

Mark David Goss

Member 859.244.3232 mgoss@fbtlaw.com

March 24, 2011

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MAR 2 4 2011

PUBLIC SERVICE COMMISSION

Mr. Jeff Derouen Executive Director Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: PSC Case No. 2011-00032

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 February 28, 2011, 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.

Very truly yours,

Mark David Goss

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Counsel

Enclosures

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MAR 2 4 2011

PUBLIC SERVICE COMMISSION

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)	2011-00032
DECEMBER 31, 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 FEBRUARY 28, 2011

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	COMMONWEALTH OF KENTUCKY
	BEFORE THE PUBLIC SERVICE COMMISSION
In th	ne 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 DECEMBER 31, 2010; 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 Director 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, and in March 2011, I became Director
	of Regulatory Services. I am a certified public accountant in Kentucky.

1	Q.	Please provide a brief description of your duties at EKPC.
2	A.	As Director of Regulatory Services, I am responsible for managing all filings with
3		the Public Service Commission ("Commission.") I report directly to the Chief
4		Financial Officer.
5	Q.	What is the purpose of your testimony?
6	A.	The purpose of my testimony is to describe how EKPC and its Member Systems
7		have applied the environmental surcharge mechanism in a reasonable manner
8		during the period under review and to identify the over/under recoveries
9		accumulated for the periods under review for EKPC and each Member System
10		and recommend an amortization of such amounts accumulated during the period
11		under review. My testimony will also propose updating the rate of return and
12		Times Interest Earned Ratio ("TIER") used in the environmental surcharge
13		calculation.
14	Q.	Is EKPC preparing testimony and responding to data requests on behalf of
15		its member systems?
16	A.	Yes. EKPC is preparing testimony on behalf of each member system. These
17		member systems are: Big Sandy Rural Electric Cooperative Corporation; Blue
18		Grass Energy Cooperative Corporation; Clark Energy Cooperative, Inc.;
19		Cumberland Valley Electric, Inc.; Farmers Rural Electric Cooperative
20		Corporation; Fleming-Mason Energy Cooperative; Grayson Rural Electric
21		Cooperative Corporation; Inter-County Energy Cooperative Corporation; Jackson
22		Energy Cooperative; Licking Valley Rural Electric Cooperative Corporation;
23		Nolin Rural Electric Cooperative Corporation; Owen Electric Cooperative; Salt

1		River Electric Cooperative Corporation; Shelby Energy Cooperative, Inc.; South
2		Kentucky Rural Electric Cooperative Corporation; and Taylor County RECC.
3	Q.	Have other EKPC representatives provided responses to data requests in this
4		proceeding?
5	A.	Yes. Ernest W. Huff, Manager of Fuels and Emissions, has provided the emission
6		allowance information for Response 3 of the First Information Request of
7		Commission Staff. Frank J. Oliva, Manager of Finance, has provided the debt
8		and average interest rate/ TIER information for Responses 5 and 6 of the First
9		Information Request of Commission Staff.
10	Q.	Previous Commission Orders required EKPC and its Member Systems to
11		incorporate certain provisions into the calculation of the monthly
12		environmental surcharge factors. Please comment on how EKPC and the
13		Member Systems have addressed the most significant aspects of these Orders
14		during the periods under review.
15	A.	A brief description of each component of the environmental surcharge
16		calculation, applied consistently with Commission Orders, is discussed below.
17		• Compliance Plan Projects
18		EKPC's compliance plan consists of the projects approved by the Commission
19		upon implementation of the environmental surcharge (Case No. 2004-00321)
20		and upon the amendment to its compliance plan (Case No. 2008-00115.) The
21		monthly environmental surcharge reports, incorporated by reference in this
22		case, show the capital costs for these projects. On September 24, 2010, the
23		Commission approved EKPC's second amendment to its compliance plan

1	(Case No. 2010-00083.) EKPC began to include those projects approved in
2	this compliance plan amendment in the September 2010 expense month.
3	Base/Current Method
4	As a result of the Commission's Order in Case No. 2009-00317 dated January
5	28, 2010, EKPC's base factor is 0%.
6	Actual Emission Allowance Expense
7	EKPC included only actual SO2 and NOx emission allowance expense in the
8	monthly filings.
9	• Return on Emission Allowance Inventory and Limestone Inventory
10	EKPC has included a return on all environmental surcharge assets, including
11	emission allowances purchased for current and vintage years. This is
12	addressed in Response 3 to the First Data Request of Commission Staff.
13	EKPC has also included a return on its limestone inventory.
14	• Return on Construction Work in Process (CWIP)
15	EKPC has included a return on CWIP during the period under review.
16	• Rate of Return
17	• EKPC's rate of return consists of two components: the average cost of debt
18	on its compliance plan projects and a Times Interest Earned Ratio (TIER)
19	component. For the July 2010 billing period (June 2010 expense month),
20	EKPC applied an average cost of debt of 4.482% and a 1.35 TIER to yield a
21	6.051% rate of return; this rate of return was approved in Case No. 2009-
22	00317. As a result of Commission Order in Case No. 2010-00021, EKPC
23	updated its average cost of debt at 4.54% and applied a 1.35 TIER, which

yielded a 6.129% rate of return. EKPC applied this rate of return beginning with the November 2010 billing period (October 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.

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.

I	Q.	Did ERPC incur any over and under recoveries during the periods under
2		review?
3	A.	Yes. However, as shown in Response 1 to the First Information Request of
4		Commission Staff, EKPC applied its December 2010 over-recovery to the
5		January 2011 expense month. Therefore, there are no cumulative over or under
6		recoveries to consider in this proceeding.
7	Q.	Did the Member Systems incur any over or under recoveries during the
8		review periods?
9	A.	Yes. The over or under recovery amounts for each month and cumulatively for
10		the period under review are provided in Response 2 to the First Information
11		Request of Commission Staff.
12	Q.	How will the Member Systems reflect recovery of these over or under
13		recovery amounts?
14	A.	As approved by Commission Order in Case No. 2010-00021, dated November 5
15		2010, EKPC proposes that the accumulated over or under recovery amounts be
16		amortized for each month in the six-month period following the Commission's
17		Order in this proceeding.
18	Q.	Does EKPC propose changes to its wholesale surcharge mechanism during
19		this review?
20	A.	No. EKPC proposes no changes to its wholesale surcharge mechanism during
21		this review.
22	Q.	Do EKPC's member systems propose any changes to their surcharge
23		mechanism during this review?

1 A. No. EKPC's member systems do not propose any changes to their surcharge 2 mechanism during this review. 3 Has EKPC updated the rate of return to be used prospectively? Q. 4 Yes. As indicated in Response 6 the First Data Request of Commission Staff, A. 5 EKPC recommends that the Commission approve the average debt cost of 6 4.524%. 7 Does EKPC recommend any changes to its current TIER level of 1.35? Q. 8 A. Yes. As authorized by the Commission's Order in Case No. 2010-000167, EKPC 9 proposes to increase its TIER to 1.50. EKPC has reviewed the Orders in Case No. 10 2004-00321 (EKPC's implementation of the environmental surcharge) and Case 11 No. 2008-00115 (EKPC's first compliance plan amendment proceeding), as well 12 as KRS 278.183, and noted no limitations as to when TIER can be modified. 13 When does EKPC propose to apply the updated average debt cost and TIER Q. 14 level to its rate of return calculation? 15 EKPC plans to use the new average debt cost and 1.50 TIER level in its rate of A. 16 return calculation in the first month following the Commission's Final Order in 17 this proceeding. 18 Does this conclude your testimony? Q. 19 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION

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AN EXAMINATION BY THE PUBLIC SERVICE)	
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SURCHARGE MECHANISM OF EAST KENTUCKY	<i>"</i>)	
POWER COOPERATIVE, INC. FOR THE)	CASE NO.
SIX-MONTH BILLING PERIOD ENDING)	2011-00032
DECEMBER 31, 2010 AND THE PASS-THROUGH)	
MECHANISM FOR ITS SIXTEEN MEMBER)	
DISTRIBUTION COOPERATIVES)	

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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.

Subscribed and sworn before me on this 24 day of March, 2011.

Lun M-Willey

MY COMMISSION EXPIRES NOVEMBER 30, 2013 NOTARY ID #409352

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC ADMINISTRATIVE CASE 2011-00032

PUBLIC SERVICE COMMISSION INFORMATION REQUEST DATED 02/28/11

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 February 28, 2011. Each response with its associated supportive reference materials is individually tabbed.

BEFORE THE PUBLIC SERVICE COMMISSION

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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)	2011-00032
DECEMBER 31, 2010 AND THE PASS-THROUGH)	
MECHANISM FOR ITS SIXTEEN MEMBER)	
DISTRIBUTION COOPERATIVES)	

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Ernest 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's Requests for Information contained in Appendix B in the above-referenced case dated February 28, 2011, 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 24 day of March, 2011.

...T COMMINISSION EXPIRES NOVEMBER 30, 2013 NOTARY ID #409352

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BEFORE THE PUBLIC SERVICE COMMISSION

IN	THE	MA	TTER	OF:

AN EXAMINATION BY THE PUBLIC SERVICE)	
COMMISSION OF THE ENVIRONMENTAL)	
SURCHARGE MECHANISM OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. FOR THE)	CASE NO.
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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's Requests for Information contained in Appendix B in the above-referenced case dated February 28, 2011, 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 24 day of March, 2011.

Notary Public

MY COMMISSION EXPIRES NOVEMBER 30, 2013

NOTARY ID #409352

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER	K U	JF:
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AN EXAMINATION BY THE PUBLIC SERVICE)	
COMMISSION OF THE ENVIRONMENTAL)	
SURCHARGE MECHANISM OF EAST KENTUCKY)	
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DECEMBER 31, 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's Requests for Information contained in Appendix B in the above-referenced case dated February 28, 2011, 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 24th day of March, 2011.

NOTARY ID #409352

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2011-00032 ENVIRONMENTAL SURCHARGE APPENDIX B FIRST INFORMATION REQUEST RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 02/28/11 REQUEST 1

RESPONSIBLE PARTY: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

Request 1. Prepare a summary schedule showing the calculation of E(m) and the surcharge factor for the expense months covered by the billing period 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. Because EKPC utilizes the one-month "true up" adjustment, EKPC has no accumulated over or under revenues for the period under review.

East Kentucky Power Cooperative, inc. Environmental Surcharge Report Calculation of Current Month Environmental Surcharge Factor (CESF) and (Over)/Under Recovery Calculation

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Line		Ø.	Jun-10	OL-IDE	Aug-10	Sep-10	00-100	01-101	חבר- וס
	E(m) = RORB + OE - BAS								
7	Rate Base		\$605,748,113	\$603,722,880	\$602,103,182	\$656,511,504	\$658,507,629	\$672,249,903	\$689,078,438
က	Rate Base / 12		\$50,479,009	\$50,310,240	\$50,175,265	\$54,709,292	\$54,875,636	\$56,020,825	\$57,423,203
4	Rate of Return	П	6.051%	6.051%	6.051%	6.051%	6.129%	6.129%	6.129%
-CJ	Return on Rate Base (RORB)	+	\$3,054,485	\$3,044,273	\$3,036,105	\$3,310,459	\$3,363,328	\$3,433,516	\$3,519,468
9	Operating Expenses (OE)	+	\$3,709,990	\$3,884,632	\$4,258,464	\$3,796,005	\$3,954,251	\$4,063,676	\$4,408,424
7	By-Product and Emission Allowance Sales (BAS)	1	0\$						
∞	Sub-Total E(m)		\$6,764,475	\$6,928,905	\$7,294,569	\$7,106,464	\$7,317,579	\$7,497,192	\$7,927,892
89	Prior Periods Adjustments								
თ	Member System Allocation Ratio for the Month (Form 3.0)		98.44%	97.92%	97.36%	97.24%	97.30%	97.32%	97.41%
	Subtotal E(m) = Subtotal E(m) x Member System Allocation Ratio		\$6,658,949	\$6,784,783	\$7,101,992	\$6,910,326	\$7,120,004	\$7,296,268	\$7,722,559
<u> </u>	11 Adjustment for (Over)/Under Recovery, as applicable		*0\$	0\$	\$	\$0	\$522,666	\$522,666	\$0
12	12a E(m) = Subtotal E(m) plus (Over)/Under Recovery		\$6,658,949	\$6,784,783	\$7,101,992	\$6,910,326	\$7,642,670	\$7,818,934	\$7,722,559
12	22b 2-month true up adjustment		\$946,051	\$791,708	(\$353,562)	(\$1,193,197)	(\$329,933)	\$1,626,354	\$1,195,887
12	12c E(m)= Ln 12a + Ln 12 b		\$7,605,000	\$7,576,492	\$6,748,430	\$5,717,129	\$7,312,737	\$9,445,288	\$8,918,446
+	R(m) = Average Monthly Wholesale Revenue for the 12 Months Ending with the Current Expense Month (Form 3.0)		\$57,662,277	\$58,759,809	\$59,596,338	\$59,912,729	\$59,621,682	\$59,606,578	\$60,620,788
-	14 CESF: Line 12 c / Line 13 E(m) / R(m); as a % of Revenue		13.19%	12.89%	11.32%	9.54%	12.27%	15.85%	14.71%
	15 BESF		%00'0	0.00%	%00.0	0.00%	0.00%	%00.0	0.00%
=	16 MESF		13.19%	12.89%	11.32%	9.54%	12.27%	15.85%	14.71%
	17 Authorized Recovery Amount: Line 13 x Line 16		\$7,605,000	\$7,576,492	\$6,748,430	\$5,717,129	\$7,312,737	\$9,445,288	\$8,918,446
-	18 Environmental Surcharge Revenues Billed		\$6,691,031	\$8,798,197	\$8,600,595	\$6,054,258	\$4,090,774	\$6,116,850	\$12,919,387
-	Monthly (Over)/Under = Previous Month Line 17 Minus Current Month Line 18		(\$353,562)	(\$1,193,197)	(\$1,024,104)	\$694,172	\$1,626,355	\$1,195,887	(\$3,474,099)
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East Kentucky Power Cooperative, Inc. Environmental Surcharge Report Calculation of Current Month Environmental Surcharge Factor (CESF) and (Over)/Under Recovery Calculation

ine	Description	10	Jan-11	Feb-11
-	E(m) = RORB + OE			
7	Rate Base		\$692,024,473	\$702,068,777
က	Rate Base / 12		\$57,668,706	\$58,505,731
4	Rate of Return	11	6.109%	6.109%
2	Return on Rate Base (RORB)	+	\$3,522,981	\$3,574,115
9	Operating Expenses (OE)	+	\$4,071,561	\$4,084,959
7	By-Product and Emission Allowance Sales (BAS)	1		
œ	Sub-Total E(m)		\$7,594,542	\$7,659,074
89	Prior Periods Adjustments			
6	Member System Allocation Ratio for the Month (Form 3.0)		97.44%	97.24%
9	Subtotal E(m) = Subtotal E(m) x Member System Allocation Ratio		\$7,400,122	\$7,447,684
Ę.	Adjustment for (Over)/Under Recovery, as applicable		0\$	0\$
12a	E(m) = Subtotal E(m) plus (Over)/Under Recovery		\$7,400,122	\$7,447,684
12b	12b 1-month true up adjustment		(\$3,474,099)	(\$3,572,498)
120	12c E(m)= Ln 12a + Ln 12 b		\$3,926,023	\$3,875,186
65	R(m) = Average Monthly Wholesale Revenue for the 12 Months Ending with the Current Expense Month (Form 3.0)		\$60,675,073	\$60,048,030
14	CESF: Line 12 c / Line 13 E(m) / R(m); as a % of Revenue		6.47%	6.45%
5	BESF		00.00	0.00%
16	MESF		6.47%	6.45%
17	Authorized Recovery Amount: Line 13 x Line 16		\$3,926,023	\$3,875,186
8	Environmental Surcharge Revenues Billed		\$12,490,944	\$4,494,315
19	Monthly (Over)/Under = Previous Month Line 17 Minus Current Month Line 18		(\$3,572,498)	(\$568,292)
1				

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2011-00032 ENVIRONMENTAL SURCHARGE APPENDIX B FIRST INFORMATION REQUEST RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 02/28/11 REQUEST 2

RESPONSIBLE PARTY: Ann F. Wood

COMPANY: 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. Please see pages 2 through 17 of this response for the detail of each Member System's cumulative over or under recovery. As stated in testimony in this proceeding and as approved by the Commission in Case No. 2010-00021, EKPC's Member Systems will amortize the cumulative over or under recover over a six-month period.

Big Sandy RECC - Calculation of (Over)/Under

		EKPC	I	Billed to				
		Invoice		Retail				
		Month	Co	nsumer &				
	r	ecorded	rec	corded on		Monthly	C	umulative
	N	lember's	М	ember's	(Over) or	(Over) or
		Books		Books		Under		Under
Mo/Yr		(1)		(2)		(3)		(4)
Jul-10	\$	188,340	\$	372,842	\$	(184,502)	\$	(184,502)
Aug-10	\$	180,952	\$	203,514	\$	(22,562)	\$	(207,064)
Sep-10	\$	122,284	\$	(7,925)	\$	130,209	\$	(76,855)
Oct-10	\$	90,430	\$	222,397	\$	(131,967)	\$	(208,822)
Nov-10	\$	150,871	\$	103,837	\$	47,034	\$	(161,789)
Dec-10	\$	320,045	\$	199,067	\$	120,978	\$	(40,811)
Jan-11	\$	299,011	\$	288,003	\$	11,008	\$	11,008
Feb-11	\$	103,756		*	\$	103,756	\$	114,764

Cumulative 6-months (Over)/Under Recovery	\$ (40,811)
Monthly Recovery (per month for six months)	\$ (6,802)

^{*} Information not available.

\$1,315,474

\$ 219,246

Blue Grass Energy - Calculation of (Over)/Under

	EKPC	Billed to		
	Invoice	Retail		
	Month	Consumer &		
	recorded	Recorded on	Monthly	Cumulative
	on Member's	Member's	(Over) or	(Over) or
	Books	Books	Under	Under
Mo/Yr	(1)	(2)	(3)	(4)
Jul-10	\$ 924,029	\$ 856,798	\$ 67,231	\$ 67,231
Aug-10	\$ 901,945	\$ 523,657	\$ 378,288	\$ 445,519
Sep-10	\$ 639,861	\$ 584,089	\$ 55,772	\$ 501,292
Oct-10	\$ 412,183	\$ 531,234	\$ (119,051)	\$ 382,241
Nov-10	\$ 628,456	\$ 366,357	\$ 262,099	\$ 644,340
Dec-10	\$ 1,394,884	\$ 723,750	\$ 671,134	\$1,315,474
Jan-11	\$ 1,349,074	\$ 1,200,305	\$ 148,769	\$ 148,769
Feb-11	\$ 477,977	*	\$ 477,977	\$ 626,746

Cumulative 6-months (Over)/Under Recovery

Monthly Recovery (per month for six months)

^{*} Information not available.

Clark Energy Cooperative - Calculation of (Over)/Under

		EKPC		Billed to					
		Invoice		Retail					
		Month	Cc	nsumer &					
	re	ecorded	re	corded on		Monthly	С	umulative	
	on	Members	N	lember's		(Over) or	((Over) or	
		Books		Books		Under		Under	
Mo/Yr	(1)		(2)			(3)	(4)		
Jul-10	\$	252,236	\$	310,229	\$	(57,993)	\$	(57,993)	
Aug-10	\$	337,889	\$	410,301	\$	(72,412)	\$	(130,405)	
Sep-10	\$	325,936	\$	384,096	\$	(58,160)	\$	(188,565)	
Oct-10	\$	221,652	\$	204,226	\$	17,426	\$	(171,139)	
Nov-10	\$	150,008	\$	129,046	\$	20,962	\$	(150,178)	
Dec-10	\$	238,270	\$	277,630	\$	(39,360)	\$	(189,538)	
Jan-10	\$	535,872	\$	498,188	\$	37,684	\$	37,684	
Feb-10	Feb-10 \$ 509,568				\$	509,568	\$	547,252	
Cumulative 6-mo	onths	(Over)/Und	er Re	ecovery			\$	(189,538)	

\$

(31,590)

Monthly Recovery (per month for six months)

^{*} Information not available.

Cumberland Valley Electric - Calculation of (Over)/Under

Invoice Retail Consumer & recorded recorded on Monthly Cumula (Over) or (Over) Books Books Under Under	or	
recorded recorded on Monthly Cumula	or	
on Member's Books Member's Books (Over) or Under (Over) Under Mo/Yr (1) (2) (3) (4)	or	
Books Books Under Under Mo/Yr (1) (2) (3) (4)		
Mo/Yr (1) (2) (3) (4)		
	er	
1.1.1.0 ¢ 276.004 ¢ 202.220 ¢ 74.571 ¢ 7	(4)	
Jul-10 \$ 376,901 \$ 302,330 \$ 74,571 \$ 7	4,571	
Aug-10 \$ 375,176 \$ 136,824 \$ 238,352 \$ 31	2,924	
Sep-10 \$ 260,746 \$ 207,399 \$ 53,347 \$ 36	6,271	
Oct-10 \$ 188,722 \$ 269,158 \$ (80,436) \$ 28	5,835	
Nov-10 \$ 292,509 \$ 217,497 \$ 75,012 \$ 36	0,847	
Dec-10 \$ 612,116 \$ 429,827 \$ 182,289 \$ 54	3,136	
Jan-11 \$ 569,010 \$ 566,362 \$ 2,648 \$	2,648	
Feb-11 \$ 203,616 * \$	2,648	

Cumulative 6-months (Over)/Under Recovery	\$	543,136
Monthly Recovery (per month for six months)	- \$	90,523

^{*} Information not available.

Farmers RECC - Calculation of (Over)/Under

		EKPC		Billed to			
		Invoice		Retail			
		Month	Co	onsumer &			
	1	ecorded	re	corded on	Monthly	С	umulative
	on	Member's	Ν	1ember's	(Over) or		(Over) or
		Books		Books	Under		Under
Mo/Yr		(1)		(2)	(3)		(4)
Jul-10	\$	294,493	\$	377,186	\$ (82,693)	\$	(82,693)
Aug-10	\$	390,476	\$	411,898	\$ (21,422)	\$	(104,115)
Sep-10	\$	375,561	\$	396,192	\$ (20,631)	\$	(124,746)
Oct-10	\$	254,559	\$	237,746	\$ 16,813	\$	(107,934)
Nov-10	\$	168,618	\$	229,907	\$ (61,289)	\$	(169,222)
Dec-10	\$	249,689	\$	265,292	\$ (15,603)	\$	(184,825)
Jan-11	\$	523,940	\$	434,233	\$ 89,707	\$	89,707
Feb-11	\$	516,373		*	\$ 516,373	\$	606,080

Cumulative 6-months (Over)/Under Recovery	\$	(184,825)
Monthly Recovery (per month for six months)	- S	(30.804)

^{*} Information not available.

Fleming-Mason - Calc of (Over)/Under - Sch C + Spec Contracts Fle									Fleming-Mason - Calc of (Over)/Under - All Others											
		EKPC		Billed to					Г			EKPC		Billed to	Γ-		Γ		Г	
1		Invoice		Retail								Invoice		Retail	l				1	
1		Month	Co	onsumer &		ì		i	1			Month	Co	onsumer &					1	
	Г	ecorded	re	corded on		Monthly	С	umulative				recorded	re	corded on		Monthly	C	Cumulative	F	leming-Mason
	on	Member's	N	/lember's		(Over) or	((Over) or			or	Member's	1	Member's		(Over) or		(Over) or		Total
		Books		Books		Under		Under				Books		Books		Under		Under		(Over)/Under
Mo/Yr		(1)		(2)		(3)		(4)		Mo/Yr		(1)		(2)		(3)		(4)		
Jul-10		378,531		378,531	\$	-	\$	-	\$	40,360	\$	315,085	\$	188,661	\$	126,424	\$	126,424	\$	126,424
Aug-10		371,557	\$	371,557	\$	-	\$	-	\$	40,391	\$	304,053	\$	317,739	\$	(13,686)	\$	112,737	\$	112,73
Sep-10		319,193	\$	319,193	\$	-	\$	-	\$	40,422	\$	213,492	\$	315,964	\$	(102,472)	\$	10,266	\$	10,266
Oct-10		241,517	\$	241,517	\$	- 1	\$	- [\$	40,452	\$	147,193	\$	182,407	\$	(35,214)	\$	(24,948)	\$	(24,948
Nov-10		286,855		286,855	\$	-	\$	-	\$	40,483	\$	235,337	\$	83,828	\$	151,509	\$	126,562	\$	126,56
Dec-10		463,853	\$	463,853	\$		\$	-	\$	40,513	\$	501,390	\$	479,223	\$	22,167		148,729	\$	148,729
Jan-11		472,207	\$	472,207	\$	-	\$	-	\$	40,179	\$	479,746	\$	677,830	\$	(198,084)	\$	(198,084)	\$	(198,084
Feb-11	\$	190,118			\$	190,118	\$	190,118	\$	40,210	\$_	172,274		*	\$	172,274	\$	(25,810)	\$	164,308
umulative 6-mo	nths	(Over)/Unde	er Re	covery		i	_\$_		C	ımulative 6-m	onth	s (Over)/Und	er R	ecovery			\$	148,729	\$	148,729
								,	,								·			
lonthly Recover	y (pe	r month for s	ix m	onths)			\$		Mo	onthly Recove	ry (p	er month for	six n	nonths)			S	24,788	\$	24,78

^{*} Information not available.

Grayson - Calculation of (Over)/Under

		EKPC		Billed to						
		Invoice		Retail						
	Month Consumer &									
	r	ecorded	re	corded on		Monthly	Cumulative			
	on	Member's	N	lember's		(Over) or	(-	Over) or		
		Books		Books Under				Under		
Mo/Yr	(1)			(2)		(3)	(4)			
Jul-10	\$	201,507	\$	242,994	\$	(41,487)	\$	(41,487)		
Aug-10	\$	193,051	\$	163,387	\$	29,664	\$	(11,823)		
Sep-10	\$	131,318	\$	102,335	\$	28,983	\$	17,160		
Oct-10	\$	95,614	\$	58,999	\$	36,615	\$	53,775		
Nov-10	\$	150,260	\$	183,526	\$	(33,266)	\$	20,509		
Dec-10	\$	306,182	\$	284,357	\$	21,825	\$	42,334		
Jan-11	\$	291,386		*	\$	291,386	\$	291,386		
Feb-11	\$	104,937		*	\$	104,937	\$	396,323		
Cumulative 6-mo	nths	(Over)/Unde	er Re	covery			\$	42,334		
Monthly Recover	у (ре	er month for	six m	ionths)			\$	7,056		

^{*} Information not available.

Inter-County ECC - Calculation of (Over)/Under

		EKPC		Billed to				
		Invoice	Retail					
		Month	Consumer &					
	r	ecorded	re	corded on		Monthly	C	Cumulative
	on	Member's	N	lember's		(Over) or		(Over) or
		Books		Books		Under		Under
Mo/Yr		(1)		(2)		(3)		(4)
Jul-10	\$	257,024	\$	316,573	\$	(59,549)	\$	(59,549)
Aug-10	\$	337,690	\$	424,109	\$	(86,419)	\$	(145,968)
Sep-10	\$	328,285	\$	371,578	\$	(43,293)	\$	(189,261)
Oct-10	\$	224,753	\$	168,149	\$	56,604	\$	(132,657)
Nov-10	\$	149,543	\$	94,869	\$	54,674	\$	(77,983)
Dec-10	\$	237,752	\$	279,230	\$	(41,478)	\$	(119,461)
Jan-11	\$	562,919		*	\$	562,919	\$	562,919
Feb-11	\$	541,944		*	\$	541,944	\$	1,104,863

Cumulative 6-months (Over)/Under Recovery	\$ (119,461)
Monthly Recovery (per month for six months)	\$ (19,910)

^{*} Information not available.

Jackson Energy Cooperative - Calculation of (Over)/Under

		EKPC		Billed to					
		Invoice		Retail					
		Month	C	onsumer &					
	-	recorded	re	corded on		Monthly	С	umulative	
	on	Member's	Λ	/lember's		(Over) or		(Over) or	
		Books		Books		Under	Under		
Mo/Yr		(1)	(2)		(3)			(4)	
Jul-10	\$	694,586	\$	555,760	\$	138,826	\$	138,826	
Aug-10	\$	680,845	\$	413,795	\$	267,050	\$	405,876	
Sep-10	\$	468,294	\$	302,346	\$	165,948	\$	571,824	
Oct-10	\$	334,746	\$	312,911	\$	21,835	\$	593,659	
Nov-10	\$	531,311	\$	657,956	\$	(126,645)	\$	467,014	
Dec-10	\$	1,182,373	\$	1,004,265	\$	178,108	\$	645,121	
Jan-11	\$	1,111,317		*	\$	1,111,317	\$	1,111,317	
Feb-11	\$	387,380		*	\$	387,380	\$	1,498,697	

Cumulative 6-months (Over)/Under Recovery	\$ 645,121
Monthly Recovery (per month for six months)	\$ 107,520

^{*} Information not available.

Licking Valley RECC - Calculation of (Over)/Under

		EKPC		Billed to				
		Invoice		Retail				
		Month	C	onsumer &				
	١	ecorded	re	corded on		Monthly	С	umulative
	on	Member's	N	/lember's		(Over) or	(Over) or
		Books	Books		Under		Under	
Mo/Yr		(1)	(2)		(3)		(4)	
Jul-10	\$	200,622	\$	261,328	\$	(60,706)	\$	(60,706)
Aug-10	\$	197,089	\$	233,276	\$	(36,187)	\$	(96,893)
Sep-10	\$	131,109	\$	80,811	\$	50,298	\$	(46,595)
Oct-10	\$	97,637	\$	106,429	\$	(8,792)	\$	(55,386)
Nov-10	\$	154,714	\$	175,446	\$	(20,732)	\$	(76,119)
Dec-10	\$	321,268	\$	274,679	\$	46,589	\$	(29,530)
Jan-11	\$	304,850		*	\$	304,850	\$	304,850
Feb-11	\$	106,993		*	\$	106,993	\$	411,843

Cumulative 6-months (Over)/Under Recovery	\$ (29,530)
Monthly Recovery (per month for six months)	\$ (4,922)

^{*} Information not available.

Nolin RECC - Calculation of (Over)/Under

		EKPC		Billed to				
		Invoice	Retail			}		
		Month	Co	nsumer &				
	r	ecorded	re	corded on		Monthly	С	umulative
	on	Member's	N	1ember's		(Over) or		(Over) or
		Books	Books			Under	Under	
Mo/Yr		(1)	(2)		(3)		(4)	
Jul-10	\$	561,933	\$	720,523	\$	(158,590)	\$	(158,590)
Aug-10	\$	554,155	\$	755,641	\$	(201,486)	\$	(360,076)
Sep-10	\$	391,095	\$	358,677	\$	32,418	\$	(327,658)
Oct-10	\$	253,184	\$	315,314	\$	(62,130)	\$	(389,788)
Nov-10	\$	365,054	\$	396,483	\$	(31,429)	\$	(421,217)
Dec-10	\$	791,216	\$	724,619	\$	66,597	\$	(354,620)
Jan-11	\$	790,610		*	\$	790,610	\$	790,610
Feb-11	\$	284,465		*	\$	284,465	\$	1,075,075

Cumulative 6-months (Over)/Under Recovery	\$ (354,620)
Monthly Recovery (per month for six months)	\$ (59,103)

^{*} Information not available.

		Owen	Total	(Over)/Under		v	s	s) \$ (534,673)	v,	(809,353			\$ (809,353)	\$ (134,892)
Miers		Cumulative	(Over) or	Under	(4)	(46,367)	(366,518)	(618,680)	\$ (534,673	\$ (554,247)	(809,353)	\$ 1,050,001	2,049,630	(809,353)	(134,892)
Owen Electric Cooperative - Calculation of (Over) Order - All Others		Monthly	(Over) or	Under	(3)	(46,367)	(320,150)	(252,163)	84,007	(19,574)	(255,106)	1,050,001	999,629	\$	S
live - Calculators of	Billed to Retail	Consumer &	Member's	Books	(2)	\$ 955,859	1,146,617 \$	1,060,342 \$	490,633 \$	339,549 \$	758,455 \$		*	nder Recovery	or six months)
weil Electric Cooper	EKPC	Month	on Member's	Books	(1)	612,189	826,467 \$	808,179 \$	574,640 \$	319,975 \$	503,349	1,050,001	629'656	Cumulative 6-months (Over)/Under Recoven	Monthly Recovery (per month for six months
					Mo/Yr	Jul-10 8	Aug-10 \$	Sep-10 \$	Oct-10	Nov-10	Dec-10	Jan-11 S	Feb-11 S	Cumulative 6	Monthly Reco
Uwen Electric Looperative - Calculation of (Overnoner - Scrip		ovitetime	(Over) or	Under	(4)		•		,	•	,			•	,
		Monthly	Over) or	Under	(3)		,	,	0	,		126,281	128,427	\$	v
io lionamanon o	Billed to Retail		Member's		(2)	91,714 \$	115,972 \$	113,469 \$	89,632	69,918 \$	85,066 \$	s s	υ •	ler Recovery	ery months)
Electific Cooperan			on Member's M		(1)	91,714 \$	115,972 \$	113,469 \$	89.632	69.918 \$	85,066 \$	126,281	128,427	Cumulative 6-months (Over)/Under Recovery	of throw see/
Owen	m :	- (2		Mo/Yr	Jul-10 S	Aug-10 S	Sep-10 S	Oct-10 S	Nov-10 S	Dec-10 S	Jan-11 S	Feb-11 S	umulative 6-mo	Monthly Decovery for eye months
		1	(Over) or	Under	(4)		,	,	•	•	•			[-	
Owen Electric Cooperative - Calculation of (Over)/Under - Gallatin			Over) or		(3)	s	·	· 0			,			S	٥
siculation or (Overy	Billed to Retail		Members (436.644 S	436.379 \$	298.299 \$	251 999 \$	320 488 \$	524.162 S	571.134 \$	•	overy	thet
ric Cooperative - C.			recorded reco		-	436.644 S	436 379 \$	298 299 \$	251 999 8	320.48B S	524 162 S	571.134 S	217,326)ver)/Under Rec	om sie sog spece
Owen Elect	ı ı	Z	rec	- A	Mo/Yr	Jul-10 S	Ain-10	Sep-10	v	Nov-10	v	S	S	Cumulative 6-months (Over)/Under Recovery	to discount of the second seco

Information not available.

Salt River RECC - Calculation of (Over)/Under

	*****	EKPC		Billed to			
		Invoice		Retail			
		Month	Co	onsumer &			
		recorded	re	corded on	Monthly	С	umulative
	or	Member's	٨	/lember's	(Over) or		(Over) or
		Books		Books	Under	Under	
Mo/Yr		(1)		(2)	(3)		(4)
Jul-10	\$	872,195	\$	747,831	\$ 124,364	\$	124,364
Aug-10	\$	849,837	\$	674,694	\$ 175,143	\$	299,506
Sep-10	\$	590,059	\$	587,720	\$ 2,339	\$	301,845
Oct-10	\$	357,104	\$	424,934	\$ (67,830)	\$	234,015
Nov-10	\$	527,681	\$	248,414	\$ 279,267	\$	513,283
Dec-10	\$	1,132,552	\$	707,147	\$ 425,405	\$	938,688
Jan-11	\$	1,081,962		*	\$ 1,081,962	\$	1,081,962
Feb-11	\$	389,593		*	\$ (389,593)	\$	692,369

Cumulative 6-months (Over)/Under Recovery	\$ 938,688
Monthly Recovery (per month for six months)	\$ 156,448

^{*} Information not available.

Shelby Energy Cooperative - Calculation of (Over)/Under

		EKPC		Billed to				
		Invoice		Retail				
		Month	Co	onsumer &				
	ı	ecorded	re	corded on		Monthly	C	umulative
	on	Member's	N	Member's		(Over) or	(Over) or
		Books		Books		Under	Under	
Mo/Yr		(1)	(2)		(3)		(4)	
Jul-10	\$	334,899	\$	265,459	\$	69,440	\$	69,440
Aug-10	\$	326,857	\$	251,830	\$	75,027	\$	144,467
Sep-10	\$	238,240	\$	197,982	\$	40,258	\$	184,725
Oct-10	\$	159,196	\$	182,144	\$	(22,948)	\$	161,777
Nov-10	\$	232,585	\$	225,940	\$	6,645	\$	168,423
Dec-10	\$	461,580	\$	380,100	\$	81,480	\$	249,902
Jan-11	\$	443,372		*	\$	443,372	\$	443,372
Feb-11	\$	163,345	<u></u>	*	\$	163,345	\$	606,717

Cumulative 6-months (Over)/Under Recovery	\$ 249,902
Monthly Recovery (per month for six months)	\$ 41,650

^{*} Information not available.

South Kentucky RECC - Calculation of (Over)/Under

		EKPC		Billed to			
		Invoice	Retail				
		Month	C	onsumer &			
		recorded	re	corded on	Monthly	C	umulative
	C	n EKPC's	N	/lember's	(Over) or		(Over) or
		Books		Books	Under		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	\$	18,560
Aug-10	\$	922,180	\$	417,383	\$ 504,797	\$	523,357
Sep-10	\$	639,907	\$	630,226	\$ 9,681	\$	533,038
Oct-10	\$	437,672	\$	475,983	\$ (38,311)	\$	494,727
Nov-10	\$	675,828	\$	365,336	\$ 310,492	\$	805,219
Dec-10	\$	1,557,426	\$	801,654	\$ 755,772	\$	1,560,991
Jan-11	\$	1,501,542		*	\$ 1,501,542	\$	1,501,542
Feb-11	\$	524,348		*	\$ 524,348	\$	2,025,890

Cumulative 6-months (Over)/Under Recovery	\$ 1,560,991
Monthly Recovery (per month for six months)	\$ 260.165

^{*} Information not available.

Taylor County RECC - Calculation of (Over)/Under

		EKPC		Billed to			
		Invoice		Retail			
		Month	Co	onsumer &			
	1	ecorded	re	corded on	Monthly	С	umulative
	on	Member's	Λ	/lember's	(Over) or		(Over) or
		Books		Books	Under		Under
Mo/Yr		(1)		(2)	(3)		(4)
Jul-10	\$	278,216	\$	339,764	\$ (61,548)	\$	(61,548)
Aug-10	\$	362,149	\$	444,116	\$ (81,967)	\$	(143,515)
Sep-10	\$	355,089	\$	442,582	\$ (87,493)	\$	(231,008)
Oct-10	\$	245,125	\$	223,011	\$ 22,114	\$	(208,894)
Nov-10	\$	165,515	\$	160,385	\$ 5,130	\$	(203,764)
Dec-10	\$	250,775	\$	243,262	\$ 7,513	\$	(196,251)
Jan-11	\$	551,327	\$	501,323	\$ 50,004	\$	50,004
Feb-11	\$	529,782		*	\$ 529,782	\$	579,786

Cumulative 6-months (Over)/Under Recovery	\$ (196,251)
Monthly Recovery (per month for six months)	\$ (32,709)

^{*} Information not available.

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EAST KENTUCKY POWER COOPERATIVE, INC PSC CASE NO. 2011-00032 ENVIRONMENTAL SURCHARGE APPENDIX B FIRST INFORMATION REQUEST RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 02/28/11 REQUEST 3

RESPONSIBLE PARTY:

Ernest W. Huff

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 3 and 3a. 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 ("SO₂") emission allowance inventory, explain the reason(s) for all purchases of allowances reported during these expense months.

Response 3 and 3a. EKPC purchased no SO₂ emission allowances during the period under review.

Request 3b. For nitrogen oxide emission allowance inventory, explain the reasons for all purchases of allowances reported during these expense months.

Response 3b. EKPC purchased no seasonal NO_x allowances during the period under review. Please see the chart on page 2 of this response for purchase of annual NO_x allowances.

NO_x (annual) Emission Allowances

Month	Quantity <u>Acquired</u>	Reason
Jul-10	0	
Aug-10	1,500	For 2010 compliance or for other anticipated future needs.
Sep-10	0	
Oct-10	0	
Nov-10	0	
Dec-10	0	

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

EKPC monitors the number of tons of SO₂ and NO_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 SO₂ and NO_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 SO₂ and NO_x allowances. Beginning in 2009, the Clean Air Interstate Rules ("CAIR") have requirements for seasonal as well as annual NO_x allowances. Final rules for the Clean Air Transport Rules ("CATR") are anticipated by the summer 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.

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EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2011-00032 ENVIRONMENTAL SURCHARGE APPENDIX B FIRST INFORMATION REQUEST RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 02/28/11 REQUEST 4

RESPONSIBLE PARTY: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

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 22 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. Please note that EKPC labor costs are directly charged to accounts/maintenance projects based on hours reported on time sheets. Benefits are accumulated in account 926, then allocated to accounts/maintenance projects based on labor dollars or labor hours.

East Kentucky Power Cooperative, Inc. Environmental Surcharge Operating and Expense Month over Month Analysis For the Expense Period July - December 2010

50144	Fuel Coal Gilbert	June		Jul		Aug		Sep		0ct		Nov		Dec
	Expense Dollars \$	\$ 68,570 \$	8	124,530 \$ 240,017	8	240,017	₩		બ્ર	227,773 \$	ક્ર	\$ 306,88		525,594
	Expense Dollars Change \$	\$ 68,570 \$	↔	55,960	₩,	115,487	↔	(240,017) \$ 227,773 \$ (138,868) \$	↔	227,773	\$	138,868)	↔	436,689
-	Percent Change			81.61%		81.61% 92.74%		-100.00%			•	-60.97%		491.19%

Monthly expense changes are due to increases or decreases in contractor payments for ash removal.

July - Payment for June \$124,530

August - Payment for July \$240,017

October - Payment for August \$133,545 and September \$94,227

November - Payment for October \$88,905

December - Payment for November \$153,295 and December \$372,299

501445	Fuel Coal Spurlock 4	June	Juc	Aug	Sep		Oct	Nov		Dec
	Expense Dollars	\$ 68,570 \$		124,530 \$ 240,017	sə	,	\$ 227,773	\$ 88,905	8	525,594
	Expense Dollars Change	\$ 68,570 \$		55,960 \$ 115,487 \$		(210,0	(240,017) \$ 227,773 \$	\$ (138,868)	63	436,689
	Percent Change		81.61%	92.74%	-	-100.00%		-60.97%	•	491.19%

Monthly expense changes are due to increases or decreases in contractor payments for ash removal.

July - Payment for June \$124,530

August - Payment for July \$240,017

October - Payment for August \$133,545 and September \$94,227

November - Payment for October \$88,905

December - Payment for November \$153,295 and December \$372,299

51241	Mtce of Boiler Plant Spurlock 1	June	Jul		Aug		Sep	Ō	Oct	Nov		Dec
	Expense Dollars	\$ 97,109	€9	\$ 659	115,380 \$		3,907	S	2,487	3,5	3,249 \$	3,039
	Expense Dollars Change		\$ (79,	(79,450)	97,721	æ	(111,473) \$	· •	(1,420)	6	762	(210)
	Percent Change		-81.	-81.82%	553.38%		-96.61%	•	36.35%	30.6	30.64%	-6.46%

Project 03501 - Decrease in contractor payments of \$71.1K, decrease in Materials of \$0.1K and decrease in EKPC payroll and benefits of \$6.7K July - Project 03330 - Decrease in contractor payments of \$1.1K, increase in Materials of \$0.3K and decrease in EKPC payroll and benefits of \$0.8K Labor and materials to vacuum ducts and expansion joints August - Project 03330 - Increase in contractor payments of \$44.6K, decrease in Materials of \$0.3K, and increase in EKPC payroll and benefits of \$3.7K Labor and Materials to supply oil to 2 ID Fans with forced lubrication

Project 03501 - Increase in contractor payments of \$49.3K, increase in EKPC payroll and benefits of \$0.3K Supervision, Labor and material to vacuum ducts and expansion joints

September - Project 03330 - Decrease in contractor payments of \$48.4K, decrease in EKPC payroll and benefits of \$3.9K

Project 03501 - Decrease in contractor payments of \$60.0K, increase in EKPC payroll and benefits of \$0.8K. Supervision, Labor and material to vacuum ducts and expansion joints

October - Project 03330 - Increase in EKPC payroll and benefits of \$0.8K

Project 03501 - Decrease in contractor payments of \$2.9K and increase in EKPC payroll and benefits of \$0.6K

Project 03501 - Increase in contractor payments of \$1.5K, increase in Materials of \$0.1K and decrease in EKPC payroll and benefits of \$1.4K November - Project 03330 - Increase in EKPC payroll and benefits of \$0.6K

51242	Mtce of Boiler Plant Spurlock 2	June		Jul		Aug		Sep		Oct		Nov		Dec
	Expense Dollars	\$ 4,568	ક્ક	25,057 \$	ક્ર	\$ 14,861 \$	မှ	22,462 \$	↔	\$ 1,442 \$	↔	18,631	es	23,352
	Expense Dollars Change		↔	20,489	₩	(10,196)	s	7,601	↔	7,601 \$ (21,020) \$	ь	17,189 \$	Θ	4,721
	Percent Change			448.53%		40.69%		51.15%		-93.58%		192.02%		25.34%

Project 03502 is for Spurlock 2 SCR maintenance.

July - Increase in contractor payments of \$13.4K, increase in Materials of \$8.0K and decrease in EKPC payroll and benefits of \$0.9K Labor and material to install NH3 100ppm sensor and 500ppm sensor and Sensalert 2 wire transmitter August - Decrease in contractor payments of \$2.1K, decrease in Materials of \$11.1K and increase in EKPC payroll and benefits of \$3.0K

September - Decrease in contractor payments of \$4.2K, increase in materials of \$11.0K and increase in EKPC payroll and benefits of \$0.8K

October - Decrease in contractor payments of \$4.4K, decrease in Materials of \$11.0K and decrease in EKPC payroll and benefits of \$5.6K

November - Increase in contractor payments of \$6.1K, increase in Materials of \$3.1K and increase in EKPC payroll and benefits of \$7.9K

December - Increase in contractor payments of \$15.4K, decrease in Materials of \$3.1K and decrease in EKPC payroll and benefits of \$7.6K Furnish and install scaffolding for Maintenance, Supervision, Labor and material.

51244	Maintenance of Boiler Plant Gilbert	June	Jul	Aug	Sep	Oct	Nov	Dec
	Expense Dollars	763,156	334,063	43,772	76,155	123,854	88,055	215,876
	Expense Dollars Change		(429,093)	(290,291)	32,383	47,699	(35,799)	127,821
	Percent Change		-56.23%	-86.90%	73.98%	62.63%		145.16%

Project 03206 is for Spuriock 3 Boiler Pollution Control equipment and Project 03350 is for Spuriock 3 Bag House, SNCR and FDA equipment.

July - Project 03206 - Decrease in contractor payments of \$611.3K, increase in Materials of \$4.1K and increase in EKPC payroll and benefits of \$3.2K upervision, Labor and material to repair waterwall and mills

Project 03350 - Increase in contractor payments of \$177.6K, decrease in Materials of \$0.1K and decrease in EKPC payroll and benefits of \$2.7K Supervision, Labor and material to repair airheater erosion and demobilize baghouse AR plates August - Project 03206 - Decrease in contractor payments of \$81.8K, increase in Materials of \$1.8K and decrease in EKPC payroll and benefits of \$7.7K Supervision, Labor and material to repair waterwall and mills

Project 03350 - Decrease in contractor payments of \$208.3K, increase in Materials of \$4.0K and increase in EKPC payroll and benefits of \$1.9K Supervision, Labor and material to repair airheater erosion and demobilize baghouse AR plates September - Project 03206 - Increase in contractor payments of \$5.9K, decrease in Materials of \$5.2K and increase in EKPC payroll and benefits of \$4.8K Project 03350 - Increase in contractor payments of \$7.4K, decrease in Materials of \$0.1K and increase in EKPC payroll and benefits of \$19.4K October - Project 03206 - Increase in contractor payments of \$24.7K, increase in Materials of \$31.2K and decrease in EKPC payroll and benefits of \$6.2K Labor, equipment and materials for refactory

Project 03350 - Increase in contractor payments of \$25.9K, decrease in Materials of \$3.0K and decrease in EKPC payroll and benefits of \$25.0K abor and rental of scaffolding, erecting and dismantling November - Project 03206 - Decrease in contractor payments of \$66.1K, decrease in Materials of \$36.7K and decrease in EKPC payroll and benefits of \$0.8K abor, equipment and materials for refacton.

Project 03350 - Increase in contractor payments of \$20.9K, increase in Materials of \$20.3K and increase in EKPC payroll and benefits of \$26.5K abor and rental of scaffolding, erecting and dismantling December - Project 03206 - Increase in contractor payments of \$28.8K, increase in Materials of \$46.8K and increase in EKPC payroll and benefits of \$8.6K Labor and materials to install reducer retro kit, RH and reducer shaft mount

Project 03350 - Increase in contractor payments of \$744.0K, decrease in Materials of \$679.8K and decrease in EKPC payroll and benefits of \$20.6K Purchase and deliver hot shot filter bags

abor to vacuum FDA mixers

 Maintenance of Boiler Plant Spurlock 4	June		Aug	Sep	Oct	Nov	Dec
Expense Dollars	47,250	83,842	101,794	161,676	622,389	343,334	52,248
Expense Dollars Change		36,592	17,952	59,882	493,713	(312,055)	(291,086)
Percent Change		77.44%	21.41%	58.83%	305.37%	-47.61%	-84.78%

Project 03206 is for Spurlock 4 Boiler Pollution Control equipment and Project 03350 is for Spurlock 4 Bag House, SNCR and FDA equipment.

July - Project 03206 - Increase in contractor payments of \$33.5K and decrease in EKPC payroll and benefits of \$8.3K

abor and Material to rebuild Limestone Mill Journal Assemblies

Project 03350 - Increase in contractor payments of \$31.6K, increase in Materials of \$0.4K and decrease in EKPC payroll and benefits of \$20.6K Labor and equipment to vacuum dust, debris and spilled material from ground floor area. August - Project 03206 - Increase in contractor payments of \$36.8K, decrease in Materials of \$4.3K and decrease in EKPC payroll and benefits of \$1.7K Labor and Materials to repair and replace B seal pot expansion joint

Project 03350 - Decrease in contractor payments of \$23.2K, increase in Materials of \$0.3K and increase in EKPC payroll and benefits of \$10.1K abor and equipment to vacuum dust, debris and spilled material from ground floor area. September - Project 03206 - Increase in contractor payments of \$27.6K, increase in Materials of \$25.2K and decrease in EKPC payroll and benefits of \$2.3K

Supervision, Labor and material to install Motor 30HP Labor and Material for SRD Reducer up to shaft size 2

Project 03350 - Increase in contractor payments of \$12.9K, decrease in Materials of \$0.6K and decrease in EKPC payroll and benefits of \$2.9K abor and equipment to vacuum dust, debris and spilled material from ground floor area. October - Project 03206 - Increase in contractor payments of \$387.3K, decrease in Materials of \$14.7K and increase in EKPC payroll and benefits of \$76.6K abor, equipment and material for refractory repairs

Project 03350 - Increase in contractor payments of \$25.8K, increase in Materials of \$0.1K and increase in EKPC payroll and benefits of \$18.7K abor, material and equipment to install Baghouse AR plate lining

November - Project 03206 - Decrease in contractor payments of \$188.7K, decrease in Materials of \$10.4K and decrease in EKPC payroll and benefits of \$77.9K.

Project 03350 - Decrease in contractor payments of \$18.3K, decrease in Materials of \$0.2K and decrease in EKPC payroll and benefits of \$16.6K abor, equipment and material for refractory repairs

abor, material and equipment to install Baghouse AR plate lining

December - Project 03206 - Decrease in contractor payments of \$293.4K, decrease in Materials of \$0.6K and increase in EKPC payroll and benefits of \$7.5K.

Project 03350 - Decrease in contractor payments of \$11.4K, increase in Materials of \$5.7K and increase in EKPC payroll and benefits of \$1.3K. Labor, equipment and material for refractory repairs

Labor and equipment to vacuum mixers and cable trays.

512431	Mtce of Boiler Plant Scrubber 1	June	Jul	Aug		Sep		oct Oct	Nov		Ω	Dec
	Expense Dollars	\$ 133,037 \$	\$ 95,132 \$	\$ 148,550 \$	\$	16,251 \$	ક્ક	35,352 \$		40,018 \$	l	77,741
	Expense Dollars Change		\$ (306'28) \$	\$ 53,418 9	8	(132,299)	ω	1 \$ 19,101 \$	\$ 4,666 \$	999	(1)	37,723
-	Percent Change		-28.49%		%	-89.06%		117.54%	13.	13.20%		94.27%

July - Decrease in contractor payments of \$36.5K, decrease in Materials of \$0.3K and decrease in EKPC payroll and benefits of \$1.1K

August - Increase in contractor payments of \$67.3K, decrease in Materials of \$19.6K and increase in EKPC payroll and benefits of \$5.7K

September - Decrease in contractor payments of \$152.1K, increase in Materials of \$15.2K and increase in EKPC payroll and benefits of \$4.6K

October - Increase in contractor payments of \$20.4K, increase in Materials of \$4.8K and decrease in EKPC payroll and benefits of \$6.1K

November - Increase in contractor payments of \$8.2K, decrease in Materials of \$2.8K and decrease in EKPC payroll and benefits of \$0.8K.

December - Increase in contractor payments of \$21.5K, increase in Materials of \$7.0 and increase in EKPC payroll and benefits of \$9.2K.

512432	Mtce of Boiler Plant Scrubber 2	June	Juf	Aug	Sep	Oct		Nov	۵	Dec
	Expense Dollars	\$ 78,570 \$		7,052	\$ 46,449 \$	3 13,675	375 \$	\$ 322,370	\$ 34	\$ 349,702
	Expense Dollars Change		\$ 166,274 \$	(237,792)	69	Θ	774) \$; (32,774) \$ 308,695 \$	\$	27,332
	Percent Change		211.63%	% -97.12%	558.66%		-70.56% 2	2257.37%		8.48%

July - Increase in contractor payments of \$158.4K, increase in Materials of \$3.2K and increase in EKPC payroll and benefits of \$4.7K

August - Decrease in contractor payments of \$126.5K, decrease in Materials of \$108.2K and decrease in EKPC payroll and benefits of \$3.1K

September - Decrease in contractor payments of \$66.8K, increase in Materials of \$103.1K and increase in EKPC payroll and benefits of \$3.1K

October - Decrease in contractor payments of \$15.7K, decrease in Materials of \$6.8K and decrease in EKPC payroll and benefits of \$10.3K

50621	Misc Stm Pwr Env - Dale	June	Jul	Aug		Sep	Oct		Nov		Dec
	Expense Dollars		ج	€9	69		\$	\$ -		\$	\$ 267,607
	Expense Dollars Change		· &		<i>€</i> 3	•	6 9	<i>⇔</i> -		↔	\$ 267,607
	Percent Change										
50631	Misc Stm Pwr Env - Cooper	June	Jul	Aug		Sep	Oct		Nov		Dec
	Expense Dollars		۰ ج	c-s	\$ -	,	↔	1	,	69	\$ 344,966
	Expense Dollars Change		· &	↔	<i>-</i>	•	У	\$		↔	\$ 344,966
	Percent Change										
50645	Misc Stm Pwr Env - Spurlock	June	Juc	Aug		Sep	Oct		Nov	+	Dec
	Expense Dollars		9	\$	\$	1	s	٠	,	€9	\$ 349,836
	Expense Dollars Change		· •Э	↔	<i>⊕</i> -	,	49	₩ 	1	₩	349,836
	Percent Change										

Air permit fees paid in December for Dale, Cooper and Spurlock for calendar 2010 emissions.

peraung E	Apellae- Allillound												
50641	Misc Stm Pwr Exp - Spurlock 1	June		Jul	Aug		Sep	0	Oct	_	Nov	Dec	
	Expense Dollars \$	\$ 115,701 \$	49	57,240	\$ 75,570	\$	\$ 509'55	69	969'1	€9	58,421 \$	\$ 111,374	374
	Expense Dollars Change		↔	(58,461)	\$ 18,330 \$	બ		4	3 42,091 \$ (<u>پ</u>	\$ (39,275) \$	\$ 52,953	953
	Percent Change			-50.53%	32.02%		-26.42%	7	75.70%	•	-40.20%	90.64%	34%

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

50642	Expense Dollars \$	June		Inc		Aug		Sep		ว		Nov		Dec
		\$ 91,300	\$ 00		ક્ક	54,060 \$ 67,674	es.	74,817 \$		80,182 \$ 37,040 \$ 115,174	G	37,040	မာ	115,174
	Expense Dollars Change		↔	37,240) \$	G	13,614 \$	မှာ	7,143 \$	69	5,365	69	5,365 \$ (43,142) \$ 78,134	↔	78,134
	Percent Change			-40.79%		25.18%		10.56%		7.17%		-53.81%		210.94%
Jperating t	Operating Expense- Ammonia and Limestone										Î			
50644	Misc Steam Power Expense- Gilbert	June		Jul		Aug		Sep		Oct		Nov		Dec
	Ammonia Expense \$	\$ 36,608	\$ 80	30,368	s	28,941	so	40,927 \$	↔	35,558 \$ 46,252	બ	46,252	क	0
	Limestone Expense \$	\$ 273,316	16 \$	3 293,264	69	\$ 319,883	69	252,340	છ	252,340 \$ 355,228 \$ 254,666 \$	8	54,666	↔	324,705
	Limestone Tons Used	26,705	0.2	28,222		30,925		24,432		34,401		24,616		31,255
	Total Expense Dollars \$	\$ 309,924	24 \$	323,632	ω	\$ 348,824	↔	293,267	ક્ક	293,267 \$ 390,786 \$ 300,918 \$	(·)	00,918		324,705
	Expense Dollars Change		↔	3 13,708 \$	69	25,192 \$	↔	(55,557)	Θ	97,519 \$	€	\$ (898'68)	↔	23,787
	Percent Change	*******		4.42%		7.78%		-15.93%		33.25%	·	-23.00%		7.90%

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.

September - Limestone expenses decreased by \$67.6K and Ammonia expenses increased by \$12.0K.

October - Limestone expenses increased by \$102.9K and Ammonia expenses decreased by \$5.3K.

November - Limestone expenses decreased by \$100.6K and Ammonia expenses increased by \$10.7K

December - Limestone expenses increased by \$70.0K and Ammonia expenses decreased by \$46.3K

erating Ex	erating Expense- Limestone and Magnesium						أ							
506431	Misc Stm Pwr Exp- Spurlock 1	June		Inc	-	Aug		Sep		Oct	_	Nov		Dec
	Magnesium Expense	\$ 6,003	မာ	29,118	க	11,897	sə	11,720 \$	ક્ક	11,296 \$	69	5,692	↔	5,880
	Limestone Expense	3	↔	93,442	₩	07,985	G	91,077	G	93,102	υ	78,268	↔	101,040
	Imestone Tons Used			9,049		10,452		8,714		8,791		7,448		9,873
	Expense Dollars \$	7	€	122.560 \$		119,882	s	102,797		104,398	G	83,960	છ	106,920
	Expense Dollars Change		69	14,872 \$		(2,678)	ь	(17,085)		1,601	69	(20,438)	ø	22,960
	Percent Change			13.81%		-2.19%		-14.25%		1.56%		-19.58%		27.35%

July - Limestone expenses decreased by \$8.3K and magnesium expenses increased by \$23.1K.

September - Limestone expenses decreased by \$16.9K and magnesium expenses decreased by \$0.2K.

November - Limestone expenses decreased by \$14.8K and magnesium expenses decreased by \$5.6K.

December - Limestone expenses increased by \$22.8K and magnesium expneses decreased by \$0.2K.

Operating E.	perating Expense-Limestone and Magnesium													
506432	Misc Stm Pwr Exp- Spurlock 2	June		Juc	⋖	Aug	S	Sep	J	Oct	ž	Nov	_	Dec
	Magnesium Expense \$	1	\$	5,860 \$	ج	23,548 \$	į	35,133 \$	es es	18,189	\$		↔	23,310
	Limestone Expense \$	\$ 119,369	8	181,387 \$ 149,121 \$	\$	19,121	τ	131,062	٠.	38,028 \$		61,496	G	172,041
	Limestone Tons Used			17,566	•	14,433		12,539		3,591		5,852		16,810
•	Expense Dollars \$	8	<i>\$</i>	187,247 \$	÷-	172,669 \$	•	166,195	ω	56,217 \$		61,496		195,351
	Expense Dollars Change		€9	55,974 \$ (14,578) \$	\$	14,578)		(6,474)	\$ (1((6,474) \$ (109,978) \$		5,279 \$	€	133,855
	Percent Change			42.64%		-7.79%		-3.75%	Ψ	-66.17%		9.39%	.,	217.66%

July - Limestone expenses increased by \$62.0K and magnesium expenses decreased by \$6.0K.

October - Limestone expenses decreased by \$93.1K and magnesium expenses decreased by \$16.9K.

November - Limestone expenses increased by \$23.5K and magnesium expenses decreased by \$18.2K

December - Limestone expenses increased by \$110.5K and magnesium expenses increased by \$23.3K.

	Dec	\$ 53,783	\$ 323,649	31,153	\$ 377,432	\$ (35,856)	-8.68%
-		80	0	2	00	2	%
	Nov	56,64	356,64	34,46	413,28	153,49	29.08%
ļ		\$	4		↔	€3	
	Oct	23,763 \$ 56,648 \$	236,030 \$ 356,640 \$	22,860	259,793	(208,308) \$ 111,912 \$ 153,495 \$	75.68%
ļ		\$	₩.		€>	€	
	Sep	42,321 \$	105,560 \$	10,221	147,881	(208,308)	-58.48%
		ωş	↔		69	↔	
	Aug	36,132 \$	267,876 \$ 320,057	30,942	304,721 \$ 356,189 \$	51,468	16.89%
		ક્ક	બ્ર		↔	↔	
	Inc	36,845 \$		25,781	304,721	16,131 \$	5.59%
		ક્ક	G		↔	↔	
	June	\$ 42,756 \$	245,834	23,607	288,590		
		4	↔		69		
Jelating Lypense- Allinolina and Emissione	Misc Stm Pwr Exp- Spurlock 4	Ammonia Expense	Limestone Expense \$	Limestone Tons Used	Expense Dollars \$	Expense Dollars Change	Percent Change
Operating L	506445						

August - Limestone expenses increased by \$52.2K and ammonia expenses decreased by \$0.7K.

September - Limestone expenses decreased by \$214.5K and ammonia expenses increased by \$6.2K.

October - Limestone expenses increased by \$130.4K and ammonia expenses decreased by \$18.6K.

November - Limestone expenses increased by \$120.6K and ammonia expenses increased by \$32.9K

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2011-00032 ENVIRONMENTAL SURCHARGE APPENDIX B FIRST INFORMATION REQUEST RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 02/28/11 REQUEST 5

RESPONSIBLE 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 October 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. 2011-00032 ENVIRONMENTAL SURCHARGE APPENDIX B FIRST INFORMATION REQUEST RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 02/28/11 REQUEST 6

RESPONSIBLE PARTY: Frank J. Oliva

COMPANY: East Kentucky Power Cooperative, Inc.

Request 6. The Settlement Agreement in Case No. 2004-00321 provides that 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 October 31, 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 through 5 of this response for debt information associated with compliance plan projects approved in Case Nos. 2004-00321, 2008-00115 and 2010-00083. As stated in testimony in this proceeding, EKPC proposes to increase its TIER level to 1.50 as approved by the Commission in Case No. 2010-00167.

Weighted Average Cost of Debt

Weights Return	(4)=(2)*(3) $(5)=(4)*1.50$	0.471%	0.153%	0.511%	0.254%	0.619%	1.059%	1.446%	0.011%	4.524% 6.786%	Composite	Rate	Fotal (4) / Total (2)	(5)												4.92%
Cost We	(3) $(4)=($	4.71% 0	4.92% 0	4.92% 0	4.92% 0	4.50% 0	4.33%	4.40%	4.40% 0	4	Com	Yearly R	Interest Fotal (4)	(4)	980,743	1,066,585	1,089,318	1,132,137	1,146,169	1,125,853	1,112,813	1,237,863	288,409	448,224	172,866	9,800,979
															€9	↔	↔	↔	8	↔	↔	€9	S	↔	89	69
10/31/2010	(2)	59,160,200	18,430,586	61,470,886	30,579,674	81,464,182	144,560,598	194,507,437	1,474,107	591,647,670		Interest	Rate	(3)	4.460%	4.819%	4.950%	5.091%	5.149%	2.065%	5.011%	5.149%	4.890%	4.338%	4.306%	
		69	↔	69	↔	↔	69	₩.	↔	8																
Source	(1)	Z-8	Y-8	Y-8	Y-8	AD-8	AG-8	AG-8	AH-8		Current	Liability	10/31/2010	(2)	\$21,989,745	22,132,915	22,006,421	22,238,006	22,260,040	22,228,087	22,207,399	24,040,843	5,897,925	10,332,503	4,014,547	\$ 199.348.431
	Compliance Project	Gilbert (Environmental Portion)	Spurlock 1 - Precipitator	Spurlock 1 - SCR	Spurlock 2 - SCR	Spurlock #4 (Environmental Portion)	Spurlock #1 Scrubber	Spurlock #2 Scrubber	Dale 1&2 - Low Nox Burners		Y-8 30-year		Note Number	(1)	HO720	HO725	HO730	HO750	HO755	09LOH	HO765	HO770	HO885	096ОН	HO1005	•
			2.	3.	4.	5.	6.	7.	∞.																	

PSC Request 6
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Composite Rate	Fotal (4) / Total (2)	(5)					•												4.71%	Composite	Rate	Fotal (4) / Total (2)	(5)									
Yearly	Interest	(4)	2,208,156	2,248,219	2,308,164	1,082,839	1,043,162	1,094,443	1,002,616	760,496	1,243,232	1,243,822	1,332,309	756,847	503,366	1,043,007	1,062,458	133,552	19,066,688		Yearly	Interest	(4)	2,359,245	1,158,420	2,283,428	1,070,720	2,272,958	2,251,524	343,586	850,802	853,390
			↔	↔	↔	69	↔	↔	€9	ℹ	↔	↔	↔	∽	↔	↔	€9	↔	89					↔	649	↔	6∕3	6∕9	6∕3	€9	₩	↔
Interest	Rate	(3)	4.744%	4.825%	4.946%	4.658%	4.497%	4.705%	4.332%	4.324%	4.468%	4.470%	4.769%	5.345%	5.333%	4.776%	4.812%	3.801%			Interest	Rate	(3)	4.821%	4.736%	4.669%	4.384%	4.648%	4.605%	4.396%	4.355%	4.368%
Current Liability	10/31/2010	(2)	\$ 46,546,290	46,595,216	46,667,278	23,246,869	23,196,835	23,261,268	23,144,410	17,587,797	27,825,247	27,826,003	27,936,870	14,159,900	9,438,707	21,838,495	22,079,350	3,513,612	\$ 404,864,146	Current	Liability	10/31/2010	(2)	\$ 48,936,841	24,459,882	48,906,150	24,423,358	48,901,855	48,893,019	7,815,883	19,536,211	19,537,322
Z-8 30-year	Note Number	(1)	HO810	HO815	HO820	HO825	HO830	HO835	HO840	HO845	HO855	098ОН	HO870	0680Н	HO895	HO915	HO920	HO1025		AD-8 30-year		Note Number	(1)	HO925	HO930	HO935	HO940	HO945	HO955	HO965	HO975	086ОН

								4.50%		Composite	Rate	Fotal (4) / Total (2)	(5)												4.40%
1,106,327	1,162,909	331,585	1,061,512	1,075,947	204,208	887,332	608,381	21,012,522			Yearly	Interest [(4)	1,389,864	1,089,176	1,093,423	1,146,894	1,835,030	1,145,644	481,944	68,266	238,382	483,348	35,617	9,007,589
69 €	/ 9 // 9	9 69	↔	↔	↔	€9	↔	↔						€>	€	↔	₩	↔	€	↔	₩	↔	↔	∽	€
4.527%	4.754%	4.298%	4.347%	4.405%	2.846%	3.651%	4.252%				Interest	Rate	(3)	3.988%	4.374%	4.391%	4.605%	4.605%	4.600%	4.262%	4.175%	3.990%	4.508%	3.922%	
24,438,424	24,461,699 24,448,362	7,714,869.79	24,419,408	24,425,590	7,175,253	24,303,807	14,308,104	\$ 467,106,037		Current	Liability	10/31/2010	(2)	34,851,150	24,901,133	24,901,453	24,905,404	39,848,647	24,905,313	11,307,936	1,635,118	5,974,492	10,722,008	908,136	\$ 204,860,792
H0985	HO990 HO995	HO1000	HO1010	HO1015	HO1020	HO1030	HO1065	83	AG-8 30-year	Spurlock #2 Scrubber		Note Number	(1)	FO1035	FO1040	FO1045	FO1050	FO1055	FO1060	FO1070 (Split btween Spur.1 & Spur.2)	FO1115 (Split btween Spur.1 & Spur.2)	FO1130	FO1170 (Split btween Spur.1 & Spur.2)	FO1190	57

AG-8 30-year						
Spurlock #1 Scrubber	Current				Composite	
	Liability	Interest		Yearly	Rate	
Note Number	10/31/2010	Rate		Interest	Fotal (4) / Total (2)	
(1)	(2)	(3)		(4)	(5)	
FO1070 (Split btween Spur.1 & Spur.2)	13,590,577	4.262%	89	579,230		
FO1075	24,895,883	4.100%	€9	1,020,731		
FO1085	24,902,814	4.464%	8	1,111,662		
FO1100	24,904,748	4.569%	∽	1,137,898		
FO1095	24,901,434	4.390%	↔	1,093,173		
FO1105	7,229,743	4.142%	643	299,456		
FO1110	587,307	4.194%	↔	24,632		
FO1115 (Split btween Spur.1 & Spur.2)	18,282,754	4.175%	\$	763,305		
FO1170 (Split btween Spur.1 & Spur.2)	3,678,491	4.508%	6/3	165,826		
I	\$ 142,973,751		89	6,195,913	4.33%	
AH-8 30 year						
	Current				Composite	

	Composite	Rate	Fotal (4) / Total (2)	(5)	4.40%
		Yearly	Interest	(4)	88,121
				(3)	\o
	Current	Liability	10/31/2010	(2)	2,004,580.00
AH-8 30 year			Note Number	(1)	H1090