

Hinton, Daniel E (PSC)

From: Brian Frasure
Sent: Wednesday, February 14, 2024 9:05 AM
To: Hinton, Daniel E (PSC)
Cc: Rogness, Benjamin (PSC)
Subject: RE: KY-PSC Electronic Filing Center NotificationTFS2024-00057

This Message Originated from Outside the Organization

This Message Is From an External Sender.

Report Suspicious

I appreciate your help, Daniel.

I'll draft a public notice for the Levelized Bill Payment Plan tariff and let you look over it before publishing it.

Yes, the Bill Type would reflect that a bill had been estimated.

Thanks,

Brian

From: Hinton, Daniel E (PSC) <dehinton@ky.gov>
Sent: Wednesday, February 14, 2024 7:27 AM
To: Brian Frasure
Cc: Rogness, Benjamin (PSC) <benjamin.rogness@ky.gov>
Subject: RE: KY-PSC Electronic Filing Center NotificationTFS2024-00057

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I can mark the filing as withdrawn based on your email below, if that is ok with you. Once you are ready to file again, you'll just establish a new filing.

Looking over the bill format, there was one question I had. There is a field titled Bill Type that has Regular Bill in it. What other text may show up in that field. One thing we have been making sure of lately is that the bill shows whether it was a bill based on an actual or estimated reading. If it were estimated, would it reflect that in the Bill Type field? If so, I think that is sufficient. If not, you may want to look into adding something to the bill that would show that.

If you have any questions, please let me know.

Thanks.

Daniel

From: Brian Frasure
Sent: Tuesday, February 13, 2024 8:47 PM
To: Hinton, Daniel E (PSC) <dehinton@ky.gov>
Subject: RE: KY-PSC Electronic Filing Center NotificationTFS2024-00057

Hey Daniel,

Neighbor to Neighbor is not a new program. After doing research, it looks like Clark began this program back in 2003. Clark partnered with Kentucky River Foothills and Gateway Community Services to offer the program. Both Foothills and Gateway provide energy assistance to Clark members. The gist of this partnership seems to have been that Clark members could voluntarily donate funds as they wished to the program. Clark would accumulate those funds throughout the year, and send a check annually to Foothills and Gateway to be used for energy assistance. Clark did not determine who received the funds, we would just collect and remit.

With all of that said, it does not look like there has been any activity in this program since 2017. This is well before my tenure began with Clark in 2020, so I am needing to research everything. Can we please put a temporary hold on filing the bill format tariff sheets? I need to determine if this is an ongoing program, or if it needs to be removed from our billing statements.

Thanks,

Brian Frasure, CPA

Vice President of Finance/Office Services



2640 Ironworks Road
P.O. Box 748
Winchester, KY 40392-0748
Direct: 859-901-9218
Toll Free: 800-992-3269
Fax: 859-744-4218

From: Hinton, Daniel E (PSC) <dehinton@ky.gov>
Sent: Tuesday, February 13, 2024 12:48 PM
To: Brian Frasure
Subject: RE: KY-PSC Electronic Filing Center NotificationTFS2024-00057

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Looking over the bill format, is the Neighbor to Neighbor program a new program?

Does Clark Energy have any affiliation or control over the Neighbor to Neighbor program or Kentucky River Foothills and Gateway Community Services?

Thanks.

Daniel

From: Brian Frasure
Sent: Tuesday, February 13, 2024 8:21 AM
To: Hinton, Daniel E (PSC) <dehinton@ky.gov>
Subject: RE: KY-PSC Electronic Filing Center NotificationTFS2024-00057

Yes, we can go ahead with the bill format part of the tariff.

Thanks

From: Hinton, Daniel E (PSC) <dehinton@ky.gov>
Sent: Tuesday, February 13, 2024 7:31 AM
To: Brian Frasure
Subject: RE: KY-PSC Electronic Filing Center NotificationTFS2024-00057

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You would not need to include those three subsections from the regulation in the notice as they cannot be accurately depicted in this instance.

All the other language from the Notice Content part of the regulation would need to be included. Also, the effective date will need to be at least 30 days out from the date of the initial notice and the date the filing is refiled with us. So, if Clark gives notice on March 1 and refiles that same day, the earliest effective date would be March 31.

For the changes, I would do the following:

For the change in enrollment period, include the following in the notice: Clark Energy is revising the enrollment period for the Levelized Billing Payment Plan from March through October to any month of the year.

For the change in C. 3., include the following in the notice: Clark Energy's current tariff states: "Any debit or credit deferred amount will be annualized and will be added or subtracted from the monthly levelized billing amount." That sentence is being revised to the following: "In addition, monthly levelized adjustments will be calculated and added to the average amount. The monthly adjustment will be one-twelfth (1/12) of the unpaid balance. There will be no adjustment calculated for a credit balance."

If you want me to look over the notice before you give it to customers, you can always email it to me. I can make sure it has all of the required information.

Regarding the billing format part of the tariff filing, did you want to go ahead and go forward with that under the current filing?

If you have any questions, please let me know.

Thanks.

Daniel

From: Brian Frasure
Sent: Monday, February 12, 2024 5:22 PM
To: Hinton, Daniel E (PSC) <dehinton@ky.gov>
Subject: RE: KY-PSC Electronic Filing Center NotificationTFS2024-00057

Hey Daniel,

I'm reviewing the notice requirements under 807 KAR 5:011. I have some uncertainties regarding the "Notice Content" requirements found in Section 8(4):

1) 8(4)(b) states "The present rates and proposed rates for each customer classification to which the proposed rates will apply." There will be no change in rate that I can provide notice of.

2) 8(4)(c) states "The amount of the change requested in both dollar amounts and percentage change for each customer classification to which the proposed rates will apply." This amount of change cannot be determined. As mentioned above, there will not be a change in rates, and Levelized billing is a billing option that is participated in on a voluntary basis. The amount of change experienced by this change in calculation methodology will vary on a case-by-case basis. Providing this information on a public notice really isn't feasible.

3) 8(4)(d) states "The amount of the average usage and the effect upon the average bill for each customer classification to which the proposed rates will apply." We would have the same issue here as with requirement 8(4)(c). The impact would be very much a case-by-case basis.

To sum it up, I feel that providing accurate numbers for a public notice here would not be feasible.

Would it be acceptable for me to provide a "before" and "after" copy of the tariff sheet? The "before" would be a copy as the tariff reads now and the "after" would be how the tariff would read after the changes are approved.

Also, is there a public notice required to change the months of enrollment from "March through October", as it currently reads in our tariff, to "any month of the year" as I am proposing to change it?

I apologize for the long reply, but your guidance here would be greatly appreciated.

Thanks,

Brian Frasure, CPA

Vice President of Finance & Office Services



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From: Hinton, Daniel E (PSC) <dehinton@ky.gov>

Sent: Monday, February 12, 2024 2:35 PM

To: Brian Frasure

Cc: Rogness, Benjamin (PSC) <benjamin.rogness@ky.gov>

Subject: RE: KY-PSC Electronic Filing Center NotificationTFS2024-00057

***** This is an EXTERNAL email. BEWARE of Links or Attachments! *****

Mr. Frasure,

In glancing over the below filing, if it is revising how the monthly levelized bill amount is calculated, notice would be required under 807 KAR 5:011, Section 8. That regulation states: "A utility shall provide notice if a charge, fee, condition of service, or rule regarding the provision of service is changed, revised, or initiated and the change will affect the amount that a customer pays for service or the quality, delivery, or rendering of a customer's service." A change to how the levelized adjustment is calculated would affect the amount that a customer pays for service.

The bill format part of the filing would not require notice though.

If you have any questions, please let us know.

Thanks.

Daniel

From: PSC Tariffs <psc.tariffs@ky.gov>

Sent: Monday, February 12, 2024 2:06:44 PM (UTC-05:00) Eastern Time (US & Canada)

To:

Cc: PSC Tariffs <psc.tariffs@ky.gov>

Subject: KY-PSC Electronic Filing Center NotificationTFS2024-00057

This notification has been sent to you regarding your recent Tariff filing : TFS2024-00057
file(s) have been transmitted successfully.

Documents received for Tariff filing: TFS2024-00057 for Clark Energy Cooperative, Inc.
2/12/2024 2:06:43 PM

File Summary:

File Name: _Cover_Letter_-_Tariff_Update.pdf

Description: Cover Letter

File Name: TARIFF_SHEETS_-_CLEAN_COPY.pdf

Description: Tariff

File Name: LEVELIZED_BILLING_TARIFF_-_STRIKE_THRU.pdf

Description: Tariff

Thank you.