

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY POWER)	
COOPERATIVE, INC. FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY FOR)	CASE NO.
THE CONSTRUCTION OF A FLUE GAS)	2006-00132
DESULFURIZATION SYSTEM ON SPURLOCK)	
POWER STATION UNIT 1)	

FIRST DATA REQUEST OF COMMISSION STAFF
TO EAST KENTUCKY POWER COOPERATIVE, INC.

Pursuant to 807 KAR 5:001, Commission Staff requests that East Kentucky Power Cooperative, Inc. ("EKPC") file the original and 7 copies of the following information with the Commission no later than 10 days from the date of this request, with a copy to all parties of record. Each copy of the information requested should 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 should 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 Exhibit 1, page 2 of 3 of the March 28, 2006 Application, the second “Whereas” from the top of the page. Provide any and all workpapers associated with the expected average allowance cost for the 30-year period of over \$700.

2. Refer to Exhibit 5, page 3 of 5 of the March 28, 2006 Application. In answering Question No. 9 at the top of the page, there is an explanation of what factors went into the economic evaluation of the viability of the Spurlock Unit No. 1 scrubber. Provide any supporting documentation associated with the projected costs mentioned in the response.

3. Refer to Exhibit 5, page 3 of 5 of the March 28, 2006 Application. Provide the documentation associated with the production of the base fuel forecast performed by Energy Ventures Analysis (“EVA”).

4. Refer to Exhibit 7, page 3 of 9 of the March 28, 2006 Application. Provide documentation associated with EVA’s average allowance cost estimate as stated within response A9.

5. Refer to Exhibit 7. On page 4, Jeff Brandt states, “The 30-year net present value savings due to the use of Powder River Basin coal was \$205 million, virtually the same as the \$206 million savings for the high sulfur coal scrubbed option.”

- a. To what is each option being compared?
- b. Explain in detail how the \$205 million and \$206 million were derived. Provide all supporting calculations.

6. Refer to the Table titled, "Brandt Prepared Testimony Exhibit 1." Provide an explanation of why sulfur dioxide emission allowance costs drop sharply between 2018 and 2035.



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

DATED May 5, 2006

cc: All Parties