COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

2009 INTEGRATED RESOURCE PLAN OF EAST KENTUCKY POWER COOPERATIVE, INC.

CASE NO. 2009-00106

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

East Kentucky Power Cooperative, Inc. ("EKPC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before September 4, 2009. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

EKPC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which EKPC fails or refuses to furnish all or part of the requested information, it shall provide a

written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

- Refer EKPC's Response to item 1 of the Commission Staff's Second Data
 Request ("Staff's Second Request").
- a. For the January 2008 and January 2009 peaks, provide the date, time, and the reported temperature at which each peak occurred.
- b. For the January 2009 peak, identify the supply-side resources relied upon by EKPC to meet the peak of 3,152 MW. Identify specific units and purchases, including the MW provided.
 - c. Provide the amount of EKPC's summer peak to date for 2009.
- 2. Refer to page 5-11 of the IRP, the "Normal Weather Inputs" in the Load Forecast Technical Appendix, and the response to item 3 of Staff's Second Request.
- a. Page 5-11 of the IRP indicates that seven different weather stations are used in determining normal weather for EKPC's system; however, only six cities, Jackson, Louisville, Covington, Bowling Green, Huntington, and Lexington, are included in the "Normal Weather Inputs" spreadsheet. Explain the discrepancy.
- b. The "Normal Weather Inputs" spreadsheet, in addition to data for each of the six cities, includes data for "Lexington Mild" and "Lexington Extreme."

Explain what these represent and how this data is used in the determination of normal weather for EKPC's system.

- 3. Refer to EKPC's Response to item 4 of Staff's Second Request and Table 5.(4)-1 on page 5-16 of the IRP.
- a. Identify the selling party and the specific MW levels of each seasonal power purchase contract needed to serve load prior to Spurlock 4 becoming operational.
- b. Spurlock 4 is rated at 278 MW and became operational on April 1,2009. In what year in the table is the addition of the unit reflected?
- 4. Refer to EKPC's Response to item 6 of Staff's Second Request. The average monthly price for natural gas purchases is provided for January 2008 through June 2009. Given the decline in natural gas prices in 2009, explain why May's average price was \$15.70 when April's and June's average prices were \$4.15 and \$6.98, respectively.
- 5. Refer to EKPC's Response to item 7 of Staff's Second Request. Provide the report identified in the footnote.
- 6. Refer to EKPC's Response to item 9 of Staff's Second Request and page 7-17 of the IRP.
- a. The response refers to the residential class sample design using ratio-estimation which provides "at least +-10% precision with 90% confidence (90/10) regardless of season" and the medium commercial class sample design being "created to provide 5% relative accuracy with 95% confidence." Explain whether some

percentage of "relative accuracy" has the same meaning as "at least +- 'some percentage' precision."

- b. 178 is the number of residential load profile meters installed on the EKPC system. The residential class is the only class for which the response indicates less than 95 percent confidence. What number of load profile meters would need to be installed on the system to provide 95 percent confidence with "at least +- 10%" precision?
- c. Explain why the response does not provide either an accuracy level-of-confidence percentage for the small commercial class. If such data for the small commercial class exists, provide the data.
- d. The response indicates there are 315 large power customers on the EKPC system and that they "are census metered to the best of our ability." Explain, specifically, what is meant by census metered and why there are only 295 meters when there are 315 customers.
- 7. Refer to EKPC's Response to item 12 of Staff's Second Request. Provide the date EKPC became a member of the Cooperative Research Network and the amount of dues paid for all years prior to 2008, if applicable.
- 8. Refer to EKPC's Response to item 13 of Staff's Second Request and page 8-5 of the IRP.
- a. Provide the beginning and ending dates of the Southeast Electric Reliability Corporation's ("SERC") recent audit of EKPC's compliance with the reliability standards of the North American Reliability Corporation ("NERC").

- b. The response indicates that EKPC has not received SERC's final audit report on its compliance with NERC's reliability standards. Explain how EKPC is aware of SERC's findings regarding its compliance.
 - c. When is the final report expected to be issued?
- 9. Refer to EKPC's Responses to items 18 and 19 of Staff's Second Request. Provide a detailed description of the demand-side management ("DSM") experience of John F. Farley.
- 10. Refer to EKPC's Response to item 20 of Staff's Second Request, which indicates that the participant levels and load impacts of existing DSM programs are fixed for the forecast period because "the impacts of these programs are embedded in the load forecast." 807 KAR 5:058, Section 7(3), states that "[f]orecasts shall not include load impacts of additional, future demand-side programs. . . ." It also states that "[f]orecasts shall include the utility's estimates of existing and continuing demand-side programs. . . ."
- a. Explain whether EKPC's Response means that EKPC's estimates of its existing and continuing DSM programs include no growth (or decline) in participation levels and load impacts beyond 2009.
- b. If the response to part a. of this request is affirmative, given that the number of participants and load impacts of its existing DSM programs have tended to change from year to year, explain in detail why it is reasonable to not reflect similar changes in the estimates that the regulation requires be included in the load forecast.

- 11. Refer to EKPC's Response to item 13 of the First Request of the Sierra Club, Kentucky Environmental Foundation, and Kentuckians for the Commonwealth (the "Environmental Groups"). Provide an update of the response which shows energy sales and peak demand for July 2009 and, as they become available, monthly updates for the subsequent months in 2009.
- 12. Refer to EKPC's Response to item 46 of the First Request of the Environmental Groups. Provide the anticipated completion date of the fuel study that EKPC commissioned Liberty Green Renewables to conduct.

Jeff Derouen
Executive Director

Public Service Commission

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DATED _AUG 2 1 2009

cc: All Parties

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