

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION 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 August 20, 2012. 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 the 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.

1. Refer to the first paragraph on page 6 of EKPC's Integrated Resource Plan ("IRP") and page 8 in Volume 1 of the Technical Appendix ("TA").

a. Describe EKPC's current evaluation, measurement, and verification procedures and what it believes is lacking in those procedures.

b. The footnote on page 8 of TA-Volume 1, states that "Historical energy impacts for DSM and interruptible loads are not directly metered and therefore are estimated." Explain how the DSM impacts are currently estimated.

2. Refer to the last sentence on page 3 of TA-Volume 2, which states that the new DSM programs will require an investment of just over \$256 million by EKPC, its member cooperatives, and participating customers in order to produce the projected savings. Explain how the \$256 million investment was determined.

3. Refer to pages 2-3 of Exhibit DSM-4 of TA-Volume 2. The participant cost sections of the programs listed on these pages include state and federal tax credits. Explain whether these are the only programs for which state or federal tax credits are available to the participant. If not, explain why other programs that qualify for state or federal tax credits did not have the credits included as part of the participant cost.

4. Refer to the Response to Commission Staff's First Request for Information ("Staff's First Request"), Item 3, and pages 113-119 of the IRP.

a. Assuming its request to join PJM Interconnection (“PJM”) is approved by the Commission, describe any impacts this is expected to have on EKPC’s DSM programs.

b. Assuming its request to join PJM is approved by the Commission, what impact will being a transmission owner have on EKPC’s 15-year transmission plan as discussed on pages 113-119 of the IRP?

c. What financial impact is EKPC’s being a transmission owner expected to have on its members?

d. Explain how interconnections with other utilities might be affected.

e. Explain whether EKPC anticipates that transmission lines will need to be built solely for import/export capabilities.

f. How is PJM’s generation economic dispatch expected to affect EKPC’s transmission system?

g. What impact is PJM membership expected to have on EKPC’s generation expansion plan as discussed on page 118 of the IRP.

5. Explain whether joining PJM was factored in the update of the MEAGER Program, presented to the EKPC Board, as discussed on page 139.

6. On page 121 of the IRP, EKPC discussed working with member distribution cooperatives concerning power factor corrections.

a. Describe the process and explain who performed the study.

b. Was a study completed for each cooperative or was the study prepared for EKPC’s system as a whole?

Jason D. Guernsey for

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DATED AUG 03 2012

cc: Parties of Record

Case No. 2012-00149

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