



November 02, 2021

***VIA ELECTRONIC TARIFF
FILING SYSTEM***

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

Re: Green Energy Tariff Amendment

Dear Ms. Bridwell:

Please find enclosed for filing with the Commission the above-referenced Clark Energy Cooperative, Inc.–Renewable Energy Program tariff amendment, which includes a Renewable Energy Purchase Agreement (“Green Energy Tariff”). This tariff filing is a significant and necessary expansion of Clark Energy Cooperative’s existing renewable energy program and is submitted in furtherance of our goal to meet end-use members’ growing expectations to source renewable energy at fair, just and reasonable rates. The attached Green Energy Tariff is carefully designed to offer end-use members the flexibility they desire without causing harm to other customers. It is based upon the Green Energy Tariff and updated Renewable Energy Purchase Agreement that the Commission approved for East Kentucky Power Cooperative, Inc. (“EKPC”) on September 29, 2021.

The Green Energy Tariff is a rider to all current rate schedules. In its original version, the Green Energy Tariff was marketed as “Envirowatts” and allowed end-use members to support renewable energy by purchasing Renewable Energy Certificates (“RECs”) derived from various solar, wind, hydroelectric or biomass resources. End-use members participated in Envirowatts via contributions on their monthly electric bill. EKPC then purchased and retired the appropriate number and category of RECs based upon the dollar amount of RECs contributed by the end-use member.

While Envirowatts was well-suited for the needs of residential and small commercial customers, EKPC found it to less responsive to the growing sustainability objectives of larger commercial and industrial energy consumers. A typical energy-related sustainability goal is to purchase a percentage of a company’s energy requirements from physical renewable or sustainable resources. Through an ongoing dialogue with the larger end-use members on the EKPC system, EKPC sought to develop a tariff that would enable these energy users to satisfy their sustainability goals without prejudicing EKPC’s other customers. EKPC’s due diligence included researching similar tariffs already in place with other utilities, consulting with a company that currently utilizes

a green tariff offered by another utility and retaining a consultant to help EKPC's staff model and fully understand the economics of a green tariff. These efforts resulted in EKPC evolving the Green Energy Tariff to include an "Option B" that provided a means for significant energy consuming customers to enter into a power supply agreement for the purchase of renewable energy from EKPC and its owner-members. Following Commission review, the expanded Green Energy Tariff was approved by the Commission on March 25, 2020.¹

The expanded Green Energy Tariff was immediately attractive to customers, however, it soon became clear that EKPC's Green Energy Tariff needed one more addition – a mechanism for large commercial and industrial customers to purchase RECs on a scale not contemplated in Option A of the tariff. Over the past year, EKPC has worked with its owner-members to develop a new "Option C" for the Green Energy Tariff. Due to the scale of the REC purchases likely to be made under emerging corporate sustainability trends, the option of simply expanding Option A's REC purchase provisions did not appear prudent. While both individual residential customers and large multi-national corporations may have an interest in offsetting their carbon emissions with REC purchases, the differences in respective volumes indicated that a new tariff offering was necessary. The culmination of these efforts are set forth in EKPC's updated Green Energy Tariff – Rate H, that was approved on September 29, 2021 and is now effective.

To assure that the benefits of the Green Energy Tariff are available to its end-use members, Clark Energy Cooperative, Inc. is filing its corresponding retail tariff with the Commission. Pursuant to KRS 278.180(1), Clark Energy Cooperative, Inc. is giving at least 30-days' advance notice to the Commission. Therefore, the proposed effective date of these tariff revisions will be December 2, 2021.

Pursuant to 807 KAR 5:011, Section 8, this is a voluntary tariff that will not affect the amount that a customer pays for service or the quality, delivery, or rendering of a customer's service and, therefore, customer notice does not appear to be required. Nevertheless, to be transparent without incurring unnecessary costs, Clark Energy Cooperative, Inc. has posted notice at its office located at 2640 Iron Works Road, Winchester, KY 40391 and will post notice on its website, no later than five (5) business days from today's date, which will include a hyperlink to the Commission's website where the tariff can be found. Copies of the Customer Notice and proposed Green Energy Tariff and Renewable Energy Purchase Agreement are attached.

Please contact me if you have any questions.

Very truly yours,



Billy O. Frasure

Vice President, Finance and Office Services

¹ See *In the Matter of the Electronic Tariff Filing of East Kentucky Power Cooperative, Inc. to Implement a New Green Energy Option for Non-Residential Retail Customers*, Order, Case No. 2019-00379 (Ky. P.S.C. March 25, 2020).