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ATTORNEYS

## Kentucky - Ohio - Indiana • Tennessee • West virginia

October 7, 2010

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602
Re: PSC Case No. 2010-00319
Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case, an original and ten copies of the responses of East Kentucky Power Cooperative, Inc., ("EKPC") to the Commission's Appendix B First Information Requests, contained in the Commission's Order dated September 7, 2010, and the Prepared Testimony of Ann F. Wood on Behalf of EKPC. All documents contained in this filing are also being filed on behalf of EKPC's member systems.


Enclosures

Cc: Parties of Record

## COMMONWEALTH OF KENTUCKY <br> BEFORE THE PUBLIC SERVICE COMMISSION


#### Abstract

In the Matter of:

\title{ AN EXAMINATION BY THE PUBLIC SERVICE ) } COMMISSION OF THE ENVIRONMENTAL ) SURCHARGE MECHANISM OF EAST KENTUCKY ) POWER COOPERATIVE, INC. FOR THE ) CASE NO. SIX-MONTH BILLING PERIOD ENDING ) 2010-00319 JUNE 30, 2010 AND THE PASS-THROUGH ) MECHANISM FOR ITS SIXTEEN MEMBER ) DISTRIBUTION COOPERATIVES )


RESPONSES TO COMMISSION STAFF'S FIRST INFORMATION REQUEST TO EAST KENTUCKY POWER COOPERATIVE, INC.

DATED SEPTEMBER 7, 2010

# EAST KENTUCKY POWER COOPERATIVE, INC. 

## PSC ADMINISTRATIVE CASE 2010-00319

## PUBLIC SERVICE COMMISSION INFORMATION REQUEST DATED 09/07/10

East Kentucky Power Cooperative, Inc. (EKPC) hereby submits responses to the information requests contained in Appendix B to the Order of the Public Service Commission ("PSC") in this case dated September 7, 2010. Each response with its associated supportive reference materials is individually tabbed.

## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

## In the Matter of:

| AN EXAMINATION BY THE PUBLIC SERVICE |  |  |
| :--- | :--- | :--- |
| COMMMSSION OF THE ENVIRONMENTAL |  |  |
| SURCHARGE MECHANISM OF EAST KENTUCKY ) |  |  |
| POWER COOPERATIVE, INC. FOR THE |  |  |
| SIX-MONTH BILLING PERIOD ENDING | CASE NO. |  |
| UUNE 30, 201; AND THE PASS-THROUGH | ) |  |
| MECHANISM FOR ITS SIXTEEN MEMBER | ) |  |
| DISTRIBUTION COOPERATIVES | ) |  |

## DIRECT TESTIMONY OF ANN F. WOOD

 ON BEHALF OF EAST KENTUCKY POWER COOPERATIVE, INC.
## Q. Please state your name, business address and occupation.

A. My name is Ann F. Wood and my business address is East Kentucky Power Cooperative ("EKPC"), 4775 Lexington Road, Winchester, Kentucky 40391. I am the Manager of Regulatory Services for EKPC.
Q. Please state your education and professional experience.
A. I received a B.S. Degree in Accounting from Georgetown College in 1987. After graduation I accepted an audit position with Coopers \& Lybrand in the Lexington office. My responsibilities ranged from performing detailed audit testing to managing audits. In October 1995, I started working for Lexmark International, Inc. as an analyst. In May 1997, I joined EKPC and held various management positions in the accounting and internal auditing areas. In August 2008, I became Manager of Regulatory Services at EKPC. I am a certified public accountant in Kentucky.

## Q. Please provide a brief description of your duties at EKPC.


#### Abstract

A. As Manager of Regulatory Services, I am responsible for managing all filings with the Public Service Commission ("Commission.") I report directly to the Chief Financial Officer.


Q. What is the purpose of your testimony?
A. The purpose of my testimony is to describe how EKPC and its Member Systems have applied the environmental surcharge mechanism in a reasonable manner during the period under review and to identify the over/under recoveries accumulated for the periods under review for EKPC and each Member System and recommend an amortization of such amounts accumulated during the period under review. My testimony will also propose updating the rate of return used in the environmental surcharge calculation.
Q. Is EKPC preparing testimony and responding to data requests on behalf of its member systems?
A. Yes. EKPC is preparing testimony on behalf of each member system. These member systems are: Big Sandy Rural Electric Cooperative Corporation; Blue Grass Energy Cooperative Corporation; Clark Energy Cooperative, Inc.; Cumberland Valley Electric, Inc.; Farmers Rural Electric Cooperative Corporation; Fleming-Mason Energy Cooperative; Grayson Rural Electric Cooperative Corporation; Inter-County Energy Cooperative Corporation; Jackson Energy Cooperative; Licking Valley Rural Electric Cooperative Corporation; Nolin Rural Electric Cooperative Corporation; Owen Electric Cooperative; Salt

River Electric Cooperative Corporation; Shelby Energy Cooperative, Inc.; South Kentucky Rural Electric Cooperative Corporation; and Taylor County RECC.
Q. Have other EKPC representatives provided responses to data requests in this proceeding?
A. Yes. Ernest W. Huff, Manager of Fuels and Emissions, has provided the emission allowance information for Response 3 of the First Information Request of Commission Staff. Frank J. Oliva, Manager of Finance, has provided the debt and average interest rate/ TIER information for Responses 5 and 6 of the First Information Request of Commission Staff.
Q. Previous Commission Orders required EKPC and its Member Systems to incorporate certain provisions into the calculation of the monthly environmental surcharge factors. Please comment on how EKPC and the Member Systems have addressed the most significant aspects of these Orders during the periods under review.
A. A brief description of each component of the environmental surcharge calculation, applied consistently with Commission Orders, is discussed below. - Compliance Plan Projects

EKPC's compliance plan consists of the projects approved by the Commission upon implementation of the environmental surcharge (Case No. 2004-00321) and upon the amendment to its compliance plan (Case No. 2008-00115.) The monthly environmental surcharge reports, incorporated by reference in this case, show the capital costs for these projects. Please note that the Commission has approved EKPC's second amendment to its compliance plan
(Case No. 2010-00083); however, this second amendment does not impact the period under review in this proceeding.

- Base/Current Method

EKPC used the Base/Current method for calculating the monthly environmental surcharge factor during the review periods. As a result of the Commission's Order in Case No. 2009-00317 dated January 28, 2010, EKPC's base factor is now $0 \%$. This base factor change was made beginning with the January 2010 expense month calculation.

## - Actual Emission Allowance Expense

 EKPC included only actual SO2 and NOx emission allowance expense in the monthly filings.- Return on Emission Allowance Inventory and Limestone Inventory EKPC has included a return on all environmental surcharge assets, including emission allowances purchased for current and vintage years. This is addressed in Response 3 to the First Data Request of Commission Staff. EKPC has also included a return on its limestone inventory.
- Return on Construction Work in Process (CWIP) EKPC has included a return on CWIP during the period under review.
- Rate of Return

EKPC's rate of return consists of two components: the average cost of debt on its compliance plan projects and a Times Interest Earned Ratio (TIER) component. For the January 2010 billing period (December 2009 expense month) as granted in Case No. 2009-00039, EKPC applied an average cost of
debt of $4.762 \%$ and a 1.35 TIER to yield a $6.429 \%$ rate of return. As a result of Commission Order in Case No. 2009-00317, EKPC updated its average cost of debt at $4.482 \%$ and applied a 1.35 TIER, which yielded a $6.051 \%$ rate of return. EKPC applied this rate of return beginning with the February 2010 billing period (January 2010 expense month) through the current billing period. Application of the rate of return is reflected in Response 1 to the First Information Request of Commission Staff. Please note that in Case No. 201000021, which is still pending before the Commission, EKPC also updated the debt component of the rate of return calculation.

- Operation and Maintenance (O\&M) Expenses

EKPC has continued to use a 12 -month rolling average for $O \& M$ expenses associated with the compliance plan projects. For those instances where the change in the level of O\&M expense exceeded 10 percent, EKPC has provided an explanation. These explanations are provided in Response 4 to the First Information Request of Commission Staff.

- Pass-Through Mechanism

The environmental surcharge factors computed for retail customers were billed by EKPC's Member Systems at approximately the same time as EKPC billed the Member Systems at wholesale. The calculation of the monthly factors for each Member System was provided in the monthly reports filed with the Commission. EKPC and the Member Systems adhered to these and all other requirements and provisions of the Commission's Orders for the periods under review.
Q. Were the environmental-related amounts included in the monthly surcharge calculation based on booked costs?
A. Yes. EKPC continues to use the amounts booked for the various cost categories included in the surcharge calculation and these costs were actual costs and incurred in a prudent manner.
Q. Did EKPC incur any over and under recoveries during the periods under review?
A. Yes. However, as shown in Response 1 to the First Information Request of Commission Staff, EKPC applied its June 2010 over-recovery to the August 2010 expense month. Therefore, there are no cumulative over or under recoveries to consider in this proceeding.
Q. Did the Member Systems incur any over or under recoveries during the review periods?
A. Yes. However, the over or under recovery amounts through June 2010, shown in Response 2 to the First Information Request of Commission Staff, have since been flowed through subsequent months' calculations. Therefore, there are no cumulative over or under recoveries to consider in this proceeding.
Q. Does EKPC propose changes to its wholesale surcharge mechanism during this review?
A. Please note that the following proposed change was included in Case No. 201000021, which is pending before the Commission. As part of this proceeding, EKPC reiterates its request to change from a two-month "true-up" adjustment to a one-month "true-up" adjustment at the wholesale level with respect to over and
under recoveries. In order to accomplish this proposed change, in the month after either the Commission's Order in this proceeding or the Commission's Order in 2010-00021, if received sooner, EKPC will need to reflect two-months of over/under recoveries in one month. EKPC recognizes this proposed change will require a change to its wholesale tariff (Rate ES-Environmental Surcharge).

Please see Exhibit AFW-1 for the proposed tariff change.
Q. Do EKPC's member systems propose any changes to their surcharge mechanism during this review?
A. Yes. As part of Case No. 2009-00039, EKPC proposed, and the Commission approved, the establishment of a two-month "true-up" mechanism for over and under recoveries at both wholesale and retail. For reasons discussed in greater detail in the Supplemental Testimony of Ann F. Wood filed with the Commission in Case No. 2010-00021 on April 30, 2010, EKPC reiterates its member system request that the retail two-month "true-up" adjustment be ceased effective with the date of the Commission's Order in this proceeding, or the date of the Commission's Order in Case No. 2010-00021, whichever is sooner. The tariff revision associated with this change is provided as Exhibit AFW-2.
Q. How do the EKPC member systems propose to treat future over or under recoveries?
A. EKPC's member systems propose that accumulated over/under recoveries will be determined during the six-month and two-year reviews, and, after review and approval by the Commission, be amortized over a future six-month period.
Q. Has EKPC updated the rate of return to be used prospectively?

1 A. Yes. As indicated in Response 6 the First Data Request of Commission Staff, EKPC recommends that the Commission approve the average debt cost of 4.525\%. As indicated earlier in my Direct Testimony, EKPC will maintain the use of a 1.35 TIER in calculating the rate of return.
Q. When does EKPC propose to apply the updated average debt cost to its rate of return calculation?
A. EKPC plans to use the new average debt cost in its rate of return calculation in the first month following the Commission's Final Order in this proceeding.
Q. Does this conclude your testimony?
A. Yes.

## COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

## In the Matter of:

## AN EXAMINATION BY THE PUBLIC SERVICE )

 COMMISSION OF THE ENVIRONMENTAL ) SURCHARGE MECHANISM OF EAST KENTUCKY ) POWER COOPERATIVE, INC. FOR THE ) CASE NO. SIX-MONTH BILLING PERIOD ENDING ) 2010-00319 JUNE 30, 2010 AND THE PASS-THROUGH ) MECHANISM FOR ITS SIXTEEN MEMBER ) DISTRIBUTION COOPERATIVES )
## AFFIDAVIT

## STATE OF KENTUCKY )

## COUNTY OF CLARK )

Ann F. Wood, being duly sworn, states that she has read the foregoing prepared
testimony and that she would respond in the same manner to the questions if so asked
upon taking the stand, and that the matters and things set forth therein are true and correct to the best of her knowledge, information and belief.
Annit.word

Subscribed and sworn before me on this $6^{d L}$ day of October, 2010.


## RATE ES - ENVIRONMENTAL SURCHARGE

## APPLICABILITY

Applicable to all sections of this rate schedule and this rate schedule shall apply to each Member System.

## AVAILABILITY

This rate schedule shall apply to EKPC rate sections A, B, C, E, and G and all special contracts with rates subject to adjustment upon the approval of the Commission.

## RATE

The Environmental Surcharge shall provide for monthly adjustments based on a percent of revenues equal to the difference between the environmental compliance costs in the base period and in the current period based on the following formula:

```
\(\mathrm{CESF}=\mathrm{E}(\mathrm{m}) / \mathrm{R}(\mathrm{m})\)
\(\operatorname{MESF}=\mathrm{CESF}-\mathrm{BESF}\)
MESF \(=\) Monthly Environmental Surcharge Factor
CESF \(=\) Current Environmental Surcharge Factor
BESF \(=\) Base Environmental Surcharge Factor of 0\%
```

where $E(m)$ is the total of each approved environmental compliance plan revenue requirement of environmental costs for the current expense month and $R(\mathrm{~m})$ is the revenue for the current expense month as expressed below.

## Definitions

(1) $\mathrm{E}(\mathrm{m})=[(\mathrm{RB} / 12)(\mathrm{RORB})+\mathrm{OE}-\mathrm{BAS}+($ Over $)$ Under Recovery
where:
(a) RB is the Environmental Compliance Rate Base, defined as electric plant in service for applicable environmental projects adjusted for accumulated depreciation, CWIP, cash working capital, spare parts and
limestone inventory, emission allowance inventory;
(b) RORB is the Rate of Return on the Environmental Compliance Rate Base, designated as the average cost of debt for environmental compliance plan projects approved by the Commission plus application of a times-interest-earned ratio of 1.35 ;

| DATE OF ISSUE Febrtary 3,2010 | DATE EFFECTIVE: Jantary 28,2010 |
| :--- | :--- |
| ISSUED BY |  |

issued by authority of an Order of the Public Service Commission of Kentucky in
Case No. 2009-00317 Dated Jantary 28,2010

# For All Counties Served <br> P.S.C. No. 34 

First Revised Sheet No. 25
Canceling P.S.C. No. 34
EAST KENTUCKY POWER COOPERATIVE, INC
Original Sheet No. 25
(c) OE is the Monthly Pollution Control Operating Expenses, defined as the average of the twelve month operating and maintenance expense; depreciation expense, property taxes, insurance expense, emission allowance expense, and consulting fees.;
(d) BAS is the net proceeds from By-Products and Emission Allowance Sales, and;
(e) (Over) or Under recovery amount resulting from the amortization of amounts determined by the Commission during six-month and two-year reviews and the one-month "true-up" adjustment.
(2) Total $\mathrm{E}(\mathrm{m})$ is multiplied by the Member System Allocation Ratio to arrive at Net $\mathrm{E}(\mathrm{m})$. The Member System Allocation Ratio is based on the ratio of the 12 -month total revenue from sales to Member Systems to which the Surcharge will be applied, ending with the current expense month, divided by the 12 -month total revenue from sales to Member Systems and off-system sales.
(3) The revenue $R(\mathrm{~m})$ is the average monthly revenue, including base revenues and automatic adjustment clause revenues less Environmental Cost Recovery Surcharge revenues, for EKPC for the twelve months ending with the current expense month.
(4) The current expense month (m) shall be the second month preceding the month in which the Environmental Surcharge is billed.

FOR ENTIRE TERRITORY SERVED
Community, Town or City
P.S.C. KY. NO.
$\qquad$ SHEET NO.

## CLASSIFICATION OF SERVICE

## RATES SCHEDULE ES - ENVIRONMENTAL SURCHARGE

## AVAILABILITY

In all of the Company's service territory.

## APPLICABILITY

This rate schedule shall apply to all electric rate schedules and special contracts.

## RATE

$\operatorname{CES}(\mathrm{m})=\mathrm{ES}(\mathrm{m})$
where $\operatorname{CES}(\mathrm{m})=$ Current Month Environmental Surcharge Factor
$\mathrm{ES}(\mathrm{m})=$ Current Month Environmental Surcharge Calculation
$\mathrm{ES}(\mathrm{m})=[(($ WESF $) \times$ (Average of 12 -months ended revenues from sales to Member System, excluding environmental surcharge) $)+($ Over $) /$ Under Recovery] divided by
[Average of 12 -months ending Retail Revenue (excluding environmental surcharge)] = \%
where WESF = Wholesale Environmental Surcharge Factor for Current Expense Month

DATE OF ISSUE $\qquad$
Month / Date / Year
DATE EFFECTIVE $\qquad$
Month / Date / Year
ISSUED BY $\qquad$
(Signature of Officer)
TITLE $\qquad$ President and General Manager

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION
IN CASE NO. $\qquad$ DATED $\qquad$

## CLASSIFICATION OF SERVICE

(Over)/Under Recovery $=$

6-months cumulative (over)/under recovery as defined by amount billed by EKPC to Member System minus the amount billed by Member System to retail customer. 6 -months cumulative over or under recoveries result from
the amertization of amounts detemined are reviewed and approved by the Commission during six-month and two-year reviews. and the two-month "true-up" adjustment. Over or under recoveries shall be amortized over a future six-month period.

## BILLING

The current expense month (m) shall be the second month preceding the month in which the Environmental Surcharge is billed.

DATE OF ISSUE $\qquad$
Month / Date / Year
DATE EFFECTIVE $\qquad$
Month / Date / Year
ISSUED BY $\qquad$
(Signature of Officer)
TITLE $\qquad$ President and General Manager

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION
IN CASE NO. $\qquad$ DATED $\qquad$

## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

## In the Matter of:

| AN EXAMINATION BY THE PUBLIC SERVICE |  |
| :--- | :--- |
| COMMISSION OF THE ENVIRONMENTAL |  |
| SURCHARGE MECHANISM OF EAST KENTUCKY ) |  |
| POWER COOPERATIVE, INC. FOR THE | ) |
| SIX-MONTH BILLING PERIOD ENDING | CASE NO. |
| JUNE 30, 2010 AND THE PASS-THROUGH | () |
| MECHANISM FOR ITS SIXTEEN MEMBER |  |
| DISTRIBUTION COOPERATIVES | ) |

## CERTIFICATE

## STATE OF KENTUCKY )

COUNTY OF CLARK )

Ennest W. Huff, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service

Commission Staff First Data Requests contained in Appendix B in the above-referenced case dated September 7, 2010, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.


Subscribed and sworn before me on this $5^{\text {H }}$ day of October, 2010.


## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| AN EXAMINATION BY THE PUBLIC SERVICE |  |
| :--- | :--- |
| COMMISSION OF THE ENVIRONMENTAL |  |
| SURCHARGE MECHANISM OF EAST KENTUCKY ) |  |
| POWER COOPERATIVE, INC. FOR THE | ) |
| SIX-MONTH BILLING PERIOD ENDING | CASE NO. |
| JUNE 30, 2010 AND THE PASS-THROUGH | () |
| MECHANISM FOR ITS SIXTEEN MEMBER |  |
| DISTRIBUTION COOPERATIVES |  |

## CERTIFICATE

STATE OF KENTUCKY )
COUNTY OF CLARK

Frank J. Oliva, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff First Data Requests contained in Appendix B in the above-referenced case dated September 7, 2010, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.


Subscribed and sworn before me on this $S^{t 1}$ day of October, 2010.


## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:


#### Abstract

AN EXAMINATION BY THE PUBLIC SERVICE ) COMMISSION OF THE ENVIRONMENTAL ) SURCHARGE MECHANISM OF EAST KENTUCKY ) POWER COOPERATIVE, INC. FOR THE )

CASE NO. SIX-MONTH BILLING PERIOD ENDING ) 2010-00319 JUNE 30, 2010 AND THE PASS-THROUGH ) MECHANISM FOR ITS SIXTEEN MEMBER ) DISTRIBUTION COOPERATIVES )


## CERTIFICATE

## STATE OF KENTUCKY )

COUNTY OF CLARK )

Ann F. Wood, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff First Data Requests contained in Appendix B in the above-referenced case dated September 7, 2010, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.


Subscribed and sworn before me on this $6^{t /}$ day of October, 2010.


## EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2010-00319
ENVIRONMENTAL SURCHARGE APPENDIX B

## FIRST INFORMATION REQUEST RESPONSE

## COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 9/7/10 REQUEST 1 <br> RESPONSIBLE PARTY: <br> Ann F. Wood COMPANY: <br> East Kentucky Power Cooperative, Inc.

Request 1. Prepare a summary schedule showing the calculation of $\mathrm{E}(\mathrm{m})$ and the surcharge factor for the expense months covered by the billing periods under review. Form 1.1 can be used as a model for this summary. Include the two expense months subsequent to the billing period in order to show the over- and under-recovery adjustments for the months included for the billing period. Include a calculation of any additional over- or under-recovery amount EKPC believes needs to be recognized for each six-month review. Include all supporting calculations and documentation for the additional over- or under-recovery.

Response 1. Please see pages 2 and 3 of this response. For purposes of this review period, there is no cumulative over/under recovery as EKPC has followed the two-month "true up" adjustment approved in Case No. 2009-00039. As further discussed in testimony in this proceeding, EKPC is requesting the Commission's approval to change to a one-month "true up" adjustment going forward.
East Kentucky Power Cooperative, Inc. Environmental Surcharge Report
Calculation of Current Month Environmental Surcharge Factor (CESF) and (Over)/Under Recovery Calculation

| Line | Description |  | Jan-10 | Feb-10 | Mar-10 | Apr-10 | May-10 | Jun-10 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | $E(m)=R O R B+O E-B A S$ |  |  |  |  |  |  |  |
| 2 | Rate Base |  | \$610,014,766 | \$608,169,233 | \$609,112,895 | \$609,322,372 | \$607,557,545 | \$605,748,113 |
| 3 | Rate Base / 12 |  | \$50,834,564 | \$50,680,769 | \$50,759,408 | \$50,776,864 | \$50,629,795 | \$50,479,009 |
| 4 | Rate of Retum | $=$ | 6.051\% | 6.051\% | 6.051\% | 6.051\% | 6.051\% | 6.051\% |
| 5 | Retum on Rate Base (RORB) | + | \$3,075,999 | \$3,066,693 | \$3,071,452 | \$3,072,508 | \$3,063,609 | \$3,054,485 |
| 6 | Operating Expenses (OE) | + | \$3,558,103 | \$3,565,307 | \$3,700,850 | \$3,580,656 | \$3,492,422 | \$3.709,990 |
| 7 | By-Product and Emission Allowance Sales (BAS) | - |  |  |  |  |  |  |
| 8 | Sub-Total E(m) |  | \$6,634,102 | \$6,632,000 | \$6,772,302 | \$6,653,164 | \$6,556,031 | \$6.764,475 |
| 8 a | Prior Periods Adjustments |  |  |  |  |  |  |  |
| 9 | Member System Allocation Ratio for the Month (Form 3.0) |  | 98.61\% | 98.66\% | 98.49\% | 98.21\% | 98.46\% | 98.44\% |
| 10 | Subtotal $E(m)=$ Subtotal $E(m) \times$ Member System Allocation Ratio |  | \$6.541,888 | \$6,543,132 | \$6,670,040 | \$6,534,072 | \$6,455,068 | \$6,658,949 |
| 11 | Adjustment for (Over)/Under Recovery, as applicable |  | \$650,316 | \$650,316 | \$0 | \$0 | \$0 | \$0 |
| 12a | $E(m)=$ Subtotal $E(m)$ plus (Over)/Under Recovery |  | \$7,192,204 | \$7,193,448 | \$6.670.040 | \$6,534,072 | \$6,455,068 | \$6,658,949 |
| 12 b | 2-month true up adjustment |  | \$600,084 | (\$988,935) | (\$3,611,167) | (\$2,674,594) | (\$117,599) | \$946,051 |
| 12c | $E(m)=\operatorname{Ln} 12 a+\operatorname{Ln} 12 b$ |  | \$7,792,289 | \$6,204,513 | \$3,058,873 | \$3,859,478 | \$6,337,469 | \$7,605,000 |
| 13 | $R(m)=$ Average Monthly Wholesale Revenue for the 12 Months Ending with the Current Expense Month (Form 3.0) |  | \$57,234,360 | \$58,107,422 | \$58,057,214 | \$57,174,483 | \$57.077.299 | \$57,662,277 |
| 14 | CESF: Line $12 \mathrm{c} /$ Line 13 <br> $\mathrm{E}(\mathrm{m}) / \mathrm{R}(\mathrm{m})$; as a \% of Revenue |  | 13.61\% | 10.68\% | 5.27\% | 6.75\% | 11.10\% | 13.19\% |
| 15 | BESF |  | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 16 | MESF |  | 13.61\% | 10.68\% | 5.27\% | 6.75\% | 11.10\% | 13.19\% |
| 17 | Authorized Recovery Amount: Line $13 \times$ Line 16 |  | \$7.792,289 | \$6,204,513 | \$3,058,873 | \$3,859,478 | \$6,337,469 | \$7,605,000 |
| 18 | Environmental Surcharge Revenues Billed |  | \$11,233,064 | \$10,466,883 | \$6,322,112 | \$2,112,822 | \$3,067,770 | \$6,691,031 |
| 19 | Monthly (Over)/Under $=$ Previous Month Line 17 Minus Current Month Line 18 |  | (\$3.611.167) | (\$2.674.594) | (\$117,599) | \$946,051 | \$791,708 | (\$353,562) |

PSC Request 1
Page 3 of 3
East Kentucky Power Cooperative, Inc. Environmental Surcharge Report Current Month Environmental Surcharge Factor (CESF)
and (Over)/Under Recovery Calculation

| Line | \| Description |  | Jul-10 | Aug-10 |
| :---: | :---: | :---: | :---: | :---: |
| 1 | $E(\mathrm{~m})=\mathrm{RORB}+\mathrm{OE}-\mathrm{BAS}$ |  |  |  |
| 2 | Rate Base |  | \$603,722,880 | \$602,103,182 |
| 3 | Rate Base / 12 |  | \$50,310,240 | \$50,175,265 |
| 4 | Rate of Retum | $=$ | 6.051\% | 6.051\% |
| 5 | Retum on Rate Base (RORB) | $+$ | \$3,044,273 | \$3,036,105 |
| 6 | Operating Expenses (OE) | + | \$3,884,632 | \$4,258,464 |
| 7 | By-Product and Emission Allowance Sales (BAS) | - |  |  |
| 8 | Sub-Total E(m) |  | \$6,928,904 | \$7,294,569 |
| 8 a | Prior Periods Adjustments |  |  |  |
| 9 | Member System Allocation Ratio for the Month (Form 3.0) |  | 97.92\% | 97.36\% |
| 10 | Subtotal $E(m)=$ Subtotal $E(m) \times$ Member System Allocation Ratio |  | \$6,784,783 | \$7,101,992 |
| 11 | Adjustment for (Over)/Under Recovery, as applicable |  | \$0 | \$0 |
| 12a | $E(m)=$ Subtotal $E(m)$ plus (Over)/Under Recovery |  | \$6,784,783 | \$7,101,992 |
| 12 b | 2-month true up adjustment |  | \$791,708 | (\$353,562) |
| 12c | $E(m)=\operatorname{Ln} 12 a+\operatorname{Ln} 12 b$ |  | \$7,576,491 | \$6,748,430 |
| 13 | $R(m)=$ Average Monthly Wholesale Revenue for the 12 Months Ending with the Current Expense Month (Form 3.0) |  | \$58,759,809 | \$59,596,338 |
| 14 | CESF: Line $12 \mathrm{c} /$ Line 13 $\mathrm{E}(\mathrm{m}) / \mathrm{R}(\mathrm{m})$; as a \% of Revenue |  | 12.89\% | 11.32\% |
| 15 | BESF |  | 0.00\% | 0.00\% |
| 16 | MESF |  | 12.89\% | 11.32\% |
| 17 | Authorized Recovery Amount: Line $13 \times$ Line 16 |  | \$7,576,491 | \$6,748,430 |
| 18 | Environmental Surcharge Revenues Billed |  | \$8,798,197 | \$8,600,595 |
| 19 | Monthly (Over)/Under = Previous Month Line 17 Minus Current Month Line 18 |  | (\$1,193,197) | $(\$ 1,024,104)$ |

# EAST KENTUCKY POWER COOPERATIVE, INC. 

PSC CASE NO. 2010-00319
ENVIRONMENTAL SURCHARGE APPENDIX B FIRST INFORMATION REQUEST RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 9/7/10 REQUEST 2<br>RESPONSIBLE PARTY: COMPANY:<br>Ann F. Wood<br>East Kentucky Power Cooperative, Inc.

## Request 2. Prepare summary schedules showing the pass-through revenue

 requirement for each of the Member Cooperatives for the months corresponding to the six-month review. Include the two months subsequent to the billing period included in the review periods. Include a calculation of any additional over- or under-recovery amount the distribution cooperative believes needs to be recognized for the six-month review. Include all supporting calculations and documentation for the additional over- or under-recovery.
## Response 2. <br> Please see pages 2 through 17 of this response. For purposes of this

 review period, there is no cumulative over/under recovery, as the June 2010 over/under recovery will be applied to the September expense month calculation. As further discussed in testimony in this proceeding, EKPC's member systems are requesting that the two-month "true-up" adjustment at retail be ceased.Big Sandy RECC - Calculation of (Over)/Under w/ 2-month lag

|  | EKPC <br> Invoice <br> Month <br> recorded <br> Member's <br> Books | Billed to <br> Retail <br>  <br> recorded on <br> Member's <br> Books | Monthly <br> (Over) or <br> Under | Cumulative <br> (Over) or <br> Under |
| :---: | :---: | :---: | :---: | :---: |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 270,382$ | $\$ 198,551$ | $\$ 71,831$ |  |
| Feb-10 | $\$ 237,677$ | $\$ 309,876$ | $(\$ 72,199)$ |  |
| Mar-10 | $\$ 145,975$ | $\$ 42,043$ | $\$ 103,932$ |  |
| Apr-10 | $\$ 46,275$ | $(\$ 8,148)$ | $\$ 54,423$ |  |
| May-10 | $\$ 64,909$ | $\$ 155,123$ | $(\$ 90,214)$ |  |
| Jun-10 | $\$ 139,402$ | $\$ 35,282$ | $\$ 104,120$ |  |
| Jul-10 | $\$ 188,340$ | $\$ 372,842$ | $(\$ 184,502)$ |  |
| Aug-10 | $\$ 180,952$ | $\$ 203,514$ | $(\$ 22,562)$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

## Blue Grass Energy - Calculation of (Over)/Under w/ 2-month lag

|  | EKPC <br> Invoice <br> Month <br> recorded <br> on Member's <br> Books | Billed to <br> Retail <br>  <br> Recorded on <br> Member's <br> Books | Monthly <br> (Over) or <br> Under | Cumulative <br> (Over) or <br> Under |
| ---: | :---: | :---: | :---: | :---: |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 1,213,430$ | $\$ 594,512$ | $\$ 618,918$ |  |
| Feb-10 | $\$ 1,136,993$ | $\$ 924,310$ | $\$ 212,683$ |  |
| Mar-10 | $\$ 646,401$ | $\$ 954,459$ | $(\$ 308,058)$ |  |
| Apr-10 | $\$ 208,506$ | $\$ 458,354$ | $(\$ 249,848)$ |  |
| May-10 | $\$ 317,970$ | $\$ 407,389$ | $(\$ 89,419)$ |  |
| Jun-10 | $\$ 704,542$ | $\$ 852,489$ | $(\$ 147,947)$ |  |
| Jul-10 | $\$ 924,029$ | $\$ 856,798$ | $\$ 67,231$ |  |
| Aug-10 | $\$ 901,945$ | $\$ 523,657$ | $\$ 378,288$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

| Clark Energy Cooperative - Calculation of (Over)/Under w/ 2-month lag |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  | EKPC <br> Invoice Month recorded on Members Books | Billed to Retail Consumer \& recorded on Member's Books | Monthly (Over) or Under | Cumulative (Over) or Under |
| $\mathrm{Mo} / \mathrm{Yr}$ | (1) | (2) | (3) | (4) |
| Jan-10 | \$231,131 | \$169,927 | \$61,204 |  |
| Feb-10 | \$460,330 | \$405,014 | \$55,316 |  |
| Mar-10 | \$430,707 | \$397,417 | \$33,290 |  |
| Apr-10 | \$239,017 | \$193,870 | \$45,147 |  |
| May-10 | \$74,382 | \$114,951 | $(\$ 40,569)$ |  |
| Jun-10 | \$113,646 | \$179,597 | $(\$ 65,951)$ |  |
| Jul-10 | \$252,236 | \$310,229 | $(\$ 57,993)$ |  |
| Aug-10 | \$337,889 | \$410,301 | $(\$ 72,412)$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

[^0]|  | EKPC <br> Invoice <br> Month <br> recorded <br> on Member's <br> Books | Billed to <br> Retail <br>  <br> recorded on <br> Member's <br> Books | Monthly <br> (Over) or <br> Under | Cumulative <br> (Over) or <br> Under |
| ---: | :---: | :---: | :---: | :---: |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 522,223$ | $\$ 370,091$ | $\$ 152,132$ |  |
| Feb-10 | $\$ 483,004$ | $\$ 477,067$ | $\$ 5,937$ |  |
| Mar-10 | $\$ 299,941$ | $\$ 517,876$ | $(\$ 217,935)$ |  |
| Apr-10 | $\$ 94,413$ | $\$ 212,795$ | $(\$ 118,382)$ |  |
| May-10 | $\$ 134,015$ | $\$ 72,730$ | $\$ 61,285$ |  |
| Jun-10 | $\$ 286,898$ | $\$ 300,592$ | $(\$ 13,694)$ |  |
| Jul-10 | $\$ 376,901$ | $\$ 302,330$ | $\$ 74,571$ |  |
| Aug-10 | $\$ 375,176$ | $\$ 136,824$ | $\$ 238,352$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

Farmers RECC - Calculation of (Over)/Under w/ 2-month lag

|  | EKPC <br> Invoice <br> Month <br> recorded <br> on Member's <br> Books | Billed to <br> Retail <br>  <br> recorded on <br> Member's <br> Books | Monthly <br> (Over) or <br> Under | Cumulative <br> (Over) or <br> Under |
| ---: | :---: | :---: | :---: | :---: |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 238,657$ | $\$ 274,100$ | $(\$ 35,443)$ |  |
| Feb-10 | $\$ 478,473$ | $\$ 395,471$ | $\$ 83,002$ |  |
| Mar-10 | $\$ 432,041$ | $\$ 408,143$ | $\$ 23,898$ |  |
| Apr-10 | $\$ 256,435$ | $\$ 223,373$ | $\$ 33,062$ |  |
| May-10 | $\$ 88,280$ | $\$ 85,346$ | $\$ 2,934$ |  |
| Jun-10 | $\$ 128,870$ | $\$ 108,168$ | $\$ 20,702$ |  |
| Jul-10 | $\$ 294,493$ | $\$ 377,186$ | $(\$ 82,693)$ |  |
| Aug-10 | $\$ 390,476$ | $\$ 411,898$ | $(\$ 21,422)$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

Please note that the June 2010 (over)/under recovery will be
included in the September 2010 Expense Month calculation.

Grayson - Calculation of (Over)/Under w/ 2-month lag

|  | EKPC <br> Invoice <br> Month <br> recorded <br> on Member's <br> Books | Billed to <br> Retail <br>  <br> recorded on <br> Member's <br> Books | Monthly <br> (Over) or <br> Under | Cumulative <br> (Over) or <br> Under |
| ---: | :---: | :---: | :---: | :---: |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 266,096$ | $\$ 258,307$ | $\$ 7,789$ |  |
| Feb-10 | $\$ 242,512$ | $\$ 184,999$ | $\$ 57,513$ |  |
| Mar-10 | $\$ 147,943$ | $\$ 119,266$ | $\$ 28,677$ |  |
| Apr-10 | $\$ 48,277$ | $\$ 42,721$ | $\$ 5,556$ |  |
| May-10 | $\$ 68,322$ | $\$ 88,346$ | $(\$ 20,024)$ |  |
| Jun-10 | $\$ 147,570$ | $\$ 211,486$ | $(\$ 63,916)$ |  |
| Jul-10 | $\$ 201,507$ | $\$ 242,994$ | $(\$ 41,487)$ |  |
| Aug-10 | $\$ 193,051$ | n/a | $\mathrm{n} / \mathrm{a}$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

Inter-County ECC - Calculation of (Over)/Under w/ 2-month lag

|  | EKPC <br> Invoice <br> Month <br> recorded <br> on Member's <br> Books | Billed to <br> Retail <br>  <br> recorded on <br> Member's <br> Books | Monthly <br> (Over) or <br> Under | Cumulative <br> (Over) or <br> Under |
| ---: | :---: | :---: | :---: | :---: |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 240,954$ | $\$ 127,896$ | $\$ 113,058$ |  |
| Feb-10 | $\$ 499,788$ | $\$ 443,209$ | $\$ 56,579$ |  |
| Mar-10 | $\$ 456,146$ | $\$ 384,427$ | $\$ 71,719$ |  |
| Apr-10 | $\$ 253,781$ | $\$ 192,357$ | $\$ 61,424$ |  |
| May-10 | $\$ 76,593$ | $\$ 141,284$ | $(\$ 64,691)$ |  |
| Jun-10 | $\$ 111,073$ | $\$ 203,869$ | $(\$ 92,796)$ |  |
| Jul-10 | $\$ 257,024$ | $\$ 316,573$ | $(\$ 59,549)$ |  |
| Aug-10 | $\$ 337,690$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

Jackson Energy Cooperative - Calculation of (Over)/Under w/ 2-month lag

|  | EKPC <br> Invoice <br> Month <br> recorded <br> on Member's <br> Books | Billed to <br> Retail <br>  <br> recorded on <br> Member's <br> Books | Monthly <br> (Over) or <br> Under | Cumulative <br> (Over) or <br> Under |
| ---: | :---: | :---: | :---: | :---: |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 1,010,987$ | $\$ 825,851$ | $\$ 185,136$ |  |
| Feb-10 | $\$ 938,395$ | $\$ 766,950$ | $\$ 171,445$ |  |
| Mar-10 | $\$ 547,319$ | $\$ 612,199$ | $(\$ 64,880)$ |  |
| Apr-10 | $\$ 169,777$ | $\$ 380,479$ | $(\$ 210,702)$ |  |
| May-10 | $\$ 239,054$ | $\$ 432,701$ | $(\$ 193,647)$ |  |
| Jun-10 | $\$ 523,384$ | $\$ 621,682$ | $(\$ 98,298)$ |  |
| Jul-10 | $\$ 694,586$ | $\$ 555,760$ | $\$ 138,826$ |  |
| Aug-10 | $\$ 680,845$ | $n / a$ | $n / a$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

| Licking Valley RECC - Calculation of (Over)/Under w/ 2-month lag |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  | EKPC | Billed to |  |  |
|  | Invoice | Retail <br> Month <br>  |  |  |
|  | recorded | recorded on | Monthly | Cumulative |
|  | (On Member's | Member's | (Over) or | (Over) or |
|  | Books | Books | Under | Under |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 273,406$ | $\$ 246,792$ | $\$ 26,614$ |  |
| Feb-10 | $\$ 251,822$ | $\$ 219,838$ | $\$ 31,984$ |  |
| Mar-10 | $\$ 151,024$ | $\$ 121,347$ | $\$ 29,677$ |  |
| Apr-10 | $\$ 48,908$ | $\$ 8,215$ | $\$ 40,693$ |  |
| May-10 | $\$ 67,670$ | $\$ 106,520$ | $(\$ 38,850)$ |  |
| Jun-10 | $\$ 148,536$ | $\$ 161,215$ | $(\$ 12,679)$ |  |
| Jul-10 | $\$ 200,622$ | $\$ 261,328$ | $(\$ 60,706)$ |  |
| Aug-10 | $\$ 197,089$ | $\$ 233,276$ | $(\$ 36,187)$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

Nolin RECC - Calculation of (Over)/Under w/ 2-month lag

|  | EKPC <br> Invoice <br> Month <br> recorded <br> on Member's <br> Books | Billed to <br> Retail <br>  <br> recorded on <br> Member's <br> Books | Monthly <br> (Over) or <br> Under | Cumulative <br> (Over) or <br> Under |
| ---: | :---: | :---: | :---: | :---: |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 708,699$ | $\$ 685,459$ | $\$ 23,240$ |  |
| Feb-10 | $\$ 654,703$ | $\$ 660,007$ | $(\$ 5,304)$ |  |
| Mar-10 | $\$ 376,588$ | $\$ 234,618$ | $\$ 141,970$ |  |
| Apr-10 | $\$ 125,766$ | $(\$ 43,345)$ | $\$ 169,111$ |  |
| May-10 | $\$ 195,215$ | $\$ 219,867$ | $(\$ 24,652)$ |  |
| Jun-10 | $\$ 431,918$ | $\$ 385,843$ | $\$ 46,075$ |  |
| Jul-10 | $\$ 561,933$ | $\$ 720,523$ | $(\$ 158,590)$ |  |
| Aug-10 | $\$ 554,155$ | n/a | n/a |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

|  |  |  |
| :---: | :---: | :---: |
|  |  | 앙앙 |
|  |  | $\left\lvert\, \begin{array}{cc} \begin{array}{c} 2 \\ 4 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \end{array} \\ \hline \end{array}\right.$ |
|  |  |  |
| $\left.\begin{aligned} & 2 \\ & 2 \\ & 2 \end{aligned} \right\rvert\,$ |  |  |

Please note that the June 2010 (over/under recovery will be
included in the September 2010 Expense Month calculation.

Salt River RECC - Calculation of (Over)/Under w/ 2-month lag

|  | EKPC <br> Invoice <br> Month <br> recorded <br> on Member's <br> Books | Billed to <br> Retail <br>  <br> recorded on <br> Member's <br> Books | Monthly <br> (Over) or <br> Under | Cumulative <br> (Over) or <br> Under |
| ---: | :---: | :---: | :---: | :---: |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 963,394$ | $\$ 433,729$ | $\$ 529,665$ |  |
| Feb-10 | $\$ 898,348$ | $\$ 797,993$ | $\$ 100,355$ |  |
| Mar-10 | $\$ 528,280$ | $\$ 676,950$ | $(\$ 148,670)$ |  |
| Apr-10 | $\$ 179,569$ | $\$ 306,765$ | $(\$ 127,196)$ |  |
| May-10 | $\$ 292,949$ | $\$ 360,736$ | $(\$ 67,787)$ |  |
| Jun-10 | $\$ 667,098$ | $\$ 906,276$ | $(\$ 239,178)$ |  |
| Jul-10 | $\$ 872,195$ | $\$ 747,831$ | $\$ 124,364$ |  |
| Aug-10 | $\$ 849,837$ | $\$ 674,694$ | $\$ 175,143$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

| Shelby Energy Cooperative - Calculation of (Over)/Under w/ 2-month lag |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  | EKPC Invoice Month recorded on Member's Books | Billed to Retail Consumer \& recorded on Member's Books | Monthly (Over) or Under | Cumulative (Over) or Under |
| $\mathrm{Mo} / \mathrm{Yr}$ | (1) | (2) | (3) | (4) |
| Jan-10 | \$397,554 | \$276,707 | \$120,847 |  |
| Feb-10 | \$378,343 | \$356,142 | \$22,201 |  |
| Mar-10 | \$228,211 | \$250,155 | $(\$ 21,944)$ |  |
| Apr-10 | \$80,997 | \$157,092 | $(\$ 76,095)$ |  |
| May-10 | \$118,508 | \$198,518 | (\$80,010) |  |
| Jun-10 | \$256,495 | \$244,180 | \$12,315 |  |
| Jul-10 | \$334,899 | \$265,459 | \$69,440 |  |
| Aug-10 | \$326,857 | n/a | $\mathrm{n} / \mathrm{a}$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

South Kentucky RECC - Calculation of (Over)/Under w/ 2-month lag

|  | EKPC <br> Invoice <br> Month <br> recorded <br> on EKPC's <br> Books | Billed to <br> Retail <br>  <br> recorded on <br> Member's <br> Books | Monthly <br> (Over) or <br> Under | Cumulative <br> (Over) or <br> Under |
| ---: | :---: | :---: | :---: | :---: |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 1,370,361$ | $\$ 660,707$ | $\$ 709,654$ |  |
| Feb-10 | $\$ 1,250,125$ | $\$ 975,929$ | $\$ 274,196$ |  |
| Mar-10 | $\$ 723,543$ | $\$ 1,184,988$ | $(\$ 461,445)$ |  |
| Apr-10 | $\$ 226,193$ | $\$ 487,517$ | $(\$ 261,324)$ |  |
| May-10 | $\$ 321,488$ | $\$ 489,611$ | $(\$ 168,123)$ |  |
| Jun-10 | $\$ 718,352$ | $\$ 904,424$ | $(\$ 186,072)$ |  |
| Jul-10 | $\$ 942,282$ | $\$ 923,722$ | $\$ 18,560$ |  |
| Aug-10 | $\$ 922,180$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

Taylor County RECC - Calculation of (Over)/Under w/ 2-month lag

|  | EKPC <br> Invoice <br> Month <br> recorded <br> on Member's <br> Books | Billed to <br> Retail <br>  <br> recorded on <br> Member's <br> Books | Monthly <br> (Over) or <br> Under | Cumulative <br> (Over) or <br> Under |
| ---: | :---: | :---: | :---: | :---: |
| Mo/Yr | $(1)$ | $(2)$ | $(3)$ | $(4)$ |
| Jan-10 | $\$ 250,304$ | $\$ 207,744$ | $\$ 42,560$ |  |
| Feb-10 | $\$ 503,153$ | $\$ 399,858$ | $\$ 103,295$ |  |
| Mar-10 | $\$ 437,269$ | $\$ 349,895$ | $\$ 87,374$ |  |
| Apr-10 | $\$ 256,534$ | $\$ 194,316$ | $\$ 62,218$ |  |
| May-10 | $\$ 83,556$ | $\$ 111,104$ | $(\$ 27,548)$ |  |
| Jun-10 | $\$ 121,774$ | $\$ 151,313$ | $(\$ 29,539)$ |  |
| Jul-10 | $\$ 278,216$ | $\$ 339,764$ | $(\$ 61,548)$ |  |
| Aug-10 | $\$ 362,149$ | $\$ 444,116$ | $(\$ 81,967)$ |  |

Please note that the June 2010 (over)/under recovery will be included in the September 2010 Expense Month calculation.

## EAST KENTUCKY POWER COOPERATIVE, INC

PSC CASE NO. 2010-00319
ENVIRONMENTAL SURCHARGE APPENDIX B FIRST INFORMATION REQUEST RESPONSE

\section*{COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 9/7/10 REQUEST 3 <br> | RESPONSIBLE PARTY: | Ernest W. Huff |
| :--- | :--- |
| COMPANY: | East Kentucky Power Cooperative, Inc. |}

Request 3. Refer to Form 2.3, Inventory and Expense of Emission Allowances, for each of the expense months covered by each billing period under review. For the sulfur dioxide (" $\mathrm{SO}_{2}{ }^{\text {" }}$ ) emission allowance inventory, explain the reason(s) for all purchases of allowances reported during these expense months.

Response 3. EKPC purchased no $\mathrm{SO}_{2}$ emission allowances during the period under review.

Request 3a. For nitrogen oxide (" $\mathrm{NO}_{\mathrm{x}}$ ") emission allowance inventory, explain the reasons for all purchases of allowances reported during these expense months.

Response 3a. EKPC purchased no seasonal $\mathrm{NO}_{x}$ allowances and no annual $\mathrm{NO}_{\mathrm{x}}$ allowances during the period under review.

Request 3b. Explain how the purchase of allowances in the expense months covered by the billing period complies with EKPC's emissions allowance strategy plan.

Response 3b. EKPC monitors the number of tons of $\mathrm{SO}_{2}$ and $\mathrm{NO}_{\mathrm{x}}$ emitted from its generating stations. Based on these measured emissions, the projected generation, and allowances allocated to EKPC by EPA, EKPC projects the number of $\mathrm{SO}_{2}$ and $\mathrm{NO}_{\mathrm{x}}$ allowances that will be needed to be held at the end of each year in order to comply with state and federal emissions limitations. In general, EKPC endeavors to purchase emission allowances in a planned cost-effective manner, utilizing dollar-cost-averaging, to hold in inventory a sufficient number of allowances to cover anticipated utilization of $\mathrm{SO}_{2}$ and $\mathrm{NO}_{\mathrm{x}}$ allowances. Beginning in 2009, the Clean Air Interstate Rules ("CAIR") have requirements for seasonal as well as annual $\mathrm{NO}_{\mathrm{x}}$ allowances. Comments are due to EPA on their proposed Clean Air Transport Rules ("CATR") by October 1, 2010. Final rules are anticipated in the spring of 2011 with an effective compliance date of January 1 , 2012. Since it is unknown whether any allowance banks (inventory) will be allowed to carry forward into the new program, EKPC has modified its purchasing strategy in the short term to reduce its allowance inventory as much as possible by the end of 2011.

The goal of EKPC's Emissions Allowance Strategy Plan is to be in compliance with regulatory requirements while minimizing the volatility to EKPC's Member Systems. EKPC regularly reviews compliance options and their costs. EKPC's strategy for achieving its goal is to develop a program that meets federal and state standards at the lowest cost while providing operational flexibility to meet all of its power production needs.

EKPC's compliance strategy includes the purchase of low-sulfur fuel, the purchase of $\mathrm{SO}_{2}$ and $\mathrm{NO}_{x}$ emission allowances, and operation of Selective Catalytic Reduction ("SCR") equipment and scrubbers.

# EAST KENTUCKY POWER COOPERATIVE, INC. 

PSC CASE NO. 2010-00319
ENVIRONMENTAL SURCHARGE

## APPENDIX B

 FIRST INFORMATION REQUEST RESPONSE
## COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 9/7/10 REQUEST 4 <br> RESPONSIBLE PARTY: COMPANY: <br> Ann F. Wood <br> East Kentucky Power Cooperative, Inc.

Request 4. Refer to Form 2.5, Operating and Maintenance Expenses, for each of the expense months covered by each billing period under review. For each of the 20 expense account numbers listed on this schedule, explain the reasons for any change in the expense levels from month to month if that change is greater than plus or minus 10 percent.

Response 4. Please see pages 2 through 8 of this response.
East Kentu . Power Cooperative, Inc.
Environmental Surcharge Operating and Expense Month over Month Analysis For the Expense Period January - June 2010

| 50144 | Fuel Coal Gilbert | Dec |  | Jan |  | Feb |  | March |  | Apr |  | May |  | June |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Expense Dollars | \$ | 80,141 | \$ | 83,147 | \$ | - | \$ | 226,750 | \$ | 103,878 | \$ | - | \$ | 68,570 |
|  | Expense Dollars Change |  |  | \$ | 3,006 | \$ | $(83,147)$ | \$ | 226,750 | \$ | (122,872) | \$ | (103.878) | \$ | 68.570 |
|  | Percent Change |  |  |  | 3.75\% |  | -100.00\% |  | \#DIV/0! |  | -54.19\% |  | -100.00\% |  | DDIV/O! |

Monthly expense changes are due to increases or decreases in contractor payments for ash removal.
Note there were timing issues in billings from contractors for February, May and June.-EKPC did not receive the invoices until March, June and August respectively.
March invoice included February amount of $\$ 110,508$ and March amount of $\$ 116,242$; June invoice included May amount of $\$ 68,570$; August invoice included June amount of $\$ 124,530$.


January - The following expenses were incurred in December, Contractor payments were $\$ 64.7 \mathrm{~K}$ for the following work: Inspection and Services on Ammonia Tanks and Skid Area Labor \& Equipment to Water Wash \& lean
March - Hauling and Landfill Disposal for January $\$ 116.2$. February $\$ 110.5 \mathrm{~K}$ and reverse and accrual setup in $12 / 2009$ for ( $\$ 83.1 \mathrm{~K}$ )
June - Increase in contractor payments of $\$ 89.5 \mathrm{~K}$ to remove and replace seals on the Inlet slide gate damper and an increase in EKPC payroll and benefits of $\$ 4.0 \mathrm{~K}$,
East Kentuc. Power Cooperative, Inc.
Environmental Surcharge Operating and Expense Month over Month Analysis For the Expense Period January - June 2010

|  | Mtce of Boiler Plant Spurlock 2 | Dec |  | Jan |  | Feb |  | March |  | Apr |  | May |  | June |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 51242 |  | \$ | 5,042 | \$ | 2,623 | \$ | 9.346 | \$ | 29,822 | \$ | 39,272 | \$ | 86.573 | \$ | 4,568 |
|  | Expense Dollars Change | \$ | 5,042 | \$ | $(2,419)$ | \$ | 6,723 | \$ | 20,476 | \$ | 9,450 | \$ | 47,301 | \$ | (82,005) |
|  | Percent Change |  |  |  | -47.98\% |  | 256.31\% |  | 219.09\% |  | 31.69\% |  | 120.44\% |  | -94.72\% |

January - Decrease in EKPC payroll and benefits of $\$ 2.4 \mathrm{~K}$
February - Increase in contractors payments of $\$ 5.7 \mathrm{~K}$ to insulate and metal vaporizers by ammonia tanks and air lines. A reduction of EKPC payroll and benefits of $\$ 0.7 \mathrm{~K}$ and increase material taken from warehouse of $\$ 1.7 \mathrm{~K}$
March - Increase in EKPC payroll and benefits of $\$ 25.0 \mathrm{~K}$ and a reduction of contractor payments of $\$ 4.3 \mathrm{~K}$.
April - EKPC payroll and benefits decreased by $\$ 30.3 \mathrm{~K}$, Materials decreased by $\$ 3.4 \mathrm{~K}$ and contractors expenses increased by $\$ 43.2 \mathrm{~K}$. Contractor payments of $\$ 44.6 \mathrm{~K}$ were for Ambient Air Intake
May - EKPC payroll and benefits increased by $\$ 10.3 \mathrm{~K}$, Materials increased by $\$ 1.6 \mathrm{~K}$ and contractor expenses increased by $\$ 35.4 \mathrm{~K}$.
Contractor payments of $\$ 80.0 \mathrm{~K}$ were for SCR tuning and air emission testing.
June - No contractor payments and EKPC payroll and benefits were $\$ 4.6 \mathrm{~K}$

| 51244 | Maintenance of Boiler Plant Gilbert | Dec | Jan | Feb | March | Apr | May | June |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Expense Dollars | 435,338 | 91,306 | 32,851 | 54.585 | 394,739 | 167,151 | 763,156 |
|  | Expense Dollars Change |  | (344,032) | $(58,455)$ | 21.734 | 340,154 | (227,588) | 596,005 |
|  | Percent Change |  | -79.03\% | -64.02\% | 66.16\% | 623.16\% | -57.66\% | 356.57\% |

[^1] reduced by a net amount of $\$ 368.9 \mathrm{~K}$.
February - EKPC payroll and benefits decreased by a net of $\$ 28.3 \mathrm{~K}$, warehouse expenses were reduced by a net of $\$ 1.9 \mathrm{~K}$ and contract expenses were reduced by a net of $\$ 28.4 \mathrm{~K}$. Contract expenses of $\$ 15.2 \mathrm{~K}$ were for Scrubber maintenance contract.
March - EKPC payroll and benefits increased by a net of $\$ 7.3 \mathrm{~K}$, warehouse expenses decreased by a net of $\$ 3.7 \mathrm{~K}$ and contract expenses were increased by $\$ 18.3 \mathrm{~K}$. Contract expenses of $\$ 33.5$ were for 4 " Mueller $150 \#$ Flange
April - EKPC payroll and benefits increased by a net of $\$ 78.4 \mathrm{~K}$, warehouse expenses increased by a net of $\$ 88.3 \mathrm{~K}$ and contract expenses were increased by $\$ 178.3 \mathrm{~K}$. Contract expenses of $\$ 211.8$ were for the following:
Labor to Setup and Tear Down Equipment for Outage
Labor \& Equipment to Wash \& Equipment to Cleanout Crossover Ducts
Labor \& Equipment to Airlance Ash From FBHE Boxes
Labor to Open Nozzles in the Combustion Chambers
East Kentul..., Power Cooperative, Inc.
Environmental Surcharge Operating and Expense Month over Month Analysis For the Expense Period January - June 2010

| 51245 | Maintenance of Boiler Plant Spurlock 4 | Dec | Jan | Feb | March | Apr | May | June |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Expense Dollars | - | 65.872 | 44,405 | 8,010 | 27,229 | 56,924 | 47,250 |
|  | Expense Dollars Change |  | 65,872 | $(21,467)$ | $(36,395)$ | 19,219 | 29,695 | $(9,674)$ |
|  | Percent Change |  | \#DIV/0! | -32.59\% | -81.96\% | 239.94\% | 109.06\% | -16.99\% |

[^2]Labor, Material and Equipment for Refractory Repairs for Boiler Pollution Control Equipment
June - EKPC payroll and benefits increased by $\$ 6.0 \mathrm{~K}$, warehouse expenses decreased by $\$ 52.2 \mathrm{~K}$ and contract expenses increased by $\$ 644.2 \mathrm{~K}$. Contract expenses of $\$ 734.8 \mathrm{~K}$ were for the following:
May - EKPC payroll and benefits decreased by a net of $\$ 65.1 \mathrm{~K}$, warehouse expenses decreased by a net of $\$ 34.4 \mathrm{~K}$ and contract expenses were decreased by a net of $\$ 119.2 \mathrm{~K}$. Contract expenses of $\$ 92.6 \mathrm{~K}$ were for the following:
Labor, Material and Equipment for Refractory Repairs for Boiler Pollution Control Equipment

| 512431 | Mtce of Boiler Plant Scrubber 1 | Dec |  | Jan |  | Feb |  | March |  | Apr |  | May |  | June |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Expense Dollars | \$ | 69,139 | \$ | 473.111 | \$ | 74,474 | \$ | 80,482 | \$ | 228,195 | \$ | 39,064 | \$ | 133,037 |
|  | Expense Dollars Change |  |  | \$ | 403,972 | \$ | $(398,637)$ | \$ | 6,008 | \$ | 147,713 | \$ | $(189,131)$ | \$ | 93,973 |
|  | Percent Change |  |  |  | 584.29\% |  | -84.26\% |  | 8.07\% |  | 183.54\% |  | -82.88\% |  | 240.56\% |

January - EKPC payroll and benefits increased $\$ 15.1 \mathrm{~K}$, Material increased $\$ 6.5 \mathrm{~K}$ and contract expenses increased
by $\$ 382.5 \mathrm{~K}$. Contract expenses of $\$ \$ 449.1 \mathrm{~K}$ were for the following:
Annual Preventive Maintenance
Labor, Material and Equipment to Repair Recycle Pump Impeller
Labor, Maierials and Equipment for FBH ESH Box Tube Repair
Labor, Materials and Equipment to Set up FBHE Superheat Box
February - EK
by $\$ 397.3 \mathrm{~K}$
April - EKPC payroll and benefits decreased by $\$ 7.8 \mathrm{~K}$, contract expenses increased by $\$ 154.0 \mathrm{~K}$
Contract expenses of $\$ 215.6 \mathrm{~K}$ were for Labor, Material and Equipment for Repair of Agitator Shaft end and Wingjet.
May - EKPC payroll and benefits increased by $\$ 11.1 \mathrm{~K}$, Materials increased by $\$ 11.2 \mathrm{~K}$ and Contract expenses decreased by $\$ 212.2 \mathrm{~K}$

June - EKPC payroll and benefits decreased by $\$ 20.7 \mathrm{~K}$. Material increased by $\$ 9.4 \mathrm{~K}$ and contract expense increased by $\$ 124.7$.
Contract expenses of $\$ 128.0 \mathrm{~K}$ were for Labor, Material and Equipment to Set up and Dismantle Scaffolding from Outage.
East Kentuc..y Power Cooperative, Inc.
Environmental Surcharge Operating and Expense Month over Month Analysis
For the Expense Period January - June 2010

| 512432 | Mtce of Boiler Plant Scrubber 2 | Dec |  | Jan |  | Feb |  | March |  | Apr |  | May |  | June |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Expense Dollars | \$ | 91,385 | \$ | 177,554 | \$ | 189,134 | \$ | 333.160 | \$ | 273,129 | \$ | 9.587 | \$ | 78,570 |
|  | Expense Dollars Change |  |  | \$ | 86,169 | \$ | 11,580 | \$ | 144.026 | \$ | (60,031) | \$ | $(263,542)$ | \$ | 68,983 |
|  | Percent Change |  |  |  | 94.29\% |  | 6.52\% |  | 76.15\% |  | -18.02\% |  | -96.49\% |  | 719.55\% |

January - EKPC payroll and benefits are decreased by $\$ 2.1 \mathrm{~K}$, Material increased by $\$ 34.7 \mathrm{~K}$ and contract expenses
increased by $\$ 58.9 \mathrm{~K}$. Contract expenses of $\$ 108.3$ were for the following:
Labor and Equipment for A\&B Oxidation Blower
Labor and Equipment for Ball Mill "B" Gear Spray
Labor and Equipment to Repair Broken Nipple on Inlet Duct
March - EKPC payroll and benefits decreased by $\$ 6.1 \mathrm{~K}$, Materials increased by $\$ 28.8 \mathrm{~K}$ and contract expenses increased by $\$ 121.1 \mathrm{~K}$. Contract expenses of $\$ 260.8 \mathrm{~K}$ were for the following:
Labor \& Equipment to Replace seals on Airheater
Labor \& Equipment for A Rotary Drum Vacuum Drain Tank Leak
by $\$ 13.9 \mathrm{~K}$. Contract expenses of $\$ 246.9$ were for the following:
Labor, Material and Equipment to perform Preventive Maintenance.
May - EKPC payroll and benefits decreased by $\$ 17.5 \mathrm{~K}$ and contract expenses decreased by $\$ 246.9 \mathrm{~K}$.
June - EKPC payroll and benefits increased by $\$ 2.3 \mathrm{~K}$, Materials increased by $\$ 7.4 \mathrm{~K}$ and Contract expenses increased by $\$ 59.2 \mathrm{~K}$.
East Kentuc..., Power Cooperative, Inc.
Environmental Surcharge Operating and Expense Month over Month Analysis For the Expense Period January - June 2010

| 50621 | Misc Stm Pwr Env - Dale | Dec |  | Jan |  | Feb |  | March |  | Apr |  | May |  | June |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Expense Dollars Expense Dollars Change Percent Change | \$ | 292,619 | \$ | $\begin{aligned} & (292,619) \\ & -100.00 \% \end{aligned}$ | $\begin{aligned} & \$ \\ & \$ \end{aligned}$ | - | \$ |  | $\begin{aligned} & \$ \$ \\ & \$ \end{aligned}$ | - | \$ |  | $\begin{aligned} & \$ \\ & \$ \end{aligned}$ | - |
| 50631 | Misc Stm Pwr Env - Cooper |  | Dec |  | Jan | Feb |  | March |  | Apr |  | May |  | June |  |
|  | Expense Dollars Expense Dollars Change Percent Change | \$ | 350,874 | \$ | $\begin{aligned} & (350,874) \\ & -100.00 \% \end{aligned}$ | $\begin{aligned} & \$ \\ & \$ \end{aligned}$ | - | \$ | - | $\begin{aligned} & \$ \\ & \$ \end{aligned}$ | - | \$ | - | $\begin{aligned} & \$ \$ \\ & \$ \end{aligned}$ |  |
| 50645 | Misc Stm Pwr Env - Spurlock |  | Dec |  | Jan | Feb |  | March |  | Apr |  | May |  | June |  |
|  | Expense Dollars Expense Dollars Change Percent Change | \$ | 316.177 | \$ | $\begin{gathered} \overline{-} \\ (316.177) \\ -100.00 \% \\ \hline \end{gathered}$ | \$ | - | \$ | - | \$ | $-$ | \$ | - | \$ | - |

Air permit fees paid in December for Dale, Cooper and Spuriock for calendar 2009 emissions.

The monthly change in expense is due to the increase or decrease in payments for Ammonia receipts.

| 50642 | Misc Steam Power Exp - Spurlock 2 | Dec |  | Jan |  | Feb |  | March |  | Apr |  | May |  | June |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Expense Dollars | \$ | 58,704 | \$ | 62,710 | \$ | - | \$ | 138.441 | \$ | 60.590 | \$ | - | \$ | 91,300 |
|  | Expense Dollars Change |  |  | \$ | 4,006 | \$ | (62,710) | \$ | 138,441 | \$ | (77.851) | \$ | (60.590) | \$ | 91,300 |
|  | Percent Change |  |  |  | 6.82\% |  | -100.00\% |  | \#DIV/0! |  | -56.23\% |  | -100.00\% |  | \#DIV/O! |

The monthly change in expense is due to the increase or decrease in payments for Ammonia receipts.

| 50644 | Misc Steam Power Expense-Gilbert | Dec |  | Jan |  | Feb |  | March |  | Apr |  | May |  | June |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Ammonia Expense | \$ | 21,628 | \$ | 23,104 | \$ | - | \$ | 48,862 | \$ | 21.385 | \$ | - | \$ | 36,608 |
|  | Limestone Expense | \$ | 217,768 | \$ | 273,433 | \$ | 251.860 | \$ | 242,893 | \$ | - | \$ | 209,865 | \$ | 273,316 |
|  | Limestone Tons Used |  | 22,047 |  | 27,028 |  | 24,686 |  | 23,838 |  | 0 |  | 20,334 |  | 26,705 |
|  | Total Expense Dollars | \$ | 239,396 | \$ | 296,537 | \$ | 251,860 | \$ | 291,755 | \$ | 21,385 | \$ | 209,865 | \$ | 309.924 |
|  | Expense Dollars Change |  |  | \$ | 57,141 | \$ | (44,677) | \$ | 39,895 | \$ | (270.370) | \$ | 188,480 | \$ | 100.059 |
|  | Percent Change |  |  |  | 23.87\% |  | -15.07\% |  | 15.84\% |  | -92.67\% |  | 881.37\% |  | 47.68\% |

East Kentur.., Power Cooperative, Inc.
Environmental Surcharge Operating and Expense Month over Month Analysis For the Expense Period January - June 2010
Limestone is stockpiled throughout the year and taken from the stockpile for usage. There may be slight variances in the cost according to fluctuations in contract prices and freight cost per shipment of limestone.
January - Limestone expenses increased by $\$ 55.6 \mathrm{~K}$ and Ammonia expenses increased by $\$ 1.5 \mathrm{~K}$.
There were no outages in the month of January.
There were no outages in the month of January.
February - Limestone expenses decreased by $\$ 2$

## February - Limestone expenses decreased by $\$ 21.5 \mathrm{~K}$ and Ammonia expenses decreased by $\$ 23.1 \mathrm{~K}$.

March - Limestone expenses decreased by $\$ 9.0 \mathrm{k}$ and Ammonia expenses increased by $\$ 48.9 \mathrm{~K}$
The unit was down for 1 day in March.
April - Limestone expenses decreased by $\$ 242.9 \mathrm{~K}$ and Ammonia expenses decreased by $\$ 27.5 \mathrm{~K}$.
The unit was down for April.
May - Limestone expenses increased by $\$ 209.9 \mathrm{~K}$ and Ammonia expenses decreased by $\$ 21.4 \mathrm{~K}$
The unit was down for April
June - Limestone expenses increased by $\$ 63.4 \mathrm{~K}$ and Ammonia expenses increased by $\$ 36.6 \mathrm{~K}$
Operating Expense- Limestone and Magnesium

| 506431 | Misc Stm Pwr Exp- Spurlock 1 | Dec |  | Jan |  | Feb |  | March |  | Apr |  | May |  | June |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Magnesium Expense | \$ | 6.701 | \$ | 8,854 | \$ | 11,622 | \$ | 5,917 | \$ | 5,824 | \$ | - | \$ | 6,003 |
|  | Limestone Expense | \$ | 68,237 | \$ | 97.750 | \$ | 82,680 | \$ | 104,426 | \$ | 168,654 | \$ | 50,859 | \$ | 101.685 |
|  | Limestone Tons Used |  | 7,065 |  | 9,253 |  | 8,009 |  | 10,059 |  | 4,614 |  | 4,880 |  | 9,785 |
|  | Expense Dollars | \$ | 74,938 | \$ | 106,604 | \$ | 94,302 | \$ | 110.343 | \$ | 174.478 | \$ | 50,859 | \$ | 107.688 |
|  | Expense Dollars Change |  |  | \$ | 31,666 | \$ | $(12,302)$ | \$ | 16,041 | \$ | 64,135 | \$ | $(123,619)$ | \$ | 56,829 |
|  | Percent Change |  |  |  | 42.26\% |  | -11.54\% |  | 17.01\% |  | 58.12\% |  | -70.85\% |  | 111.74\% |

January - Limestone expenses up by $\$ 29.5 \mathrm{~K}$ and magnesium expenses up by $\$ 2.2 \mathrm{~K}$.
February - Limestone expenses decreased by $\$ 15.1 \mathrm{~K}$ while magnesium expenses increased by $\$ 2.8 \mathrm{~K}$.
March - Limestone expenses increased by $\$ 21.7 \mathrm{~K}$ and magnesium expenses decreased by $\$ 5.7 \mathrm{~K}$.
April - Limestone expenses increased by $\$ 64.2 \mathrm{~K}$ and magnesium expenses decreased by $\$ .01 \mathrm{~K}$.
May - Limestone expenses decreased by $\$ 117.8 \mathrm{~K}$ and there were no magnesium expenses.
June - Límestone expenses increased by $\$ 50.8 \mathrm{~K}$ and magnesium expenses increased by $\$ 6.0 \mathrm{~K}$.
East Kentur.., Power Cooperative, Inc.
Environmental Surcharge Operating and Expense Month over Month Analysis For the Expense Period January - June 2010

|  | Misc Stm Pwr Exp- Spurlock 2 | Dec |  | Jan |  | Feb |  | March |  | Apr |  |  |  | June |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 506432 |  |  |  | May |  |  |  |  |  |  |  |  |
|  | Magnesium Expense | \$ | 10,933 |  |  | \$ | 8,719 | \$ | 17,612 | \$ | 5,972 | \$ | 29,637 | \$ | - | \$ | 11,904 |
|  | Limestone Expense | \$ | 138,542 | \$ | 146,625 | \$ | 129,320 | \$ | 108,692 | \$ | 47.569 | \$ | 118,674 | \$ | 119,369 |
|  | Limestone Tons Used |  | 14,344 |  | 13,880 |  | 12.528 |  | 10,470 |  | 16.359 |  | 11.387 |  | 11.486 |
|  | Expense Dollars | \$ | 149,475 | \$ | 155,344 | \$ | 146,932 | \$ | 114.664 | \$ | 77,206 | \$ | 118,674 | \$ | 131,273 |
|  | Expense Dollars Change |  |  | \$ | 5,869 | \$ | $(8,412)$ | \$ | $(32,268)$ | \$ | (37.458) | \$ | 41,468 | \$ | 12,599 |
|  | Percent Change |  |  |  | 3.93\% |  | -5.42\% |  | -21.96\% |  | -32.67\% |  | 53.71\% |  | 10.62\% |

March - Limestone expenses decreased by $\$ 20.6 \mathrm{~K}$ and Magnesium expenses decreased by $\$ 11.6 \mathrm{~K}$.
April - Limestone expenses decreased by $\$ 61.1 \mathrm{~K}$ and Magnesium expenses increased by $\$ 23.7 \mathrm{~K}$.
May - Limestone expenses increased by $\$ 71.1 \mathrm{~K}$ and Magnesium expenses decreased by $\$ 29.6 \mathrm{~K}$.
June - Limestone expenses increased by $\$ 0.7 \mathrm{~K}$ and Magnesium expenses increased by $\$ 11.9 \mathrm{~K}$

| 506445 | Misc Stm Pwr Exp-Spurlock 4 | Dec |  | Jan |  | Feb |  | March |  | Apr |  | May |  | June |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Ammonia Expense | \$ | 13,904 | \$ | 14,852 | \$ | - | \$ | 65,149 | \$ | 28,513 | \$ | - | \$ | 42,756 |
|  | Limestone Expense | \$ | 264,719 | \$ | 256,622 | \$ | 229,404 | \$ | 280,068 | \$ | 291,728 | \$ | 268,992 | \$ | 245,834 |
|  | Limestone Tons Used |  | 26,809 |  | 25,367 |  | 22,485 |  | 27,362 |  | 28,401 |  | 26,082 |  | 23,607 |
|  | Expense Dollars | \$ | 278,623 | \$ | 271,474 | \$ | 229,404 | \$ | 345,217 | \$ | 320,241 | \$ | 268,992 | \$ | 288,590 |
|  | Expense Dollars Change |  |  | \$ | (7.149) | \$ | (42,070) | \$ | 115,813 | \$ | $(24,976)$ | \$ | $(51,249)$ | \$ | 19,598 |
|  | Percent Change |  |  |  | -2.57\% |  | -15.50\% |  | 50.48\% |  | -7.23\% |  | -16.00\% |  | 7.29\% |

February - Limestone expenses decreased by $\$ 27.2 \mathrm{~K}$ and Ammonia expenses decreased by $\$ 14.9 \mathrm{~K}$.
March - Limestone expenses increased by $\$ 50.7 \mathrm{~K}$ and Ammonia expenses increased by $\$ 65.1 \mathrm{~K}$
May - Limestone expenses decreased by $\$ 22.7 \mathrm{~K}$ and Ammonia expenses decreased by $\$ 28.5 \mathrm{~K}$.

## EAST KENTUCKY POWER COOPERATIVE, INC.

# PSC CASE NO. 2010-00319 <br> ENVIRONMENTAL SURCHARGE APPENDIX B FIRST INFORMATION REQUEST RESPONSE 

## COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 9/7/10

 REQUEST 5RESPONSIBLE PARTY: Frank J. Oliva
COMPANY:
East Kentucky Power Cooperative, Inc.

Request 5. Provide the percentage of EKPC's debt issuances directly related to projects in the approved compliance plan that have a variable interest rate as of the May 2010 expense month.

Response 5. The percentage is $0 \%$. The debt issuances directly related to the projects in the approved compliance plan are at fixed interest rates.

# EAST KENTUCKY POWER COOPERATIVE, INC. 

PSC CASE NO. 2010-00319
ENVIRONMENTAL SURCHARGE APPENDIX B FIRST INFORMATION REQUEST RESPONSE

## COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 9/7/10 REQUEST 6 <br> RESPONSIBLE PARTY: <br> Frank J. Oliva <br> COMPANY: <br> East Kentucky Power Cooperative, Inc.

Request 6. The Settlement Agreement in Case No. 2004-00321 provides that the EKPC's rate of return on compliance-related capital expenditures will be updated to reflect current average debt cost at the conclusion of the six-month surcharge review. Provide the following information as May 2010:
a. The debt issuances directly related to projects in the approved compliance plan and subsequent amendment and corresponding outstanding balances of each debt issuance.
b. The debt cost for each debt issuance directly related to the projects in the approved compliance plan and subsequent amendment.
c. EKPC's calculation of the weighted average debt cost and the rate of return resulting from multiplying the weighted average debt cost by a 1.35 TIER. Include all supporting calculations showing how the weighted average debt cost was determined.

Response 6. a-c. Please see the schedule on pages 2 and 3 of this response for debt information associated with compliance plan projects approved in Case Nos. 2004-00321 and 2008-00115.

| Compliance Project | L.oan Source (1) |  | $\begin{aligned} & \text { NBV } \\ & 5 / 31 / 2010 \end{aligned}$ <br> (2) | Cost <br> (3) | Weights $(4)=(2) *(3)$ | Rate of Return $(5)=(4)^{*} 1.35$ | Page 2 of 3 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1. Gilbert (Envirommental Portion) | Z-8 | \$ | 59,371,260 | 4.71\% | 0.478\% |  |  |
| 2. Spurlock 1-Precipitator | Y-8 | \$ | 18,689,443 | 4.92\% | 0.156\% |  |  |
| 3. Spurlock 1-SCR | Y-8 | 5 | 62,334,241 | 4.92\% | 0.520\% |  |  |
| 4. Spurlock 2-SCR | Y-8 | \$ | 30,982,038 | 4.92\% | 0.258\% |  |  |
| 5. Spurlock \#4 (Environmental Portion) | AD-8 | \$ | 82,342,029 | 4.50\% | 0628\% |  |  |
| 6. Spurlock \#1 Scrubber | AG-8 | \$ | 146,395,269 | 4.33\% | 1076\% |  |  |
| 7. Spurlock \#2 Scrubber | AG-8 | \$ | 188,839,852 | 4.40\% | 1409\% |  |  |
|  |  |  | 589,454,132 |  | 4.525\% | 6.109\% |  |


| Y-8 30-year <br> Note Number |  | Current Liability 5/31/2010 $\qquad$ <br> (2) | Interest Rate (3) |  | Yearly Interest <br> (4) | $\begin{gathered} \text { Composite } \\ \text { Rate } \\ \text { Total (4)/Total (2) } \\ \text { (5) } \\ \hline \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| HO720 | \$ | 22,279,824 | 4.460\% | \$ | 993,680 |  |
| H0725 | \$ | 22,411,370 | 4.819\% | \$ | 1,080,004 |  |
| H0730 | \$ | 22,278,504 | 4.950\% | \$ | 1,102,786 |  |
| HO750 | \$ | 22,507,827 | 5.091\% | \$ | 1,145,873 |  |
| HO755 | \$ | 22,528,039 | 5.149\% | \$ | 1,159,969 |  |
| H0760 | \$ | 22,498,726 | 5065\% | \$ | 1,139,560 |  |
| H0765 | \$ | 22,479,743 | 5.011\% | \$ | 1,126,460 |  |
| HO770 | \$ | 24,330,282 | 5149\% | \$ | 1,252,766 |  |
| H0885 | \$ | 5,971,431 | $4890 \%$ | \$ | 292,003 |  |
| HO960 | \$ | 10,471,002 | 4.338\% | \$ | 454,232 |  |
| H01005 | \$ | 4,068,584 | 4.306\% | \$ | 175,193 |  |
|  | \$ | 201,825,331 |  | \$ | 9,922,527 | 4.92\% |
| Z-8 30-year <br> Note Number (1) | Current <br> Liability 5/31/2010 <br> (2) |  | Interest Rate (3) | Yearly Interest (4) |  | $\begin{gathered} \text { Composite } \\ \text { Rate } \\ \text { Total (4) / Total (2) } \\ \text { (5) } \\ \hline \end{gathered}$ |
| H0810 | \$ | 46,940,811 | 4.744\% | \$ | 2,226,872 |  |
| HO815 | \$ | 46,984,613 | 4825\% | § | 2,267,008 |  |
| HOS20 | \$ | 47,049,106 | 4946\% | \$ | 2,327,049 |  |
| H0825 | \$ | 23,446,875 | 4658\% | \$ | 1,092,155 |  |
| H0830 | \$ | 23,402,049 | 4.497\% | \$ | 1,052,390 |  |
| H0835 | \$ | 23,459,770 | 4.705\% | \$ | 1,103,782 |  |
| H0840 | \$ | 23,355,055 | 4332\% | \$ | 1,011,741 |  |
| HO845 | \$ | 17,748,090 | 4.324\% | \$ | 767,427 |  |
| H0855 | \$ | 28,072,641 | 4.468\% | \$ | 1,254,286 |  |
| H0860 | \$ | 28,073,319 | 4.470\% | \$ | 1,254,877 |  |
| HO870 | \$ | 28,172,630 | 4.769\% | \$ | 1,343,553 |  |
| H0890 | \$ | 14,267,872 | 5345\% | \$ | 762,618 |  |
| H0895 | \$ | 9,510,832 | 5333\% | \$ | 507,213 |  |
| HO915 | \$ | 22,022,560 | 4776\% | § | 1,051,798 |  |
| HO920 | \$ | 22,264,286 | 4.812\% | § | 1,071,357 |  |
| HO1025 | \$ | 3,548,609 | $3801 \%$ | \$ | 134,883 |  |
|  | \$ | 408,319,124 |  | \$ | 19,229,009 | 4.71\% |
| AD-8 30-year | Currem <br> Liability |  | Interest Yearly |  |  | Composite <br> Rate <br> Total (4)/Total (2) <br> (5) |
|  |  |  |  |  |  |  |
| $\begin{aligned} & \text { Note Number } \\ & \text { (1) } \\ & \hline \end{aligned}$ | $\begin{gathered} 5 / 31 / 2010 \\ (2) \end{gathered}$ |  | Rate | Interest |  |  |
|  |  |  | (3) | (4) |  |  |
| H0925 | \$ | 49,297,513 | 4.821\% | \$ | 2,376,633 |  |
| HO930 | \$ | 24,643,073 | 4.736\% | \$ | 1,167,096 |  |
| H0935 | \$ | 49,277,081 | 4.669\% | \$ | 2,300,747 |  |
| HO940 | \$ | 24,618,741 | 4.384\% | \$ | 1,079,286 |  |
| H0945 | \$ | 49,274,221 | 4.648\% | \$ | 2,290,266 |  |
| H0955 | \$ | 49,268,3,36 | $4.605 \%$ | \$ | 2,268,807 |  |
| H0965 | \$ | 7,878,269 | $4396 \%$ | \$ | 346,329 |  |
| HO975 | \$ | 19,693,343 | $4355 \%$ | \$ | 857,645 |  |
| HO980 | \$ | 19,694,083 | $4368 \%$ | \$ | 860,238 |  |
| H0985 | \$ | 24,628,781 | 4.527\% | \$ | 1,114,945 |  |
| HO990 | § | 24,644,283 | 4.754\% | \$ | 1,171,589 |  |
| HO995 | \$ | 24,6,35,402 | 4.623\% | \$ | 1,138,895 |  |
| HO1000 | \$ | 7,777,581 | 4.298\% |  | 334,280 |  |
| HO1010 | \$ | 24,616,108 | 4.347\% | \$ | 1,070,062 |  |
| HO1015 | \$ | 24,620,229 | 4.405\% | \$ | 1,084,521 |  |
| HO1020 | § | 7,251,013 | 2.846\% | \$ | 206,364 |  |
| HO1030 | \$ | 24,526,205 | 3651\% | \$ | 395,452 |  |
| HO1065 | \$ | 14,425,405 | $4252 \%$ | \$ | 613,368 |  |
|  | \$ | 470,769,667 |  | \$ | 21,176,522 | 4.50\% |

AG-8 30-year

| Note Number (1) |
| :---: |
| FO1035 |
| FO1040 |
| FO1045 |
| FOI050 |
| FO1055 |
| FO1060 |
| FO1070 (Split biween Spur 1 \& Spur 2) |
| FO1115 (Split btween Spur 1 \& Spur.2) |
| FOII 130 |
| FO1170 (Split bwween Spur 1 \& Spur 2) |
| FOII90 |


|  | Current Liability 5/31/2010 <br> (2) | Interest Rate (3) |  | Yearly Interest (4) | Composite Rate Total (4)/Total (2) (5) |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 5 | 35,000,000 | 3.988\% | \$ | 1,395,800 |  |
| \$ | 25,000,000 | $4374 \%$ | \$ | 1,093,500 |  |
| \$ | 25,000,000 | 4391\% | \$ | 1,097,750 |  |
| \$ | 25,000,000 | 4.605\% | \$ | 1,151,250 |  |
| \$ | 40,000,000 | 4605\% | \$ | 1,842,000 |  |
| \$ | 25,000,000 | 4600\% | \$ | 1,150,000 |  |
| \$ | 11,353,800 | 4.262\% | \$ | 483,899 |  |
| \$ | 1,641,860 | 4.175\% | \$ | 68,548 |  |
| \$ | 6,000,000 | 3.990\% | \$ | 239,400 |  |
| \$ | 10,763,500 | 4.508\% | \$ | 485,219 |  |
| \$ | 910,000 | 3.922\% | \$ | 35,690 |  |
| \$ | 205,669,160 |  | \$ | 9,043,055 | 4.40\% |


| AG-8 30-year |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Spurlock \#1 Scrubber | Current |  | Interest |  |  | Composite |
|  |  | Liability |  |  |  | Rate |
| Note Number |  | /31/2010 | Rate |  | Interest | Total (4) / Total (2) |
| (1) |  | (2) | (3) |  | (4) | (5) |
| FO1070 (Split btween Spur 1 \& Spur. 2) | \$ | 13,645,700 | 4262\% | \$ | 581,580 |  |
| F01075 | \$ | 25,000,000 | $4100 \%$ | \$ | 1,025,000 |  |
| FO1085 | \$ | 25,000,000 | 4.464\% | \$ | 1,116,000 |  |
| FOll 100 | \$ | 25.000,000 | 4.569\% | \$ | 1,142,250 |  |
| FOL095 | \$ | 25,000,000 | 4.390\% | \$ | 1,097,500 |  |
| FO1105 | \$ | 7,259,740 | 4.142\% | \$ | 300,698 |  |
| FO1110 | \$ | 1,641,860 | 4194\% | \$ | 68,860 |  |
| FO1115 (Split btween Spur 1 \& Spur. 2) | \$ | 18,358,140 | 4175\% | \$ | 766.452 |  |
| FO1170 (Split btween Spur 1 \& Spur.2) | \$ | 3,692,726 | $4508 \%$ | \$ | 166.468 |  |
|  | \$ | 144,598,166 |  | \$ | 6,264,808 | 4.33\% |


[^0]:    Cumberland Valley Electric - Calculation of (Over)/Under w/ 2-month lag

[^1]:    December - Contractor expenses totaled $\$ 412.5 \mathrm{~K}$, warehouse material charges were $\$ 3.9 \mathrm{~K}$ and
    EKPC labor and benefits were up $\$ 18.6 \mathrm{~K}$ in December. December contractor expenses were for the following:
    Scaffold for areas -FBAC, FBHE, Cyclone Area, Mills, Seal Pots
    Scaffold for areas to Make Repairs to Refractory in Boiler \& Related Areas
    Labor \& Material to Make Repairs to Refractory in Boiler \& Related Areas
    Labor, equipment, \& consumables for X-Ray Services on Spurlock Unit 3 F
    Labor \& Material to Erect \& Dismantle Scaffolding at Various Locations on Unit 3 Baghouse, SNCR, FDA \& Associated Equipment
    Labor \& Material to Erect \& Dismantle Scaffolding at Various Locations on Unit 3 Boiler Pollution Control Equipment

[^2]:    January - EKPC payroll and benefits increased by $\$ 7.4 \mathrm{~K}$, Materials increased by $\$ 2.1 \mathrm{~K}$ and contractor expenses increased by $\$ 56.3 \mathrm{~K}$
    February - EKPC payroll and benefits increased by $\$ 18.9 \mathrm{~K}$, Materials decreased by $\$ 1.2 \mathrm{~K}$ and contractor expenses decreased by $\$ 39.1 \mathrm{~K}$.
    March - EKPC payroll and benefits decreased by $\$ 27.1 \mathrm{~K}$, Materials decreased by $\$ 0.8 \mathrm{~K}$ and contractor expenses decreased by $\$ 8.5 \mathrm{~K}$.
    April - EKPC payroll and benefits increased by $\$ 13.3 \mathrm{~K}$. Materials increased by $\$ 3.6 \mathrm{~K}$ and contractor expenses increased by $\$ 2.4 \mathrm{~K}$.
    May - EKPC payroll and benefits decreased by $\$ 0.6 \mathrm{~K}$, Materials increased by $\$ 41.3 \mathrm{~K}$ and contractor expenses decreased by $\$ 11.1 \mathrm{~K}$.
    June - EKPC payroll and benefits increased by $\$ 27.3 \mathrm{~K}$, Materials decreased by $\$ 40.1 \mathrm{~K}$ and contractor expenses increased by $\$ 3.1 \mathrm{~K}$.

