

# Goss • Samford PLLC



October 19, 2012

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PUBLIC SERVICE  
COMMISSION

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

Re: PSC Case No. 2012-00149

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten redacted copies of updates to responses to Requests 1-26b, 1-28, 1-35a, and 1-45a of East Kentucky Power Cooperative, Inc. ("EKPC") to Sonia McElroy and Sierra Club's Initial Requests for Information, originally filed with the Commission on July 17, 2012, and EKPC's Petition for Confidential Treatment of Information. One copy of the designated confidential portions of the responses is enclosed in a sealed envelope.

Very truly yours,

Mark David Goss

CC: Parties of Record

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>2012 INTEGRATED RESOURCE PLAN</b>	)	
<b>OF EAST KENTUCKY POWER</b>	)	<b>CASE NO. 2012-00149</b>
<b>COOPERATIVE, INC.</b>	)	

**PETITION FOR CONFIDENTIAL  
TREATMENT OF INFORMATION**

Comes now the petitioner, East Kentucky Power Cooperative, Inc. (“EKPC”) and, as grounds for this Petition for Confidential Treatment of Information (the “Petition”), states as follows:

1. This Petition is filed in conjunction with the filing of responses to Requests 1-26b, 1-28, 1-35a, and 1-45a of the Sierra Club in this case, and relates to confidential information contained in that filing that is entitled to protection pursuant to 807 KAR 5:001 Section 7 and KRS §61.878 (1)(c) 1, and related sections.

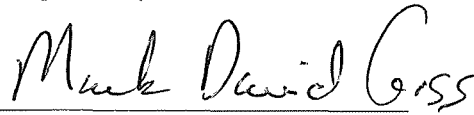
2. The information designated as confidential in the IRP includes projected fuel costs, projected capital costs of potential generation facilities, and projected operations and maintenance costs. Disclosure of this information to utilities, independent power producers and power marketers that compete with EKPC for sales in the bulk power market, would allow such competitors to determine EKPC’s power production costs for specific periods of time under various operating conditions and to use such information to potentially underbid EKPC in transactions for the sale of surplus bulk power, which would provide an unfair commercial advantage to competitors of EKPC.

3. Disclosure of confidential information contained in the response to Request 28 relating to the estimated costs of future generation projects to potential bidders in future EKPC requests for proposals for generating capacity, or disclosure of confidential projections of fuel costs to potential fuel suppliers, could facilitate manipulation of bids, resulting in less competitive proposals and potentially higher future generation costs for EKPC. Such a situation would create an unfair commercial advantage to competitors of EKPC for the reasons stated and could artificially increase power costs to EKPC's member systems.

4. Along with this Petition, EKPC has enclosed one copy of confidential sections these responses, with the confidential information identified by highlighting or other designation, and 10 copies with the confidential information redacted. The identified confidential information is not known outside of EKPC and is distributed within EKPC only to persons with a need to use it for business purposes. It is entitled to confidential treatment pursuant to 807 KAR 5:001 Section 7 and KRS §61.878(1)(c) 1, for the reasons stated hereinabove, as information which would permit an unfair commercial advantage to competitors of EKPC if disclosed. The subject information is also entitled to protection pursuant to KRS §61.878(1)(c) 2 c, as records generally recognized as confidential or proprietary which are confidentially disclosed to an agency in conjunction with the regulation of a commercial enterprise.

WHEREFORE, EKPC respectfully requests the Public Service Commission to grant confidential treatment to the identified information and deny public disclosure of said information.

Respectfully submitted,



Mark David Goss  
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Suite B130  
Lexington, KY 40504  
*Counsel for East Kentucky Power Cooperative, Inc.*

**CERTIFICATE OF SERVICE**

This is to certify that an original and 10 copies of the foregoing Petition for Confidential Treatment of Information in the above-styled case were hand delivered to the office of the Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601 this 19th day of October, 2012. Further, this is to certify that copies of the foregoing Petition for Confidential Treatment of Information in the above-styled case were transmitted by first-class U.S. mail to: Hon. Michael L. Kurtz, Boehm, Kurtz and Lowry, 36 East Seventh Street, Suite 1510, Cincinnati, Ohio 45202; Joe Childers, Joe F. Childers & Associates, 300 Lexington Building, 201 West Short Street, Lexington, Kentucky 40507 and Ms. Kristin Henry Sierra Club, 85 Second Street, 2<sup>nd</sup> Floor, San Francisco, CA 94105 pursuant to 807 KAR 5:001, Section 7(2)(c).



Counsel for East Kentucky Power Cooperative, Inc.

EAST KENTUCKY POWER COOPERATIVE, INC.  
PSC CASE NO. 2012-00149  
FIRST REQUEST FOR INFORMATION RESPONSE

MOVANTS' INITIAL REQUESTS FOR INFORMATION DATED 06/08/12

REQUEST 26

RESPONSIBLE PERSON: Gary G. Stansberry

COMPANY: East Kentucky Power Cooperative, Inc.

**Request 26b.** For each of the Cooper, Dale, or Spurlock coal-fired generating units: Identify the current undepreciated book value, and the expected undepreciated book value in each year of 2013 through 2026.

**Response 26b.** The book value for each of the generating stations as of December 31, 2011 were provided in the August 10, 2012 filing with the Commission. The table below provides book values for 2013 – 2026.

Book Value			
Year Ending Dec. 31,...	Dale	Cooper	Spurlock
2013	[REDACTED]	[REDACTED]	[REDACTED]
2014	[REDACTED]	[REDACTED]	[REDACTED]
2015	[REDACTED]	[REDACTED]	[REDACTED]
2016	[REDACTED]	[REDACTED]	[REDACTED]
2017	[REDACTED]	[REDACTED]	[REDACTED]
2018	[REDACTED]	[REDACTED]	[REDACTED]
2019	[REDACTED]	[REDACTED]	[REDACTED]
2020	[REDACTED]	[REDACTED]	[REDACTED]
2021	[REDACTED]	[REDACTED]	[REDACTED]
2022	[REDACTED]	[REDACTED]	[REDACTED]
2023	[REDACTED]	[REDACTED]	[REDACTED]
2024	[REDACTED]	[REDACTED]	[REDACTED]
2025	[REDACTED]	[REDACTED]	[REDACTED]
2026	[REDACTED]	[REDACTED]	[REDACTED]

**EAST KENTUCKY POWER COOPERATIVE, INC.  
PSC CASE NO. 2012-00149  
FIRST REQUEST FOR INFORMATION RESPONSE**

**MOVANTS' INITIAL REQUESTS FOR INFORMATION DATED 06/08/12**

**REQUEST 28**

**RESPONSIBLE PERSON:** Gary G. Stansberry

**COMPANY:** East Kentucky Power Cooperative, Inc.

**Request 28.** Refer to p. 187 and Table 9-1 of the IRP. For each of the Cooper, Dale, or Spurlock coal-fired generating units, identify the following values used in the calculation of present value revenue requirements identified therein

**Request 28a.** The annual environmental capital expenditures for each year from 2012 through 2026.

**Response 28a.** EKPC declines to respond as this information is subject to attorney-client privilege and is attorney work product.

**Request 28b.** The annual non-environmental capital expenditures for each year from 2012 through 2026.

**Response 28b.** Please see the table below.

Non-Environmental Capital Expenditures			
Year	Dale	Cooper	Spurlock
2012	[REDACTED]	[REDACTED]	[REDACTED]
2013	[REDACTED]	[REDACTED]	[REDACTED]
2014	[REDACTED]	[REDACTED]	[REDACTED]
2015	[REDACTED]	[REDACTED]	[REDACTED]
2016	[REDACTED]	[REDACTED]	[REDACTED]
2017	[REDACTED]	[REDACTED]	[REDACTED]
2018	[REDACTED]	[REDACTED]	[REDACTED]
2019	[REDACTED]	[REDACTED]	[REDACTED]
2020	[REDACTED]	[REDACTED]	[REDACTED]
2021	[REDACTED]	[REDACTED]	[REDACTED]
2022	[REDACTED]	[REDACTED]	[REDACTED]
2023	[REDACTED]	[REDACTED]	[REDACTED]
2024	[REDACTED]	[REDACTED]	[REDACTED]
2025	[REDACTED]	[REDACTED]	[REDACTED]
2026	[REDACTED]	[REDACTED]	[REDACTED]

Request 28c. The annual fixed O&M costs for each year from 2012 through 2026.

Response 28c. Please see the table below.

Annual Fixed O&M Costs			
Year	Dale	Cooper	Spurlock
2012	[REDACTED]	[REDACTED]	[REDACTED]
2013	[REDACTED]	[REDACTED]	[REDACTED]
2014	[REDACTED]	[REDACTED]	[REDACTED]
2015	[REDACTED]	[REDACTED]	[REDACTED]
2016	[REDACTED]	[REDACTED]	[REDACTED]
2017	[REDACTED]	[REDACTED]	[REDACTED]
2018	[REDACTED]	[REDACTED]	[REDACTED]
2019	[REDACTED]	[REDACTED]	[REDACTED]
2020	[REDACTED]	[REDACTED]	[REDACTED]
2021	[REDACTED]	[REDACTED]	[REDACTED]
2022	[REDACTED]	[REDACTED]	[REDACTED]
2023	[REDACTED]	[REDACTED]	[REDACTED]
2024	[REDACTED]	[REDACTED]	[REDACTED]
2025	[REDACTED]	[REDACTED]	[REDACTED]
2026	[REDACTED]	[REDACTED]	[REDACTED]



Request 28d. The annual variable O&M costs for each year from 2012 through 2026.

Response 28d. Please see the table below.

Annual Variable O&M Costs			
Year	Dale	Cooper	Spurlock
2012	[REDACTED]	[REDACTED]	[REDACTED]
2013	[REDACTED]	[REDACTED]	[REDACTED]
2014	[REDACTED]	[REDACTED]	[REDACTED]
2015	[REDACTED]	[REDACTED]	[REDACTED]
2016	[REDACTED]	[REDACTED]	[REDACTED]
2017	[REDACTED]	[REDACTED]	[REDACTED]
2018	[REDACTED]	[REDACTED]	[REDACTED]
2019	[REDACTED]	[REDACTED]	[REDACTED]
2020	[REDACTED]	[REDACTED]	[REDACTED]
2021	[REDACTED]	[REDACTED]	[REDACTED]
2022	[REDACTED]	[REDACTED]	[REDACTED]
2023	[REDACTED]	[REDACTED]	[REDACTED]
2024	[REDACTED]	[REDACTED]	[REDACTED]
2025	[REDACTED]	[REDACTED]	[REDACTED]
2026	[REDACTED]	[REDACTED]	[REDACTED]

**Request 28e.** The annual fuel costs for each year from 2012 through 2026.

**Response 28e.** Please see the table below.

Annual Fuel Costs			
Year	Dale	Cooper	Spurlock
2012	[REDACTED]	[REDACTED]	[REDACTED]
2013	[REDACTED]	[REDACTED]	[REDACTED]
2014	[REDACTED]	[REDACTED]	[REDACTED]
2015	[REDACTED]	[REDACTED]	[REDACTED]
2016	[REDACTED]	[REDACTED]	[REDACTED]
2017	[REDACTED]	[REDACTED]	[REDACTED]
2018	[REDACTED]	[REDACTED]	[REDACTED]
2019	[REDACTED]	[REDACTED]	[REDACTED]
2020	[REDACTED]	[REDACTED]	[REDACTED]
2021	[REDACTED]	[REDACTED]	[REDACTED]
2022	[REDACTED]	[REDACTED]	[REDACTED]
2023	[REDACTED]	[REDACTED]	[REDACTED]
2024	[REDACTED]	[REDACTED]	[REDACTED]
2025	[REDACTED]	[REDACTED]	[REDACTED]
2026	[REDACTED]	[REDACTED]	[REDACTED]

EAST KENTUCKY POWER COOPERATIVE, INC.  
PSC CASE NO. 2012-00149  
FIRST REQUEST FOR INFORMATION RESPONSE

MOVANTS' INITIAL REQUESTS FOR INFORMATION DATED 06/08/12

REQUEST 35

RESPONSIBLE PERSON: Scott Drake

COMPANY: East Kentucky Power Cooperative, Inc.

**Request 35.** Refer to pp. 31-32 of the 2010 Load Forecast. With regards to the direct load control program referenced therein:

**Request 35a.** Identify the annual budget for that program.

**Response 35a.** EKPC's budget cycle is a two-year cycle. The direct load control program budget for 2013 and 2014 is \$████████ and \$████████, respectively.

EAST KENTUCKY POWER COOPERATIVE, INC.  
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FIRST REQUEST FOR INFORMATION RESPONSE

MOVANTS' INITIAL REQUESTS FOR INFORMATION DATED 06/08/12

REQUEST 45

RESPONSIBLE PERSON: Scott Drake

COMPANY: East Kentucky Power Cooperative, Inc.

Request 45. For each DSM program currently offered by EKPC, identify the:

Request 45a. Past and projected future annual budget,

Response 45a. EKPC's budget cycle is a two-year cycle. The total energy efficiency program budget for 2013 and 2014 is \$ [REDACTED] and \$ [REDACTED], respectively.