(\$1.498)	\$0	(\$27,042)	(\$27,042)	\$135,209	\$0	\$108,167	\$18,774	\$89,393	
45																		
46 Totals	204,302	72,000	0							\$0	(\$316,906)	(\$316,906)	\$1,530,222	\$0	\$1,213,316	\$251,474	\$961,842	

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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. 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

49 taken before the EDR Credit is determined. As the analysis above shows, had there been no interruptible demand credit, the marginal demand 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 2023.xlsx
 2 Detailed Analysis of Customer Billing - Exclusion of Impact of Interruptible Demand Credit on Billed Demand Revenues
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122 **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	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 January										(\$22,470)	\$74,900	\$0	\$52,430	\$15,200	\$37,230
February -															
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 February										(\$22,470)	\$74,900	\$0	\$52,430	\$15,200	\$37,230
March -															
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 March										(\$22,470)	\$74,900	\$0	\$52,430	\$15,200	\$37,230
April															
Excess Contract	2,085			\$9.98		\$9.98	30.00%	(\$2.994)	2,085	(\$6,242)	\$20,808				
Contract	800	500		\$7.49		\$7.49	30.00%	(\$2.247)	500	(\$1,124)	\$3,745				
Interruptible	2,885	500	0	\$9.98	\$0.00	\$9.98	30.00%	(\$2.994)	0	\$0					
Total April										(\$7,366)	\$24,553	\$0	\$17,187	\$4,385	\$12,802
May -															
Excess Contract	(106)			\$9.98		\$9.98	30.00%	(\$2.994)	(106)	\$317	(\$1,058)				
Contract	800	500		\$7.49		\$7.49	30.00%	(\$2.247)	800	(\$1,798)	\$5,992				
Interruptible	694	500	0	\$0.00	\$0.00	\$0.00	30.00%	\$0.000	0	\$0					
Total May										(\$1,481)	\$4,934	\$0	\$3,453	\$1,055	\$2,398
June -															
Excess Contract	(138)			\$9.98		\$9.98	30.00%	(\$2.994)	(138)	\$413	(\$1,377)				
Contract	800	500		\$7.49		\$7.49	30.00%	(\$2.247)	800	(\$1,798)	\$5,992				
Interruptible	662	500	0	\$0.00	\$0.00	\$0.00	30.00%	\$0.000	0	\$0					
Total June										(\$1,385)	\$4,615	\$0	\$3,230	\$688	\$2,542
July															
Excess Contract	(285)			\$9.98		\$9.98	30.00%	(\$2.994)	(285)	\$853	(\$2,844)				
Contract	800	500		\$7.49		\$7.49	30.00%	(\$2.247)	800	(\$1,798)	\$5,992				
Interruptible	515	500	0	\$0.00	\$0.00	\$0.00	30.00%	\$0.000	0	\$0					
Total July										(\$945)	\$3,148	\$0	\$2,203	\$536	\$1,667
August -															
Contract	800	500		\$7.49		\$7.49	30.00%	(\$2.247)	800	(\$1,798)					
Interruptible	500	500	0	\$0.00	\$0.00	\$0.00	30.00%	\$0.000	0	\$0					
Total August										(\$1,798)	\$5,992	\$0	\$4,194	\$520	\$3,674
September -															
Excess Contract	(257)			\$9.98		\$9.98	30.00%	(\$2.994)	(257)	\$769	(\$2,565)				
Contract	800	500		\$7.49		\$7.49	30.00%	(\$2.247)	800	(\$1,798)	\$5,992				
Interruptible	543	500	0	\$0.00	\$0.00	\$0.00	30.00%	\$0.000	0	\$0					
Total August										(\$1,029)	\$3,427	\$0	\$2,398	\$565	\$1,833
October															
Excess Contract	8,780			\$9.98		\$9.98	30.00%	(\$2.994)	8,780	(\$26,287)	\$87,624				
Contract	800	500		\$7.49		\$7.49	30.00%	(\$2.247)	800	(\$1,798)	\$5,992				
Interruptible	9,580	500	0	\$0.00	\$0.00	\$0.00	30.00%	\$0.000	0	\$0					
Total October										(\$28,085)	\$93,616	\$0	\$65,531	\$9,963	\$55,568
November -															
Excess Contract	7,579			\$9.98		\$9.98	30.00%	(\$2.994)	7,579	(\$22,692)	\$75,638				
Contract	10,000	1,000		\$7.49		\$7.49	30.00%	(\$2.247)	10,000	(\$22,470)	\$74,900				
Interruptible	17,579	1,000	0	\$0.00	\$0.00	\$0.00	30.00%	\$0.000	0	\$0					
Total November										(\$45,162)	\$150,538	\$0	\$105,376	\$18,282	\$87,094
December 2022 -															
Contract	10,000	1,000		\$7.49		\$7.49	20.00%	(\$1.498)	10,000	(\$14,980)					
Interruptible	10,000	1,000	0	\$7.49	\$0.00	\$7.49	20.00%	(\$1.498)	0	\$0					
Total December										(\$14,980)	\$74,900	\$0	\$59,920	\$10,400	\$49,520
Total All Months	57,579	26,890	0							(\$169,641)	\$590,423	\$0	\$420,782	\$91,994	\$328,788

Notes: The total demand revenues reflect the combined effects of the interruptible demand credit, the EDR Credit, and the application of the demand charge. The interruptible demand credit has to be taken before the EDR Credit is determined. As the analysis above shows, had there been no interruptible demand credit, the marginal demand costs were more than adequately covered by the revenues that would have resulted from the demand charge and EDR Credit.

1 EDR Analysis CY 2023.xlsx
 2 Detailed Analysis of Customer Billing - Exclusion of Impact of Interruptible Demand Credit on Billed Demand Revenues
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190 **Big Sur Group, Inc.**

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 192 Firm Load 150 kW
 193 Contract Demand 1,000 kW - billed at the highest demand during the current month or preceding eleven months coincident with EKPC. 1,000kW is the minimum.
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195 **As Billed:**

Month	Total Demand	Firm Load	Interruptible	Demand Charge	Interruptible Credit	Net Demand Charge	EDR Credit Percentage	EDR Credit Rate (Interruptible)	EDR Credit Rate (Firm)	EDR Credit (Interruptible)	EDR Credit (Firm)	Total EDR Credit	Demand	Interruptible	Total Net Demand Charges	Marginal Cost - Demand	Difference
199 January 2023	0	0	0	\$0.00	\$0.00	\$0.00	0.00%	\$0.000	\$0.000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
200 February	0	0	0	\$0.00	\$0.00	\$0.00	0.00%	\$0.000	\$0.000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
201 March	0	0	0	\$0.00	\$0.00	\$0.00	0.00%	\$0.000	\$0.000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
202 April	0	0	0	\$0.00	\$0.00	\$0.00	0.00%	\$0.000	\$0.000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
203 May	1,000	150	850	\$7.49	(\$5.60)	\$1.89	50.00%	(\$0.945)	(\$3.745)	(\$803)	(\$562)	(\$1,365)	\$7,490	(\$4,760)	\$1,365	\$1,520	(\$155)
204 June	1,000	150	850	\$7.49	(\$5.60)	\$1.89	50.00%	(\$0.945)	(\$3.745)	(\$803)	(\$562)	(\$1,365)	\$7,490	(\$4,760)	\$1,365	\$1,040	\$325
205 July	1,425	150	1,275	\$7.49	(\$5.60)	\$1.89	50.00%	(\$0.945)	(\$3.745)	(\$1,205)	(\$562)	(\$1,767)	\$10,673	(\$7,140)	\$1,766	\$1,482	\$284
206 August	1,425	150	1,275	\$7.49	(\$5.60)	\$1.89	50.00%	(\$0.945)	(\$3.745)	(\$1,205)	(\$562)	(\$1,767)	\$10,673	(\$7,140)	\$1,766	\$1,482	\$284
207 September	1,425	150	1,275	\$7.49	(\$5.60)	\$1.89	50.00%	(\$0.945)	(\$3.745)	(\$1,205)	(\$562)	(\$1,767)	\$10,673	(\$7,140)	\$1,766	\$1,482	\$284
208 October	1,943	150	1,793	\$7.49	(\$5.60)	\$1.89	50.00%	(\$0.945)	(\$3.745)	(\$1,694)	(\$562)	(\$2,256)	\$14,553	(\$10,041)	\$2,256	\$2,021	\$235
209 November	1,999	150	1,849	\$7.49	(\$5.60)	\$1.89	50.00%	(\$0.945)	(\$3.745)	(\$1,747)	(\$562)	(\$2,309)	\$14,973	(\$10,354)	\$2,310	\$2,079	\$231
210 December 2023	1,999	150	1,849	\$7.49	(\$5.60)	\$1.89	50.00%	(\$0.945)	(\$3.745)	(\$1,747)	(\$562)	(\$2,309)	\$14,973	(\$10,354)	\$2,310	\$2,079	\$231
211 Totals	12,216	1,200	11,016							(\$10,409)	(\$4,496)	(\$14,905)	\$91,498	(\$61,689)	\$14,904	\$13,185	\$1,719

214 **Billing Excluding Interruptible:**

Month	Total Demand	Firm Load	Interruptible	Demand Charge	Interruptible Credit	Net Demand Charge	EDR Credit Percentage	EDR Credit Rate (Interruptible)	EDR Credit Rate (Firm)	EDR Credit (Interruptible)	EDR Credit (Firm)	Total EDR Credit	Demand	Interruptible	Total Net Demand Charges	Marginal Cost - Demand	Difference
218 January 2023	0	0	0	\$0.00	\$0.00	\$0.00	0.00%	\$0.000	\$0.000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
219 February	0	0	0	\$0.00	\$0.00	\$0.00	0.00%	\$0.000	\$0.000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
220 March	0	0	0	\$0.00	\$0.00	\$0.00	0.00%	\$0.000	\$0.000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
221 April	0	0	0	\$0.00	\$0.00	\$0.00	0.00%	\$0.000	\$0.000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
222 May	1,000	150	0	\$7.49	\$0.00	\$7.49	50.00%	(\$3.745)	\$0	(\$3,745)	(\$3,745)	(\$7,490)	\$0	\$0	\$3,745	\$1,520	\$2,225
223 June	1,000	150	0	\$7.49	\$0.00	\$7.49	50.00%	(\$3.745)	\$0	(\$3,745)	(\$3,745)	(\$7,490)	\$0	\$0	\$3,745	\$1,040	\$2,705
224 July	1,425	150	0	\$7.49	\$0.00	\$7.49	50.00%	(\$3.745)	\$0	(\$5,337)	(\$5,337)	(\$10,673)	\$0	\$0	\$5,336	\$1,482	\$3,854
225 August	1,425	150	0	\$7.49	\$0.00	\$7.49	50.00%	(\$3.745)	\$0	(\$5,337)	(\$5,337)	(\$10,673)	\$0	\$0	\$5,336	\$1,482	\$3,854
226 September	1,425	150	0	\$7.49	\$0.00	\$7.49	50.00%	(\$3.745)	\$0	(\$5,337)	(\$5,337)	(\$10,673)	\$0	\$0	\$5,336	\$1,482	\$3,854
227 October	1,943	150	0	\$7.49	\$0.00	\$7.49	50.00%	(\$3.745)	\$0	(\$7,277)	(\$7,277)	(\$14,553)	\$0	\$0	\$7,276	\$2,021	\$5,255
228 November	1,999	150	0	\$7.49	\$0.00	\$7.49	50.00%	(\$3.745)	\$0	(\$7,486)	(\$7,486)	(\$14,973)	\$0	\$0	\$7,487	\$2,079	\$5,408
229 December 2023	1,999	150	0	\$7.49	\$0.00	\$7.49	50.00%	(\$3.745)	\$0	(\$7,486)	(\$7,486)	(\$14,973)	\$0	\$0	\$7,487	\$2,079	\$5,408
230 Totals	12,216	1,200	0							\$0	(\$45,750)	(\$45,750)	\$91,498	\$0	\$45,748	\$13,185	\$32,563

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 233 Notes: The total demand revenues reflect the combined effects of the interruptible demand credit, the EDR Credit, and the application of the demand charge. The interruptible demand credit has to be taken before the EDR Credit is determined. As the analysis above shows, had there been no
 234 interruptible demand credit, the marginal demand costs were more than adequately covered by the revenues that would have resulted from the demand charge and EDR Credit.
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