COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION OF) THE FUEL ADJUSTMENT CLAUSE OF EAST) KENTUCKY POWER COOPERATIVE, INC. FROM) CASE NO. 2004-00464 NOVEMBER 1, 2002 TO OCTOBER 31, 2004)

<u>COMMISSION STAFF'S INTERROGATORIES AND</u> <u>REQUESTS FOR PRODUCTION OF DOCUMENTS TO</u> EAST KENTUCKY POWER COOPERATIVE, INC.

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that East Kentucky Power Cooperative, Inc. ("East Kentucky") file the original and 5 copies of the following information with the Commission, with a copy to all parties of record. The information requested herein is due on or before February 25, 2005. Each copy of the information requested shall be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention shall be given to copied material to ensure its legibility. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Refer to ordering paragraph 5 of the Commission's December 13, 2004 Order. File a motion requesting acceptance of the late-filed written testimony of witnesses whom East Kentucky intends to call at the scheduled hearing, accompanied by the written testimony.

2. Refer to Item 14, page 8, of East Kentucky's response to the Commission's December 13, 2004 Order. Forced outages totaling over 2,190 hours occurred at Spurlock unit 1 during the period July 2004 through September 2004. Describe in detail the nature of the problem, which is identified as control failure, that caused the outages. Explain whether such control failure normally causes outages of this length or whether this event would be considered extraordinary.

3. Refer to Item 15 of East Kentucky's response to the Commission's December 13, 2004 Order. Four of the fuel contracts listed have expired, or will expire by June 2005. Explain whether East Kentucky has replaced the coal deliveries discontinued by the expiring contracts with new or extended contracts.

4. East Kentucky's appendix to its monthly fuel adjustment clause backup report includes a comparison of the number of days' coal supply at its three generating stations. Throughout 2004, the Dale generating station's number of days' supply was typically much lower than the supplies at the Cooper and Spurlock stations. Explain why the number of days' supply for the Dale station coal inventory was maintained at much lower levels than the Cooper and Spurlock inventories in 2004.

5. Refer to Item 20 of the response to the Commission's December 13, 2004 Order, which shows East Kentucky's system-wide coal inventory stated in number of days' burn.

a. Provide the coal inventory level at each of East Kentucky's generating stations, stated in tons and in number of days' supply, for the most recent

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date available. Show the derivation of the tons per day burn rate used in determining the number of days' supply.

b. Provide the date(s) on which East Kentucky conducted the most recent physical inventory of coal for its Dale, Cooper and Spurlock generating stations.
Explain any adjustments made to the coal inventory at each generating station as a result of the physical inventory.

Beth O'Donnell Executive Director Public Service Commission P. O. Box 615 Frankfort, KY 40602

DATED: _<u>February 10, 2005</u>____

cc: Parties of Record