

June 13, 2007

HAND DELIVERED

Ms. Elizabeth O'Donnell Executive Director Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

Re: PSC Case No. 2006-00472

RECEIVED

JUN 132007

PUBLIC SERVICE COMMISSION

Dear Ms. O'Donnell:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten redacted copies of the responses of East Kentucky Power Cooperative, Inc. ("EKPC") to the Commission Staff's Fourth Data Request, dated May 30, 2007. An original and ten copies of EKPC's Responses to the Third Data Request of Kentucky Industrial Utility Customers, Inc. ("KIUC"), and the Second Data Request of the Sierra Club, both dated May 30, 2007, are also enclosed.

Also enclosed are an original and ten copies of EKPC's Petition for Confidential Treatment of Information regarding designated responses to the Commission Staff data requests, along with a copy of the designated confidential pages.

Very truly yours,

Charles A. Lile

Senior Corporate Counsel

Enclosures

Cc: Parties of Record

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

GENERAL ADJUSTMENT OF ELECTRIC RATES) CASE NO.
OF EAST KENTUCKY POWER) 2006-00472
COOPERATIVE, INC.

PETITION FOR CONFIDENTIAL TREATMENT OF INFORMATION

Comes now the petitioner, East Kentucky Power Cooperative, Inc. ("EKPC") and, as grounds for this Petition for Confidential Treatment of Information (the "Petition"), states to the Public Service Commission (the "Commission") as follows:

- 1. This Petition is filed in regard to information in EKPC's response to Request 19 of the Commission Staff's Fourth Data Request in this case, dated May 30, 2007, that is entitled to protection pursuant to 807 KAR 5:001 Section 7 and KRS §61.878 (1) (c) 1 and related sections.
- 2. The designated confidential information in the response to Commission Staff Request 19 consists of accounting entries associated with the on-going litigation with the Environmental Protection Agency (the "EPA") concerning EKPC's compliance with environmental regulations. EKPC is currently involved with settlement discussions regarding this litigation, and disclosure of the details of this information could adversely affect its strategies and bargaining position in such discussions. Such disclosure could result in less favorable settlement terms, which would potentially increase the magnitude of the out-of-pocket costs of any settlement, and/or lead to the proposal of less favorable

terms regarding EKPC plant operation. Such developments would increase EKPC's overall operating costs and would lead to an unfair competitive disadvantage for EKPC in its efforts to compete with the power marketers, utilities and other entities that deal in the market for surplus bulk power, and to compete with other utilities in Kentucky for new industrial customers.

- 3. The Commission granted confidential treatment on December 15, 2006 and January 9, 2007, for similar information submitted by EKPC in PSC Case No. 2006-00455, and granted confidential treatment to similar information in this case on February 9, 2007 and June 7, 2007.
- 4. Along with this Petition, EKPC has enclosed one copy of confidential sections of the subject responses, with the confidential information identified by highlighting or other designation, and 10 copies of its complete responses to the subject Data Request, with the confidential information redacted. The identified confidential information is not known outside of EKPC and is distributed within EKPC only to persons with a need to use it for business purposes. It is entitled to confidential treatment pursuant to 807 KAR 5:001 Section 7 and KRS §61.878(1)(c) 1, for the reasons stated hereinabove, as information which would permit an unfair commercial advantage to competitors of EKPC if disclosed. The subject information is also entitled to protection pursuant to KRS §61.878(1)(c) 2 c, as records generally recognized as confidential or proprietary which are confidentially disclosed to an agency in conjunction with the regulation of a commercial enterprise.

WHEREFORE, EKPC respectfully requests the Public Service Commission to grant confidential treatment to the identified information and deny public disclosure of said information.

Respectfully submitted,

DAVID A SMART

CHARLES A. LILE

P. O. BOX 707 WINCHESTER, KY 40392-0707 (859) 744-4812

ATTORNEYS FOR EAST KENTUCKY POWER COOPERATIVE, INC.

CERTIFICATE OF SERVICE

This is to certify that an original and 10 copies of the foregoing Petition for Confidential Treatment of Information in the above-styled case were delivered to the office of Elizabeth O'Donnell, Executive Director of the Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601, and copies were mailed to Parties of Record, this 13th day of June, 2007.

Charles A. Lile

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

GENERAL ADJUSTMENT OF ELECTRIC RATES) CASE NO. OF EAST KENTUCKY POWER COOPERATIVE, INC.) 2006-00472

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

William A. Bosta, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff Data Requests in the above-referenced case dated May 30, 2007, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

William A. Bosta

Subscribed and sworn before me on this $\frac{13^{\text{tl}}}{2}$ day of June, 2007.

Notary Phonic

My Commission expires:

December 8, 2009

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:		
GENERAL ADJUSTMENT OF ELECTRIC RATES OF EAST KENTUCKY POWER	,	CASE NO. 2006-00472
COOPERATIVE, INC.)	

RESPONSES TO COMMISSION STAFF'S FOURTH DATA REQUEST TO EAST KENTUCKY POWER COOPERATIVE, INC.

DATED MAY 30, 2007

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 1

RESPONSIBLE PERSON:

William A. Bosta/Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 1. Refer to the response to the Commission Staff's Third Data Request dated May 1, 2007 ("Staff's Third Request"), Item 2. The following questions relate to information contained on the CD provided in the response.

Rows 8 through 31 of the "Details" tab of the spreadsheet file "PSC Response 2 Adjustment 3.xls" and Columns E through H of the "Sheet 1" tab of the spreadsheet file "PSC Response 2 Adjustment 25.xls" cannot be viewed. Provide electronic copies of the referenced spreadsheet files with all sections of the spreadsheet viewable.

Response 1a. Both of these questions may be resolved by using the "unhide" feature. In the first file, go to Row 7 on the far left side, highlight, and drag to Row 32 (one row down). Then right click and select "unhide." Rows 8 through 31 will appear. In the second file, go to Column D, highlight, and drag to Column I (one column over). Right click and then select "unhide." Columns E, F, G and H will appear.

Refer to the "Shift and OT" tab of the spreadsheet file "PSC Response 2 – backup for schedules 4, 5, part of 6.xls." Explain in detail why the majority of the adjustment calculations shown on this tab page reference 2 percent increases instead of 3 percent. In addition, indicate which percentage increase is correct.

Response 1b. Because regular shift differential and overtime shift differential are somewhat difficult to annualize, EKPC reviewed the trend of shift differential hours from 2003 through the test year. Based on this review, a 2-3% increase in hours seemed to be appropriate in applying the shift differential rate. EKPC determined "regular" (i.e. non-shift) overtime by averaging overtime dollars from 2003 through the test year, then applying the 3% escalation. The highlighted box on the worksheet in the "Shift and OT" tab reflects the 3% escalation in both the regular overtime and shift differential dollar amounts.

Request 1c. Refer to the spreadsheet file "psc 2 backup for schedule 9.xls."

- (1) Explain the purpose of the information shown on the "Prop Tax 123106" and "Prop Tax 123106 (2)" tabs.
- (2) Explain why the totals from the "Prop Tax -93006" tab should be used for the proposed property tax adjustment rather than the totals from the "Prop Tax -123106" and "Prop Tax -123106 (2)" tabs.
- (3) Provide copies of the actual property tax bills that support the monthly amounts presented on the "PTax Exp" tab.
- Response 1c. (1) The "Prop Tax 123106" tab assumes 12 months of depreciation at both the old and new depreciation rates. The "Prop Tax –123106 (2)" tab assumes 9 months of depreciation for both the old and new depreciation rates.

- (2) The "Prop Tax -93006" should be used in the adjustment calculation because it reflects the NBV at 9/30/06, the end of the test year, and applies the appropriate property tax rates, at the account level.
 - (3) The copies are provided on the attached CD.

Refer to the spreadsheet file "PSC Response 2 Adjustment 19.xls."

- (1) Explain how the balances shown on this spreadsheet for Account No. 92100 Propane Expense; Account No. 93022 Propane Expense; and Account No. 92100 ACES Expense were determined.
- (2) The balances shown on this spreadsheet for the first six accounts listed have been cross-checked with the trial balances provided in the response to the Commission Staff's First Data Request dated December 5, 2006 ("Staff's First Request"), Items 13(a and b) and the response to the Kentucky Industrial Utility Customers, Inc. ("KIUC") Second Data Request dated April 30, 2007 ("KIUC Second Request"), Item 1.70. While the balances for the first six accounts shown on the spreadsheet agree with the trial balance provided in the Staff's First Request, Items 13(a and b), five of the six accounts do not agree with the trial balance provided in the KIUC Second Request, Item 1.70. Both trial balances are supposed to be as of September 30, 2006. Explain the reason(s) for these differences and indicate which account balances are correct.
- (3) Prepare a comparison of the September 30, 2006 trial balances submitted in the response to the Staff's First Request, Items 13(a and b) and the response to the KIUC Second Request, Item 1.70. For each account balance that is different, explain the reason(s) for the differences and indicate which account balance is correct.
- Response 1d. (1) The amounts shown on this spreadsheet for accounts 92100—Propane, 93022—Propane, and 92100—ACES were determined by analyzing the detail within those accounts.

- (2) The trial balance provided in Commission Staff's First Data Request dated December 5, 2006, Items 13(a and b) was for the 12-month period (test year) ending September 30, 2006. The trial balance provided in KIUC's Second Data Request dated April 30, 2007, Item 1.70, was for the nine-months ending (calendar year-to-date) September 30, 2006. Balances are correct for their particular time periods.
 - (3) Please see the response to (2) above.

Refer to the Application, Exhibit F, Schedule 23, page 2 of 3, and file "PSC Response 2, Adjustment 23.pdf."

- (1) The invoices provided in the file "PSC Response 2, Adjustment 23.pdf" show that the East Central Reliability Council ("ECAR") dues listed for October and November 2005 on Application Exhibit F, Schedule 23, page 2 of 3, are actually invoices for October and November 2006 from Reliability First. Provide copies of the October and November 2005 invoices from ECAR. In addition, identify Reliability First and describe the function of this entity.
- (2) Explain why there were no ECAR dues for the months of July through September 2006. If there were ECAR dues for these months, provide the actual invoices for these dues.
- (3) Schedule 23, page 2 of 3, shows the Southeast Reliability Council ("SERC") 2007 Invoice to be \$132,828. The invoices in the file "PSC Response 2, Adjustment 23.pdf" show a quarterly invoice from the North American Electric Reliability Council ("NAERC") in the amount of \$33,206.94. Annualizing this quarterly amount produces a total of \$132,828. Describe the differences between SERC and NAERC and explain why the NAERC invoice has been presented in Schedule 23 as the SERC invoice.
- (4) Provide copies of the actual invoice received from SERC in the amount of \$78,067 and from NAERC in the amount of \$33,206.94.

- Response 1e. (1) These invoices from Reliability First were for October and November of 2006 and should not have been part of the adjustment. The \$208 and the \$79 were for Automatic Reserve Sharing (ARS) costs incurred by Reliability First and charged to EKPC. Reliability First took over providing this service from ECAR in the upper midwest following the dissolution of ECAR. EKPC joined SERC following the dissolution of ECAR but continued to incur relatively minor ARS expenses from Reliability First during 2006.
- (2) ECAR was effectively dissolved at the end of 2005. The ECAR dues shown in Exhibit F, Schedule 23, Page 2 of 3, are for service beginning in October 2005 (shown as the November 2005 invoice amount of \$17,462) and continuing throughout the test year. The costs incurred in the January through May (June 2006 invoice amount of \$738) period were wind down costs. There were no wind down costs for the June through September 2006 period for ECAR and no invoices.
- (3) The \$132,828 amount, for the 2007 invoice should be "NERC" instead of "SERC." While EKPC is a member of SERC, NERC is providing the billing function for all NERC and SERC services. SERC no longer bills EKPC separately. SERC is effectively the regional representative of the NERC.
- (4) Please see the attached invoice from SERC of \$78,067. The quarterly invoice from NERC for February 14, 2007 is attached.

PSC Request 1e(4)
Attachment
Page 1 of 5
13 628
1-154545
Invoice //a5



Southeastern Electric Reliability Council, Inc.

600 North 18th Street P. O. Box 2641 Birmingham, AL 35291 205/257-6407

Date

Invoice #

12/15/2005

2802

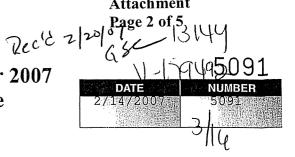
East Kentucky Power Cooperative George C. Carruba Manager Power Delivery-Operations P.O. Box 707 Winchester, KY 40392-0707

Federal Tax ID: 20-3311003

Description	ANNUAL %	ASSESSMENT AMT.
Description 2006 Annual Assessment Dues Vendind and Paryat 18101 Acron vendind and Paryat 1	1.67%	ASSESSMENT AMT. 78,067.30
Assessments are due January 31, 2006. SERC assessments may be paid in two (2) equal installments, due January 31, 2006 and		

ARTH AMERICAN ELECTRIC RELIABILITY CORPORATION

116-390 Village Blvd Princeton, NJ 08540-5731 609-452-8060 (T) 609-452-9550 (F) 2nd Quarter 2007 Invoice



PSC Request 1e(4)

Attachment

Billing Address

East Kentucky Power Cooperative George Carruba 4775 Lexington Road P.O. Box 707 Winchester, KY 40392-0707

Please return the bottom portion with your payment.

Please reference the invoice number on your check.

harge Date	Charge Code				Description	1		Amount
是控制和联系部分的	1297NERC	1 1884	知時間 新町 おおう ごうりゅう		Cooperative			\$16,048.8 \$17,158.0
271472007	1297REGION	East	Kencucky	rower	Cooperative	SERC REGION	Assimic	7+14+30.V
					akto PM	1 marzolo		
					BC 130 -5		W.£	
				\\	130 -5	402	∭ MAR	1 6 2007
			QQ?	DN.	BC ,		By	

Payment Terms: Net 45 Days

Total:

\$33,206.94

Customer ID

1297

Invoice ID

5091

Customer Name East Kentucky Power Cooperative

Invoice Date

2/14/2007

Charge Date	Charge Code	Description	Amount
2/14/2007	1297NERC	East Kentucky Power Cooperative NERC Assmnt	\$16,048.89
		East Kentucky Power Cooperative SERC REGION Assmnt	\$17,158.05

Total:

\$33,206.94

2007 Allocation of NERC and Regional Entity Costs to Load Serving Entities (or designee)

طدر	ş-	•	Г	ANNUAL			QUARTERLY			
						n. d. d. l.			Regional Entity	
				Total ERO Funding	Total NERC	Regional Entity Funding (including	Total ERO		Funding (including RAB	
10000000000000000000000000000000000000	skanenarini mahadi			(w/ RE costs)	Funding	RAB funding)	Funding	NERC Funding	funding)	
Data Year	Region		Country							
		FOCAT		2 224 222 24	1 001 100 01	4 070 755 00	1 500 004 50	240 545 01	1,217,688.75	
2005	ERCOT	ERCOT	U.S.	6,264,938.24 6,264,938.24	1,394,183.24 1,394,183.24	4,870,755.00 4,870,755.00	1,566,234.56 1,566,234.56	348,545.81 348,545.81	1,217,688.75	
2005	FRCC	Alachua, City of	U.S.	1,654.55	541.18	1,113.37	413.64	135.30	278.34	
2005	FRCC	Bartow, City of	U.S.	10,412.72	3,403.82	7,008.90	2,603.17	850.95	1,752.22	
2005	FRCC	Chattahoochee, City of FlorIda Keys Electric Cooperative Assn	U.S. U.S.	1,323.04 11,358,17	432.35 3,713.06	890.69 7,645.11	330.76 2,839.55	108.09 928.27	222.67 1,911.28	
2005 2005	FRCC FRCC		U.S.	113,779.99	37,194.25	76,585.74	28,445.00	9,298.56	19,146.44	
2005	FRCC		U.S.	1,727,802.94	564,813.43	1,162,989.51	431,950.74	141,203.36	290,747.38	
2005	FRCC	Florida Public Utilities Company	U.S.	7,813.71	2,554.38	5,259.33	1,953.43	638.60	1,314.83	
2005	FRCC	Gainesville Regional Utilities	U.S.	31,144.00	10,180.92	20,963.08	7,786.00	2,545.23	5,240.77	
2005	FRCC	Homestead, City of JEA	U.S. U.S.	6,395.52 207,941.48	2,090.51 67,975.57	4,305.01 139,965.91	1,598.88 51,985.37	522.63 16,993.89	1,076.25 34,991.48	
2005 2005	FRCC FRCC	Lakeland Electric	U.S.	46,629.20	15,242.90	31,386.30	11,657.30	3,810.73	7,846.57	
2005	FRCC	Mount Dora, City of	U.S.	3,638.61	1,189.20	2,449.40	909.65	297.30	612.35	
2005	FRCC	New Smyrna Beach, Utilities Commission of	U.S.	6,254.31	2,044.72	4,209.58	1,563.58	511.18	1,052.40	
2005	FRCC	Orlando Utilities Commission	U.S.	106,727.16	34,888.59	71,838.57	26,681.79	8,722.15	17,959.64	
2005	FRCC	Progress Energy Florida	U.S. U.S.	684,063.63 4,914.58	223,618.19 1,606.29	460,445.45 3,308.29	171,015.91 1,228.64	55,904.55 401.57	115,111.36 827.07	
2005 2005	FRCC FRCC	Quincy, City of Reedy Creek Improvement District	U.S.	19,817.21	6,478.03	13,339.18	4,954.30	1,619.51	3.334.79	
2005	FRCC	Seminole Electric Cooperative	U.S.	258,434.67	84,481.43	173,953.24	64,608.67	21,120.36	43,488.31	
2005	FRCC	St. Cloud, City of (OUC)	U.S.	8,128.53	2,657.13	5,471.39	2,032.13	664.28	1,367.85	
2005	FRCC	Tallahassee, City of	U.S.	45,479.76	14,867.52		11,369.94	3,716.88	7,653.06	
2005	FRCC	Tampa Electric Company	U.S. U.S.	322,277.37 1,086.68	105,351.41 355.04	216,925.96 731.64	80,569.34 271.67	26,337.85 88.76	54,231.49 182.91	
2005 2005	FRCC FRCC	Wauchula, City of Williston, City of	U.S.	1,150.44	376.39		287.61	94.10	193.51	
2005	FRCC	Winter Park, City of	U.S.	12,067.26	3,945.00		3,016.82		2,030.57	
				3,640,295.52	1,190,001.32	2,450,294.20	910,073.89	297,500.35	612,573.54	
:	MRO	Alliant Energy (Alliant East - WPL & Alliant West	U.S.	741,069.94	169,670.56	571,399.38	185,267.48	42,417.64	142,849.84	
٤.	MRO	Ames Municipal Electric System	U.S.	19,546.54	4,475.47		4,886.64		3,767.77	
2005	MRO	Auburn Board of Public Works	U.S.	1,788.56			447.14		344.85	
2005	MRO	Basin Electric Power Cooperative	U.S. U.S.	184,972.78 11,459.07			46,243.20 2,864.76		35,655.66 2,208.78	
2005 2005	MRO MRO	Cedar Falls Municipal Utilities Central Iowa Power Cooperative (CIPCO)	U.S.	76,190.56			19,047.64		14,686.60	
2005	MRO	City of Escanaba Electric Department	U.S.	3,705.83			926.46		714.39	
2005	MRO	Corn Belt Power Cooperative	U.S.	42,514.29	•		10,628.58		8,195.12	
2005	MRO	Dairyland Power Cooperative / GEN-SYS Energy	U.S.	120,062.00			30,015.50		23,143.39	
2005	MRO	Falls City Water & Light Department	U.S. U.S.	1,326.46 10,708.59			331.62 2,677.15		255.75 2,064,15	
2005 2005	MRO MRO	Fremont Department of Utilities Geneseo Municipal Utilities	U.S.	2,020.22			505.06			
2005	MRO	Grand Island Utilities Department	U.S.	17,391.71			4,347.93		3,352.52	
2005	MRO	Great River Energy	U.S.	317,095.91			79,273.97			
2005	MRO	Hastings Utilities	U.S.	12,385.77			3,096.45			
2005	MRO	Heartland Consumers Power District Hutchinson Utilities Commission	U.S. U.S.	15,470.98			3,867.75 1,992.93		2,982.13 1,536.62	
2005 2005	MRO MRO	lowa Association of Municipal Utilities	U.S.	7,971.73 12,465.05			3,116.27			
2005	MRO	Lincoln Electric System	U.S.	87,478.41			21,869.60			
2005	MRO	Madison, Gas and Electric	U.S.	84,225.09	19,283.69	64,941.39	21,056.27	4,820.92		
2005	MRO	Manitoba Hydro	Canada	598,304.27			149,576.07			
2005	MRO	Manitowoc Public Utilities	U.S.	13,902.16			3,475.53 0.40			
2005 2005	MRO MRO	McGregor and St. Charles Municipal (GEN-SYS MidAmerican Energy Company	U.S. U.S.	1.59 510,823.92			127,705.98			
2005	MRO	Minnesota Power	U.S.	319,541.16			79,885.29			
2005		Minnkota Power Cooperative, Inc.	U.S.	93,801.48	21,476.3	4 72,325.14	23,450.37	7 5,369.09	18,081.28	
2005	MRO	Missouri River Energy Services	U.S.	47,060.10			11,765.03			
2005		MN Municipal Power Agency (MMPA)	U.S.	23,013.10			5,753.27			
2005 2005		Montana-Dakota Utilities Co. Municipal Energy Agency of Nebraska	U.S. U.S.	58,067.09 13,079.5			14,516.77 3,269.89			
2005		Muscatine Power and Water	U.S.	22,582.1			5,645.5			
2005		Nebraska City Utilities	U.S.	696.5			174.13			
2005		Nebraska Public Power District	U.S.	290,723.4			72,680.8			
2005		Northwestern Public Service Company	U.S.	33,693.8			8,423.4			
2005		Omaha Public Power District	U.S.	250,533.3 97,196.0	•		62,633.3 24,299.0			
2005 2005		Otter Tail Power Company Rochester Public Utilities	U.S. U.S.	97,196.0 442.3	·		24,299.0 110.5			
2005		SaskPower	Canada	473,954.7			118,488.6			
2005	MRO	Southern Minnesota Municipal Power Agency	U.S.	72,603.8			18,150.9		3 13,995.22	
5000		Southern Montana Generation and Transmission	U.S.	411.2	4 94.1	4 317.11	102.8	1 23.5	3 79.28	
	MRO	Western Area Power Administration (LM)	U.S.	8,319.0			2,079.7			
<u>ئ</u>	MRO	Western Area Power Administration (UM)	U.S.	162,765.4			40,691.3			
2005		Willmar Municipal Utilities Wisconsin Public Power, Inc. (East and West	U.S. U.S.	7,450.5 125,124.3			1,862.6 31,281.0			
2005 2005		WPS Resources (WPS and UPPCO)	U,S.	369,283.8			92,320.9			
2005		Xcel Energy Company (NSP)	U.S.	1,149,464.8	5 263,173.3	886,291.51	287,366.2	1 65,793.3	3 221,572.88	
				6,512,689.4	4 1,491,101.6	5,021,587.82	1,628,172.3	372,775.3	9 1,255,396.95	

[,] 2007 Allocation of NERC and Regional Entity Costs to Load Serving Entities (or designee)

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				***		AND THE PROPERTY OF THE PROPER			Regional Entity
				Total ERO Funding	Total NERC	Regional Entity Funding (including	Total ERO		Funding (including RAB
				(w/ RE costs)	Funding	RAB funding)	Funding	NERC Funding	funding)
Data	Regional								
Year	Entity	Entity of	Country						
2005 2005	RFC RFC		U.S. U.S.	482,628.15 9,672.55	166,774.18 3,342.68	315,853.98 6,329.87	120,657.03 2,418.14	41,693.54 835.67	78,963.49 1,582.47
2005	RFC	Quest Energy	U.S.	16,568.32	5,725.41	10,842.91	4,142.08	1,431.35	2,710.73
2005 2005	RFC RFC		U.S. U.S.	21,102.13 340.52	7,291.73 117.41	13,810.40 223.11	5,275.53 85.13	1,822.93 29.35	3,452.60 55.78
2005	RFC		U.S.	1,257.24	434.35	822.89	314.31	108.59	205.72
2005	RFC		U.S.	3,482.40	1,203.20	2,279.20	870.60	300.80	569.80
2005 2005	RFC RFC		U.S. U.S.	4,796.16 22,175.56	1,657.59 7,663.06	3,138.58 14,512.51	1,199.04 5,543.89	414.40 1,915.76	784.64 3,628.13
2005	RFC		U.S.	22,603.20	7,810.34	14,792.87	5,650.80	1,952.58	3,698.22
2005	RFC RFC		U.S. U.S.	4,255.36 2,918.44	1,470.19 1,008.52	2,785.17 1,909.92	1,063.84 729.61	367.55 252.13	696.29 477.48
2005	NEC	The Cincinnati Gas & Electric Co. dba Duke	U.S.	2,910.44	1,006.52	1,505.52	725.01	202.10	4/7.40
2005	RFC		U.S.	300,289.16	103,766.03	196,523.13	75,072.29	25,941.51	49,130.78
2005	RFC	The Union Light, Heat and Power Company dba Duke Energy Kentucky, Inc.	U.S.	65,467.29	22,622.65	42,844.64	16,366.82	5,655.66	10,711.16
2005	RFC	Thumb Electric Cooperative	U.S.	2,413.64	834.13	1,579.51	603.41	208.53	394.88
2005 2005	RFC RFC		U.S. U.S.	89,314.21 345.72	30,862.70 119.19	58,451.51 226.52	22,328.55 86.43	7,715.67 29.80	14,612.88 56.63
2005	RFC	Village of Sebewaing	U.S.	638.75	220.98	417.78	159.68	55.24	104.44
2005	RFC RFC	Wabash Valley Power Association, Inc. Wisconsin Electric Power Co. (WEPC)	U.S.	37,291.37	12,886.50	24,404.87 302,187.42	9,322.85 115,436.49	3,221.63 39,889.63	6,101.22 75,546.86
2005 2005	RFC	Wisconsin Energy Services	U.S.	461,745.93 8,759.83	159,558.51 3,027.11	5,732.72	2,189.96	756.78	1,433.18
2005	RFC	Wisconsin Public Power, Inc.	U.S.	58,799.08	20,318.60	38,480.48	14,699.77	5,079.65	9,620.12
2005 2005	RFC RFC	Wolverine Power Marketing Cooperative Wolverine Power Supply Cooperative	U.S. U.S.	13,572.71 1,553.44	4,690.43 536.56	8,882.28 1,016.87	3,393.18 388.36	1,172.61 134.14	2,220.57 254.22
2005	RFC	Wolverine Power Supply Cooperative	U.S.	16,365.07	5,655.06	10,710.01	4,091.26	1,413.76	2,677.50
2005 2005	RFC RFC	WPS Energy Services, Inc. WPS Energy Services, Inc.	U.S. U.S.	1,317.14 1,682.97	454.89 581.63	862.25 1,101.34	329,28 420,74	113.72 145.41	215.56 275.33
2005	RFC	Zelienople (ZELI)	U.S.	522.10	180.33	341.78	130.52	45.08	85.44
				14,321,241.10	4,948,769.10	9,372,472.00	3,580,310.29	1,237,192.27	2,343,118.02
2005	SERC	Alabama Electric Cooperative, Inc.	U.S.	90,690.31	43,830.63		22,672.58	10,957.66	11,714.92
2005 2005	SERC SERC	Alabama Municipal Electric Authority Alabama Power Company	U.S. U.S.	37,499.77 624,146.35	18,123.65 301,649.27		9,374.94 156,036.59	4,530.91 75,412.32	4,844.03 80,624.27
2005	SERC	Ameren - CILCO	U.S.	71,895.20	34,747.09	37,148.12	17,973.80	8,686.77	9,287.03
2005 2005	SERC SERC	Ameren - IP Ameren - UE/CIPS	U.S. U.S.	207,026.26 617,926.68	100,055.57 298,643.03		51,756.56 154,481.67	25,013.89 74,660.76	26,742.67 79,820.91
2005	SERC	APGI - Yadkin Division	U.S.	413.10	199.43		103.28	49.86	53.42
2005	SERC SERC	Associated Electric Cooperative, Inc. Big Rivers Electric Corporation	U.S. U.S.	193,605.54	93,569.19 56,658.49		48,401.39 29,308.32	23,392.30 14,164.62	25,009.09 15,143.70
2005 2005	SERC	Black Warrior EMC	U.S.	117,233.29 4,658.54			1,164.64	562.83	601.81
2005	SERC	Blue Ridge EMC	U.S.	12,098.43	•		3,024.61	1,461.80	1,562.81
2005 2005	SERC SERC	Central Electric Power Cooperative Inc City of Blountstown, FL	U.S. U.S.	1,537.10 436.21	742.87 211.05		384.28 109.05	185.72 52.76	198.56 56.29
2005	SERC	City of Camden, SC	U.S.	2,120.23	1,024.48	1,095.75	530.06	256.12	
2005 2005	SERC SERC	City of Collins, MS City of Columbia, MO	U.S. U.S.	451.61 15,120.66	218.45 7,307.97		112.90 3,780.16	54.61 1,826.99	58.29 1,953.17
2005	SERC	City of Conway, AR (Conway Corporation)	U.S.	9,543.61	4,612.44	4,931.17	2,385.90	1,153.11	1,232.79
2005 2005	SERC SERC	City of Dalton, GA City of Evergreen, AL	U.S. U.S.	17,907.10 695.66			4,476.77 173.91	2,163.62 84.04	
2005	SERC	City of Hampton, GA	U.S.	277.26			69.32		
2005	SERC	City of Hartford, AL City of Henderson, KY	U.S.	336.33			84.08		
2005 2005	SERC SERC	City of North Little Rock, AR (DENL)	U.S. U.S.	7,284.76 11,209.13			1,821.19 2,802.28		
2005	SERC	City of Orangeburg (SC) Department of Public	U.S.	10,458.00			2,614.50		
2005 2005	SERC SERC	City of Robertsdale, AL City of Ruston, LA (DERS)	U.S. U.S.	662.64 3,018.67			165.66 754.67		
2005	SERC	City of Seneca, SC	U.S.	1,897.86	917.1	7 980.69	474.46	229.29	245.17
2005 2005	SERC SERC	City of Troy, AL City of West Memphis, AR (West Memphis	U.S. U.S.	3,731.78 4,249.20			932.95 1,062.30		
2005	SERC	Dominion Virginia Power	U.S.	904,198.98		•	226,049.74		
2005 2005	SERC SERC	Duke Energy Carolinas East Kentucky Rowel Gooderalive	U.S. U.S.	897,856.49 132,827.77	•		224,464.13		
2005	SERC	East Mississippi (Includes SEPA)	U.S.	4,277.97			1,069.49		
2005	SERC	Electric Energy Inc.	U.S.	545.82			136.45		
2005 2005	SERC SERC	EnergyUnited EMC Entergy	U.S. U.S.	24,875.50 1,127,033.00			6,218.87 281,758.26		
2005	SERC	Fayetteville (NC) Public Works Commission	U.S.	24,083.0	7 11,639.2	1 12,443.87	6,020.77	2,909.80	3,110.97
20n= 2	SERC SERC	Florida Public Utilities (FL Panhandle Load) French Broad EMC	U.S. U.S.	3,782.00 5,407.90			945.51 1,351.99		
2 2	SERC	Georgia Power Company	U.S.	930,669.5			232,667.40		
2008		Georgia System Operations Corporation	U.S.	388,277.8			97,069.45		
2009 2010		Greenwood (SC) Commissioners of Public Works Gulf Power Company	U.S. U.S.	3,395.2 126,267.9			848.8° 31,566.98		
2011	SERC	Illinois Municipal Electric Agency	U.S.	18,524.3	6 8,953.0	0 9,571.36	4,631.0	9 2,238.25	5 2,392.84
2012 2013		Kentucky Utilities Company Louisiana Generating, LLC	U.S. U.S.	222,740.8 91,559.6			55,685.23 22,889.93		
2014		Louisville Gas & Electric Company	U.S.	131,899.9			32,975.0		

• 2007 Allocation of NERC and Regional Entity Costs to Load Serving Entities (or designee)

<i>A</i>		*		ANNUAL				QUARTERLY	
				Total ERO Funding (w/ RE costs)	Total NERC Funding	Regional Entity Funding (including RAB funding)	Total ERO Funding	NERC Funding	Regional Entity Funding (including RAB funding)
Data Year	Regiona Entity	Harris Barris Ba	Country						
2005	WECC	Portland General Electric Company - PGE	U.S.	344,112.48	91,235.45	252,877.03	1-p-1-1///		
2005	WECC	Public Service Company of Colorado (Xcel)	U.S.	705,102.17	186,945.60	518,156.57			
2005	WECC	Public Service Company of New Mexico	U.S.	239,095.53	63,392.03	175,703.50			
2005	WECC	Public Utility District No. 1 of Chelan County	U.S.	52,056.70	13,801.93	38,254.77		1	
2005	WECC	Public Utility District No. 1 of Douglas County	U.S.	21,764.12	5,770.38	15,993.74		1	
2005	WECC	Public Utility District No. 2 of Grant County	U.S.	65,893.28	17,470.46	48,422.82		1	
2005	WECC	Puget Sound Energy	U.S.	425,625.88	112,847.31	312,778.57		-	
2005	WECC	Salt River Project	U.S.	466,175.26	123,598.28	342,576.99			
2005	WECC	San Carlos Indian Irrigation Project - APS	U.S.	2.60	0.69	1.91			
2005	WECC	Seattle City Light	U.S.	172,347.23	45,694.88	126,652.36		1	
2005	WECC	Sempra Energy Solutions - PGE	U.S.	18,547.23	4,917.48	13,629.76			
2005	WECC	Sierra Pacific Resource Transmission	U.S.	180,508.76	47,858.76	132,650.00			
2005	WECC	SMUD Utility - SMUD	U.S.	196,999.39	52,230.97	144,768.42		l	
2005	WECC	Tacoma Power	U.S.	85,306.90	22,617.64	62,689.26			
2005	WECC	The City of Burbank - LDWP	U.S.	20,051.95	5,316.43	14,735.53			
2005	WECC	The City of Glendale - LDWP	U.S.	20,729.48	5,496.06	15,233.42			
2005	WECC	Tohono O'Odham Utility Authority - APS	U.S.	1,316.76	349.12	967.64			
2005	WECC	Town of Wickenburg - APS	U.S.	526.70	139.64	387.05			
2005	WECC	Tucson Electric Power Company	U.S.	216,603.20	57,428.58	159,174.62		1	
2005	WECC	Turlock Irrigation District	U.S.	3,063.56	812.25	2,251.31			
2005	WECC	Unisource Electric - APS	U.S.	30,394.12	8,058.47	22,335.65			
2005	WECC	Unit B Irrigation District - APS	U.S.	0.32	0.08	0.23			
2005	WECC	Western (WAPA-Sierra Nevada Region) - SMUD	U.S.	22,765.23	6,035.81	16,729.42		1	
2005	WECC	Western Area Power Administration - Billings, MT	U.S.	9,939.31	2,635.24	7,304.08			
2005	WECC	Western Area Power Administration - Loveland,	U.S.	360,654.29	95,621.22	265,033.07			
2005	WECC	Western Area Power Administration - Phoenix, AZ	U.S.	191,812.91	50,855.86	140,957.04			
2005	WECC	Yuma Irrigation District - APS	U.S.	54.44	14.43	40.01		1	
2005	WECC	Yuma-Mesa Irrigation District - APS	U.S.	3.22	0.85			*	
				14,487,291.91	3,841,053.91	10,646,238.00			
		Total		68,757,622.38	22,487,331.21	46,270,289.17	13,567,582.55	4,661,569.80	8,906,012.75
0	ou Deele : 1	F-40.							
Su	by Regional	Entity		0.004.000.04	1 004 100 04	4.070.755.00			
2000	ERCOT			6,264,938.24	1,394,183.24				
2005	FRCC			3,640,295.52	1,190,001.32				
2005	MRO			6,512,689.44	1,491,101.63				
2005	NPCC			8,564,908.40	3,350,547.25				
2005	RFC			14,321,241.10	4,948,769.10				
2005	SERC			10,680,360.41	5,161,805.41				
2005 2005	SPP WECC			4,285,897.37	1,109,871.37				
2005	WEOL			14,487,291.91 68,757,622.38	3,841,053.91 22,487,333.21				
				00,101,022.38	22,401,000.21	40,210,200.11			

		•

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 2

RESPONSIBLE PERSON:

William A. Bosta/Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 2. Refer to the response to the Staff's Third Request, Item 5.

Request 2a. In the response to Item 5(c) EKPC states, "If the surcharge is to be excluded EKPC concurs with the approach followed in the aforementioned KU and LGE proceedings." Does EKPC contend that an exclusion is not necessary? Explain the response and include a discussion of how EKPC's position is consistent with the provisions of KRS 278.183(2).

Request 2b. In the response to Item 5(c) EKPC states, "The 1.35 TIER proposed by EKPC or any approved TIER different than 1.15 in this proceeding may necessitate a further adjustment in either the base revenue requirement or surcharge." Explain the meaning of this statement and provide examples of the type of "further adjustment" EKPC would envision.

Response 2a,b. Attached is a revised response to Staff Third Item 5(a)(1) and (2) which excludes the synchronization amount of \$490,633 as provided to Exhibit F, Schedule 1, page 2 of 4. EKPC incorrectly included the expense month revenue of \$57,962,407 rather than the book revenue of \$57,471,774 from Exhibit F, Schedule 1, page 2 of 4.

EKPC believes that the only adjustment required for excluding the environmental surcharge from book data is the environmental surcharge synchronization adjustment included in the filing in Exhibit F, Schedule 1, page 2 of 4, and that its position is in compliance with KRS 278.183(2). By including (i.e. by not excluding) the same level of environmental surcharge per book revenues and environmental surcharge costs in the case, the effect of the surcharge is effectively eliminated. EKPC did not exclude the difference in the requested 1.35 TIER in this case versus the 1.15 TIER on the approved assets included in the environmental surcharge, as it believes that an overall TIER of 1.35 is appropriate for all of its assets. It is EKPC's understanding that such an approach is consistent with the KU and LG&E approach where the debt cost assigned to the surcharge rate base was carved out of the total ratemaking capitalization in Case Nos. 98-00426 and 98-00474.

A further adjustment may be required at some point. If the revenue requirement difference in the requested 1.35 TIER and the 1.15 TIER associated with environmental surcharge assets is eliminated from this case and the Commission awards EKPC a 1.35 TIER in base rates, EKPC will need to promptly petition the Commission to increase the TIER in the surcharge to 1.35, due to its deteriorated financial condition. Alternatively, if the 1.35 TIER is applicable to all interest expense in this case, including the interest expense associated with the environmental surcharge, then the surcharge TIER will remain at a 1.15 TIER level on those existing environmental surcharge assets because the difference in the 1.35 and 1.15 TIER is effectively recovered in base rates for those environmental surcharge assets.

PSC Request 2(a)(b) Attachment Page 1 of 2

Staff Third Data Request 5(a)(1) As Revised

East Kentucky Power Cooperative, Inc. and Subsidiary Interim Consolidated Balance Sheets (Dollars in Thousands) unaudited

	,		September 30 2006			Adjusted at Sept. 30, 2006	
ASSETS							
	Electric plant, at original cost						
	In-service	\$	2,052,639	\$	(221,507)	\$	1,831,132
	Construction in Progress		300,891				300,891
	-		2,353,530		(221,507)		2,132,023
	Less accumulated depreciation		804,958		(32,079)		772,879
	Electric plant, net	***************************************	1,548,572		(189,428)		1,359,144
	Long-term accounts receivable		8,811				8,811
	Investment Securities						
	Available for sale		44,396				44,396
	Held to maturity		8,216				8,216
	neid to maturity		0,210				0,210
	Current Assets						
	Cash and cash equivalents		81,364		(880)		80,484
	Accounts Receivable		51,685				51,685
	Fuel		37,111				37,111
	Materials and supplies		36,414		(210)		36,204
	Emission allowances		50,282		(49,929)		353
	Other		2,075		(,,		2,075
	Total current assets		258,931		(51,019)		207,912
	Deferred charges		4,623				4,623
	Other		5,846				5,846
						_	
Total ass	ets	\$	1,879,395	\$	(240,447)	\$	1,638,948
LIABILITI	ES AND MEMBERS' EQUITIES						
LIADILIA	Members' equities	\$	91,986	\$	(1,053)	\$	90,933
	Long-tem debt		1,621,262		(239,394)		1,381,868
	Current liabilities						
	Accounts payable		32,623				32,623
	Accrued expenses		26,721				26,721
	Total current liabilities		59,344				59,344
	Accrued postretirement benefit cost		48,854				48,854
	Other		57,949				57,949
Total liab	ilities and members' equities	\$	1,879,395	\$	(240,447)	\$	1,638,948

PSC Request 2(a)(b) Attachment Page 2 of 2

Staff Third Data Request 5(a)(2) As Revised

East Kentucky Power Cooperative, Inc. and Subsidiary Interim Consolidated Statements of Revenue and Expenses (Dollars in Thousands) unaudited

	Twelve Months Ended Sept 30, 2006		OSS Adj	Adjusted 12 mo Ended Sept. 30, 2006
Operating Revenue	\$ 667,784	\$ (57,472)	\$ (635)	\$ 609,677
Operating Expenses: Fuel Other Production Purchased Power Transmission and Distribution Depreciation General and Administrative	272,236 123,180 103,501 25,196 55,135 39,343	(38,605) (8,554)		272,236 84,575 103,501 25,196 46,581 39,343
General and Administrative	618,591	(47,159)	-	571,432
Operating Margins	49,193	(10,313)	(635)	38,245
Interest expense	79,680	(9,895)		69,785
Net Operating Deficit	(30,487)	(418)	(635)	(31,540)
Nonoperating Margins Interest Income Allowance for Funds Used During Construction Assessments Miscellaneous	7,542 6,619 (32,555) 909 (17,485)		***************************************	7,542 6,619 (32,555) 909 (17,485)
Capital Credits and Patronage Capital Allocations	316		······································	316
Net Deficit	\$ (47,656)	\$ (418)	\$ (635)	\$ (48,709)

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 3

RESPONSIBLE PERSON: Frank J. Oliva

COMPANY: East Kentucky Power Cooperative, Inc.

Refer to the response to the Staff's Third Request, Item 6.

Request 3a. Concerning the response to Item 6(a), what was the average annual interest rate EKPC experienced on its investments for calendar years 2001 through 2006?

Response 3a. Below are the average annual investment interest rates for the years 2001 through 2006:

2001 - 5.90 %	2004 - 3.41 %
2002 - 4.40 %	2005 - 4.19 %
2003 - 3.64 %	2006 - 4.99 %

Request 3b. For the 6 months after test-year end, did EKPC experience interest rates on its investments that were significantly higher, significantly lower, or about the same as experienced during the test year?

Response 3b. For the 6 months after the test-year, the investment rates were slightly higher than experienced during the actual test-year.

Request 3c. What are EKPC's expectations concerning the interest rates available for its investments over the next 12 months? Explain the response.

Response 3c. EKPC anticipates that investment interest rates will remain about the same, if not slightly lower than current levels. Many economists do not anticipate a rise in the Fed Funds rate during 2007 (a rate that helps fuel investment rates), while other economists predict that there may even be a slight drop in the rate.

Refer to the response to Item 6(e), the Attachment, pages 1 and 4 of 6. Explain how EKPC could earn interest income, as shown on page 1 of 6, in February, March, and April of 2005 on "Temporary Cash Investments – Smith Pollution Control Bond Fund" when there is no indication that investment funds were available, as shown on page 4 of 6.

Response 3d. EKPC mistakenly omitted the actual investment in the Smith Bond fund. That investment for the months ending February and March 2005 should have been \$46,299.

Refer to the response to Item 6(e), the Attachment, pages 1 through 3 of 6.

- (1) What was the average actual monthly interest income for the 27 months covered by the response?
- (2) Using the response to subpart (1) above, calculate an annualized interest income.

Response 3e. (1) The average actual monthly interest income for the 27 months ending March 31, 2007 was \$626,410.

PSC Request 3

Page 3 of 3

(2) Using the above actual monthly interest income for the 27 months ending March 31, 2007, the annualized interest income would be \$7,516,920.

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 4

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the response to the Staff's Third Request, Item 9, and the response to the KIUC Second Request, Item 1.52, page 2 of 2. EKPC has proposed to recognize annualized salaries of \$1,996,160 for 30 new employees it had expected to hire by March 31, 2007.

Request 4a. Using the information provided in the referenced data responses, provide the annualized salaries for those positions which have been filled by EKPC.

Response 4a. Annualized salaries for those positions that have been filled by EKPC are listed on page 2 of this response.

Request 4b. Would EKPC agree that, if any of the new positions are recognized as part of the payroll adjustment, only the annualized salaries for the new positions actually hired should be included in the adjustment? Explain the response.

Response 4b. EKPC agrees that only the annualized salaries for the new positions actually hired should be included in the adjustment. As a result of cost containment efforts in place at EKPC, only 7 of the 30 budgeted new employees have been hired.

PSC Request 4a Page 2 of 2

	Annualized Salaries	
	of F	illed Positions
Dale Lab Tech	\$	41,700
Operations EngineerPD	\$	86,800
Const. TechPD	\$	32,575
Landfill Operator	\$	54,000
Plant Safety/Whse Coord.	\$	61,000
Maint Mat Specialist	\$	51,400
Whse Safety Coor	\$	60,000
	Ф	007 475
	\$	387,475

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 5

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 5.

Refer to the response to the Staff's Third Request, Item 10.

Refer to the response to Item 10(c). EKPC was asked if cost/benefit analyses or studies were performed by or for EKPC concerning the "earlyout" retirement program. In addition, if no cost/benefit analyses or studies were performed, EKPC was requested to explain in detail why such analyses or studies were not performed. EKPC responded that there were no cost/benefit analyses performed concerning the program, but failed to provide the requested explanation. Provide the originally requested explanation of why cost/benefit analyses were not performed.

Response 5a. EKPC Human Resources projected the annual savings associated with the "early-out" program, assuming all eligible employees accepted the "early-out" offer, and used that analysis to make the "early-out" offer.

Request 5b. Refer to the response to Item 10(e).

(1) Provide a breakdown of the total annual savings associated with the "early-out" retirement program between salaries, payroll taxes, and employee benefits.

(2) Would EKPC agree that the annual savings associated with this program should be included for rate-making purposes in this proceeding? Explain the response.

Response 5b. (1) Below is a breakdown of the annual savings associated with the "early-out" retirement program.

 Salaries
 \$565,845

 Payroll Taxes
 28,911

 Benefits
 283,720

 Total
 \$878,476

(2) EKPC agrees that the annual savings associated with this program should be considered for rate-making purposes in this proceeding.

Request 5c. Refer to the response to Item 10(f).

- (1) Explain why EKPC believes the total actual costs of the program of \$601,450.60 reflect an immediate cash outlay.
- (2) How many annual installments did EKPC elect to utilize to finance the \$601,450.60?
- (3) If EKPC elected to pay the \$601,450.60 in multiple annual installments, calculate the total cost including the 8.5 percent annual interest charged on the installments.
- (4) If the costs associated with the "early-out" retirement program were to be included for rate-making purposes in this proceeding, would EKPC agree that the adjustment should recognize the number of years over which the total costs have been financed? Explain the response.

Response 5c.

- (1) EKPC has elected to pay the \$601,450.60 in one payment.
- (2) Please see (1) above.
- (3) Not applicable. Please see (1) above.
- (4) Not applicable. Please see (1) above.

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 6

RESPONSIBLE PERSON: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

Request 6. Refer to the response to the Staff's Third Request, Item 11.

Request 6a. As of test-year end, provide the total number of employees who paid a family contribution to medical costs and the total number of employees who paid a single contribution to medical costs.

Response 6a. As of test-year end, EKPC did not require employee contributions to the medical plan. Such contributions began in January 2007. As of January 1, 2007, the participants are categorized as follows:

	Employee	Employee	Employee	Employee, Spouse
	<u>Single</u>	& Spouse	& Children	& Children
Full-Time	113	167	87	243
Retired	64	94	2	3
Disabled	11	12		4
Widows	32		1	
COBRA	5		1	

Request 6b. Explain why it is reasonable to use the mathematic average of the contribution rates for the two options rather than a weighted average approach that would reflect the proportion of family and single contributions.

Response 6b. As of the time of the filing, the categorization above was unknown. The approach used in the rate application was the best estimate available.

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 7

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 7.

Refer to the response to the Staff's Third Request, Item 12.

Request 7a. Do the property tax assessments issued by the Kentucky Department of Revenue ("KDR") always match exactly the net book values EKPC provided to KDR? If no, describe the type and nature of the differences.

Response 7a. Yes, the assessments always match exactly.

Request 7b. Explain how construction work in progress is treated in the determination of property taxes.

Response 7b. Projects that are listed in construction work in process (CWIP) are analyzed in the same manner as all plant accounts and assigned to the appropriate county. The amount reported in each county is 50% of the total CWIP for that county. The exception to this would be land for which EKPC possesses the deed; land is reported at 100% of its value.

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 8

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the Application, Exhibit F, Schedule 8, page 3 of 3, and Schedule 9, page 2 of 2.

Request 8a. Explain in detail why both proposed adjustments to property taxes compare a normalized level of property taxes to the test-year actual property tax expense.

Request 8b. Explain why these proposed adjustments to property taxes were not calculated in a manner similar to the approach used for depreciation expense, where the first adjustment compared the annualized expense to the test-year actual expense and then the second adjustment compared the annualized expense with a final normalization of expense that reflected the new depreciation rates.

Response 8a,b. EKPC's approach to this computation was considered a reasonable method at the time of filing. EKPC could have calculated property taxes in a manner similar to the approach used for depreciation expense. Please see this calculation on Page 2 of 2.

Rate change on property tax

TAX CATEGORY	TAX RATE	9/30/06 NBV	Annualized Taxes
CHARLESTON BOTTOMS	0.007215	23,884,117	172,324
COMMUNICATION EQUIP	0.0015	16,824,088	25,236
COOPER	0.005219	8,855,249	46,216
DALE	0.00616	6,700	41
DIESEL GENERATORS	0.0015	1,441,045	2,162
GENERAL	0.00616	11,033,825	67,968
LAB	0.00616	604,515	3,724
LAND	0.00584	46,933,126	274,089
LANDFILL	0.0015	8,313,000	12,469
LINES	0.0045	35,046,644	157,710
POLES	0.0015	36,334,312	54,501
ROADS	0.00136	-	•
SMITH	0.00616	202,114,185	1,245,023
SPURLOCK	0.00275	300,248,024	825,682
GILBERT	0.00275	379,828,140	1,044,527
STATION EQUIP	0.0015	137,418,542	206,128
VEHICLES			80,000
INTANGIBLE - A/R	0.0025		160,000
INTANGIBLE - INVEST	0.00015		3,600
			4,381,402
Test Year Annualized Proper	ty Taxes		4,346,462
Adjustment			34,939

Page 1 of 3

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2006-00472

FOURTH DATA REQUEST RESPONSE

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 9

RESPONSIBLE PERSON: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

Refer to the response to the Staff's Third Request, Item 13 and the response to the KIUC Second Request, Item 1.23, page 2 of 2.

Request 9a. Does EKPC receive an initial property tax assessment and a final property tax assessment from either the KDR or the various county property valuation administrators? Explain the response.

Response 9a. EKPC prepares and submits its property tax return to the KDR. The KDR, after reviewing the return, sends EKPC an initial property tax assessment for each taxing district. EKPC has 45 days to review the data and make any necessary corrections before the assessments become final. After the assessments are finalized, the KDR sends each taxing district their assessment for use in preparing the actual tax bills.

Request 9b. Do the schedules shown on pages 3 through 8 of 42; pages 10 through 14 of 42; pages 16 through 21 of 42; pages 23 through 28 of 42; pages 30 through 35 of 42; and pages 37 through 42 of 42 reflect a recap of the actual property tax bills received for a particular year? If no, explain what these schedules represent.

Response 9b. Yes, these schedules are a recap of actual tax bills received. Pages 3 through 8 of 42 are for 2001; pages 10 through 14 of 42 are for 2002; pages 16 through 21 of 42 are for 2003; pages 23 through 28 of 42 are for 2004; pages 30 through 35 of 42 are for 2005; pages 37 through 42 of 42 are for 2006.

Refer to the response to the KIUC Second Request, Item 1.23. In this response EKPC has indicated that, with the exception for the state rates, all property tax rates reflect an averaging calculation based on actual 2004 property taxes.

- (1) Explain why it is reasonable to utilize averaged property tax rates to calculate the property tax adjustment.
- (2) Explain in detail why the averaged property tax rates were based on 2004 taxes rather than 2006.
- **Response 9c.** (1) EKPC has historically utilized an average rate calculation, by account code, to budget for property taxes. This methodology has proven to be reasonable for the past.
- (2) Typically the rates do not fluctuate significantly from year to year and 2004 was the last time that EKPC had updated the average rates utilized in the budgeting of property taxes.

Request 9d. Refer to the response to Item 13, pages 37 through 42 of 42.

- (1) Could the proposed adjustment to property taxes have been determined by substituting the adjusted net book values as determined by EKPC for the amounts shown in the column titled "Assess" and then calculating the revised tax bills?
 - (2) Explain why this approach was not utilized.
- (3) Provide a property tax adjustment for EKPC using the approach outlined in subpart (1) above.

- Response 9d. (1) The proposed adjustment to property taxes was determined based on the net book value (NBV) at the account balance level multiplied by the various state and/or taxing district rates. This account balance methodology was a more reasonable approach than the taxing district methodology.
- (2) EKPC has historically tracked property taxes, by taxing district, as the bills are received.
- (3) See the attached schedule, which was prepared utilizing the 12/31/06 NBV, by taxing district, as reported to the KDR on EKPC's property tax return. Please note that the original property tax adjustment was determined based on 09/30/06 NBV, whereas, this schedule is based on 12/31/06 NBV (with 3 additional months of depreciation), which decreased the property tax liability.

PSC Request 9d(3) Attachment Page 1 of 5

		i						מ	DECIDE.					
The state of the s	R/E-1							5	1	-			_	
DISTRICT	2	ASSESS	COUNTY	SCHOOL	HEALTH	LIBRARY	Ä		SCHOOL	FIRE	HOSPITAL	AMBULANCE	OTHER	TOTAL TAX BILL
ADAIR	-	52,422	0.0860	0,4040	0.0250	0.0370	0.0270	0.0070				0.0420		329.21
ADAIR	3	1,786,243	0.1662	0.4450	0.0250	0.0692	0.0521					0.0420		14,281.01
NOWBELOVO	-	234,827	0.1100	0.5470	0.0250	0.0710				0.0400				1,862.18
ANDERSON	9	958,356	0.1443	0.5470	0.0250	0.1506				0.0780				9,064.95
Number of the second se	٢	183,545	0.1350	0.5450		0.0290	0.0160							1,330.70
NEGRA	3	3,386,927	0.1530			0.0254	0.0160							6,584.19
BARREN (BARREN CO SCHOOL)	3	3,386,927		0.5450										18,458.75
BARREN (GLASGOW SCHOOL TAX)	3	92,519		0.6640										614.33
GI ASGOW (BARREN) CITY TAXES	3	92,519											0.1510	139.70
מביים (ביים (ביים מיים מיים מיים מיים מיים מיים מיים		69,371	0.1050	0.3580	0.0400	0.0620	0.0374	0.0156		0.0780		0.0620		525.83
AID	6	948.317	0.1050	0.3580	0.0400	0.0998	0.0575			0.0780		0.0620		7,589.38
BAIH		1 293 194	0.0990	0.5240	0.0200	0.0720	0.0190							9,492.04
BOONE	+	39 760							ļ	0.1500				59.64
BURLINGTON FIRE (BOONE)	- -	097,86								0.1000				0.80
FLORENCE FIRE (BOONE)	-	900						-		0.1020				214.29
HEBRON FIRE (BOONE)		210,093							1	0.1650				9.63
PT PLEASANT FIRE (BOONE)	-	5,837								0.1030		0.000		14.07
INION FIRE (BOONE)	_	10,910								0.0680		0.0010		10.41
WEDOWN CIDE (BOONE)	_	14,237								0.0680		0.0610		18.37
ENOUGH TIME (BOOKE)	-	1 011 557								0.1750				1,770.22
WALIUN PIRE (BOONE)	- "	2 698 279	0 1540	0.5250	0.0200	0.1812	0.0356							24,710.84
BOONE) (0.1500				341.74
BURLINGTON FIRE (BOONE)	1									0.1000				191,35
FLORENCE FIRE (BOONE)	7									0.1050				51.88
HEBRON FIRE (BOONE)								-		0.1650				52.91
PT PLEASANT FIRE (BOONE)	5	32,000								0.1000		0.1000		2,448.59
UNION FIRE (BOONE)	7									0.1000				476.52
VERONA FIRE (BOONE)	E 6							-		0.1750				869.41
WALTON FIRE (BOONE)	2 0	490,000						-					0.4750	908.89
CITY OF FLORENCE (BOONE)	? (0 1540	0.5250	0.0200	0.1812	0.0356							2,440.06
BOONE (CB)	? (*									0.1000		0.1000		466.34
UNION FIRE (CB-BOONE)	, (0.1000				33.27
VERONA FIRE (CB-BOONE)	, ,			a contract									0.2210	24.11
UNION (CITY-EKPC)	- 6	+											0.1990	2,436.35
UNION (CITY-EKPC)	1"												0.1990	464.01
UNION (CITY-CB)	7	-											0.1130	1,143.06
WALTON (CITY-ERPC)	- "												0.2310	1,147.62
WALTON (CITY-EKPC)			0.1170	0.4780	0.0290	0.0630	0.0170	0.0070						571.29
BOURBON	- (_	0.1170	0.4780	0 0200	0.0932	0.0254							11,312.81
BOURBON	1		00000	0.4160	0 0340	0 1888	0.0410			0.1000		0990'0		57.51
воур	7		0.5200	0.4.00	0.030	0.500		0.0260		0.1000				67.28
BOYLE	-		0.0000	0.4740	0.0230	0.0884		0.0692	-	0.1000				7,172.52
BOYLE	7		0.0039	0.9640	0.0200	5000								839.73
BRACKEN		90,70	4,004.4	OF O										5,602.21
	7		1 1041	O 36BO										8,270,96
BRACKEN CB	7	5	Ogo o	0.0000	0.040.0	0.0690	0.0570	0.0190						8.28
вкеатніт		007.1	0,0300	0.4070	0.0400	0.0838	0.0818							1,405.54
BREATHITT	7		0.0000	0.4010	L	0.0440	0.0086							3,918.48
BULLITT			0.0330	0.15.0	_	0.1141	0.0186							16,322.33
BULLITT	η.	1,881,103	0.1330	0,5050	20.0					0.1000				94.16
MT WASHINGTON (BULLITT)										0.1000				98.30
MT WASHINGTON (BULLITT)	7	30,00								0.1000				326.64
NICHOLS FIRE (BULLITT)										0.1000				126.27
SE BULLITI FIRE (BULLI I)	- 6									0.1000				1,523.51
SE BULLITI FIRE (BULLIT)										0.0940				26.95
ZONETON (BUILITY)	8									0.1000				259.30
RITI FR	_		0.0840	0.3770	0.0225	0.0490	0.0384							161.55
					1			_						12

PSC Request 9d(3) Attachment Page 2 of 5

DISTRICT	7	ASSESS	COUNTY	SCHOOL	НЕАГТН		EXT		SCHOOL	FIRE	HOSPITAL	AMBULANCE	OTHER	TOTAL TAX BILL
CAMPBELL	1	1,543	0.1100	0.5090	0.0230	0.0640	0.0210	0.0028						11.26
CAMPBELL	3	340,637	0.1834	0.5270	0.0230	0.0947	0.0376							2,948.89
CAMPRELL-FIRE DISTRICT #4	F	1,543								0.1000				1.54
CAMPBELL GIDE DISTOICT #4	6	340 637								0.1000				340.64
Over Other Park Bloom of the P	-	5 885	0.0550	0.4620	0.0560	0.0690								37.78
CARTICLE	0	1 250 580	0 1530	0.4620	0.0560	L					-			9,508,16
CANNOLL Control and Control	, ,	000,002,				_				0 08000				64.76
GHENI FIRE (CARROLL)	7,	#56.00						<u> </u>					0.2500	202 39
GHENT City taxes (CARROLL)	7	80,824			1		0000		The state of the s			00000	0,520	20.202
CARTER	-	83,598	0.0700	0.4040	1		0.0230					0.0730		200.000
CARTER	6	1,041,887	0.0790	0.4040	1	_	0.0442					0.0730		6,565.97
CASEY	-	184,681	0.0690	0.3900		0.0630	0.0140	0.0140			0.0650	0.0230		1,224.44
CASEY	3	6,223,814	0.0690	0.3900	0.0250	0.1236	0.0153				0.0650	0.0230		44,245.09
CLARK	-	30,832,496	0.0800	0.4030		0.0490	0.0170							179,136.80
NEW 13	6	24 924 363	0.1050	0.4240	L	L	0.0276							166,320.27
OLIVATION OF THE PROPERTY OF T	-	118 494	0.0750	0.4670	L	L	0.0330	0.0100						810.50
V. A.	. 6	1 500 212	0.0750	0.4670	1	_	0.0565							10.928.20
	; -	070 074	0.0570	0805.0	L	L	0.0260	0.0147						814.79
CLINTON	- (130,010	0.0370	0.3350	1	1	0.0200							5 911 10
CLINTON	7	1,029,27.1	0.0700	0.4000	1	0.0201	20.00	<u> </u>			-		0.4700	01111012
ALBANY (CLINTON)	=	7,240		, and a					-				0.133	13.02
ALBANY (CLINTON)	6	102,507			_	_		1					0.2000	205.01
CUMBERLAND	ო	1,074,479	0.0530	0.3280		0.0100	0.0105					0.0250		4,905.43
ELLIOTT	1	177,608	0.1240	0.4060	0.0250		0,0650	0.0200				0.0880		1,292.99
11011	6	2.361.060	0.1240	0,4660	L		0.0650					0.0880		18,132.94
	1	30 826	0.0840	0.4570	L	06200	0.0400	0.0150				0.1000		340.51
ESTILL	1,	010,000	0100.0	0.4040	1	L	30000					0 4000		10 220 14
ESTILL	7	386,250	0.1030	0.4040	1	1	2000	1000			- Company	200	0.090.0	4 029 37
FAYETTE	-	144,894	0.0800	0.5410	1		0.0031	0.0004					0.0000	1,032.37
FAYETTE	6	1,370,417	0660'0	0.5410	0.0280		0.0034						o.ueuu	10,023,23
LEXINGTON (FAYETTE)	:	144,894			┙								0.1904	275.88
FLEMING	-	177,945	0.1660	0.3510			0.0330	0.000.0				0.0450		1,236.72
FLEMING	3	3,971,328	0.1660	0.3590	0.0400		0.0453	1				0.0450		28,907.30
FLOYD	-	131,194	0.1280	0.5510		0.0400	0.0155	0.0030						1,027.90
FLOYD	9	973,024	0.1470	0.5940	0.0400	0.0747	0.0250							8,569.42
AUXIER (FLOYD)	F	16,034								0.1000				16.03
AUXIER (FLOYD)	3	57,824								0.1000				57.82
GARRETT FIRE (FLOYD)	-	1,200								0.1000				1.20
MIDDI E CREEK FIRE (FLOYD)	6	241.285								0,1000				241.29
MIDDLE CREEK I WE (LECTO)	-	113 960								0.1000				113.96
NOKIH FLOTO (FLOTO)	10	110,000								0.1000				458.91
NORTH FLOTO (FLOTO)	7 (100,000											0.2980	640 70
PRESTONSBURG (FLOYD)	7	100,012	0.4070	0.10	\perp	0900	1000	0800						354 88
FRANKLIN	1	44,203	0.1370	0.3160	\perp	1	12000	٠,						10.703
FRANKLIN	6	66,235	0.2030	0.5180	\perp	4	טרבטיט							15.120
GALLATIN	=	13,182	0.1000	0.5860	0.0550	4	0.0350	0.0090						112.97
GALLATIN	6	1,257,940	0.1630	0.5860	1		0.0476							12,213.00
GARRARD	=	462,721	0.0790	0.5990	_	4	0.0311							3,651.33
GARRARD	6	1,643,472	0.1000	0.6150	0.0400	0.1219	0.0866							15,834.85
GARRARD FIRE #1	-	448,682								0.0830				372.41
GARRARD FIRE #1	6	069'889								0.0830				567.38
GARRARD FIRE #2	-	14,039								0.0650				9.13
GARRARD FIRE #2	6	309,622								0.0650				201.25
CARDARD FIRE #3	8	275,454		-						0.0600				165.27
GARRARD FIRE #4	6	55,196								0.0600				33.12
GARRARD FIRE#8	6	319,610								0.0600				191.77
INVAC	-	838.747	0.1440		0.0280	0.0480	0.0207	0.0100					0.0130	2,211.78
TIVEGO	6	2.332.234	0.1440		0.0280	L	0.0390						0.0130	7,171.62
	1	772 858		0.5130		L								4,302.77
GRANI	- (*	2 332 234		0.5130										11,964.36
WILLIAMSTOWN SCH (GRANT)	7-	6.500		0.7670										49.86
WILLIAMSTOWN SCH (GRANT)	6	256.529		0.7840										2,011.19
WILLIAMSTOWN SCH (GRANT)	-	6.500											0.2860	18.59

PSC Request 9d(3) Attachment Page 3 of 5

DISTRICT	2	ASSESS	COUNTY	SCHOOL	HEALTH	LIBRARY	EXT	SOILS	SCHOOL	FIRE	HOSPITAL	AMBULANCE	_	TOTAL TAX BILL
WILLIAMSTOWN SCH (GRANT)	3	256,529			_								0.5540	1,446.82
Name	-	23,130	0.1080	0.3850	0.0250	0.0370	0.0363					0960.0		158.97
2000	3	2,917,359	0.1080	0.3850		0.0627	0.0506					0.1000		21,334.65
Cherry	7	39.950	0.1130	0.6240	0.0390	0.0670	0.0150							342.77
GNERO	6	727 502	0.1507		_	0.1101	0.0160		1					6,837.06
GREENOF TOWNS THE CORRESPONDENT	-	954.786			_	_				0.1000				954.79
LITTE SANDI THE COLETION	6	483.011								0.1000				483.01
LITTE SANDI TINE (ONE NOT)	6	262 837								0.1000				262.84
LLOTD FIRE (GREENOT)) -	2 500								0.1000				2.50
MALONETON FIRE (GREENUP)	- 6	48 362								0.1000				48.36
MALONETON FIRE (GREENUP)	, ,	183 086						-		0.1000				183.99
LOAD FIRE (GREENUP)	? (100,000								0.1000				342.21
OLDTOWN FIRE (GREENUP)	n ,	342,214											0.1220	69.79
ELIZABETHTOWN (City tax bill) (HARDIN)		55,480												474.08
HARDIN	-	329,219	0.1440											28 204 RD
HARDIN	3	4,263,119	0.1496											4 555 95
NICE	-	329,219		0.5060										1,000.00
HADDIN (FI 17 ARETHTOWN SCHOOL)	-	55,480							0.5970		ALL PARTY OF THE P			331.22
THE PARTY AND TH	-	72.670	0.2990	0.3880	0.0350	0.0540	0.0630	0.0000						616.24
HAKLAN	1	100 780			0.0350	0.0699	0.0774							9,251.69
HARLAN	`\ 	100,100		03720	L	L.	0.0280	0.0070		0.0600				437.15
HARRISON	- -	000,40			_	L	0.0620			00900				29,089.15
HARRISON	£	3,557,435			1	\perp	0.00			0.0600				3.499.03
HARRISON CB	<u>م</u>	427,911	0.1290		0.0500	1	חיספקה			2000		0770 0		654.28
HART	-	94,686				0.0450						0.000		0 574.00
HART	3	1,261,094	0.1210		_							0.0900		3,5/4,23
HENDY	-	72,652		0.5430		0.0490	0.0300	0.0070						571.04
	6	974,346		0.5430	0.0400	0.0976	0.0482							8,650.24
TURKE	-	232 892				0960	0980'0	0.0180						1,853.82
JACKSON	10	3 363 104	0.0710		L	0.2000	0.0544							30,954.84
JACKSON	,	2,500,10			L	L							0.1700	2.55
MCKEE (JACKSON)	- '	000,1											0.1700	159.96
MCKEE (JACKSON)	"	94,090	0000	0 5040	00100	0.0480								2,351.11
JESSAMINE	- -	001,626			_	L				0.0460				9,297.76
JESSAMINE	7	1,037,760	0.1300		1	\perp				0 0480				3.25
JESSAMINE FIRE	-	19/9	-							0.0480				3.25
NICHOLASVILLE (JESSAMINE)	7	6,761											0.1760	11.90
NICHOLASVILLE (JESSAMINE)		6,761			\perp	\perp	0000	4						135.06
NOHNSON	-	21,077			4	\perp	0.0228	0.0070			- Constitution			11 324 59
JOHNSON	3	1,650,093			\perp	_	0.0275						0050	2 140 86
KENTON	-	256,390			4	\perp							0.0365	11 760 46
KENTON	3	1,217,325	0.1800	0.5580	0.0200	0.1616	0.0100						0.0303	11,700,40
INDEPENDENCE (KENTON)	1	217,812			-					0.1950				424.13
INDEPENDENCE (KENTON)	3	570,357								0.2000				1,140.71
BOONE/WALTON FIRE (KENTON)	1	38,578								0.1750				147.44
BOONE/WALTON FIRE (KENTON)	3	238,519								0.1750				254 95
PINER-EISKBURG (KENTON)	3	254,952								0.1000				55.65
KENTON FIRE	3	153,497				\Box				0.2000			1000	306.99
KENTON CB	3	217,110	0.1800	0.5580	0.0200	0.1616	0.0100						0.0365	2,037.40
BOONE/WALTON FIRE-KENTON CB	3	81,452								0.1750			7110	142.34
CITY OF INDEPENDENCE (KENTON)	-	217,812											0.1770	20000
CITY OF INDEPENDENCE (KENTON)	3	570,357						_					0.5780	3,230.00
KNOX	-	208,702	0.1090	0.4090				0.0140	-			0.0420		1,412.91
KNOX	3	704,394	0.2442		0.0400	0.1086						0.0657		6,442.39
1 ARIF	-	2,220	0.1450	0.4010		_			0.0580					15.34
ARIE	3	1,042,413		3 0.4010					0.0580					8,501.92
I AIIREI	_	1,322,652		0.4540	_	_		0.0040						8,491.43
A ALIBE	3	3,927,962												26,882.97
AWRENCE		9,220		0.4200				0.0120						68.99
LAWRENCE	3	655,516						-4		15.00				3,1/6.33
33	-	1,550		0.2990	0.0380	0.0610	0.0360	0.0280						12.35
						l						-		

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DISTRICT	2	ASSESS	COUNTY	SCHOOL	HEALTH	4	EXT		SCHOOL	FIRE	HOSPITAL	AMBULANCE	O HEX	IOIAL IAN BILL
LETCHER	1	28,426	0.1300	0.4670	0.0350	_	0.0384	0.0120						210.75
LETCHER	3	359,036	0.1300	0.5050	0.0350	_	0.0503							2,865.11
I EWIS	-	31,593	0.1280	0.4070	0.0340	0.0360	0.0460							205.67
: EWIS	6	808,488	0.1410	0.4070	0.0380	0.0634	0.0827							5,918.94
TO I SECTION (I EMIS)	3	373,755								0.1000				373.76
MOOI N	F	81,465	0.0890	0.3760	0.0400	0.0330	0.0320			0.0660		0.0440		553.96
NOON	8	807,962	0.0890	0.3820	L		0.0598			0.0660		0.0426		5,949.02
MADISON	-	315,546	0.0820	0.5350	L	L	0.0150					0.0530		2,442.33
Made	6	4.599.194	0.1000	0.5830	L	0.0834	0.0325					0.0600		41,802.07
MADISON TOTAL STATE STAT	, ,	13 66R	List of the last o			L							0.0300	4.10
BEREA (MADISON)	7	47 033	0.2850	0.4100	0.0500	0.0520	0.0740	0.0140						406.75
MAGOFFIN	- [070'14	0.2230	0.4440	L	L	0.0935	┺-						18.549.81
MAGOFFIN	3	1,687,942	0.4718	0.4110	L	\perp	0.0953						0.0110	198.77
MARION	-	30,637	0.0820	0.4720	\perp	1	0.0210						0 0440	19 811 97
MARION	6	2,774,008	0.1090	0.4720	0.0300	0.0466	0.0456						2 4040	1 82
LEBANON (MARION)	-	1,000											0.1013	70.1
LEBANON (MARION)	3	18,924			\perp	\perp							0.1950	35.90
MARTIN	-	28,025	0.1130	0.5310		0.0790	0.0370							222.80
MARTIN	3	12,616	0.1280	0.5310	0.0350	0.1097	0.0627							109.31
NOSON	-	44.039	0.1710	0.4470	L	0.0530	00000							343.94
MASON		3 983 546	0.2110	0.4470			0.0445							34,063.30
NACON THE PROPERTY OF THE PROP	1	151 272 E25			L	L							0.1500	226,908.94
MAYSVILLE (MASON)	- (020,212,100	***************************************										0.1500	40,283.17
MAYSVILLE (MASON)	,	20,000,440	0.4740	0.4470	o o o	0.0530	00300							93.57
	- '	100.11	2 2 2	0.4470	\perp	L	0.0445							7.042.92
MASON CB	3	823,637	0.2110	0.4470	_	0.0120	0.044						0 1500	8 328 33
MAYSVILLE CB (MASON)	-	5,552,219											0.1500	1 367 78
MAYSVILLE CB (MASON)	m	911,855			\perp	0000		0.04						454.93
MCCREARY	-	75,445	0.1000	0.3880	_	\perp		0.0130						13 990 53
MCCREARY	6	1,856,739	0.2040	0.3980	0.0400	0.1115				000,0				00.000,00
CENTRAL FIRE (MCCREARY)	-	200								0.100				807.44
CENTRAL FIRE (MCCREARY)	3	807,436								0.1000				75.95
SOUTH FIRE (MCCREARY)	-	75,245								0.1000				549 39
SOUTH FIRE (MCCREARY)	3	549,386								0.100				184 54
NORTH FIRE (MCCREARY)	6	184,512			_	1	0000	- -		0001.0				67 672
MENIFEE	-	35,338	0.1050	0.3570	ļ	0.0000	0.0400	0.0100		0.000				7 494.09
MENIFEE	e	995,628	0.1290	0.35/0	_	\perp	0.0000	4-		0.100				507 46
MERCER	-	59,991	0.0800	0.5600	_	_		0,00,0		0,0040				11 964 62
MERCER	3	1,233,339	0.0920	0.5780	0.0400	_		0.00		0,0040		0090		362.36
METCALFE	-	41.187	0.0720	0.4040		0.0380	0.0490					0.0000		22.188.51
METCALFE	m ,	3,606,129	0010.0	0.4040	0000	0,0029	0.020			0.0890		0.0260		1,131.23
MONTGOMERY	- (146,201	0.0030	0.400	1	┸				0 1000		0.1000		12,291.50
MONTGOMERY	_ε ·	1,328,380	0.0860	0.4000	0.0400	┸		0.0470		3		0.0640		493.31
MORGAN	- '	63,245	0.0350		1	1		+-				0.0640		22,935.65
MORGAN	7	2,044,032	0.0000		┸	\perp		0.0050						1,744.09
NELSON	- 0	4 180 788	0.1370			0.0806		4			VICE AND THE PROPERTY OF THE P			10,727.93
NELSON	1	3 370	00200											2.37
NORTH FIRE (NELSON)	- •	3,012	00200											436.05
NORTH FIRE (NELSON)	7 -	132,323		0.5570										29.987
BARDS I OWN INDEPENDENT SCHOOLS (NELSON)	- 6	14 719		0.5940										87.43
BARDS I OWN INDEPENDENT SCHOOLS (NELSON)) -	132 249											0.1997	264.10
CITY OF BARDS I OWN (NELSON)	- "	14 719											0.2125	31.28
CITY OF BARDSTOWN (WELSON)) [132.249											0.6030	797.46
BARDSTOWN INDEP SCHOOLS (CITY TAX:NELSON)	e e	14.719											0.6100	89.79
MICHOL AS	-	58,054	0.1300	0.3400	0.0400	0.0400				0.0480				347.16
MOHOL AS	3	1,636,426	0.1520			0.0714				0.0480				11,085.15
OWEN	-	94,677	0.3200											814.22
OWEN	٣ -	1,901,768	0,4797			\perp								50,555,55
OWSLEY	-	10,978	0.1550	0.4180	0.0400	0.1030	0.0811	0.0520		1			1	44 064 54
1	-		0 4550						_			_		

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1 1979 197	1 1,942,386 0,3100 0,5369 0,5699 0,5669 0,5699 0,5669 0,5					0.0660	000	.0840	3,628.68
1	3					0.0660	00	.0840	3,520,50
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1 11/10/21 11/10	1 119,571 0,0390 0,2170 0.00 1 13,4435 0,0390 0,3470 0.00 1 13,44,862 0,0350 0,4447 0.00 1 13,44,862 0,0350 0,4470 0.00 1 226,286 0,1340 0,4700 0.00 1 226,286 0,1340 0,4300 0.00 1 42,914 0,1340 0,4300 0.00 1 42,914 0,1340 0,4300 0.00 1 42,914 0,1340 0,4300 0.00 1 42,914 0,0620 0,4300 0.00 1 56,365 0,0760 0,4300 0.00 1 56,365 0,0760 0,4300 0.00 1 56,365 0,0760 0,4300 0.00 1 56,365 0,0760 0,4300 0.00 1 56,365 0,0760 0,4300 0.00 1 132,831 0,0160 0,4400 0.00 1 132,831 0,1160 0,4300 0.00 1 132,900 0,1100 0,4300 0.00 1 14,17 0,1100 0,4300 0.00 1 14,454 0,0710 0,4300 0,4400 1 14,454 0,0710 0,4300 0,4400 1 14,454 0,0710 0,4300 0,4400 1 14,425 0,0130 0,4440 1 14,225 0,000 0,3800 1 14,225 0,000 0,3800 1 14,225 0,000 0,3800 1 14,225 0,000 0,3800 1 14,225 0,000 0,3800 1 14,225 0,000 0,3800 1 14,225 0,000 0,3800 1 14,225 0,000 0,3800 1 14,245 0,0300 0,4440 1 14,245 0,0300 0,4440 1 14,225 0,000 0,3800 1 14,225 0,000 0,3800 1 14,225 0,000 0,3800 1 14,245 0,0300 0,4440 1 14,245 0,0300 0,4440 1 14,245 0,0300 0,4440 1 14,245 0,0300 0,4440 1 14,225 0,000 0,3800 1 14,225 0,000 0,3800 1 14,225 0,000 0,3800 1 14,225 0,000 0,000 1 14,225 0,000 0,000 1 14,225 0,000 0,000 1 14,225 0,000 0,000 1 14,225 0,000 0,000 1 14,225 0,000 0,000 1 14,225 0,000 0,000 1 14,225 0,000 0,000 1 14,225 0,000 0,000 1 14,225 0,000 0,000 1 14,225 0,000 0,000 1 14,225 0,000 0,000 1 14,000 0,000 0,000 1 14,000 0,000 0,000 1 14,000 0,000 0,000 1					0.0660		.0840	14 136 87
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1 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	1,14,14,652					0260'0	-		7.885.23
1 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	1 314882 0.0530 0.4440 0.0530 0.4440 0.0530 0.4420					0250'0		-	100.370.89
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1 1,25,2,14 1,25,2 1,2	1 204,215 0.0800 0.4270 0.0000 0.4270 0.0000 0.4270 0.0000 0.4420 0.0000 0.4420 0.0000 0.4420 0.0000 0.4420 0.0000 0.4420 0.0000 0.4420 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0					0.0660			11,863.67
1	1,1254,310 0,0570 0,4800 0.0 1					0.0920	0.0370		1,494.85
1 3,124,415 0,0350 0,0420 0,0	1 204,215 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.4420 0.0570 0.452	 				0.0920	0.00	-	24 526 68
1 1 1 1 1 1 1 1 1 1	3 3,128,403 0,0920 0,4420 0.00000 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000						0.0500		24,320,00
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1 12,22,212 1,111 1,11	BY) BY) BY					_		_	4,380.20
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1	1 132,831 0.110 0.6410 0.6500							+	40 704 2E
1	BY) BY) BY) BY BY BY BY BY BY B							1	13,701.35
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1 87,284	BY) 1 87,386 BY) 1 1 87,386 Otherwise of the control of the co				0.0700				87.99
87) 1 (1417)	BY) 1 87,986 BY 3 14,117 BY 1 4,926 O 3 560,522 O 3 991,423 0.1260 0.4080 3 941,423 0.0900 0.5320 0.5370 0.5370 0.5370 0.5370 0.5370 0.5370 0.5370 0.5370 0.4230 0.5320 0.5320 0.5320 0.5320 0.5320 0.5320 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4230 0.4440 0.4230 0.4440 0.4230 0.4440 <td></td> <td></td> <td></td> <td>0.1000</td> <td></td> <td></td> <td></td> <td>14.12</td>				0.1000				14.12
1 39,2828 1,1100 0,1000	1 38,236				0.1000				20 00
1 58,258 Chorage Chora	1 38,236		+	_	0.1000			1	17.00
3 560,522 0,1060 0,1000 0,1000 0,1000 0,0390 0 3 96,4728 0,1260 0,0480 0,0480 0,0480 0,0480 0,0332 0 0,0500 0	3 560,522 1 4,569 3 991,423 1 154,963 3 826 1 154,963 0.0900 3 677,595 0.0710 1 114,454 0.0710 3 1,130,178 0.0710 1 32,906 0.0710 1 32,906 0.0710 1 426 0.0710 0,5320 0.5320 1 40,672 0.1350 3 3,155 0.1350 1 40,672 0.0730 3 1,922,862 0.0730 1 142,225 0.1080 3 2,306,619 0.2562 1 119,153 0.2440 2 0.030 0.3860 3 1,115,482 0.3393 0.4380 1 119,163 0.3393 0.4380				0.1000	_			260.95
1	1	-	+		0 1000				4.57
3 881,4253 0.0400 0.0400 0.0322 0.0500 <td> 1 4,505 1,505 </td> <td>_</td> <td></td> <td></td> <td>0.00</td> <td></td> <td></td> <td></td> <td>991.42</td>	1 4,505 1,505	_			0.00				991.42
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1 144,953 0.0400 0.040	1	0.0	190				00000	+	1 201 20
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1 114,454 0,0710 0,440 0,0390 0,0160 0,0370 0,0370 3 1,130,178 0,0710 0,6400 0,0400	114,454 0.0710 0.4230 0.4230 0.4230 0.4440 0.4250 0.4240 0.4240 0.4250							_	751.96
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1 32,906 0,0710 0,5320 0,0400 0,1633 0,0602 9 3 786,884 0,0760 0,5320 0,0400 0,1633 0,0602 9 <td> 32,906</td> <td>L</td> <td></td> <td>9</td> <td></td> <td></td> <td></td> <td></td> <td>00 040 0</td>	32,906	L		9					00 040 0
3 786,884 0,0760 0,5320 0,0400 0,1633 0,0402 0,1633 0,0403	785,884 0.0760 0.5320 0.4520 0.3700 0.3500 0.3770 0.3800 0.3770 0.4440 0.552,882 0.0730 0.4440 0.3822 0.0730 0.3820 0.3820 0.2305,619 0.2562 0.4020 0.3820 0.3820 0.3420 0.3820 0.3420 0	╧							6,646.30
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COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 10

RESPONSIBLE PERSON: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

Request 10. Refer to the response to the Staff's Third Request, Item 17.

Request 10a. Explain why the final costs for the Powell-Taylor, Southpoint, and Cedar Grove substations were higher than the estimated amounts provided in Exhibit F, Schedule 25 of the Application.

Response 10a. Actual site acquisition (land) costs were higher than estimated on the Powell-Taylor and Cedar Grove substations. Material and labor costs were higher than estimated on the Southpoint substation.

Request 10b. Provide a revised Schedule 25 reflecting the actual cost at inservice date and any actual substation revenues.

Response 10b. Please see page 2 of this response for a revised Schedule 25.

Post 9/30/06 fixed asset additions/c	Post 9/30/06 fixed asset additions/depreciation/property tax, with revenue offset	offset	New	Proposed	Proposed	
Project	Month Placed In Service	Cost	Depr Rates	NBV	Property Tax	Total \$
Powell Taylor Line138KV	January 2007	995,557	15,531	980,026	4,410	
1 Southpoint Sub	March 2007	695,196	23,776	671,420	1,007	
2 BG Parkway Sub	December 2006	631,037	21,581	609,456	914	
3 Cedar Grove Sub	January 2007	1,255,173	42,927	1,212,246	1,818	
4 Powell Taylor Sub	January 2007	812,070	27,773	784,297	1,176	
Spurlock Common Coal Handling	October 2006	22,134,358	571,209	21,563,149	32,345	
			702,797		41,671	744,468
Substation Revenue 1 Southpoint (7500-14,999) 2 BG Parkway (7500-14,999) 3 Cedar Grove (Over 15,000) 4 Powell Taylor (7500-14,999)						(34,260) (34,260) (55,260) (34,260)
Metering Point Revenues						(000'9)
Adjustment						580,428

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07

REQUEST 11

RESPONSIBLE PERSON: Frank J. Oliva

COMPANY: East Kentucky Power Cooperative, Inc.

Request 11. Refer to the response to the Staff's Third Request, Item 21.

Request 11a. Concerning the response to Item 21(a), if EKPC has a copy of the National Rural Utilities Cooperative Finance Corporation's ("CFC") post-September 30, 2006 credit evaluation, provide copies of that evaluation. EKPC may request confidential treatment of the response pursuant to 807 KAR 5:001, Section 7. If EKPC does not have a copy of the most recent CFC credit evaluation, but has summaries or other information from the evaluation, provide copies of the summaries or other information.

Response 11a. EKPC does not have a copy, summaries, or other information related to CFC's post-September 30, 2006 credit evaluation of EKPC. This information is not distributed outside of CFC.

Refer to the response to Item 21(a)(3), the Attachment, page 8 of 11. Under the heading "New Loan Applications Submitted" is the reference to a loan for the construction of the Smith Unit 1 and combustion turbines 8 through 12. Given the May 11, 2007 Order in Case No. 2006-00564, will EKPC be amending the referenced loan application? Explain the response.

Response 11b. Based on new cost estimates, EKPC is drafting a revision to the original RUS loan application for the construction of the Smith CFB Unit 1 and combustion turbines 8 and 9. EKPC expects to complete this revision in June 2007.

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07

REQUEST 12

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the response to the Staff's Third Request, Item 24(b). Request 12. Provide copies of the 2006 Annual Report. If the report is not available as of the date of the response to this request, explain the reason(s) for the delay and indicate when the report will be available.

Response 12. EKPC's 2006 Annual Report is provided on the enclosed CD.

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 13

RESPONSIBLE PERSON: Frank J. Oliva

COMPANY: East Kentucky Power Cooperative, Inc.

Request 13. Refer to the response to the Staff's Third Request, Item 32.

Request 13a. Indicate when the key assumptions, data sources, and commentary for the 2007-2026 financial forecast were developed.

Response 13a. The key assumptions, data sources, and commentary for the 2007 – 2026 financial forecast were developed in December 2006 and finalized in January 2007 before being submitted to the Board of Directors for review at the February 6, 2007 Board Meeting.

Request 13b. Were the Board of Directors advised of any changed conditions that directly affected the assumptions, data sources, or commentary used to develop the 2007-2026 financial forecast before it was adopted on March 5, 2007? Explain the response.

Response 13b. A presentation was made at the February Board Meeting, where all major assumptions and results of the financial forecast were discussed. At the March Board Meeting, the Board was advised of any changes in assumptions, inputs, or

commentary to the financial forecast. An updated financial forecast was approved. A copy is attached.

Refer to page 4 of 24. Explain in detail why the assumptions concerning the annual off-system sales for the period 2007-2010 are reasonable given the following:

- (1) EKPC's actual off-system sales levels in 2005 and 2006;
- (2) EKPC anticipates new base load generation not becoming operational before 2009.
- (3) In the response to the Staff's Third Request, Item 39, page 2 of 2 is the statement, "EKPC's off-system sales are minimal, due to the absence of excess capacity."

Response 13c. EKPC uses computer models to simulate system operation. The model dispatches units to meet native load levels and to make purchases and sales based on expected market prices. Projections of market purchases and sales have a high degree of uncertainty due to the volatility in the prices of natural gas and market purchases. Outages on generating units may also add to the uncertainty in purchases and sales. In addition, actual load data can vary greatly from load projections due to variances in weather and the economy and cause actual purchases and sales to vary greatly.

Even though the financial forecast for the period 2007-2010 projects gross revenue from off-system power sales to be between \$22 million and \$35 million annually, it is assumed that the majority of these off-system sales will be made from combustion turbine generation, resulting in a high cost of sales (due to generation from natural gas) and a low margin per MWh. Margins from off-system sales are budgeted to be only 2% to 8% of the gross revenue from off-system sales for the years 2007-2010. EKPC management deems these projected margin levels to be reasonable for the time period specified.

Refer to page 5 of 24. Is it correct that EKPC anticipates that Smith Unit 1 will become operational in June 2011? If yes, explain why the assumptions stated an operational date of June 2010.

Response 13d. EKPC currently considers commercial operation of Smith Unit 1 in Summer 2011 to be achievable if the Supplemental Environmental Impact Statement (SEIS) for the project is approved by RUS by August 2008. At the time the original assumptions were developed, June 2010 was considered to be achievable. However, RUS subsequently indicated that the SEIS was expected to be approved in August 2008 which delayed commercial operation to Summer 2011. A commercial operation date of June 2011 is used in the updated financial forecast.

Request 13e. Refer to page 7 of 24.

- (1) Would EKPC agree that the response to the Staff's Third Request, Item 6(e), the Attachment, page 6 of 6, shows total sources of funds available for investment as of December 31, 2006 to be \$208,127,891?
- (2) Explain why the 2007-2026 financial forecast reported that funds available for investment were estimated to be \$93.9 million as of December 31, 2006, in light of the information provided in the response to the Staff's Third Request, Item 6(e).
- Response 13e. (1) The response to the Staff's Third Request, Item 6(e), the Attachment, page 6 of 6, provides a schedule showing the balance of investments that generated interest income for specific periods, which includes December 2006. The \$208,127,891 is broken down as follows:

\$39.6 million Investments included under property & investments in the financial forecast

\$92.6 million

Temporary cash investments included under cash and

investments in the financial forecast

\$75.9 million

A cushion of credit account included as an offset to long-term debt in the financial forecast. This is a program established by the Rural Utilities Service (RUS). Under this program RUS borrowers may make voluntary deposits in a special account. This account accrues interest to the borrower at a rate of 5 percent per annum. The amounts in the cushion of credit account (deposits and earned interest) can only be used to make scheduled payments on loans made or guaranteed under the RE Act.

(2) The \$93.9 million shown in the financial forecast as of December 31, 2006 includes the \$92.6 million temporary cash investments as shown in the response to Question 13(e)(1), plus an additional \$1.3 million balance in EKPC's bank accounts.

Request 13f. Refer to page 9 of 24. Explain in detail why the assumption concerning the capacity and energy purchases from the Southeastern Power Administration do not reflect the situation at the Wolf Creek dam.

Response 13f. EKPC was notified by the Corps of Engineers in early February 2007 that pool operations at Lake Cumberland were being modified and that the lake level would be dropping to approximately 680 feet. In late February 2007, EKPC was notified that an Interim Operating Plan would go into effect beginning February 25, 2007 as a means of sharing the reduced level of hydropower benefits on an equitable basis. These changes in operations at Lake Cumberland came after the financial forecast was developed.

PSC Request 13b Attachment Page 1 of 23

TWENTY-YEAR FINANCIAL FORECAST EQUITY DEVELOPMENT PLAN 2007-2026

FEBRUARY 2007 (REVISED 2-14-07)

EAST KENTUCKY POWER COOPERATIVE, INC.

TWENTY-YEAR FINANCIAL FORECAST EQUITY DEVELOPMENT PLAN 2007-2026

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EAST KENTUCKY POWER COOPERATIVE

TWENTY-YEAR FINANCIAL FORECAST EQUITY DEVELOPMENT PLAN 2007 – 2026

This financial forecast reflects actual operating data for 2005 and 2006, the budget for 2007 and 2008, and a projection of revenue requirements and operating costs for the period of 2009 through 2026. The projections made in this forecast are based on the Integrated Resource Plan filed in October 2006, the 2006 Load Forecast dated August 2006, the 2006 Evaluation of Production O&M Expense, the Board approved Twenty-Year Financial Forecast for 2006-2025 dated February 2006, and other appropriate updated information.

Key Assumptions

1. Annual compound load growth for the member cooperatives for the forecast period is provided below:

Winter Demand	2.5%
Summer Demand	2.1%
Energy	2.4%

- 2. 2006 information is based upon twelve months of actual information.
- 3. Budget information is used for the years of 2007 and 2008.
- 4. The general rate of escalation and the capital cost escalation rate are estimated to be 3.0 percent per annum for the forecast period. Since the rate of increase in medical costs is expected to exceed the general inflation rate, the escalation rate for employee benefits has been assumed at 4.0 percent per annum.
- 5. Annual off-system sales are estimated to range from 397,120 to 1,370,400 MWh per year from 2009 through 2026. The 2007 and 2008 budgets are estimated at 307,600 MWh and 373,290 MWh, respectively. Margins on off-system sales are assumed to be 4.0 mills per kWh in 2006, with this margin escalating at one-half the escalation rate.
- 6. Interest rates in this forecast for long-term debt are estimated to be 6.0 percent in 2009 and 2010, increasing to 6.5 percent from 2011 through 2026. Short-term debt interest rates are estimated to be 7.25 percent from 2009 through 2026. Taxexempt bonds are estimated to be 4.0 percent from 2009 through 2026.
- 7. Internally generated funds are invested at an annual investment rate of 5.0 percent from 2007 through 2026.

- 8. Revenue requirements and rates in this forecast have been determined on the basis of the annual TIER level required by RUS. A rate increase has been deemed appropriate in those years when the current rates provide a TIER less than 1.05. The 1.05 minimum TIER is in compliance with RUS's "General and Pre-Loan Policies and Procedures Common to Insured and Guaranteed Electric Loans", 7 CFR Part 1710 published January 9, 1992.
- 9. The current Fuel Adjustment Clause (FAC) base fuel charge of 20.25 mills per kWh is held constant throughout the forecast period.
- 10. The U.S. EPA has issued new regulations for the reduction of sulfur dioxide, nitrogen oxide, and mercury emissions. The Clean Air Interstate Rule (CAIR) and the Clean Air Mercury Rule (CAMR) will require a 60-70% reduction in the emissions of these pollutants. The CAIR rule for SO₂ and NOx requires reductions by 2010 and the CAMR rule for mercury requires reductions in 2010. These regulations will necessitate the installation of pollution controls at the various EKPC power plants to achieve the necessary reductions.

The estimated annual costs of these controls have been included in the financial forecast and are listed in Exhibits A & B.

- 11. Clean Air Act compliance costs and PSC funding requirements for SFAS 106 (Post-Retirement Employee Benefits) have been included in this forecast.
- 12. In March 2005, the E. A. Gilbert Generating Unit became operational. This is a coal-fired 268 MW circulating fluidized bed unit. Capital cost was \$400 million.
- 13. In April 2009, Spurlock Unit No. 4 will become operational. This is a coal-fired 278 MW circulating fluidized bed unit. Estimated capital cost is \$522 million.
- 14. In June 2011, Smith Unit No. 1 will become operational. This is a coal-fired 278 MW circulating fluidized bed unit. Estimated capital cost is \$660 million.

COMMENTARY

EQUITY DEVELOPMENT PLAN

The January 19, 1995, revision to Code of Federal Regulations, 7 CFR Part 1710, specifies that a G & T's projected equity level be adequate to enable the borrower to meet its financial needs and to provide service consistent with the RE Act.

The results of this Twenty-Year Financial Forecast/Equity Development Plan show EKPC's equity to asset ratio increasing from 5.7% in 2005 to about 6.3% in 2015, 9.3% in 2020, and 13.3% in 2026.

Because EKPC's distribution cooperatives are at a competitive disadvantage with neighboring investor-owned and municipal utilities in Kentucky, it will be impractical for EKPC to build a great level of equity in the near term. EKPC does not have a capital credit rotation plan due to its current equity levels and competitive situation. Capital credit rotation is not included in the Financial Forecast/Equity Development Plan.

EKPC and its member distribution cooperatives will use their best efforts to achieve objectives contained in its Financial Forecast/Equity Development Plan. EKPC will establish wholesale rates (subject to Kentucky Public Service Commission approval) to meet its equity development plans so long as economic or competitive conditions in EKPC's member systems' service territories will allow.

REVENUE

Rates to Member Cooperatives

Beginning July 2005, an environmental surcharge was implemented. This surcharge is designed to recover the costs of SCRs, scrubbers, and related pollution control facilities necessary to comply with environmental requirements. In addition, rate increases are anticipated in various years of this twenty year period. These rate increases will be needed to finance costs associated with the addition of generation units, additional transmission and distribution facilities, inflation, and increased O&M costs. The fuel adjustment clause has been calculated on the basis of the current fuel base of 2.025 cents per kWh. Page 9 provides the average cost of power for the member systems from base rates, the environmental surcharge, and the fuel adjustment clause.

Off-System Sales

Annual revenue from off-system sales has been developed on the basis of selling approximately 397,120 to 1,370,400 MWh per year from 2009 through 2026. The 2007 and 2008 budgets are estimated at 307,600 MWh and 373,290 MWh, respectively. A margin of 4.0 mills per kWh in 2006 is escalated at one-half the general inflation rate to establish the margin per kWh for each year of the forecast period. The rate per kWh is

the sum of the sourced cost, plus the average production variable O&M expense (when appropriate), plus margin. These rates are provided in Schedule IV.

Other Revenue (Interest Income)

Interest income is calculated on the basis of the funds available for investment during each year of the forecast. Funds available for investment are estimated to be \$93.9 million as of December 31, 2006. These funds will be invested at an estimated rate of 5.0 percent for 2007 through 2026.

EXPENSES

Fuel Expenses

Fuel costs used in this forecast have the following bases (2007\$ except where noted):

	2007	
	\$/MBtu	
Dale	\$2.40	
Cooper No. 1 and Cooper No. 2		
Compliance Coal	2.26	
High Sulphur Coal	1.81	(2012 \$/Mbtu)
Spurlock No. 1		
Compliance Coal	2.42	
High Sulphur Coal	1.62	(2009 \$/Mbtu)
Spurlock No. 2		` ,
Compliance Coal	2.54	
High Sulphur Coal	1.62	(2008 \$/Mbtu)
Gilbert Unit and Spurlock No. 4	1.26	` ,
Smith No. 1 and Smith No. 2	1.40	(2009 \$/Mbtu)
Combustion Turbines	10.67	
Landfill Gas Generation	.27	

These fuel prices are in accordance with EKPC's strategy for compliance with the 1990 Clean Air Act Amendments. The fuel prices are a combination of various annual escalation rates and market prices.

Production O&M

Production O&M expenses for EKPC's existing coal-fired plants are estimated on the following basis. In addition to these estimates, there is an annualized adder of \$.28/MWh to Cooper Unit Nos. 1 & 2 and Spurlock Unit No. 1 and \$.24/MWh to Spurlock Unit No. 2 for variable O&M related to operation of the SCR's.

	Fixed O&M	Variable O&M
	Per kW of Capacity	Per MWh Generated
Station/Unit	2006 Base	<u>2006 Base</u>
Dale	\$41.45	\$2.29
Cooper No. 1 & 2	31.93	1.01
Spurlock No. 1 & 2	23.42	1.31

Production O&M expenses for scrubbers, circulating fluidized bed units, peaking units, and combined cycle units are estimated on the following basis.

	Fixed O&M Per	Variable O&M
	kW of Capacity	Per MWh Generated
Station/Unit	<u>2006 Base</u>	2006 Base
Peaking Units	6.38 - 10.80	\$.10
Fluidized Bed Units		
Gilbert Unit	23.42	2.50
Spurlock Unit No. 4	23.42	2.50
Smith Unit No. 1	31.93	2.50
Smith Unit No. 2	23.42	2.50
Scrubber Units *	9.22 - 10.17	1.04 - 1.13
Landfill Gas Generation	3.86	9.62

^{*} See additional annual costs on attached Exhibit A & Exhibit B

Turbine overhaul costs have been forecasted on an individual unit basis. Listed below are these costs in 2006 dollars:

		Overhaul
<u>Unit</u>	<u>2006 \$</u>	Cycle (Years)
Dale No. 1 & 2	\$1,500,000	10
Dale No. 3	2,000,000	10
Dale No. 4	2,000,000	10
Cooper No. 1	3,200,000	10
Cooper No. 2	3,200,000	10
Spurlock No. 1	4,000,000	10
Spurlock No. 2	4,000,000	10
Fluidized Bed Units	4,000,000	10

Major overhaul costs have been included in the forecast for all units and are included in the dollars allocated for O&M

Overhaul costs associated with landfill gas generation units are included in the forecast at \$110,000 per unit in 2006 dollars with an overhaul cycle of every five years.

The costs associated with the MEAGER 2027 Program have been allocated between capital and expense in this forecast. Those costs identified as expenses are included as O&M costs in the Statement of Operations.

Transmission O&M

Annual transmission costs are estimated based on a percent of the transmission investment as of the end of each year in the forecast period plus an allocation cost for employee benefits, property taxes, and property insurance. The estimated percent used in this projection is 3.5 percent through 2013, 4.0 percent from 2014 through 2018, 4.5 percent from 2019 through 2023, and 5.0 percent for 2024 through 2026.

Distribution O&M

Annual distribution costs are estimated to be 2.0 percent of the distribution plant investment at the end of each year in the forecast period.

Administrative and General

Employee benefit costs are estimated to increase by 4.0 percent per annum from a base of \$23,877,193 in 2008. These costs are allocated to all functional accounts in order to more accurately reflect their total costs

Purchased Power

Capacity and energy purchases from Southeastern Power Administration (SEPA) are assumed to be 170 MW of capacity and approximately 260,000 MWh of energy for each year of this forecast. The base rates for these purchases in 2006 are \$2.232 per kW of capacity per month of total contract demand and 9.130 mills per kWh of energy. The rates for these purchases for each year are provided in Schedule IV.

Depreciation, Taxes, and Insurance

Depreciation, taxes, and insurance expenses are estimated on the basis of the application of the below listed rates to the year-end investment for each type of plant:

	Depreciation	Tax & Insurance
<u>Plant</u>	Rate-%	Rate-%
Production	Various *	0.483
Transmission	2.78	0.300
Distribution	2.86	0.225
General	12.29	0.392

^{*} The Kentucky Public Service Commission ("KPSC") and the Rural Utilities Service ("RUS") have both approved a depreciation study performed by Gannett Fleming, Inc. for EKPC's assets in service as of December 31, 2005. The net book value of each unit as of this date is amortized over each unit's remaining life. This study extended the life of EKPC's existing production units and their future production-related capital additions by a range of eight to twenty years. For future fluidized bed units and combustion turbines, a forty-year life is assumed in this forecast.

Interest

The actual interest expense has been calculated on all current loans. The interest rate on loans in 2009 and 2010 is estimated to be 6.0 percent per year. The interest rate on all future loans from 2011 through 2026 is estimated to be 6.5 percent per year. Interest is capitalized (IDC) during the construction period with IDC being charged to the Balance Sheet. Starting in the year the project becomes operational, interest will be considered an expense item for the Statement of Operations. This accounting method is in compliance with the Uniform Systems of Accounts and generally accepted accounting principles. All capital additions are funded either from general funds or borrowed funds.

NEW FACILITIES

Generation Plant

Landfill gas generation is the first type of new generation to be placed on line followed by combustion turbines, and circulating fluidized bed units in 2009, 2011, 2016, and 2022. A schedule on size, timing, type, and cost of new generation facilities is provided below:

Winter Season	Capacity - MW	Cost-(\$000)	Type
2008	7	10,378	Landfill Gas Generation
2009	148	66,000	Combustion Turbines (2)
2009	278	522,207	Spurlock Unit 4-Fluidized Bed
2009	3	3,458	Landfill Gas Generation
2010	3	4,748	Landfill Gas Generation
2011	278	659,619	Smith Unit 1-Fluidized Bed
2011	74	36,060	Combustion Turbine
2011	3	4,891	Landfill Gas Generation
2012	74	37,142	Combustion Turbine
2012	3	5,038	Landfill Gas Generation
2013	74	38,256	Combustion Turbine
2013	3	5,189	Landfill Gas Generation
2014	3	5,344	Landfill Gas Generation
2015	74	40,586	Combustion Turbine
2015	3	5,505	Landfill Gas Generation
2016	278	846,394	Fluidized Bed Unit
2016	3	5,670	Landfill Gas Generation
2017	3	5,840	Landfill Gas Generation
2018	3	6,015	Landfill Gas Generation
2019	74	45,680	Combustion Turbine
2020	74	47,050	Combustion Turbine
2021	74	48,462	Combustion Turbine
2022	278	1,010,639	Fluidized Bed Unit
2025	74	54,544	Combustion Turbine
2026	74	56,180	Combustion Turbine

Transmission Plant

Facilities to be added for the forecast period are based on Power Delivery's Ten-Year Work Plan for 2006-2016, with the remaining years developed on the basis of the average costs in this work plan plus an additional amount for circulating fluidized bed units in 2009, 2011, 2016, and 2022.

Distribution Plant

Distribution facilities in this forecast are also based on the Ten-Year Work Plan as explained above in transmission plant additions.

General Plant

General plant additions have been developed on the basis of the general escalation rates applied to the budgeted general plant investment at the end of 2009.

Average Cost of Power To Member Systems

The average cost of power to the member systems is provided below:

(Mills per kWh)

<u>Year</u>	Base <u>Rates</u>	Fuel <u>Adjustment</u>	Environmental Surcharge	Average Cost to Members
2007	44.41	7.61	5.69	57.60
2008	45.36	6.55	5.61	57.43
2009	46.60	4.52	5.46	56.52
2010	47.88	2.01	6.13	55.99
2011	49.34	.94	6.36	56.63
2012	51.64	(.41)	8.45	59.69
2013	51.69	.16	8.57	60.42
2014	51.72	.81	8.41	60.93
2015	51.74	1.87	8.50	62.10
2016	53.63	2.24	8.28	64.13
2017	56.71	1.02	8.15	65.86
2018	56.74	1.85	8.33	66.89
2019	56.74	3.13	8.57	68.41
2020	56.73	4.26	8.42	69.37
2021	56.81	5.43	8.31	70.48
2022	56.81	6.10	8.17	71.02
2023	60.38	4.86	7.99	73.18
2024	60.33	5.81	7.87	73.95
2025	60.41	7.17	7.83	75.35
2026	60.43	7.64	6.28	74.28

Amount and Timing of Rate Changes

This forecast assumes that rate changes will be effective on January 1 in the years listed below:

	Annual Percentage Change in Total to Members	Cumulative Percentage Change in Total to Members
2007	8.4%	8.4%
2008	(0.3)%	8.1%
2009	(1.6)%	6.3%
2010	(0.9)%	5.3%
2011	1.1%	6.6%
2012	5.4%	12.3%
2013	1.2%	13.7%
2014	0.9%	14.6%
2015	1.9%	16.8%
2016	3.3%	20.7%
2017	2.7%	23.9%
2018	1.6%	25.9%
2019	2.3%	28.7%
2020	1.4%	30.5%
2021	1.6%	32.6%
2022	0.8%	33.6%
2023	3.0%	37.7%
2024	1.1%	39.1%
2025	1.9%	41.8%
2026	(1.4)%	39.8%

EquityThis forecast estimates EKPC's equity to be at the levels listed below:

<u>Year</u>	Equity Amount (<u>\$000)</u>	Equity To Asset <u>Percent</u>
2007	130,699	5.16
2008	152,706	5.23
2009	169,175	5.23
2010	187,987	5.46
2011	207,168	5.63
2012	227,288	6.03
2013	248,603	6.54
2014	259,609	6.32
2015	272,350	6.27
2016	296,755	6.62
2017	321,171	7.29
2018	353,624	8.16
2010	200 250	8.93
2019	388,358 430,744	9.32
2020	478,030	9.75
2021	504,553	9.95
2022	304,333	7.73
2023	531,747	10.74
2024	562,056	11.62
2025	604,136	12.68
2026	621,588	13.26

Exhibit A

ADDITIONAL ANNUAL SCRUBBER O&M COSTS SPURLOCK UNIT NO. 1 AND UNIT NO. 2 COOPER UNIT NO. 1 AND UNIT NO. 2

<u>Year</u>	Spurlock Unit No. 1 <u>Scrubber O&M</u>	Spurlock Unit No. 2 <u>Scrubber O&M</u>	Cooper Unit Nos. 1 and 2 Scrubber O&M	Total <u>Scrubber O&M</u>
	• -	of Spurlock Unit No. 2 and Cooper Unit Nos.		•
2009	5,610,668	8,991,760		14,602,428
2010	5,901,801	9,455,303		15,357,104
2011	5,969,923	9,529,645		15,499,568
2012	6,020,556	9,634,116	6,461,671	22,116,343
2013	6,156,298	9,825,336	6,540,125	22,521,759
2014	6,289,637	10,044,380	6,681,288	23,015,305
2015	6,417,989	10,260,174	6,848,079	23,526,242
2016	6,536,619	10,437,754	6,925,692	23,900,065
2017	6,572,015	10,473,265	6,886,054	23,931,334
2018	6,698,037	10,689,027	7,019,895	24,406,959
2019	6,835,919	10,921,521	7,196,198	24,953,638
2020	6,987,877	11,174,101	7,402,696	25,564,674
2021	7,115,083	11,397,291	7,587,599	26,099,973
2022	7,247,506	11,567,143	7,707,362	26,522,011
2023	7,296,411	11,651,351	7,660,373	26,608,135
2024	7,445,411	11,900,269	7,841,390	27,187,070
2025	7,588,775	12,141,913	8,036,946	27,767,634
2026	7,743,080	12,403,626	8,237,158	28,383,864

^{*}Does not include scrubber related capital costs of \$162,181,268 for Spurlock Unit No. 2, \$156,975,507 for Spurlock Unit No. 1 and \$297,898,598 for Cooper Unit Nos. 1 and 2.

Exhibit B

ENVIRONMENTAL COMPLIANCE COSTS

Location	Equipment <u>Type</u>	In- Service <u>Date</u>	Estimated Capital <u>Costs</u>	Estimated Annual <u>O & M</u>
Spurlock #2	SCR	05/31/02	\$ 40,276,750	* \$ 372,843
Spurlock #1	SCR	06/15/03	103,007,364	** 392,182
Gilbert Unit	Pollution Control Equip	03/01/05	69,612,000	* 4,321,471
Spurlock #2	Scrubber	10/01/08	121,635,951	* 8,973,788
Spurlock #4	Pollution Control Equip	04/01/09	78,331,031	* 4,559,056
Smith #1	Pollution Control Equip	06/01/11	98,942,856	* 4,724,659
Spurlock #1	Scrubber	01/01/09	117,731,630	* 5,600,607
Cooper #2	SCR	01/01/13	72,269,139	* 229,815
Cooper #1 & #2	Scrubber & ESP's	01/01/12	223,423,949	* 6,312,268

^{*} Includes only capital costs related to emissions control.
** Includes a new precipitator on Spurlock #1 and other capital costs related to emissions control.

Schedule I Page 1 of 2

EAST KENTUCKY POWER COOPERATIVE TWENTY YEAR FINANCIAL FORECAST

(2007-2026) STATEMENT OF OPERATIONS (\$000)

	990	28,755	325	0	147	45,446	592		339,164	196,622	63,414	33,129	42,883	128,173	0	229.790	(30 113)	P	a	e 1,003,1,200	8,450 16 0 16 0	4,321 JO	2.	\$12,741	1.06
2015	990 2083	28,	132,325		966,147	45,	1,011,592		339,	196.	63	33	42	128		229	(7)	nc)		1,003	•	4		\$12	
2014	714 0013	12,202	128,255	0	929,033	48,155	977,188		329,703	188,733	51,746	32,386	41,553	126,966	0	212.605	(12 101)	(13,161)	CCI	970,664	6,524	4,482		\$11,006	1.05
2013	000 1223	2.360	128.002	0	902,162	48,732	950,894		319,047	182,685	46,267	25,008	40,265	121,495	0	201 673	60,00	(0777)	TOT	934,381	16,513	4,801		\$21,315	1.11
2012	*/0	5/19,901	123.448	34.021	871,518	51,784	923,302		310,409	180,371	41,122	24.323	39,017	113,268		100 711	177,561	€ ;	101	907,882	15,419	4.701		\$20,120	1.10
2011		5083,478	90 847	20,793	808,359	44,032	852,390		303,629	171,152	52,885	22.754	37.808	87,736	021612	100 003	109,903	(28,745)	198	837,318	15,072	4.108		\$19,180	1.10
2010	!	5647,982	65,12	20.403	781,639	35,183	816,823		288,566	156,406	70,090	21,337	36.636	76.536	00000	0 200	180,203	(33,915)	879	802,801	14,022	4 701		\$18,813	1.10
2009		5606,217	72,175	18,781	757.970	22,667	780,637		265.643	138.563	103.927	70.683	35 501	70 314	+1C,0/	0 000	163,033	(31,419)	1,220	767,485	13.152	1 116	27.75	\$16,468	1.10
BUDGET 2008		\$598,154	161,60	6,8,6,	757.279	39,717	966,962		299.618	147.861	127.287	10 050	35 487	51,734	91,/34	01	157,409	(57,827)	172	781,709	15.287	062.5	0,7,40	\$22,007	1.14
BUDGET 2007		\$536,851	96,130	72,939	738 107	32,043	770,150		747 747	145 708	117 637	10,007	19,003	34,363	43,155	10	124,683	(34,016)	220	753,737	16.413	7161	+67,1	\$23,667	1.19
ACTUAL 2006		\$509,226	81,057	55,193	927.383	3,458	648,934		026 026	114 270	072,511	72,400	10,377	39,830	39,384	-	84,634	(9,192)	200	648,740	191	10000	10,980	\$11,174	1.13
ACTUAL 2005		\$502,693	90,599	27,217	002.00	7.469	627,978		077 270	045,157	102,970	120,302	15,413	72,027	52,038	235	69,571	(6,226)	273	683,957	(020 53)	(616,66)	9,972	(\$46.008)	0.34
	OPERATING REVENUE MEMBER COOPERATIVES	BASE RATES	FUEL ADJUSTMENT	ENVIRONMENTAL SURCHARGE	BASE RATE CHANGE	TOTAL FROM MEMBERS	TOTAL OPERATING REVENUE	EXPENSES	PRODUCTION	FUEL	O AND M	OTHER POWER SUPPLY	TRANSMISSION O AND M	ADMINISTRATIVE & GENERAL	DEPRECIATION	TAXES	INTEREST ON LONG TERM DEBT	INTEREST CHARGED TO CONSTR	OTHER DERT COST	TOTAL EXPENSES		OPERATING MARGINS	OTHER REVENUE	NET MADOIN	TIMES INTEREST EARNED RATIO

Schedule I Page 2 of 2

EAST KENTUCKY POWER COOPERATIVE TWENTY YEAR FINANCIAL FORECAST

(2007-2026) STATEMENT OF OPERATIONS (\$000)

	_		l de la colonia	
2026	\$1,179,723 147,760 112,630 0 1,450,113 86,459	1,536,572	569,058 321,932 72,418 59,717 60,668 194,498 0 246,621 100 11,562 5,890 5,890	1.07
2025	\$1,158,609 136,204 150,188 0 1,445,001 86,241	1,531,242	546,436 313,156 74,483 57,505 58,782 191,727 0 252,822 0 100 1,495,011 36,231 5,850 842,080	1.17
2024	\$1,135,379 108,281 148,116 - 0 - 1,391,777 89,520	1,481,297	521,324 307,328 65,327 55,366 56,955 189,719 0 260,517 0 100 1,456,636 5,648 5,648	1.12
2023	81,047,732 88,746 147,357 65,792 1,349,627	1,439,347	498,652 298,729 58,316 48,977 55,185 188,120 0 269,243 0 107 1,417,329 22,017 22,017 5,176 5,176	1.10
2022	S1,026,612 109,124 147,688 0 1,283,423	1,353,823	484,070 278,508 72,061 47,108 53,471 167,709 0 268,714 (39,498) 110 11,332,252 21,571 4,953 4,953	1.10
2021	\$1,004,938 95,075 146,928 0 1,246,941	1,314,675	459,770 264,015 71,839 45,300 51,811 159,185 0 256,233 (35,956) 110 1,272,306 42,369 42,369	1.18
2020	\$982,542 73,000 145,830 0 1,201,372	1,271,277	438,563 256,953 63,794 43,550 50,202 156,746 0 239,987 (15,739) 110 1,234,165 37,112 5,274 \$5,274	1.18
2019	\$960,761 \$2,431 145,132 0 1,158,324	1,226,175	416,128 249,908 56,202 41,857 48,644 155,051 0 232,446 (2,651) 110 110 28,480 28,480 6,255	1.15
2018	\$939,762 30,307 137,968 0 1,108,038	1,176,953	394,574 235,289 48,085 36,529 47,134 153,527 0 235,538 0 110 1,150,788 26,165 6,288	1.14
2017	S871,321 16,367 132,181 48,975 1,068,843	70,902	377,851 222,711 44,779 35,059 45,672 152,772 0 241,744 0 110 110,698 5,369	1.10
2016	\$822,484 35,208 131,693 30,298 1,019,683	51,720	364,046 208,943 56,821 33,636 44,255 135,111 0 241,636 (33,079) 110 1,051,480 19,924 4,481	1.10
	OPERATING REVENUE MEMBER COOPERATIVES BASE RATES FUEL ADJUSTMENT ENVIRONMENTAL SURCHARGE BASE RATE CHANGE TOTAL FROM MEMBERS	OFF SYSTEM SALES TOTAL OPERATING REVENUE	EXPENSES PRODUCTION FUEL O AND M OTHER POWER SUPPLY TRANSMISSION O AND M ADMINISTRATIVE & GENERAL DEPRECIATION TAXES INTEREST ON LONG TERM DEBT INTEREST CHARGED TO CONSTR OTHER DEBT COST TOTAL EXPENSES OTHER REVENUE NET MARGIN	TIMES INTEREST EARNED RATIO

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EAST KENTUCKY POWER COOPERATIVE TWENTY YEAR FINANCIAL FORECAST

CASH FLOW SCHEDULE (\$000)

																				P	λU	la	сии	епі
2015		\$12,741	128,283	320,000	0	2,660	(0)	463,684			98,995	0	1,520	1,437	144	3,093	2,660	30,113	323,891	0	461,853 20	\$1,83109	18	of 23
2014		\$11,006	127,119	393,000	0	2,730	0	533,854			102,215	0	1,712	2,884	288	2,239	2,730	13,181	413,157	0	538,407	(\$4,553)		1.11
2013		\$21,315	121,656	253,000	0	2,749	0	398,721			642,86	142,750	1,388	3,550	355	5,389	2,749	2,220	149,429	0	406,409	(\$7,688)		1.15
2012		\$20,120	113,429	164,500	0	2,732	585	301,366			97,257	0	1,090	7,739	774	4,161	2,732	0	185,423	0	299,176	\$2,191		1.12
2011		\$19,180	87,934	309,500	0	2,745	780	420,139			96,981	0	2,421	14,856	1,486	2,194	2,745	28,745	257,660	0	407,088	\$13,052		1.04
2010		\$18,813	77,415	916,124	0	2.736	780	1,015,868			82,422	645,000	3,684	969	70	1,837	2,736	33,915	258,435	0	1.028.795	(\$12,927)		1.05
2009		\$16,468	71,534	366,800	0	2.693	780	458,275			74.123	0	(5.458)	16.280	1.628	(12,046)	2,693	31,419	319,370	0	428.008	\$30,266		1.06
BUDGET 2008		\$22,008	51.734	426.868	0	7 657	780	504,046			62.715	0	(503)	4.191	419	066	2.657	57.827	396,297	•	524 503	(\$20,547)		1.05
BUDGET 2007		\$23,667	43,155	534.516	0	2 441	780	604,559			58 453	0.00	(54 953)	3 877	388	13.043	2,643	34.016	600,415	77. (22.2	017 127	(853,120)		1.05
ACTUAL 2006		\$11.174	10 184	409 500	000,000	777 6	3,000	299,727			52 508	00,000	0 270	3,020	3,020	1,100	(14,711)	0 107	165,748	0146701	0 22 220	571 773		0.98
ACTUAL 2005		(\$46,008)	62 038	208 508	906,906	0 4	(1/3,414)	242,184			44.673	44,0/3	0	0,012	5,771	(511)	21,165	10	0,220	1/0,042		(525,277)	(312)(24)	99.0
	AVAIL ABLE FUNDS	TARLY OF A SECTION OF	NEI MARGIN	DEPRECIATION	LTD ADVANCES	SHORT TERM BORROWINGS	OPERATING RESERVES	OTHER TRANSACTIONS	TOTAL AVALABLE	CASH REQUIREMENTS		PRINCIPAL PAYMENTS	CREDIT FACILITY PAYMENIS	FUEL STOCK	MATERIALS & SUPPLIES	OTHER ASSETS	ACCOUNTS RECEIVABLE	POST RETIREMENT MEDICAL FD	INTEREST CHARGED TO CONSTR	CAPITAL ADDITIONS	CAPITAL CREDITS RETIRED	TOTAL CASH REQUIREMENTS	INCREASE DECREASE IN CASH	DEBT SERVICE COVERAGE

Page 2 of 2

EAST KENTUCKY POWER COOPERATIVE TWENTY YEAR FINANCIAL FORECAST

CASH FLOW SCHEDULE (\$000)

		Page 19 of 23
2026	\$17,452 194,598 48,000 0 2,389 (0)	144,878 0 3,635 2,179 218 426 2,389 0 108,956 0 262,681 (\$
2025	\$42,080 191,827 19,000 0 2,314 (0) 255,222	$ \begin{array}{c} 136,585 \\ 0 \\ 4,036 \\ 2,131 \\ 213 \\ 4,435 \\ 2,314 \\ 0 \\ 106,560 \\ \hline 0 \\ \hline 0 \\ \hline ($5,053) \\ \hline ($1,053) \\ \hline \end{array} $
2024	\$30,309 189,819 4,000 0 2,260	151,509 0 3,643 1,130 113 8,995 2,260 0 56,498 224,148 82,239
2023	\$27,194 188,226 1,000 0 2,215 (0) 218,635	148,245 0 2,343 1,137 114 2,215 0 56,859 0 56,859 110,948
2022	\$26,524 167,819 275,000 0 2,262 0 471,604	137,136 0 3,905 21,144 2,114 2,114 3,040 2,262 39,498 259,724 0 468,824 \$2,781
2021	\$47,285 159,295 358,000 0 2,308 (0) 566,888	125,753 0 3,408 1,872 187 3,797 2,308 35,956 394,518 0 0 567,799 (\$911)
2020	\$42,386 156,856 345,000 0 2,344 0 0	116,120 0 3,605 1,816 182 3,587 2,344 15,739 411,942 0 555,336 (\$8,749) 1.23
2019	\$34,735 155,161 87,000 0 2,344 0	110,047 0 3,464 1,882 188 4,191 2,344 2,651 175,647 175,647 115,647 115,647
2018	\$32,452 153,637 0 0 2,407 0 0 0 0 0	106,330 0 2,687 1,225 122 7,347 2,407 0 61,227 0 61,227 0 181,346 S7,151
2017	\$24,416 152,882 0 0 2,440 (0) 179,739	103,397 0 2,218 1,069 107 2,540 2,440 0 53,466 0 53,466 165,239 \$14,500
2016	\$24,405 135,221 212,000 0 2,540 0 0 374,165	101,395 0 3,999 17,410 1,741 1,937 2,540 33,079 202,631 0 364,731 89,434
	AVAILABLE FUNDS NET MARGIN DEPRECIATION LTD ADVANCES SHORT TERM BORROWINGS OPERATING RESERVES OTHER TRANSACTIONS TOTAL AVAILABLE	CASH REQUIREMENTS PRINCIPAL PAYMENTS CREDIT FACILITY PAYMENTS FUEL STOCK MATERIALS & SUPPLIES OTHER ASSETS ACCOUNTS RECEIVABLE POST RETIREMENT MEDICAL FD INTEREST CHARGED TO CONSTR CAPITAL ADDITIONS CAPITAL CREDITS RETIRED TOTAL CASH REQUIREMENTS INCREASE DECREASE IN CASH DEBT SERVICE COVERAGE

EAST KENTUCKY POWER COOPERATIVE TWENTY YEAR FINANCIAL FORECAST

BALANCE SHEET (\$000)

																					me			3b
2015	54 931 777	686,554	5,617,831	1,617,910	3,999,921	62,707	2,859	42,358	83,688	54,504	90,450	7,536	\$4,344,023			\$272,350		3,825,905 3,825,905	ge	114,475	0	84,344,023	3	6.27%
2014	64 836 303	434,535	5,263,827	1,489,737	3,774,090	60,047	2,831	40,528	80,595	52,983	89,013	7,392	SA 107 470			8229,609		3,604,900	0	114,337	178,033	\$4,107,479		6.32%
2013	200 147 19	54,0/1,905 165,585	4,837,489	1,362,771	3,474,718	57,317	2,845	45,080	78,356	51,271	86,129	7,103	000 000 00	2012010		\$248,603		3,314,115	0	114,199	125,903	\$3,802,820		6.54%
2012		\$4,492,209 193,631	4,685,840	1,241,276	3,444,564	54.568	2,868	52,768	72,967	49,883	82,579	6,748	140 000	33,100,547		\$227,288		3,302,444	0	114,061	123,153	\$3,766,947		6.03%
2011		\$4,123,378 377,040	4,500,417	1,128,008	3,372,409	52.421	2,892	50,578	68,807	48,793	74,840	5,975		33,0/0,/13		\$207,168		3,235,201	0	113,923	120,421	\$3,676,713		5.63%
2010		53,439,682	4.214.012	1,040,272	3,173,740	50 455	2,951	37,526	66,612	46.373	59.984	4,489		\$3,442,131		\$187,987		3,022,682	0	113,785	117,676	\$3,442,131		5.46%
2009		\$3,370,951	3 921 662	963.736	2,957,926	002 07	3,692	50,453	64,775	42,689	50 288	4,419		\$3,231,743		\$169,175	•	2,833,981	0	113,647	114,940	\$3,231,743		5.23%
BUDGET 2008		\$2,567,999	1,002,8/4	5,570,675	2.677.451		46,587	20.187	76.821	18 147	43,008	2,791		\$2,919,766		\$152.706		2,541,303	0	113,509	112,248	\$2.919.766		5.23%
BUDGET 2007		\$2,307,797	3 116 750	3,110,/50	2 275,062		44,710 4,637	40 733	75 831	10,001	48,049	2,372		\$2,530,811		\$130 699	10000	2,177,150	c	113,371	109,591	52 530 811		5.16%
ACTUAL 2006		\$2,079,933	402,387	2,482,319	1 683 786	20165004	43,049 4,499	03 053	73,033	07,700	103,602	34,940		\$2,028,501		6107 031	310/,016	1,701,087	c	113.233	107,150	52 078 501	1000000	5.28%
ACTUAL 2005		\$2,039,674	152,585	2,192,259	774,995	1,41,704	41,898 4,750	3	71,080	501,77	43,323	31,920	73,75	\$1,690,307		101 700	290,107	1,392,348	٥	0 77£ 80	103,484	FOC 007 F-0	31,090,507	2.69%
	ASSETS	ELECTRIC PLANT IN SERVICE	CONSTR WORK IN PROGRESS	UTILITY PLANT	ACCUM DEPRECIATION	UTILITY PLANT NET	PROPERTY & INVESTMENTS OTHER ASSETS	CURRENT ASSETS	CASH AND INVESTMENTS	ACCOUNTS RECEIVABLE	FUEL STOCK	MATERIALS & SUPPLIES	OTHER CURRENT ASSETS	TOTAL ASSETS	FOUTTY AND LIABILITIES		EQUITY	LONG TERM DEBT		SHORT TERM DEBT	CURRENT LIABILITIES DEE CREDIT & OPER RESERVES		TOTAL EQUITY & LIABILITIES	EQUITY TO ASSET RATIO

EAST KENTUCKY POWER COOPERATIVE TWENTY YEAR FINANCIAL FORECAST

BALANCE SHEET (\$000)

																1	agu		ı	<i>) 1 iu</i> .	.,	
2026		\$7,535,511 97,272	7,632,783	3,462,074	4,170,709	88,529	3,200	54.021	124,019	91,448	143,445	12,835	\$4,688,205		8621,588	3,793,509	0	115,993	157,115	\$4,688,205		13.26%
2025		\$7,426,555 97,272	7,523,827	3,267,576	4,256,251	86,141	3,162	54.264	123,593	87,812	141,266	12,617	\$4,765,106		\$604,136	3,890,388	0	115,855	154,727	\$4,765,106		12.68%
2024		\$7,319,995 97,272	7,417,267	3,075,849	4,341,418	83,827	3,124	55 316	119,157	83,777	139,135	12,404	\$4,838,159		\$562,056	4,007,973	0	115,717	152,413	\$4,838,159		11.62%
2023		\$7,263,497 97,272	7,360,769	2,886,130	4,474,639	81,567	3,086	740 63	110,162	80,133	138,005	12,291	\$4,952,961		\$531,747	4,155,482	0	115,579	150,153	\$4,952,961		10.74%
2022		\$7,206,639 97,272	7,303,911	2,698,011	4,605,900	79,352	3,055	75 300	110.128	77,790	136,868	12,177	\$5,070,660		\$504,553	4,302,728	0	115,441	147,938	\$5,070,660		9.95%
2021		\$6,203,783 800,905	7,004,688	2,530,302	4,474,386	77,090	3,027	43 640	107.088	73,885	115,724	10,063	\$4,903,872		\$478,030	4,164,864	0	115,303	145,676	\$4,903,872		9.75%
2020		\$6,074,233 499,982	6,574,214	2,371,117	4,203,098	74,782	2,999	42 530	103,290	70,477	113,852	9,876	\$4,621,894		\$430,744	3,932,616	0	115,165	143,368	\$4,621,894		9.32%
2019		\$5,967,692 178,841	6,146,533	2,214,371	3,932,162	72.438	2,971	. 010	99 703	66,872	112,036	9,694	\$4,348,145		\$388,358	3,703,736	0	115,027	141,024	\$4,348,145		8.93%
2018		\$5,870,963 97.272	5,968,235	2,059,320	3,908,915	70.094	2,943	Ş	05,513	63.408	110,154	9,506	\$4,333,975		\$353,624	3,726,783	0	114,889	138,680	\$4,333,975		8.16%
2017		\$5,809,736 97.272	5,907,007	1,905,793	4,001,215	189.19	2,915	Š	00,292	60.721	108,930	9,383	\$4,405,307		\$321,171	3,833,112	C	114,751	136,273	\$4,405,307		7.29%
2016		\$5,756,269	5,853,541	1,753,020	4,100,521	65 247	2,887	;	261,15 20,25	58.502	107.860	9,277	\$4,481,711		\$296,755	3,936,510	c	114,613	133,833	\$4,481,711		6.62%
	ASSETS	ELECTRIC PLANT IN SERVICE	ITTH ITY PLANT	ACCIM DEPRECIATION	UTILITY PLANT NET	OFWEIGHTS OF THE STAND OF THE S	OTHER ASSETS	CURRENT ASSETS	CASH AND INVESTMENTS	ACCOUNTS RECEIVABLE	FOEL STOCK	OTHER CIRRENT ASSETS	TOTAL ASSETS	EQUITY AND LIABILITIES	EQUITY	LONG TERM DEBT	тази мазт таоно	CURRENT LIABILITIES	DEF CREDIT & OPER RESERVES	TOTAL FOURTY & LIABILITIES		EQUITY TO ASSET RATIO

PSC Request 13b Attachment Page 22 of 23

Schedule IV Page 1 of 2

EAST KENTUCKY POWER COOPERATIVE TWENTY YEAR FINANCIAL FORECAST

STATISTICAL DATA

Schedule IV Page 2 of 2

EAST KENTUCKY POWER COOPERATIVE TWENTY YEAR FINANCIAL FORECAST

STATISTICAL DATA

						Page 23 of 23					
2026	60.43	7.64	6.28	74.28	-1.4%	5.39	75.82	28.00 5.91 20,325,370 19,522,167 4,389		\$6,057,378 1,333,774 144,359	87,535,511
2025	60.41	7.17	7.83	75.35	1.9%	5.39	72.25	27.18 5.82 20,102,361 19,178,141 4,315		\$6,001,198 1,285,203 140,155	\$7,426,555
2024	60.33	5.81	7.87	73.95	1.1%	5.39	67.95	26.17 5.69 19,919,082 18,819,569 4,241		\$5,945,777 1,238,146 136,073	\$7,319,995
2023	60.38	4.86	7.99	73.18	3.0%	4.92 13.27	65.47	25.37 5.54 19,656,532 18,442,345 4,241		\$5,938,844 1,192,544 132,109	\$7,263,497
2022	56.81	6.10	8.17	71.02	%8.0	4.77	69.79	25.90 5.36 18,690,351 18,070,932 4,241		\$5,930,023 1,148,355 128,261	\$7,206,639
2021	56.81	5.43	8.31	70.48	1.6%	4.77	68.68	25.22 5.27 18,229,027 17,690,980	TIES (\$000)	\$4,973,729 1,105,528 124,526	\$6,203,783
2020	56.73	8.42	69.37	1.4%	4.77	64.62	24.27 5.17 18,069,605 17,318,616 3,889	ST OF FACILI	\$4,889,311 1,064,023 120,899	\$6,074,233	
2019	56.74	3.13	8.57	68.41	2.3%	4.77	58.94	23.34 4.99 17,825,256 16,932,904 3,815	ORIGINAL COST OF FACILITIES (\$000)	\$4,826,522 1,023,792 117,377	\$5,967,692
2018	56.74	1.85	8.33	66.89	1.6%	4.35	54.98	22.39 4.46 17,620,864 16,564,001 3,741		\$4,772,210 984,794 113,959	\$5,870,963
2017	56.71	1.02	8.15	98 49	2.7%	4.21 11.40	52.84	21.69 4.05 17,422,382 16,228,008 3,738		\$4,752,106 946,990	\$5,809,736
2016	53.63	2.24		0:00	3.3%	4.21	56.87	22.17 3.85 16,417,782 15,900,557 3,735		\$4,738,514 910,338	\$5,756,269
1	MEMBER CO-OP AVG COST	BASE RATES (MILLS/RWH)	FUEL ADJ KATE (MILLS/KWH)	ENVIRON. SURCHARGE (MILLS/KWH)	TOTAL FM MEMBERS (MILLS/KWH) PERCENTAGE CHANGE IN RATES	POWER PURCHASES - SEPA DEMAND (S/KW/MO) - SEPA ENERGY - MILLS/KWH - SEPA	<u>OFF-SYSTEM SALES</u> ENERGY (MILLS/KWH)	STATISTICS AVG FUEL COST (MILLS/KWH) VARIABLE O&M (MILLS/KWH) TOTAL GENERATION (MWH) SALES TO MEMBER CO-OPS (MWH) TOTAL SYSTEM CAPACITY (MW)		PRODUCTION PLANT TRANSMISSION PLANT	GENERAL PLANT TOTAL PLANT

:		

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2006-00472 FOURTH DATA REQUEST RESPONSE

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07

REQUEST 14

RESPONSIBLE PERSON: William A. Bosta/Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

Request 14. Refer to the response to the Staff's Third Request, Item 42.

Refer to the response to Item 42(a). EKPC states, "Some directors elect to have a portion of their fees paid into a tax deferred compensation plan at NRECA rather than receiving a check in the present." Explain in detail this option available to the directors. Include citations to the Internal Revenue Service Tax Code that allow for this deferral by non-employees of EKPC.

Response 14a. NRECA provides a Director's Deferred Compensation Program to its members allowing the members to invest a portion of their participating directors' per diem payments. The EKPC Board of Directors approved this plan in January 2000. Internal Revenue Code Section 457 addresses deferred compensation plans of state and local governments and tax-exempt organizations.

Refer to the response to Item 42(d). EKPC states that Internet expenses are paid for each director. However, the analysis of directors' fees and expenses provided in the response to the Staff's First Request, Item 25(b), shows that only 12 of the 16 directors received this compensation. Explain why Internet service is provided for only some, but not all, directors.

Response 14b. Internet service is available to all directors, but all do not choose to use or seek reimbursement.

Refer to the response to Item 42(g)(1). The Audit Committee Charter requires that this committee meet at least twice a year. However, the analysis of the directors' fees and expenses shows only one meeting during the test year.

- (1) Did the Audit Committee meet between October 1 and December 31 of 2006?
- (2) Indicate the number of Audit Committee meetings held in calendar year 2002, 2003, 2004, and 2005.

Response 14c. (1) Yes, on November 14, 2006.

(2) 2002 - 1

2003 - 4

2004 - 9

2005 - 4

Refer to the response to Item 42(g)(2). Explain why all bid opening and negotiation meeting payments during the test year were paid to the same director.

Response 14d. The Chairman of the Negotiating Committee must be present at the referenced bid opening. In the event the Chairman is unable to attend, he may appoint a designee.

Refer to the response to Item 42(g)(4). The response states, "These meetings of the President and CEO and the Board Officers were to discuss various issues with regard to EKPC, wherein power supply and cost were most likely the main topics."

- (1) Why aren't the topics discussed at these meetings known?
- (2) Were any notes, minutes, or other records kept of these meetings? If yes, provide copies of the applicable notes, minutes, or other records. If no, explain in detail why this information was not kept.

Response 14e(1),(2). These meetings were not part of the regularly scheduled Board meeting. No minutes, notes or records were taken.

Refer to the responses to Items 42(g)(4) and 42(g)(5). EKPC was requested to explain why these expenses should be included for rate-making purposes. However, this explanation was not included in the responses. Provide the originally requested explanations.

Response 14f. The meetings are a reasonable and legitimate business expense as such expenses were necessary to carry out general business operations.

Request 14g. Refer to the responses to Items 42(g)(6), 42(g)(7), 42(g)(9), and 42(g)(10). EKPC has stated that expenses for the CFC Forum, the Energy Management Conference, Director Conference, and the National Rural Electric Cooperative Association ("NRECA") Strategic Issues meeting have been excluded for rate-making purposes, except for two directors.

- (1) Explain why the expenses for two directors should be included for rate-making purposes.
- (2) Provide copies of programs, agendas, and other materials that describe and discuss the topics covered at these four meetings.

Response 14g. (1) Including the expenses of two directors for these meetings and conferences is reasonable given the Commission's rulings in past cases and the significant number of cooperatives in the EKPC system (16).

(2) Please see attached.

High adj

a: constituting the latest, most fully developed, or most creative stage or period

Performance_n

a: the fulfillment of a claim, promise or request

Consumers demand high performance – a promise that your goods and services are the latest and greatest available.

Is your business meeting this challenge?

Find out by attending Kentucky's Touchstone Energy Cooperatives' 2006 Energy Management Conference: HIGH PERFORMANCE.

We promise to bring you informative training opportunities and nationally known speakers to explain the latest, most effective changes and developments in building technology and energy efficiency.

HVAC contractors and registered builders can earn up to eight hours of continuing education credits to satisfy professional certification requirements at the low cost of \$75.

HIGHPERFORMANCE

2006 ENERGY MANAGEMENT CONFERENCE

JANUARY 24TH & 25TH

NEW IDEAS, PRODUCTS & SERVICES AT KENTUCKY'S

PREMIER BUILDERS CONFERENCE



Campbellsville, KY

Kentuckys Touchstone Energy Cooperatives*

onsored by Kentucky's Touchstone Energy Cooperatives:

Danville, KY

Farmers RECC Jackson Energy Cooperative Salt River Electric Cooperative Big Sandy RECC McKee, KY Bardstown, KY Paintsville, KY Glasgow, KY Fleming-Mason Energy Cooperative Licking Valley RECC Shelby Energy Cooperative Blue Grass Energy Cooperative Nicholasville, KY Flemingsburg, KY West Liberty, KY Shelbyville, KY South Kentucky Rural Electric Grayson RECC Nolin RECC Clark Energy Cooperative Winchester, KY Grayson, KY Elizabethtown, KY Somerset, KY Taylor County RECC Cumberland Valley Electric Inter-County Energy Cooperative Owen Electric Cooperative

Owenton, KY

PROGRAM

Gray, KY

1:00 p.m.

Concurrent Sessions

"Seal Air Leaks & Save Energy" Jeff Tiller, Southface Energy

"Qualifying a Touchstone Energy Home" Roy Honican, Blue Grass Energy

Tuesday, January 24			"Landscaping with Native Plants"	2:00 p.m.	Repeat Concurrents ABCDE	
8:30 a.m.	Registration Breakfast in the Exhibit Hall		Jeff Richmer, Dropseed Native Plant Nursery	3:00 p.m. 3:30 p.m.	Break with Exhibitors Repeat Concurrents ABCDE	
9·30 a.m.	Welcome Roy Palk, President/CEO East Kentucky Power	D.	"13 Seer – Changes & Challenges"	4:30 p.m. 5:30 p.m.	Adjourn Reception with Exhibitors	
10:00 a.m.	Conference Overview Jeff Hohman, Marketing Manager		Candy Weddington, Harshaw-Trane	6:00 p.m. 7:00 p.m.	Dinner UK vs. Auburn	
10:30 a.m.	General Assembly "The Business Success Blueprint" George Hedley, Hardhat Presentations	E.	"Lighting Solutions" Frank Gaudio, RAB Lighting		Big Screens! Free Throw Contest! Prizes!	
11:30 a.m.	Lunch in the Ballroom Exhibit Viewing	Wednesda	v Tanuary 25			

Wednesday, January 25

	3		
7:30 a.m.	Breakfast in the Ballroom Registration/ Exhibit Viewing	12:00 p.m.	Lunch "Surviving In Rural America" Rodger Bingham,
8:30 a.m.	General Assembly "Integrity in Business" Bob Russell, Southeast Christian Church		(former Survivor, Kentucky Joe) Kentucky Department of Agriculture
9:30 a.m.	Break with Exhibitors		Grand Prizes Awarded
10:00 a.m.	Concurrent Sessions ABCDE		
11:00 a.m.	Repeat Concurrents ABCDE		

CFC Forum (CFC)

Page 1 of 2



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Sponsored by CFC, Federated, NRECA, and NRTC. We invite your feedback.

Welcome, Della Damron [My Profile] [My Benefits]

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The 2006 CFC Forum will be in Las Vegas, Nevada. The CFC Forum offers directors,

managers and key staff up-to-the-minute information on industry and business issues

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Advanced search

Accounting, Finance & Tax Conference (NRECA)

Conferences CFC Forum (CFC)

Annual Meeting (CFC/Federated/ NRECA/NRTC)

> Past Conference Information

June 19, 2006 - June 21, 2006

Benefits Forum (NRECA)

Benefits Update Conference (NRECA)

Board of Directors' Meetings (Federated)

CEO Close-Up (NRECA)

District Meetings

CFC Forum (CFC)

CONNECT 2006 (NRECA)

Directors' Conference (NRECA)

Executive & Administrative Assistants Conference (NRECA)

G&T Legal Seminar (NRECA)

Human Resource & Benefits Update Conferences

Independent Borrowers Executive Summit (CFC)

Legislative Conference (NRECA)

■ Past Conference Information

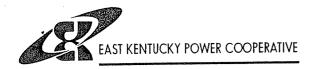
New and Emerging nologies Conference uchstone Energy)

Regional Meetings (NRECA)

CFC Forum 2005

relevant to cooperatives.

CFC Forum 2005 was held July 27-29 in Hollywood, Florida. Thanks to all who attended and helped make it a great meeting. Learn more about CFC Forum 2005, see video and listen to audio interviews.



MEMORANDUM

TO:

EKPC Directors

FROM:

Claudia Embs

DATE:

April 10, 2006

SUBJECT:

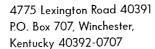
CFC 2006 Forum

The CFC 2006 Forum will be held at the Bellagio in Las Vegas from Monday, June 19 through Wednesday, June 21. According to EKPC board policy #115, all EKPC Directors are authorized and encouraged to attend at EKPC expense.

The conference information is enclosed. Some of you may wish to register and make travel arrangements with other directors going from your cooperative and bill EKPC for your expenses. If you would like for me to register you or help with your reservations, please mail or fax the enclosed registration form to me by April 23, to East Kentucky Power Cooperative, P.O. Box 707, Winchester, KY 40392-0707 or fax it to my attention at 859-744-6008. I am currently holding a few rooms at the Bellagio to insure a room for you at the conference hotel, but will have to release them on April 23. Please let me know by that date if you plan to attend.

Enclosures

c: Member System Managers (memo only)



Tel. (859) 744-4812 Fax: (859) 744-6008 http://www.ekpc.coop



"The Challenge of Change"

Preliminary Agenda (April 6, 2006)

CFC Forum 2006 is all about change.

These changes include the human dimension as a generation of leaders exits our industry; changes in the U.S. and global economies including insight into the most powerful forces driving change in the world today; and changes and challenges in the energy markets that keep co-op leaders up at night.

With each of these changes, the goal of Forum 2006 is to leave you with key ideas and actions to meet the challenge of these changes and, in the process, make your co-op even more successful.

Monday, June 19



Presiding: Cletus Carter, CFC President

Monday's General Sessions will focus on changes in the human dimension as a generation of leaders exits our industry. We will explore what kind of legacy co-op leaders will leave and how co-ops must position themselves for a successful transition.

9 a.m.-5:30 p.m.
Registration and Product Showcase



1-2:15 p.m. Leadership That Leaves a Legacy"

General Hugh Shelton, 14th Chairman of the Joint Chiefs of Staff During General Shelton's 38-year career in the military he held numerous leadership positions. He participated in the liberation of Kuwait during Operation Desert Shield/Desert Storm. He commanded the XVIII Airborne Corps where he led the U.S. Joint Task Force that restored democracy in Haiti. When Shelton was promoted to general, he became the commander-inchief of the U.S. Special Operations Command.

2:15-2:45 p.m.
Break/Product Showcase

2:45-4:15 p.m.
Breakout Sessions

"What a Director Needs to Know about Electric Rates"

- Tom Lewis, Ph.D., Professor of Accounting, Creighton University
- Tom Nusbaum, Vice President of Member Services, CFC

"Top 10 Accounting and Tax Issues"

- Kevin Dolan, Partner, Deloitte & Touche
- Lynn Midgette, Vice President-Portfolio Management, CFC
- Russ Wasson, Executive Director, Tax, Finance & Accounting Policy, NRECA

"Financial Markets' View of Electric Cooperatives and the Electric Utility Industry"

- Richard Eisenberg, Vice President-Capital Market Relations, CFC
- Peter Madonia, Managing Director, Debt Capital Markets, JP Morgan
- Alan Spen, Managing Director, Corporate Finance, Fitch Ratings

"Hot Legal Issues for Electric Cooperatives"

- Roberta Aronson, Deputy General Counsel, CFC
- Terence Brady, Assistant General Counsel for Rural Utilities, U.S. Department of Agriculture
- Kent Singer, General Counsel to Tri-State G&T Association, CO

4:15-4:30 p.m. Break/Product Showcase

4:30-5:30 p.m.

"Succession Planning Is Essential at Every Cooperative"

- Kent Farmer, President & CEO, Rappahannock EC, VA
- Charles Gill, former Governor and CEO, CFC
- Winston Tan, Principal, Human Capital & Rewards Practice, Cooperative Benefits & Finance Services, LLC
- Moderator: Wade Hensel, General Manager, BENCO EC and Brown County REC, MN



Kent Farmer



Chuck Gill



Winston Tan



Wade Hensel



5:30-5:35 p.m.

"Changing Times and Changing Opportunities"

The National The National Cooperative Services Corporation (NCSC) exists only because—over time—electric cooperatives' needs and opportunities change.

Mitchell Johnson, NCSC Board President and CEO, Ozarks Electric Cooperative Corporation, AR



6-7:30 p.m.

Reception to Celebrate "The Challenge of Change"

Grand Patio Area of Hotel Bellagio — Spons ored by NCSC

As a CFC affiliate, NCSC's mission is to provide specialized financing and related services to benefit electric cooperatives and their partners. NCSC's Board of Directors is comprised 100 percent of electric cooperative CEOs and directors. More than 350 electric cooperatives are NCSC member-owners. NCSC's products and value-added services include consumer-focused products such as EC Home Improvement and the Co-op Power Plus VISA credit card, in addition to specialized financing for electric cooperatives and their subsidiaries and partners. Please join NCSC in enjoying the spirit of cooperative friendship and the live blues-rock sound of Eat @ Joes Band, which features NRECA's Russ Wasson.







Charles



Russ



Toe

Tuesday, June 20



Presiding: Terryl Jacobs, CFC Vice President

Tuesday's General Sessions will focus on changes in the U.S. and global economies and the most powerful forces driving change in the world today. We will present both a list of specific key actions and underlying principles for co-op success in today's changing environment.

7 a.m.-5 p.m.
Registration and Product Showcase

7-8 a.m.
Continental Breakfast



8-9 a.m.

"The Changing U.S. Economy—Strengths, Weaknesses and Insights into the Forces Driving our Economic Direction"

Jeremy Siegel, Professor of Finance, Wharton School of Business

9-9:30 a.m.
Break and Product Showcase

9:30-11 a.m.
Breakout Sessions

"Leadership in the Real World" (repeats Tuesday afternoon)

Pragmatic solutions to the problems leaders at all levels face today. How to refocus on what matters most. Why "tough management" produces results. *Chuck Martin*, Author of *Tough Management*

"New Frontiers that Change Everything" (repeats Tuesday afternoon)

Economics, demographics and technology are all converging in such a way that the next 10 years will be unlike any in human history. Five trends are changing society and providing more opportunities than ever before. For those willing to rise to the challenge of the five trends, the rewards will be boundless.

Lowell Catlett, Futurist and Technological Visionary, Professor of Agricultural Economics and Agricultural Business, New Mexico State University

"Key Financial Decisions for Boards"

- Tom Lewis, Ph.D., Professor of Accounting, Creighton University
- Sherry Sharp, Regional Vice President, CFC

"How to Develop a Succession Plan for Y our Cooperative"

11-11:30 a.m.
Break and Product Showcase



Presiding: Roger Arthur, CFC Secretary-Treasurer



11:30 a.m.-1:15 p.m.
Luncheon and Presentation:
"Changing Times—Lessons and Perspectives"

Governor John H. Sununu, former Governor of New Hampshire, former Chief of Staff to the President of the United States

Governor Sununu shares his thoughts and insights on the most powerful forces driving change in the U.S. and global arenas and provides his views on what it takes to be a great leader.

1:15-1:30 p.m.
Break and Product Showcase

1:30-3:00 p.m. Breakout Sessions

"Leadership in the Real World"

Pragmatic solutions to the problems leaders at all levels face today. How to refocus on what matters most. Why "tough management" produces results. *Chuck Martin*, Author of *Tough Management*

"New Frontiers that Change Everything"

Economics, demographics and technology are all converging in such a way that the next 10 years will be unlike any in human history. Five trends are changing society and providing more opportunities than ever before. For those willing to rise to the challenge of the five trends, the rewards will be boundless.

Lowell Catlett, Futurist and Technological Visionary, Professor of Agricultural Economics Agricultural Business, New Mexico State University

"What a Director Needs to Know About Strategic & Business Planning"

- Tom Lewis, Ph.D., Professor of Accounting, Creighton University
- Brian Stavish, Regional Vice President, CFC

"Optimal Management of Your Debt Portfolio"

- John Grant, Senior Consultant-Finance Advisory Services, CFC
- John List, Senior Vice President, Member Services, & General Counsel, CFC

3-3:30 p.m. Break and Product Showcase



3:30-4 p.m.
"Eight Keys For Electric Cooperatives' Success
During Changing Times"
Sheldon C. Petersen, Governor & CEO, CFC



4-5 p.m.
"Principles for Success"

Archie Manning, Former NFL Star and Community Activist
New Orleans Saints' star quarterback for more than 10 years, Manning was
the NFL's MVP in 1978 and was voted Most Popular Saint in franchise
history. He remains in the spotlight of the New Orleans community as a
Saints analyst for WWL Radio and TV and as a spokesperson for several
local businesses. As a tribute to his success, his name and number (8) were
the first to be placed on the Wall of Champions at the Louisiana Superdome.

Mr. Manning will share the principles of success he used throughout his career. These principles can be used at your co-op.

Wednesday, June 21



Presiding: Cletus Carter, CFC President

Wednesday's General Sessions will focus on the changes in the energy markets that keep co-op leaders up at night. We'll end with a challenge to climb the heights to success.

7-10 a.m.
Registration and Product Showcase

7-8 a.m.
Continental Breakfast

8-9 a.m.

"The Changing and Challenging Energy Picture— What Keeps G&T Managers Up at Night?"

- Tony Ahern, President & CEO, Buckeye Power, Inc., OH
- Dale Arends, Executive Vice President & General Manager, Corn Belt Power Co-op, IA
- Richard Midulla, Executive Vice President/General Manager, Seminole Electric Co-op, FL
- L. Earl Watkins, Jr., President & CEO, Sunflower Electric Power Corporation, KS
- Moderator: Sheldon C. Petersen, Governor & CEO, CFC











Tony Ahern

Dale Arends

Richard Midulla

L. Earl Watkins, Jr. Sheldon C. Petersen

9-9:15 a.m. Break and Product Showcase

9:15-10:45 a.m. **Breakout Sessions**

"Disaster Preparedness—Lessons from the Frontline"

If a disaster strikes your service territory will you be prepared? Hear what these managers did when they were challenged with the forces of nature. What can you do to incorporate some of these lessons into you disaster plan?

- Robert Occhi, Executive Vice President & General Manager, Coast Electric Power Association, MS
- Randy Pierce, Executive Director, The Association of Louisiana Electric Cooperatives, LA
- Audry Ricketts, General Manager, South Dakota Rural Electric Association, SD

"Positioning for the Future"

This session will answer a question often asked of CFC staff..."What can a co-op do to position itself to be successful in the future?"

- Dan Kessler, Regional Vice President, CFC
- Steve Kettler, Regional Vice President, CFC

"New Technology Deployment at Electric Cooperatives"

- Russ Dantzler, Manager of Engineering & Operations, Mid-Carolina Electric Co-op, SC
- Bruce Griffin, General Manager, Illinois Rural Electric Cooperative, IL
- Martin E. Gordon, Senior Program Manager, Cooperative Research Network (CRN), NRECA
- Julius Hackett, Manager of Engineering, Southside Electric Cooperative, VA
- Doug Lambert, SCADA/Engineering Data Supervisor, San Bernard Electric Co-op, TX
- Moderator: Gary Harrison, General Manager, Dixie Electric Cooperative, AL

"Electric Rate Issues"

10:45-11 a.m. Break



11 a.m.-12 p.m.

"Lessons from Everest – Qualities that Can Help Your Cooperative Climb the Heights, Regardless of the Changing Environment"

Alison Levine, Mt. Everest Climber

Ms. Levine began climbing mountains just 18 months after her second heart surgery to repair a life-threatening heart condition. In between starting business school and starting a job on Wall Street, she "accidentally" climbed the highest peak on six continents. Drawing parallels between staying alive in

the mountains and thriving in a fast-paced, changing business world, she will leave you with some great ideas to take back and use at your system.

12 p.m. Adjourn

CFC Forum 2006 Conference Registration June 19-21, 2006

The Bellagio Hotel 3600 Las Vegas Blvd. South Las Vegas, NV

Name:							
Nickname for Badge:							
Spouse/Guest Name:							
Hospitality Events:							
Networking Reception, Monday, June 19 yes I will be attending and will bring guests with me							
Continental Breakfast, Tuesday, June 20 yes I will be attending and will bring guests with me							
Luncheon, Tuesday, June 20 yes I will be attending and will bring guests with me							
Continental Breakfast, Wednesday, June 21 yes I will be attending and will bring guests with me							
Room Reservations:							
Bellagio Hotel 3600 Las Vegas Blvd. South Las Vegas, NV 89109 Phone 702-693-7444							
single double smoking non-smoking							
other requests:							

MEMORANDUM

TO:

EKPC Board of Directors

FROM:

Claudia Embs

SUBJECT:

NRECA Directors' Conference

San Diego, CA – March 27-29, 2006

DATE:

January 9, 2006

According to EKPC Board Policy 115, directors are authorized to attend either the NRECA Directors' Conference or the Strategic Issues Conference at EKPC expense. Directors who did not attend the Strategic Issues Conference in Nashville in December, are eligible to attend the Directors' Conference in San Diego from March 27-29, 2006. (Pre-conference director training is being held March 25 and 26.)

The flyer is not available yet, but this is what the website has to say about this conference. "Focuses on key industry trends and how they play out in the electric cooperative board room. Given increases in the global consumption of generation fuels and the pressures that it places on the domestic power supply situation, it's never been more important to interact with industry experts and collaborate with your peers."

Since NRECA conference hotel rooms seem to book up early, I am currently holding five rooms at the Manchester Grand Hyatt in San Diego. Please let me know as soon as possible if you plan to attend. I will need the following information:

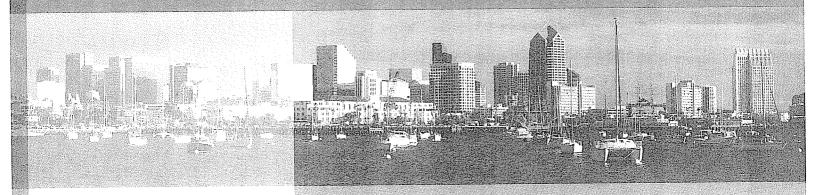
- check-in and check-out dates?
- room preferences?— smoking/non-smoking; 2 double beds/king bed
- flight preferences? (if you wish me to take care of that for you)

I plan to release the rooms on March 15.

c: Member System Managers (for your info only)
Della Damron



2006 DIRECTORS' CONFERENCE



Manchester Grand Hyatt • San Diego, CA

Marrch 27-29, 2006

March 25-26, 2006 Pre-Conference Training

Conference



2006 DIRECTORS' CONFE

SCHIEDUILE AT-A-GLANCE

MARCH 25-26, 2006; Pre-Conference Training

Saturday, March 25

7:00 - 8:00 a.m.

Registration and

Continental Breakfast

8:00 a.m. - Noon

Pre-Conference Training

Noon - 1:30 pm

Lunch on your own

1:30 - 4:00 p.m.

Pre-Conference Training

4:00 - 6:00 p.m.

Conference Registration Open

Sunday, March 26

7:00 - 8:00 a.m.

Registration and Breakfast

8:00 a.m. - Noon

Pre-Conference Training

Noon - 1:30 p.m.

Lunch on your own

1:30 - 4:00 p.m.

Pre-Conference Training

4:00 - 6:00 p.m.

Conference Registration Open

.Nonday, March 27

7:30 - 8:30 a.m.

Registration and

Continental Breakfast

8:30 - 10:45 a.m.

General Session

10:45 a.m. - Noon

Breakout Sessions

Noon - 1:30 p.m.

Lunch on your own

1:30 - 2:45 p.m.

Breakout Sessions

3:00 - 4:00 p.m.

General Session

5:00 p.m.

Welcome Reception

Tuesday, March 28

7:00 - 8:00 a.m.

Continental Breakfast

8:00 - 10:45 a.m.

General Session

10:45 a.m. - Noon

Breakout Sessions

Noon - 1:30 p.m.

Lunch on your own

1:30 - 2:45 p.m.

Breakout Sessions Repeat

3:00 - 4:00 p.m.

Face to Face with the Experts

Wednesday, March 29

7:00 - 8:00 a.m.

Continental Breakfast

8:00 - 11:15 a.m.

General Session

1:15 a.m.

Closing Remarks

ttend the 2006 Directors' Conference and make the commitment to director training. The Directors' Conference focuses on key industry trends and how those issues play out in the electric cooperative board room. One of the many strengths of the electric program has always been informing our members and collaborating at the local, state and national level. Given increases in the global consumption of generation fuels and the pressures they place on the domestic power supply situation, it has never been more important to interact with industry experts and collaborate with directors from across the country. This years' conference will focus on key current issues including:

- The Role of the G&T Director
- Board Continuity Planning and Succession Management
- Transparency, Accountability and Ethics
- Trends in Director Compensation



RENCE: Investing in your future

MARCH 27-29, 2006: Conference

Manchester Grand Hyatt • San Diego, CA

Come Early for Training!

The Directors' Pre-Conference training is another valuable opportunity for directors to gain credits towards their Credentialed Cooperative Director (CCD) or Board Leadership certificates. The CCD certificate consists of five courses that will provide you with knowledge and skills required of cooperative directors. The CCD is earned by attending all five required courses and successfully completing a learning assessment for each. Join more than 3,500 people that have already made their commitment to invest in their future as cooperative directors.

The Board Leadership certificate consists of issue and skill based courses for directors. The certificate can be obtained after earning your CCD, with the completion of 10 additional credits from the 900 level courses.

Saturday, March 25

7:00 - 8:00 a.m. Registration and

Continental Breakfast

8:00 a.m. - Noon Pre-Conference Training

Noon – 1:30 p.m. Lunch on your own

1:30 - 4:00 p.m. Pre-Conference Training Resumes

Saturday Courses:

*Attendees can take one course per day

2630.1



Strategic Planning

(Revised 12/01/05)

Boards have ultimate responsibility for ensuring and evaluating the long-term health of the organization. They help fulfill this duty by identifying goals through strategic planning and by authorizing the appropriate allocation of resources through the adoption of financial policies and by budget review and approval. This course teaches directors how to participate effectively in a strategic planning process

\$475

2640.1



Financial Decision Making

(Revised 12/01/05)

This course is designed to help directors understand the role of the board in financial planning, including identifying the basic documents used in financial planning and reporting, assessing the issues that drive financial decisions, balancing competing goals, and taking responsibility to monitor and evaluate results.

\$475

923.1

New and Emerging Technologies — What Every Director Needs to Know NEW 2006

The business of providing safe, reliable, and cost effective electrical service has never been more dependent upon technology. This course focuses on helping directors explore recent advancements in distribution system automation and information technology tools and how they help rural electric cooperatives deliver superior service to their member owners. Through case study and interactive discussion, this course explores advancements in automated meter reading, scada technologies, broadband over power lines, and other technologies to help directors stay informed and educated.

\$475

Sunday, March 26

7:00 – 8:00 a.m. Registration and Continental

Breakfast

8:00 – Noon Pre-Conference Training

Noon – 1:30 p.m. Lunch on your own

1:30 - 4:00 p.m. Pre-Conference Training

Resumes

Sunday Courses:

*Note you can only take one course per day

2610.1



Understanding the Electric Business (Revised 12/01/05)

This course is designed to help directors understand that the electric utility industry is an evolving high-tech system that must be designed and engineered to meet regulatory and consumer standards for reliability, quality, and safety, which in turn requires an appropriate investment on a planned and on-going basis. 'his course provides directors with an understanding of the key components of the electric utility industry.

\$475

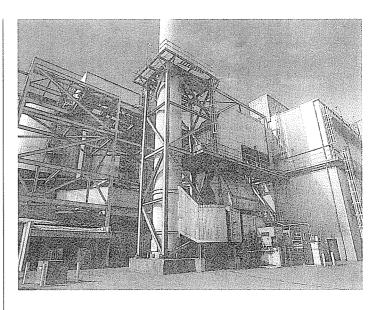
924.1

Continuity Management and Emergency
Response Planning for Directors NEW 2006

Cooperatives are consistently subjected to the ongoing challenges of providing continuous service to their membership in the face of natural and man-made disasters. Whether it's a hurricane, tornado, or employee sabotage, Directors play an increasingly important role in monitoring the activities of management to ensure that physical and IT assets are secure and safe. This course focuses on the fundamentals of disaster planning and recovery, showing how Directors can fulfill the responsibility they have to their members by ensuring the continuity of electrical and business operations.

\$475





914.1

Managing Communications and Public Opinion — The Director's Perspective NEW 2006

Given the challenges of navigating through the evolving energy landscape, effective communications from the cooperative is an area of increasing importance. Whether it's communicating future rate increases or advertising your cooperative's participation in renewables, strong communication programs strengthen your identity with your consumers and build customer loyalty. This course guides participants as they explore the roles and responsibilities of directors with regards to communicating during a crisis or controversy and how to manage public opinion.

\$475

968.1

Advanced Rate Decisions: For Experienced Directors (Available 02/01/05)

It is recommended that Directors taking this course have completed course 2640, Financial Decision Making.

This course is designed to enable directors to discuss and understand the complex issues that must be balanced when the board considers equity management and alternative rate philosophies and strategies. Through a set of case studies and problem situations, attendees will analyze and discuss such issues as equity goals, long-range revenue requirements, achieving fairness for multiple rate classes, and dealing with proposed rate increases.

\$475

Attachment Page 19 of 28

Monday, March 27

7:30 - 8:30 a.m.

Registration and Continental Breakfast

8:30 - 8:45 a.m.

Welcome and Overview

8:45 - 9:15 a.m.

Glenn English

Hear from NRECA's CEO, Glenn English to discuss the evolving domestic power supply environment and the importance of good governance and proactive communications with our members, given the possibility of future rate increases.

9:15 - 10:15 a.m.

Keynote Presentation

What are the forces shaping the electric utility industry? What are the implications for electric cooperatives? How does the role of the director take on even greater importance as a key architect of the cooperative's strategic priorities? Join us during this informative session as we discuss these and other key industry issues.

10:15 - 10:45 a.m.

Break

10:45 - Noon

Breakout Sessions

- 1. Power Supply Choices and the Role of the G&T Director This session probes the role of the distribution director as a G&T director. While keeping focused on the big picture, balancing individual interests will become increasingly important for G&T boards. Come to this session to consider key questions such as:
 - Are directors instructed on how to vote?
 - How do the G&T directors communicate back to the rest of the distribution system board?
 - What is the importance of collaborative decision making?
 - Do you have the financial and physical risk management expertise needed to ensure the successful operation of your G&T?

2. Rates Trends and Cost Dynamics

The utility industry is experiencing rapid changes from substantial increases in underlying costs. This session reviews the trends in utility costs and the causes. Discover some new and traditional remedies your co-op can adopt to maintain its financial strength in today's rapidly changing cost environment.

- 3. The Challenges of Selecting a New CEO
 Deciding who will be your next CEO will likely be one of the most important decisions your board will ever make. This session will candidly explore the challenges boards face as they identify candidates, conduct interviews, evaluate options and select the next CEO of their cooperative.
- 4. Using Board Room Processes to Make Good Decisions
 The responsibility that comes with being a director has never
 been more critical to the leadership and effectiveness of
 your cooperative. Given today's energy environment, human
 differences and expectations impact relationships and individual
 participation in the boardroom. This session explores the
 importance and value of the fundamentals of making motions,
 offering discussion, making amendments and voting to ensuring
 a healthy board room decision making process.
- 5. Building and Planning for the Continuity of the Board As co-ops transition from directors who were there at the beginning to new directors who will guide the co-op into the future, boards must effectively manage the continuity and competency of the board. This session candidly examines trends in board composition, the techniques co-ops use to ensure director competency, and the subsequent challenges for cooperatives as they prepare for the election of new directors.

Noon – 1:30 p.m.

Lunch

1:30 - 2:45 p.m.

Breakouts (repeat)

3:00 - 4:00 p.m.

Carl Hurley - humorist

Be prepared to laugh! Humorist Carl Hurley, America's funniest professor, will delight you with his reflections on life as viewed by a native of Appalachia. He encourages all of us to look for the humor in life, and not take it too seriously. "Humor brightens the load, and makes life more interesting and enjoyable," says Carl.

5:00 p.m.

Welcome Reception Sponsored by CFC



Tuesday, March 28

7:00 - 8:00 a.m.

Continental Breakfast

8:00 - 8:15 a.m.

Day One Recap - Day Two Start

8:15 - 9:15 a.m.

Trends Effecting the Energy Landscape — A Keynote Address

What are the key trends shaping the economic outlook? What are the opportunities for the Electric Cooperative Program given the domestic energy landscape? As leaders of America's electric cooperatives, you can benefit from the answers to these, and other, key questions. Come learn where your efforts fit into the broader economic picture, and discover how new technologies, globalization, and program initiatives are shaping the electric cooperative landscape.

9:15 - 9:30 a.m.

Break

9:30 - 10:30 a.m.

Building a Healthy Board — CEO Relationship

Monica Schmidt, Executive Director, National Consulting Group, NRECA

Join Monica Schmidt and a panel of cooperative directors as they talk about the importance of building a healthy board and CEO relationship. This session will offer insights into how to effectively collaborate with your CEO on important issues that face your community and your co-op. Join this group for a lively talk on how to go about building and maintaining this important relationship.

10:45 a.m. - Noon

Breakouts

Transparency, Accountability and Ethics
In an environment of heightened scrutiny on governance, boards
are rightfully asking for information disclosure and detailed
explanation of management decisions. This session will focus
on the fine line between governance and management and will
uncover strategies to help you ensure that board bylaw and policy
compliance contributes to a healthy board-CEO relationship.

2. All About Capital Credits

With ongoing changes in the demographic makeup of cooperative consumers and the importance of demonstrating the value of the cooperative form of business to today's members, capital credits continue to be a constant item of

discussion in board rooms. This session explores how board policies and strategies for capital credits are going to be affected by the current and future environment of rising costs. Specific focus will be placed on the ongoing discussion with regards to special retirements and discounting.

3. Director Fees and Expenses

With the renewed focus on corporate governance resulting from legislative and regulatory actions, the roles, responsibilities and potential liability of individual directors continues to be a topic of great discussion. As part of that discussion, focus continues to be placed on what is the most appropriate compensation for directors given the time and effort required and the legal risk they are exposed to. This session will explore trends in director compensation and how cooperatives are evaluating and determining compensation levels.

4. Staying on Message

Explore the fundamentals of effective communications and the role of the board in ensuring that the cooperative is proactively discussing industry changes with your membership. This session will focus on developing strategic communication messages to address challenges imposed by the new energy environment (rates, energy efficiency and renewables).

5. Computers for Dummies

It looks like computers are here to stay. As we strive to be more productive and efficient in our work as directors, computers and the Internet are becoming an increasingly useful tool. Come to a small, low-stress lab where you can learn some basic skills on the computer. This computer lab will walk a limited number of attendees through some useful tips and tricks to help you ENJOY computers and the Internet.

Noon - 1:30 p.m

Lunch on your own

1:30 - 2:45 p.m.

Breakouts (repeat)

3:00 - 4:00 p.m.

Face to Face with the Experts

Here is your chance to for a candid and open discussion with various speakers from the program about the challenges facing electric cooperatives and how those challenges are playing out in the board room.

'Vednesday, March 29

7:00 - 8:00 a.m.

Continental Breakfast

8:00 - 8:15 a.m.

Welcome to Day Two Review

8:15 - 9:30 a.m.

Building Effective Communications with Elected Officials

In today's turbulent domestic power supply environment, every electric cooperative depends on decisions from local, state and federal political agencies. Harmonious relationships at each level are essential to a cooperative's success. This panel will be hosted by staff from NRECA's Government Relations Department. As part of an interactive panel discussion, this session will stress:

- Establishing formal political relationships and what that means;
- Planning a coordinated effort at the local, state and federal level. Haphazard efforts without a plan are like an orchestra playing without a musical score.

Political planning in advance of a crisis and ensuring your cooperative the best chance at success.

9:30 – 10:00 a.m.

Break

10:00 - 11:00 a.m.

The Power of Playing Together...

Boris Brott - Guest Conductor of the Toronto Symphony

This interactive presentation will leave you energized as you realize the power of what can happen when electric cooperatives play together. Our guest conductor will show us how everyone can play the same song together, regardless of the number of years you have been on the board, the amount of education you have received, or your individual professional background. Leveraging the musical talents of the audience, this session will illustrate for us all the joy of communication and the achievement of success.

11:00 – 11:15 Closing Remarks

Travel & Accommodations

Hotel:

Manchester Grand Hyatt

One Market Place San Diego, CA 92101 Phone: 619.232.1234 Fax: 619.233.6464

Rate: \$208 single/double Hotel Deadline: February 24

Ground Transportation:

Taxi:

The average taxi fare ranges \$10-\$15 from the San Diego International Airport.

Travel: United

800.521.4041 Code 507UA 7% discount on tickets purchased 30 days prior; 2% discount on tickets purchased within 29 days.

Delta 800.241.6760 Sky Bonus Code

#US530116145

Rental Car Programs:

Avis

800.331.1600 AWD #A403898 Rate code M7-M9



4301 Wilson Boulevard Arlington, VA 22203-1860 www.nreca.coop

2006 DIRECTORS' CONFERENCE

REGISTRATION FORM

2006 Pre-Directors' Conference Training
March 25–26, 2006 • Manchester Grand Hyatt • San Diego, CA

2006 Directors' Conference

March 27-29, 2006 • Manchester Grand Hyatt • San Diego, CA

Please print. Use one form for each registrant Step 1. Tell Us Who You Are		
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Step 3. Tell Us How You Want 1	Го Рау	
☐ Check payable to NRECA enclosed	Charge my: AMEX Discover MC Visa	☐ Invoice Me
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Step 4. Register

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703.907.5951

Online:

www.cooperative.com

> Checks payable to:

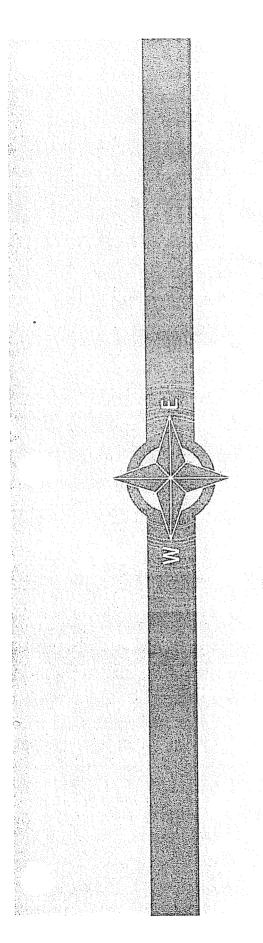
NRECA

P.O. Box # 75877

Baltimore, MD 21275-8777

Cancellation, Substitution, and Refund Policy

All changes must be made in writing. Cancellations received before March 13, 2006 are fully refundable. Registrants who cancel after March 13, 2006 will be issued a refund minus a \$150 material fee. Substitutions are always welcome Registrants failing to cancel prior to the start of the event and no-shows are responsible for paying the full registration fee. For more information regarding administrative policies such as cancellations, refunds or complaints, please contact Membership & Association Support Services at (703) 907-5868, membership@nreca.coop or fax to (703) 907-5951.

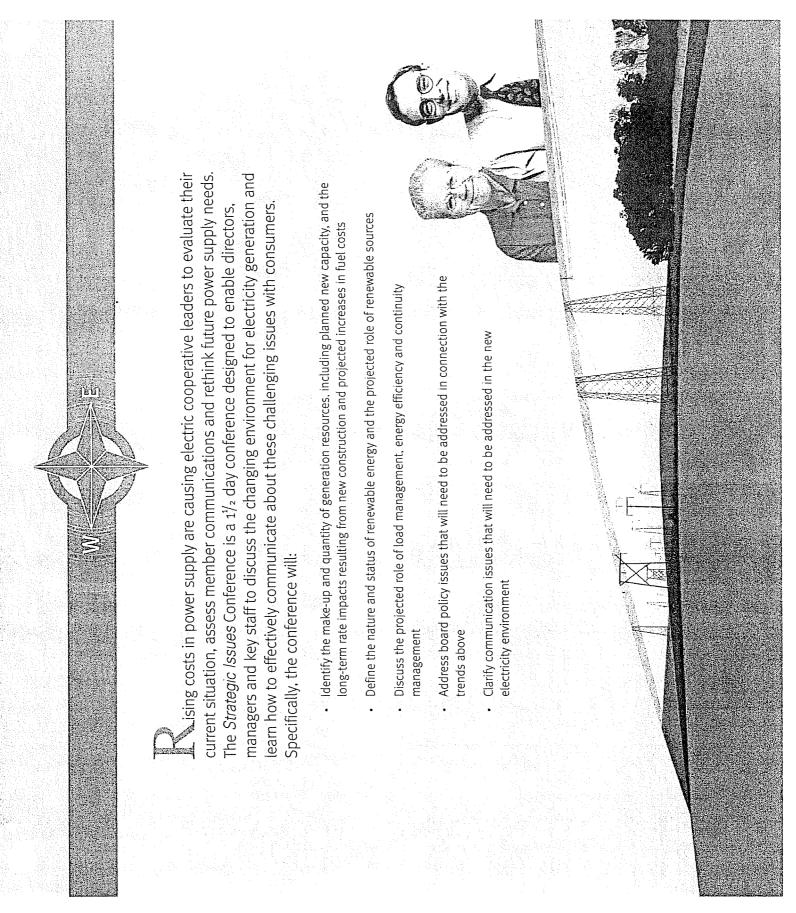


2005 STRATEGIC ISSUES CONFERENCE

Navigating the New Energy Landscape Communicating the Challenges to Your Members

EAST
December 12–13, 2005
Gaylord Opryland Resort and Convention Center
Nashville, Tennessee

December 15–16, 2005 Grand Hyatt Denver Denver, Colorado



64 Ø MERYSENOO TRATEGIC

Navigating the New Energy Landscape

Communicating the Challenges to Your Members

East – Monday, December 12 West – Thursday, December 15

7:00 - 8:00 a.m.

REGISTRATION AND CONTINENTAL BREAKFAST

8:00 - 8:15 a.m.

WELCOME, PROGRAM OVERVIEW

· Tom Hall, Director of Educational Programs,

8:15 - 9:15 a.m.

DEFINING THE NEW ENERGY LANDSCAPE

resources will alter the domestic energy landscape sumption and the subsequent demand for natural Llewellyn King as he analyzes how global con-The domestic energy environment that electric co-ops have known is rapidly changing. Join · Llewellyn King, Publisher, Energy Daily for the foreseeable future.

9:15 - 10:15 a.m.

NAVIGATING THE FUTURE OF POWER SUPPLY

competitive markets are making for choppy waters CEOs will comment on the industry forecast from Rising fuel costs, new capacity needs and volatile power supply challenges and how they're affected by the cost of fuels, the markets and transmission for the nation's electric utilities. A panel of G&T local cooperative boards in future power supply challenges. They'll also discuss the role of the Llewellyn King, discuss their system's future

10:15 - 10:30 a.m.

BREAK

10:30 - 11:15 a.m.

UNDERSTANDING RENEWABLE ENERGY

Floyd Barwig, Director of the Iowa Energy Center Cooperatives and their members are continuing to The passing of the Energy Policy Act could make renewable energy options even more attractive for cooperatives. This session will define renewables, weigh the benefits and costs of renewable energy. the opportunities and obstacles to making renewspotlight the policy issues involved, and explore able energy a bigger part of the mix.

11:15 a.m. - Noon

Here's your chance to pose pressing questions to ROUNDTABLE Q&A — ASK THE EXPERTS! our panel of energy experts.

Noon - 1:15 p.m.

LUNCHEON PRESENTATION — BUSINESS CONTINUITY MANAGEMENT AND THE UTILITY SECTOR

expectations of utilities in the post 911 environment business operation running smoothly - everything In times of crisis, cooperatives are faced not with and how cooperatives can develop organizational crisis communications talk about the heightened experts on business continuity management and records are maintained to communicating effecjust getting the power back on, but keeping the from insuring that your financial and personnel tively with employees. Listen as international

1:30 - 2:45 p.m.

CONCURRENT SESSIONS

important role in helping to manage rate increases advantage to consumers. This session will explore raise rates. In this environment, load management how both co-ops and investor owned utilities are efficiency programs, and will address the related Almost all electric utilities are being forced to and as a way to communicate the cooperative LOAD MANAGEMENT AND ENERGY EFFICIENCY policy questions that boards should consider. implementing load management and energy and energy efficiency programs can play an

CONTINUITY MANAGEMENT — KEY STEPS TO GETTING IT RIGHT

agement, and how those fundamentals are evolving recover from these types of situations. This session will focus on the fundamentals of continuity manhear from cooperative and continuity management ongoing role in knowing how to best manage and mark of America's electric cooperatives. Whether cooperatives must play an increasingly active and the continuity of electrical and business operations. and cyber crises and disasters has been the tradecontinues to fulfill the responsibility of ensuring experts, showing how the rural electric program Rapid and effective response to natural, human, it's a hurricane, tornado, or employee sabotage, in the new energy environment. Attendees will



TRENDS IN RENEWABLES AND COOPERATIVE POLICY IMPLICATIONS

Observers agree that renewables will play a larger address the policy issues raised by renewables in role in the nation's energy resource mix. But the pros and cons regarding specific renewable technologies are still debated, and boards must still situation. This interactive session will highlight their particular power supply and geographical the major areas that boards must consider.

BUILDING ADVOCACY AND FOSTERING EFFECTIVE COMMUNICATIONS

plan to build and maintain relationships with pubcommunications with public officials are increasingly important to the success of the cooperative. lic officials as an important part of the execution In this changing environment, relationships and This session will explore the need for a formal of the business strategy of cooperatives.

TRENDS IN RATES AND COOPERATIVE APPROACHES

The cooperative utility industry is entering a state of rapid change resulting from substantial increases in underlying costs. This session considers the It also identifies new and traditional remedies for maintaining a cooperative's financial strength in trends in utility costs and the underlying causes. today's rapidly changing cost environment.

2:45 - 3:00 p.m.

BREAK

CONCURRENT SESSIONS II REPEAT 3:00 - 4:15 p.m.

4:15 p.m.

ADJOURN

5:00 - 6:00 p.m.

RECEPTION FOR CONFERENCE ATTENDEES AND GUESTS

East – Tuesday, December 13 West – Friday, December 16

THE ENERGY POLICY ACT OF 2005 8:30 - 9:15 a.m.

lay Morrison, Senior Regulatory Council, NRECA

9:15 - 10:15 a.m.

Steve Allen, Sheehan and Associates COMMUNICATING EFFECTIVELY

effective communications plans and how cooperaenvironment (rates, load management and energy communication messages around the key themes cooperatives are using to address the new energy session will focus on how to develop strategic tive leaders may need to be more proactive in addressing the impacts of these changes when communicating with consumers. This general Steve Allen will explore the fundamentals of efficiency, emergency response planning, renewables, etc).

10:15 - 11:15 a.m.

COOPERATIVES RISE TO THE COMMUNICATIONS CHALLENGE

communicator, moderated by Steve Allen will A panel comprised of a co-op director, CEO, distribution system communicator and G&T share their communication strategies and experiences.

11:15 a.m.

FUTURE FOCUS AND ADJOURNMENT

ACCOMMODATIONS

Please contact hotels directly to make your reservations.

Gaylord Opryland Resort and Convention Room Cutoff Date: November 11, 2005 Room rate: \$149 + \$10 Resort Fee 2800 Opryland Drive Nashville, TN 37214 TEL: 615.889.1000 Center

Room Cutoff Date: November 10, 2005 Room rate: \$125 single/double. Grand Hyatt Denver 1750 Welton Street TEL: 303.295.1234 FAX: 303.295.2472 Denver, CO 80202

STEP 1. TELL US WHO YOU ARE Please print. Use one form for each registrant.

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CONEEKENCE K E C I Z L K V L I O N 7002 STRATEGIC ISSUES



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COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 15

RESPONSIBLE PERSON:

William A. Bosta

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 15.

Refer to the response to the Staff's Third Request, Item 43.

Request 15a. Provide copies of the complete 2006 Generation and Transmission ("G&T") Compensation Survey. In addition, identify the preparer of the survey.

Response 15a. The requested information is provided on the attached CD.

Request 15b. Provide a profile for each of the G&Ts listed by identification code below. The profile should include the number of member distribution cooperatives of the G&T, the number of ultimate retail customers served by the G&T, the total revenues for 2006, the total megawatt hours generated and sold during 2006, and the number of directors of the G&T.

- (1) B02
- (2) B15
- (3) B20
- (4) B22
- (5) B28
- (6) B34
- (7) B35
- (8) B41

Response 15b. The only information available to EKPC by G&T code is the 2006 Total Gross Revenue. That is shown below. All other information is not available in the survey and EKPC was not provided the match of the code to the G&T cooperative. As a result, EKPC is unable to provide the requested information.

<u>G&T</u>	2006 Total Revenue
B02	\$909,364,069
B15	\$546,091,000
B20	Not Available
B22	\$737,679,000
B28	\$185,213,000
B34	\$211,600,779
B35	\$ 41,770,240
B41	\$282,000,000

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07

REQUEST 16

RESPONSIBLE PERSON: William A. Bosta

COMPANY: East Kentucky Power Cooperative, Inc.

Request 16. Concerning the directors of EKPC:

Request 16a. Identify the representatives to the NRECA and the Kentucky Association of Electric Cooperatives.

<u>Response 16a</u>. NRECA – Mr. Wayne Stratton – Chairman of the Board

Mr. Robert Marshall - President/CEO of EKPC

(Alternate)

KAEC - Mr. Lonnie Vice - Vice-Chairman of Board

Mr. Robert Marshall - President/CEO of EKPC

(Manager-Director)

Request 16b. Provide the total directors' fees and expenses for calendar years 2001 through 2006.

Response 16b. The total directors' fees and expenses for calendar years 2001 through 2006 are listed below.

<u>Year</u>	Amount
2001	306,667.87
2002	325,904.16
2003	312,749.70
2004	363,284.57
2005	321,120.28
2006	288,079.00

Request 16c. Provide the occupation or profession of each director serving on the board as of test-year end. If the director is retired, provide the director's occupation or profession while employed.

Response 16c.

Big Sandy Rural Electric Cooperative Corporation - Wade May

- Self-employed, Floor Covering Business

Blue Grass Energy Cooperative Corporation - E. A. Gilbert

- Farmer

Clark Energy Cooperative, Inc. - William P. Shearer

- Banker and Farmer

Cumberland Valley Electric - Elbert Hampton

- Retired Superintendent of Operations/Electric Cooperative Farmers Rural Electric Cooperative Corporation - Randy D. Sexton

- Contractor and Consultant

Fleming-Mason Energy Cooperative - Lonnie Vice

- Retired Educator

Grayson Rural Electric Cooperative Corporation - Donnie Crum

- Self-employed-Furniture Craft Mall

Inter-County Energy Cooperative Corporation - Daniel L. Divine

- Farmer

Jackson Energy Cooperative - Fred M. Brown

- Retired Farmer

Licking Valley Rural Electric Cooperative Corporation - Michael Adams

 Retired Medical Services Administrator w/State Department of Vocational Rehabilitation

Nolin Rural Electric Cooperative Corporation - A. L. Rosenberger

- Farmer

Owen Electric Cooperative - Hope Kinman

- Retired Administrative Secretary w/Board of Education Salt River Electric Cooperative Corporation - Jimmy Longmire
- Real Estate Broker

Shelby Energy Cooperative, Inc. - R. Wayne Stratton

- CPA

South Kentucky Rural Electric Cooperative Corporation – Richard Stephens

- Self-employed Business Owner since 1960

Taylor County Rural Electric Cooperative Corporation - P. D. Depp

- Retired State Government w/Department for Health Services

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 17

RESPONSIBLE PERSON: William A. Bosta

COMPANY: East Kentucky Power Cooperative, Inc.

Refer to the response to the Staff's Third Request, Item 45, page 2 of 2. EKPC states that its economic/industrial development activities promote both its economic well-being and the Kentucky economy in general. Indicate the primary focus of these activities, promoting EKPC or the Kentucky economy. Explain how this conclusion was reached.

Response 17. EKPC believes that they go hand-in-hand. EKPC's financial well-being ensures that jobs remain available for many Kentuckians and that the communities served by EKPC and its Member Systems are economically strong and vibrant. In many of the more rural communities of the state, the presence of EKPC and its Member Systems is one of the few locally owned, permanent businesses. This is important to the economy of these smaller communities and valuable to the state's economy in general. It is also consistent with the Cooperative's mission of serving our members.



COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 18

RESPONSIBLE PERSON:

William A. Bosta

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the response to the Staff's Third Request, Item 46(c). Explain in detail how EKPC determined the appropriate level of Partners Plus program promotional-type expenses to exclude for rate-making purposes. Include all workpapers, calculations, assumptions, and other supporting documentation.

Response 18. EKPC conducted an item-by-item assessment of Partners Plus expenditures for the Test Period. All promotional expenditures, brand recognition, image advertising, donations and sponsorships were eliminated. Expenditures relating to energy efficiency, conservation, safety and the associated education of these topics were retained.



PSC Request 19
Page 1 of 1

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2006-00472 FOURTH DATA REQUEST RESPONSE

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 19

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the response to the Staff's Third Request, Item 49(c). EKPC was requested to provide a schedule detailing the transactions that made up the \$32,507,300 balance for Account No. 426 listed as "Other." While identifying three types of transactions and the amounts, EKPC responded that a difference of \$32,554,641 was redacted. However, EKPC did not submit the redacted information or request confidential treatment pursuant to 807 KAR 5:001, Section 7. Provide the originally requested information for the difference of \$32,554,641. EKPC may seek confidential treatment of the response by complying with the requirements of the applicable regulation.

Response 19. Below is a revised response to Staff's Third Request, Item 49c.

 Material write-offs
 166,483

 Propane
 (173,407)

 Life Ins
 (40,416)

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07 REQUEST 20

RESPONSIBLE PERSON: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

Request 20. Refer to the response to the Staff's Third Request, Item 50. Concerning the satisfaction survey services provided by Cooper Research and Preston Osborne Research:

Request 20a. Explain why EKPC conducts these surveys for its member systems.

Response 20a. EKPC and its member systems work jointly to perform retail customer satisfaction surveys because the information obtained is useful and relevant to both. While EKPC does not serve retail customers, it is nonetheless influenced by retail customer behavior. Satisfaction surveys, just like retail appliance saturation surveys, produce information and insight that are useful and important to EKPC. For example, concepts such as smart metering and net metering are retail based ideas that EKPC needs to understand. Questions on the satisfaction survey that relate to reliability are likewise relevant and pertinent to EKPC.

Request 20b. Provide the amounts paid during the test year by the member systems to reimburse EKPC for the cost of the satisfaction surveys. If no reimbursement was provided, explain why.

Response 20b. As noted in (a) above, customer satisfaction measurement is a joint project between EKPC and its member systems. No reimbursement was requested due to the fact that the information and insight provided is valuable and pertinent to EKPC.

A.			

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07

REQUEST 21

RESPONSIBLE PERSON: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

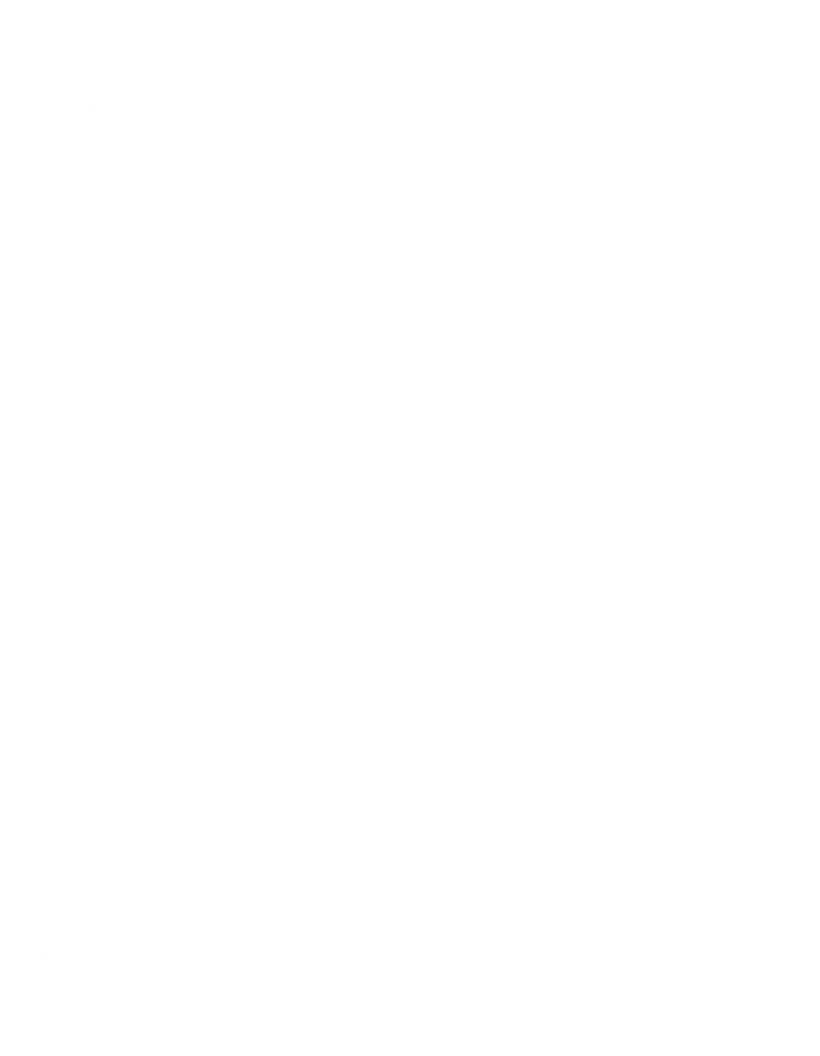
Request 21. Refer to the response to the Staff's Third Request, Item 52.

Request 21a. Provide the member annual service fees for 2007.

Response 21a. EKPC paid ACES member service fees totaling \$818,306 for the period January 1, 2007 to May 31, 2007.

Request 21b. Refer to the responses to Items 52(j)(1) and 52(k)(1). Explain why there were no written reports or written documentation of the presentations.

Response 21b. The Coopers & Lybrand presentation was located and is provided on the enclosed CD.



COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07

REQUEST 22

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the response to the Staff's Third Request, Item 53(e), the Attachment, page 5 of 22. Article II of the Operating Agreement for Envision Energy Services, LLC ("Envision") states in part that the business and purpose of Envision shall be to sell or otherwise provide energy. Explain in detail how Envision can sell or provide energy.

Response 22. At the time that Envision was founded, there was much talk about deregulation and open access of the electric industry. One thought at the time was that distribution systems might only be able to transport energy. This clause was added so that, in the event this might happen, Envision might be able to sell energy to retail customers. As deregulation and open access have yet to happen, it is unforeseen that Envision could or would sell energy.

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COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07

REQUEST 23

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 23.

Refer to the response to the Staff's Third Request, Item 54(a).

Request 23a. Did each borrower in the propane gas program begin making monthly payments of principal and interest on August 1, 2005? If no, indicate when these payments began.

Response 23a. Yes. Each borrower began making monthly payments of principal and interest on August 1, 2005.

Request 23b. Are all borrowers curre

Are all borrowers current on their loans? Explain the response.

Response 23b.

Yes. Borrowers are current on their loans.

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07

REQUEST 24

RESPONSIBLE PERSON:

William A. Bosta

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the response to the Staff's Third Request, Item 55.

Provide a schedule listing all the Electric Power Research Institute projects EKPC has purchased since April 1, 2007. Include a description of the project and the project cost.

Response 24. At this point in time, no EPRI projects have been purchased.

Page 1 of 1

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2006-00472 FOURTH DATA REQUEST RESPONSE

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07

REQUEST 25

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 25.

Refer to the response to the Staff's Third Request, Item 57.

Request 25a. How much of the \$54,205 cost of the depreciation study was expensed during the test year?

Response 25a. EKPC expensed \$42,725 relating to the depreciation study during the test year.

Request 25b. Did EKPC propose to remove this expense as a non-recurring expense? Explain the response.

Response 25b. EKPC did not propose to remove this expense as a non-recurring expense. This amount is immaterial.

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2006-00472 FOURTH DATA REQUEST RESPONSE

COMMISSION STAFF'S FOURTH DATA REQUEST DATED 05/30/07

REQUEST 26

RESPONSIBLE PERSON:

Frank J. Oliva

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the response to the Staff's Third Request, Item 58.

Provide the minimum Times Interest Earned Ratio and the Debt Service Coverage Ratio EKPC would need to achieve for calendar year 2007 to meet the Rural Utilities Service mortgage covenants.

Response 26. Because EKPC's Debt Service Coverage Ratio was .662 and .979 for the years 2005 and 2006, respectively, a DSC ratio of at least 1.03 would have to be earned in 2007 in order to meet the RUS mortgage covenants requirements. Based on EKPC's 2007 budget projection, the net margin needed to earn a DSC ratio of 1.03 in 2007 would result in a Times Earned Interest Ratio of 1.15 for the year.

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07 REQUEST 13

RESPONSIBLE PERSON:

Frank J. Oliva

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the Company's response to KIUC 2-38. Please provide an update on the status of the RUS loan of approximately \$481 million. In this update, please describe in detail why the RUS final approval has been delayed and when this loan will be available to pay down the credit facility. Provide a copy of all documents, including correspondence with the RUS related to the approval and timing of these funds.

RUS. EKPC anticipates the full \$481 million to be approved by RUS within six months. A new mortgage is in the process of being filed in the seventy-seven counties EKPC owns property. After the filings are complete, these mortgages will be returned to RUS along with various other executed documents. These documents and mortgages must be returned to RUS by July 13, 2007. After their return, RUS must inspect each document for proper execution prior to the final approval.

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KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07 REQUEST 14

RESPONSIBLE PERSON: Frank J. Oliva

COMPANY: East Kentucky Power Cooperative, Inc.

Refer to the Company's response to KIUC 2-39. If the loan was granted final approval today and the RUS released the funds, what would the interest rate be? Provide a copy of any source document relied on for this response.

Response 14. The rate, if granted final approval and release of loan funds today, June 5, 2007, would be approximately 5.145 percent annually.

This rate is the "Approximate FFB Quarterly Rates" as updated daily by the USDA Rural Development's Electric Programs - Interest Rates web page plus one-eighth of one percent (see attached).

http://www.usda.gov/rus/electric/rates

Treasury and Federal Financing Bank (FFB) Rates

The following list of interest rates for loans shall not constitute an offer or commitment to make a loan at these rates. The interest rates listed are illustrative only of the rates that would apply to funds advanced on the date identified here as the "Issue Date." These rates change daily.

ISSUE DATE: 06/05/07 06/04/07 TREASURY YIELD CURVE SEMIANNUAL RATES 3 - mo 1-yr 2-yr 3-yr 5-yr 7-yr 10-yr 20-yr 30-yr 4.81 4.99 4.99 4.97 4.91 4.91 4.93 5.11 5.02 4.92 Approx. APPROXIMATE FFB OUARTERLY RATES* + 1/8 of 1% =FFB Rate 3-mo 6-mo 1-yr 2-yr 7-yr 10-yr 20-yr <u> 30-yr</u> 5-yr 4.88 4.88 4.91 5.05 5.02 0.125 5.145 4.81 4.96 4.95 4.93 4.89

Treasury rate loans are not available for terms less than one year.

^{*}These approximate FFB rates are based upon a common type of RUS loan in which the quarterly loan payments are derived by amortizing over 30 years, but the loan matures with a balloon payment at the maturity indicated in the column heading (for example, 10 years). The column headings are approximate maturity terms, since the loans end on quarterly payment dates.

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07

REQUEST 15

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the Company's response to KIUC 2-44. Please update this response for April 2007.

Response 15. The table below reflects the updated response for April 2007 to KIUC 2-44.

KIUC Request 15 Page 2 of 2

Oct 05-Sept 06						
	Base Rates	FAC	ES	Gr	een Power	Total
October	\$ 36,256,129	\$ 7,839,503	\$ 4,457,295	\$	8,576	\$ 48,561,503
November	\$ 41,471,828	\$ 7,818,712	\$ 4,674,894	\$	9,059	\$ 53,974,493
December	\$ 54,287,752	\$ 8,664,213	\$ 6,646,702	\$	9,243	\$ 69,607,910
January	\$ 46,045,807	\$14,485,338	\$ 3,386,525	\$	9,053	\$ 63,926,723
February	\$ 46,769,947	\$ 8,278,260	\$ 4,345,255	\$	9,127	\$ 59,402,589
March	\$ 43,371,423	\$ 7,137,164	\$ 4,393,841	\$	9,202	\$ 54,911,630
April	\$ 34,025,811	\$ 5,053,563	\$ 3,527,736	\$	9,027	\$ 42,616,137
May	\$ 38,596,632	\$ 6,262,727	\$ 3,933,880	\$	9,130	\$ 48,802,369
June	\$ 40,880,460	\$ 7,228,617	\$ 4,624,694	\$	9,138	\$ 52,742,909
July	\$ 47,100,136	\$ 5,207,893	\$ 5,326,879	\$	9,305	\$ 57,644,213
August	\$ 48,465,315	\$ 6,604,086	\$ 7,021,816	\$	9,390	\$ 62,100,607
September	\$ 34,803,085	\$ 6,413,228	\$ 5,133,457	\$	9,463	\$ 46,359,233
	\$512,074,325	\$90,993,304	\$57,472,974	\$	109,713	\$660,650,316
Oct 06-Apr 07	Base Rates	FAC	ES	Gı	reen Power	Total
Oct-06	\$ 37,131,095	\$ 6,019,626	\$ 4,903,490	\$	9,451	\$ 48,063,662
Nov-06	\$ 41,471,298	\$ 2,498,092	\$ 4,340,414	\$	9,264	\$ 48,319,068
Dec-06	\$ 49,487,414	\$ 5,868,041	\$ 5,222,473	\$	9,236	\$ 60,587,164
Jan-07	\$ 53,002,598	\$ 8,536,387	\$ 5,083,197	\$	9,243	\$ 66,631,425
Feb-07	\$ 55,542,700	\$10,316,043	\$ 6,069,617	\$	9,441	\$ 71,937,801
Mar-07	\$ 42,620,504	\$14,909,257	\$ 5,159,359	\$	9,178	\$ 62,698,298
Apr-07	\$ 40,991,416	\$ 7,788,220	\$ 4,502,790	\$	9,185	\$ 53,291,611

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07 REQUEST 16

RESPONSIBLE PERSON: William A. Bosta

COMPANY: East Kentucky Power Cooperative, Inc.

Refer to the Company's response to KIUC 2-45. Please provide the information requested to annualize all revenues other than ECR and FAC revenues reflecting customer sales growth over the 12 months ending March 31, 2007. Provide all supporting assumptions and computations, including electronic spreadsheets with formulas intact.

Response 16. Please see the attached information. The additional base rate revenues are an estimate based solely on the change in customers at retail for these time periods.

Note that the information has been provided in electronic form on the attached compact disk.

East Kentucky Power Cooperative, Inc.

Case No. 2006-00472

Schedule E Per Test Year

١.		Total	Revenue/
	MWh	Revenue	MWh
	(1)	(2)	(3)=(2)/(1)
	9,181,636	\$506,592,611	\$55.17

11.	Number of Customers as of 3/31/07	500,240
	12-month average # of Customers	496,881
	% Differential of Number of Customers as of 3/31/07 to 12-month average # of Customers	0.676%
111.	Schedule E MWh x % Differential of Number of Customers as of 3/31/07 to	9,181,636
	12-month average # of Customers Additional MWh	<u>0.676%</u> 62,068
IV.	Revenue per MWh x Additional MWh	\$55.17
	Additional Revenue	<u>62,068</u> \$3,424,292
V.	Variable Cost per MWh per Test Year* x Additional MWh	\$36.57
	Additional Variable Cost	<u>62,068</u> \$2,269,827
VI.	Additional Revenue less Additional Variable Cost	<u>\$1,154,465</u>

^{*} Includes Fuel and Variable O&M and energy-related purchased power.

2.6549%

\$246,808

22,175

Schedule B Per Test Year

Revenue/ MWh

Total

Revenue (2)

12-month average # of Customers

VI. Additional Revenue less Additional Variable Cost

MWh

Additional MWh

	(1)	(2)	(3)=(2)/(1)		
	835,266	\$39,844,967	\$47.70		
11.	Number of Cus	tomers as of 3/3	31/07		58
	12-month avera	age # of Custom	ners		56.50
	, , , , , , , , , , , , , , , , , , , ,	of Number of Cua age # of Custon		53/31/07 to	2.6549%
III.	Schedule B MV x % Differentia	Vh Il of Number of (Customers as	of 3/31/07 to	835,266

IV.	Revenue per MWh	\$47.70
	x Additional MWh	<u>22,175</u>
	Additional Revenue	\$1,057,748
	Year	
V.	Variable Cost per MWh per Test Year*	\$36.57
	x Additional MWh	<u>22,175</u>
	Additional Variable Cost	\$810,940

^{*} Includes Fuel and Variable O&M and energy-related purchased power.

Schedule C Per Test Year

(3)=(2)/(1)

Revenue/ MWh

Total

Revenue (2)

١.

MWh

	430,699 \$21,069,707 \$48.92	
II.	Number of Customers as of 3/31/07	14
	12-month average # of Customers	14.67
	% Differential of Number of Customers as of 3/31/07 to 12-month average # of Customers	95.43%
111.	Schedule C MWh x % Differential of Number of Customers as of 3/31/07 to	430,699
	12-month average # of Customers	<u>-4.57%</u>
	Additional MWh	(19,683)
IV.	Revenue per MWh	\$48.92
	x Additional MWh	<u>(19,683)</u>
	Additional Revenue	(\$962,892)
V.	Variable Cost per MWh per Test Year*	\$36.57
	x Additional MWh	(19,683)
	Additional Variable Cost	(\$719,807)
VI.	Additional Revenue less Additional Variable Cost	<u>(\$243,085)</u>
	Summary	
	Schedule E	\$1,154,465
	Schedule B	\$246,808
	Schedule C	(\$243,085)
	Total Change in Revenues	<u>\$1,158,188</u>

^{*} Includes Fuel and Variable O&M and energy-related purchased power.

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07

REQUEST 17

RESPONSIBLE PERSON:

William A. Bosta

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 17. Please provide member load and customer information for the 13 months ending March 31, 2007 sufficient to compute EKPC's annualized base revenues using customer levels at March 31, 2007 and average usage per customer for the 12 months ending March 31, 2007. In addition, provide the actual revenues and revenues per customer for the same period in sufficient detail to make this computation.

Response 17. The attached information provides an annualization of the metering point, substation and base rate revenues compared to a 13-month average. These are estimates based on the change in the number of customers over time. It is similar to the response provided in Item 16.

Shown below is the average usage per customer by Wholesale rate schedule.

For Schedule "E" customers – 12 months ended March 2007:

KWH usage

9,334,989,531

No. of retail customers

500,240

KWH per customer

18,661

KIUC Request 17

Page 2 of 2

For Schedule "B" customers – 12 months ended March 2007:

KWH usage 851,053,830

No. of retail customers 58

KWH per customer 14,673,342

For Schedule "C" customers – 12 months ended March 2007:

KWH usage 429,422,763

No. of retail customers 14

KWH per customer 30,673,055

\$1,268,706

East Kentucky Power Cooperative, Inc.

Case No. 2006-00472

Schedule E Per Test Year

Revenue/

MWh

(3)=(2)/(1)

\$55.17

Total

Revenue

(2)

\$506,592,611

MWh

(1)

9,181,636

II. Number of Customers as of 3/31/07	500,240
13-month average # of Customers	496,551
% Differential of Number of Customers as of 3/31/07 to 13-month average # of Customers	0.7429%
III. Schedule E MWh x % Differential of Number of Customers as of 3/31/07 to 13-month average # of Customers Additional MWh	9,181,636 <u>0.7429%</u> 68,210
IV. Revenue per MWh x Additional MWh Additional Revenue	\$55.17 <u>68,210</u> \$3,763,146
V. Variable Cost per MWh per Test Year* x Additional MWh Additional Variable Cost	\$36.57 <u>68,210</u> \$2,494,440

Includes Fuel and Variable O&M and energy-related purchased power.

VI. Additional Revenue less Additional Variable Cost

\$1,195,744

\$36.57

25,068

\$916,737

\$279,007

Schedule B Per Test Year

Revenue/

MWh

(3)=(2)/(1)

Total

Revenue

(2)

MWh

(1)

Additional Revenue

V. Variable Cost per MWh

Additional Variable Cost

VI. Additional Revenue less Additional Variable Cost

x Additional MWh

			
	835,266	\$39,844,967	\$47.70
II. Numl	per of Customers as o	of 3/31/07	
13-m	onth average # of Cus	stomers	
% Dif	fferential of Number o	f Customers as of	3/31/07 to
	nonth average # of Cu		
III Sche	dule B MWh		
	Differential of Number	r of Customers as	of 3/31/07
13	3-month average # of	Customers	
Addit	ional MWh		
IV. Reve	enue per MWh		
	ditional MWh		

Includes Fuel and Variable O&M and energy-related purchased power.

Schedule C Per Test Year

Revenue/

MWh (3)=(4)/(1)

\$48.92

Total

Revenue

(2)

\$21,069,707

MWh

(1)

430,699

II. Number of Customers as of 3/31/07	14
13-month average # of Customers	14.62
% Differential of Number of Customers as of 3/31/07 to 13-month average # of Customers	95.76%
III. Schedule C MWh x % Differential of Number of Customers as of 3/31/07 to 13-month average # of Customers Additional MWh	430,699 - <u>4.24%</u> (18,262)
IV. Revenue per MWh x Additional MWh Additional Revenue	\$48.92 (<u>18,262)</u> (\$893,377)
V. Variable Cost per MWh x Additional MWh Additional Variable Cost	\$36.57 (18,262) (\$667,841)
VI. Additional Revenue less Additional Variable Cost	(\$225,536)

^{*} Includes Fuel and Variable O&M and energy-related purchased power.

Total Billing Units - March 2006 - March 2007 (Thirteen months)

	Metering	2000	5000	10000	20000
	Point	KVA	KVA	KVA	KVA
Member System	\$125	\$944	\$2,373	\$2,855	\$4,605
1 Big Sandy	104	0	13	91	0
2 Blue Grass	407	13	47	256	91
3 Clark	291	13	156	83	13
4 Cumberland Valley	195	0	39	143	13
5 Farmers	156	0	13	130	13
6 Fleming Mason	169	0	0	117	39
7 Grayson	169	0	78	91	0
8 Inter-County	156	0	13	117	26
9 Jackson	351	0	39	260	52
10 Licking Valley	130	0	39	91	0
11 Nolin	234	0	26	156	52
12 Owen	299	0	0	203	96
13 Salt River	342	13	52	248	29
14 Shelby	156	0	13	104	26
15 South Kentucky	439	0	39	335	52
16 Taylor County	169	0	13	156	0
Totals	3,767	39	580	2,581	502

Billing Units as of March 31, 2007

				· · · · · · · · · · · · · · · · · · ·	
	Metering	2000	5000	10000	20000
	Point	KVA	KVA	KVA	KVA
Member System	\$125	\$944	\$2,373	\$2,855	\$4,605
1 Big Sandy	8	0	1	7	0
2 Blue Grass	33	1	3	22	7
3 Clark	22	1	12	6	1
4 Cumberland Valley	15	0	3	11	1
5 Farmers	12	0	1	10	1
6 Fleming Mason	13	0	0	9	3
7 Grayson	13	0	6	7	0
8 Inter-County	12	0	1	9	2
9 Jackson	27	0	3	19	5
10 Licking Valley	10	0	3	7	0
11 Nolin	18	0	2	12	4
12 Owen	23	0	0	15	8
13 Salt River	28	1	4	20	3
14 Shelby	12	0	1	8	2
15 South Kentucky	34	0	3	26	4
16 Taylor County	13	0	1	12	0
Totals	293	3	44	200	41

Monthly AVENAGE of the	C 10 months	· · · · · · · · · · · · · · · · · · ·			
	Metering	2000	5000	10000	20000
	Point	KVA	KVA	KVA	KVA
Member System	\$125	\$944	\$2,373	\$2,855	\$4,605
1 Big Sandy	8.00	0.00	1.00	7.00	0.00
2 Blue Grass	31.31	1.00	3.62	19.69	7.00
3 Clark	22.38	1.00	12.00	6.38	1.00
4 Cumberland Valley	15.00	0.00	3.00	11.00	1.00
5 Farmers	12.00	0.00	1.00	10.00	1.00
6 Fleming Mason	13.00	0.00	0.00	9.00	3.00
7 Grayson	13.00	0.00	6.00	7.00	0.00
8 Inter-County	12.00	0.00	1.00	9.00	2.00
9 Jackson	27.00	0.00	3.00	20.00	4.00
10 Licking Valley	10.00	0.00	3.00	7.00	0.00
11 Nolin	18.00	0.00	2.00	12.00	4.00
12 Owen	23.00	0.00	0.00	15.62	7.38
13 Salt River	26.31	1.00	4.00	19.08	2.23
14 Shelby	12.00	0.00	1.00	8.00	2.00
15 South Kentucky	33.77	0.00	3.00	25.77	4.00
16 Taylor County	13.00	0.00	1.00	12.00	0.00
Totals	289.77	3.00	44.62	198.54	38.62
<u>Ln.</u> Analysis					
1. Ratio of Billing Units	1.0111	1.0000	0.9862	1.0074	1.0618
as of March 31, 2007					
to 13-month AVG					
2. Increase (Decrease)	3.23	0.00	(0.62)	1.46	2.38
in Monthly Billing Units			,		
3. Monthly Rate/Billing Unit	\$125	\$944	\$2,373	\$2,855	\$4,605
,			•	,	
4. Monthly Rev. Inc/(Dec) Ln. (2) x Ln. (3)	\$404	\$0	(\$1,460)	\$4,173	\$10,981
, , , , ,					
5. Annual Rev. Inc/ (Dec) Ln. (4) x 12	\$4,846	\$0	(\$17,524)	\$50,072	\$131,774

6. Total Annual Inc/(Dec) in Rev of Metering Pts. & Substations

\$169,169

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07 REQUEST 18

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the Company's response to KIUC 2-54. The question was directed toward capitalization v. expense policies for payroll and other costs. The response addressed functional allocations. Please provide the information originally requested.

Response 18. EKPC follows generally accepted accounting principles and Accounting Requirements for RUS Electric Borrowers (Part 1767). Part 1767 is included on the attached CD. EKPC does not have additional written policies addressing the expensing versus capitalizing of payroll and related costs, other than the documents submitted in the response to KIUC 2-54.

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KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07 REQUEST 19

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the Company's response to KIUC 2-55. Please explain the Company's capitalization v. expense policies for payroll and other costs for each function. For example, what are the Company's policies on capitalizing employee payroll and overheads to power plant construction projects? Which costs are included and which costs are excluded? Are A&G expenses allocated to the power plant construction projects and capitalized? If so, which costs are included and which costs are excluded? Be specific and provide a copy of all written guidelines and policies not already provided in response to the preceding question.

Response 19. Other than the power delivery expansion allocation discussed in response to KIUC 2-55, payroll and other costs are capitalized only if that particular employee is specifically working on a capital project. Other costs include that employee's travel expenses. EKPC does not allocate any other A&G expenses to capital projects. Please also see the response to KIUC 2-58.

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

REQUEST 20

East Kentucky Power Cooperative, Inc.

Refer to the Company's response to KIUC 2-57. Please identify any A&G costs other than benefits and payroll taxes that are capitalized. If no other A&G costs are capitalized, please explain why not? Be specific and provide a copy of all written guidelines and policies not already provided in response to the preceding two questions.

Response 20. Please see the response to Item 19 herein.

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Page 1 of 1

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2006-00472 RESPONSES TO THIRD SET OF DATA REQUESTS

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07 REQUEST 21

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the Company's response to KIUC 2-58. Please explain why the Company apparently does not capitalize any other costs to the power plant construction projects, e.g. the A&G costs of the Company's CEO and other management and administrative costs associated with these construction projects. In addition, please indicate whether the Company is prohibited from doing so by RUS regulations and/or other accounting requirements.

RUS regulations/other accounting requirements do not prohibit EKPC from capitalizing A&G costs to the power plant construction projects. However, EKPC has historically not allocated such A&G costs. Note that capital projects are audited by EKPC's external auditor and are subject to audit by RUS. Both the RUS auditors and the external auditors have accepted EKPC's capitalization methods.

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07

REQUEST 22

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 22. Refer to the Company's response to KIUC 2-63. Please provide the full actuarial report when it is available.

Response 22. As previously stated, there is not a full actuarial report associated with the projections. The full actuarial report for 2006 was provided in response to KIUC Second Data Request 1.64.

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07 REQUEST 23

RESPONSIBLE PERSON:

Frank J. Oliva

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the Company's response to KIUC 2-69 page 3 of 3. Do the emission allowance amounts include inventories necessary to resolve the USEPA and KYEPA NOVs on Dale 1 and 2? If so, please provide the NOV allowance amounts (tons and dollars) for each month October 2005 through March 2007, separating the amounts into non-penalty and penalty amounts.

Response 23. The emission allowance inventory balance shown in the referenced response includes all of the SO2 and NOx emission allowances owned by EKPC. No distinction has been made between allowances potentially held to satisfy penalties and allowances held to comply with annual emission requirements. It is possible that some inventoried allowances, as well as some allowances yet to be acquired, will be relinquished to the USEPA in settlement of a claim. But, because the matter is still under litigation, it is not possible to confirm the amount of each type allowance that may be needed to settle, nor the source of any such allowances.

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07 REQUEST 24

RESPONSIBLE PERSON:

Frank J. Oliva

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the Company's response to KIUC 2-68. Please confirm that the Company removed the NOV expense and writeoff amounts from the test year expense amounts, but did not remove the interest expense associated with either the non-penalty or penalty allowance amounts. If the Company did remove the interest expense associated with the NOV allowances, then please describe where this adjustment was made and provide the related quantifications, including all computational support.

Response 24. EKPC did remove the NOV expense and writeoff amounts from the test year expense amounts. See Exhibit F, Schedule 20. No interest expense related to these allowances was removed from the test year expense.

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07 REQUEST 25

RESPONSIBLE PERSON:

Ann F. Wood

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the Company's response to PSC 3-10. Please confirm that the annual savings of \$878,476 is not reflected in the Company's filing as a reduction in expense.

Response 25. The annual savings of \$878,476 is not reflected in EKPC's filing as a reduction in expense, as this event occurred in April 2007.

KIUC'S THIRD SET OF DATA REQUESTS DATED 05/30/07 REQUEST 26

RESPONSIBLE PERSON: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

Refer to the Company's response to PSC 3-37. Please provide further details on the cooperative propane buyout. Provide the date of the buyout, amount of the buyout, the amount of the notes, the interest rate on the notes, the interest income earned during the test year on the notes. In addition, please describe where the Company removed the related amounts from its capitalization and interest expense and the amounts it removed.

Response 26. Further details on the cooperative propane buyout follow. The date of the buyout was June 30, 2000. The amounts of the buyout/notes, by cooperative, were:

Clark \$813,783
Farmers \$965,515
Jackson \$728,449
Shelby \$942,253

The annual interest rate on the notes equals the "Prime Rate" as published in the "Money Rates" section of The Wall Street Journal minus one-half of one percent (.50%.) This rate is adjusted annually on each anniversary of the loan. Copies of the loan agreements were provided in Commission Staff's Third Data Request 54a. Interest income earned

during the test year on the notes totaled \$225,542. EKPC did not incur interest expense relating to these loans.