

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:

**APPLICATION OF EAST KENTUCKY POWER COOPERATIVE, INC.)
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY) CASE NO.
FOR THE CONSTRUCTION OF A 161kV ELECTRIC TRANSMISSION) 2005-00207
PROJECT IN BARREN, WARREN, BUTLER, AND OHIO COUNTIES, KY)**

**INTERVENOR JOEY ROBERTS'
FIRST DATA REQUEST TO EAST KENTUCKY POWER COOPERATIVE, INC.**

Pursuant to the scheduling order adopted by the Commission in this case, Intervenor Joey Roberts requests that East Kentucky Power Cooperative, Inc. (EKPC) file with the Commission the following information, with a copy to all parties of record.

1. Please identify the number of miles of "Segment 1 – Barren County to Oakland to Magna" of the proposed transmission line, as described in the subject EKPC Application, that would be eliminated from the Application in the event that the Tennessee Valley Authority (TVA) fully complied with a recent order from the Federal Energy Regulatory Commission (FERC) to "interconnect" its transmission system with EKPC's system and provide a map clearly depicting those sections of Segment 1 of the proposed EKPC transmission line that would not be constructed in the event that TVA agreed to EKPC's request for interconnection.

2. Please identify the number of miles of "Segment 2 – GM to Memphis Junction" of the proposed transmission line, as described in the subject EKPC Application, that would be eliminated from the Application in the event that the TVA fully complied with a recent order from FERC to "interconnect" its transmission system with EKPC's system and provide a map clearly depicting those sections of Segment 2 of the proposed EKPC transmission line that would not be constructed in the event that TVA agreed to EKPC's request for interconnection.

3. Please identify the number of miles of "Segment 3 – Memphis Junction to Aberdeen" of the proposed transmission line, as described in the subject EKPC Application, that would be eliminated from the Application in the event that the TVA fully complied with a recent order from FERC to "interconnect" its transmission system with EKPC's system and provide a map clearly depicting those sections of Segment 3 of the proposed EKPC transmission line that would not be constructed in the event that TVA agreed to EKPC's request for interconnection.

4. Please identify the number of miles of “Segment 4 – Aberdeen to Wilson” of the proposed transmission line, as described in the subject EKPC Application, that would be eliminated from the Application in the event that the TVA fully complied with a recent order from FERC to “interconnect” its transmission system with EKPC’s system and provide a map clearly depicting those sections of Segment 4 of the proposed EKPC transmission line that would not be constructed in the event that TVA agreed to EKPC’s request for interconnection.
5. Will any segments of the proposed transmission line require more than a 100ft right-of-way or greater than 50ft of right-of-way on either side of the centerline of the transmission line as constructed? If so, please identify those sections of the transmission line requiring greater right-of-way within each of the four Segments listed in the Application on appropriate maps and provide copies of each.
6. Given that EKPC states in paragraph 6 of the subject Application that, “... the Applicant is required to build this project in order to fulfill its obligation to transmit power and energy to Warren RECC”, please provide copies of any and all membership agreements, service contracts, and projections of rates for provision of service between EKPC and Warren Rural Electric Cooperative Corporation (WRECC).
7. Please provide copies of any guarantees of rates to be charged to WRECC for provision of services by EKPC under any arrangements, agreements, or contracts between WRECC and the Applicant related to the need justification for the project proposed in the Application. If no guarantees of wholesale rates for electric power to be transmitted by EKPC to WRECC are offered by EKPC at this time, then please state so for the record.
8. Please state the dollar amount of total costs currently estimated to be paid by EKPC for the project proposed in the Application, and state the total dollar amount of those estimated costs that will transferred to or imposed upon the membership of WRECC by means of direct or indirect billings or via an “add-on” amortization factor incorporated into rates for service provided to WRECC by EKPC.
9. Please provide copies of all applications for any loan, loan guarantee or other financial assistance for the proposed transmission facilities to entities other than those United States federal government agencies previously identified within the Application or in response to another data request.

10. Please provide an electronic data file containing the names and mailing addresses of all individuals identified as owners of property to be "crossed by the proposed right of way" according to the certification made in Exhibit 16 of the Application and any other property owners upon whose property construction will be required by the project as currently planned by EKPC. Please provide the electronic data file on standard 3.5" floppy disks or data compact discs formatted for compatibility with Microsoft Windows operating systems and suitable for direct use within or import into Microsoft Word or Excel.

Respectfully submitted by,


8-15-05

Joey Roberts, Intervenor
4234 Scottsville Rd
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270-563-4292

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing data request in the matter of PSC CASE NO 2005-00207 was duly served by mailing first-class postage prepaid to the following individuals this 15th day of August, 2005:

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