

COMMONWEALTH OF KENTUCKY

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BEFORE THE PUBLIC SERVICE COMMISSION

AUG 22 2005

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**
 FOR THE CONSTRUCTION OF A 161 kV ELECTRIC) **2005-00207**
 TRANSMISSION LINE IN BARREN, WARREN,)
 BUTLER, AND OHIO COUNTIES, KENTUCKY)

**Data Request of East Kentucky Power Cooperative, Inc.
 to Commission's Consultant, ICF Resources, L.L.C.**

Pursuant to 807 KAR 5:001, and Commission order dated August 4, 2005, East Kentucky Power Cooperative, Inc. ("East Kentucky") requests the Commission's Consultant, ICF file the original and 5 copies of the following information with the Commission on or before August 26, 2005, 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 it legibility. When the requested information has been previously provided in the proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

Data Request No. 1: On page 13 of the Technical Appraisal, prepared by ICF Resources, L.L.C., dated August 15, 2005 (“Technical Appraisal”) the Consultant states, “the final report shows some transmission element overloads as a direct result of the proposed plan, especially in the transmission systems of CIN, HE and TVA.”

- a. Explain the basis for this statement.
- b. What are the specific “transmission element overloads” that are being referenced?
- c. Under what scenarios will these overloads occur?
- d. What is the source of the information that led to this conclusion?

Data Request No. 2: On page 17 of the Technical Appraisal, the Consultant begins a narrative on “Capital, Costs, Calculations and Assumptions”.

- a. Please describe how the per unit cost of new transmission lines and the implied right of way costs in this subsection were developed?
- b. Please describe the source(s) for this information.

Data Request No. 3: On page 24 of the Technical Appraisal, the Consultant has prepared a narrative on “Supply, Demand, and Balance” which states that EKPC has “very thin reserve margins during the winter peak periods from 2008 through 2010.”

- a. In assessing EKPC’s generation reserves, what generation resources were factored into the calculated reserve margin?
- b. Was short term purchased power factored into this calculation? If so, please describe how purchased power was addressed.

Data Request No. 4: On page 23 of the Technical Appraisal, the Consultant states that “EKPC needs to provide a statement that demonstrates that they have provided these results to the effecting neighboring systems over a reasonable time period and if either received their “no objection” or their failure to comment.” Please identify what specific materials or other information should be provided to the Consultant or the Commission to demonstrate that EKPC has satisfied this recommendation.

Data Request No. 5: The last sentence on page 3 of the Technical Appraisal states that, “EKPC’s transmission system interconnects with transmission systems of Louisville Gas and Electric (“LGE”) and Cinergy, which is a major transmission provider in Ohio and Indiana.” Why were TVA and AEP omitted as interconnected transmission systems in this sentence?

Data Request No. 6: On page 4 of the Technical Appraisal, the Consultant states that, “...LGE is the only Kentucky utility that participates in MISO. The other Kentucky utilities are non-members of MISO’s energy markets but operates under MISO’s security coordination.” Upon what information is this statement made?

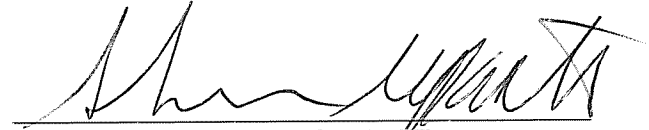
Data Request No. 7: On page 22 and 23 of the Technical Appraisal, ICF states that, “however, we find there to be insufficient information available to examine EKPC’s selection of path to minimize the need to acquire new rights-of-way”. In ICF’s opinion, what supplemental information is required to conduct such an examination?

Data Request No. 8: Is ICF familiar with the Electric Power Research Institutes Overhead Electric Transmission Line Siting Methodology Results for the proposed project contained as Warner Exhibit I in the Applicant’s Application filed on July 1, 2005?

- a. If so, does ICF concur with the relative weighting and ranking of factors considered in the comparison of alternative routes using the EPRI methodology?
- b. If ICF does not concur, please identify the specific criteria with which ICF disagrees and explain why ICF is in disagreement with such criteria.
- c. If ICF does not concur with the EPRI transmission line siting methodology, please provide ICF’s opinion as to the methodology and criteria that should be used in the siting of the proposed project.

Respectfully submitted,

DALE W. HENLEY



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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was filed and that the original and 10 copies have been mailed this day to the Commission and served herein by mailing such copy thereof via U.S. Mail, first-class postage prepaid to the Honorable AW Turner, Public Service Commission, 211 Sower Boulevard, PO Box 615, Frankfort, KY 40602; and to each person designated on the official service list compiled by the Secretary for this proceeding, this the 22nd day of August 2005.



SHERMAN GOODPASTER III