

February 23, 2007

HAND DELIVERED

Ms. Elizabeth O'Donnell Executive Director Public Service Commission Post Office Box 615 Frankfort, KY 40602

RECEIVED

FEB 2 3 2007

PUBLIC SERVICE COMMISSION

Re: PSC Case No. 2006-00564

Dear Ms. O'Donnell:

Please find enclosed for filing with the Commission in the above-referenced case an original and eight copies of the Responses of East Kentucky Power Cooperative, Inc. ("EKPC"), to the data requests contained in Appendix C to the Commission's order dated February 13, 2007. Also enclosed are an original and eight copies of the Prepared Testimony of James C. Lamb, on behalf of EKPC.

Very truly yours,

Charles A. Lile

Senior Corporate Counsel

had a. Cil

Enclosures

Cc: Elizabeth E. Blackford, Esq. Michael L. Kurtz, Esq.

COMMONWEALTH OF KENTUCKY RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

FEB 2 3 2007

PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO EAST KENTUCKY)	
POWER COOPERATIVE, INC.'S CONTINUED)	CASE NO.
NEED FOR CERTIFICATED GENERATION)	2006-00564

ORDER

On January 5, 2007, the Commission established this proceeding "to gain an assurance that [East Kentucky Power Cooperative, Inc.'s ('EKPC')] certificated generation for the Spurlock No. 4 unit and the Smith Circulating Fluidized Bed ('CFB') unit and attendant Combustion Turbines ('CTs') are still needed. . .in light of [Warren Rural Electric Cooperative Corporation's] decision" to terminate a power supply agreement with EKPC.¹

In our Order of January 5, 2007, we further directed EKPC to provide certain information regarding its generation requirements, established a procedural schedule for this proceeding, and directed that the Attorney General and Gallatin Steel Company be made parties to this proceeding. EKPC has responded to the Commission's discovery request. Although afforded an opportunity to request a hearing in this proceeding, no party has submitted such request within the time specified in the Order.

Having reviewed EKPC's response to the Commission's Order of January 5, 2007, we are presently unable to find with sufficient certainty that the public

¹ Order of January 5, 2007 at 2.

convenience and necessity currently requires the facilities for which we granted a Certificate of Public Convenience and Necessity ("CPCN") in Case No. 2005-00053.² The Commission finds that additional discovery and a formal hearing are required in this matter to ensure a complete record. Accordingly, we find that the procedural schedule set forth in the Order of January 5, 2007 should be set aside and a new procedural schedule substituted.

On an unrelated matter, the Commission places all parties on notice that Cherne Contracting Corporation, a firm that EKPC retained to provide equipment and material and the balance of plant installation on the Spurlock No. 4 project, employs Commissioner Clay's brother-in-law. While the Commission perceives no actual conflict of interest in Commissioner Clay's participation in this proceeding, the Commission will consider any motions for recusal if filed on or before February 21, 2007.

IT IS HEREBY ORDERED that:

- 1. The hearing scheduled for February 13, 2007 is cancelled.
- 2. The procedural schedule set forth in Appendix A of the Commission's Order of January 5, 2007, is set aside and the procedural schedule set forth in Appendix A of this Order is substituted.

² Case No. 2005-00053, Application of East Kentucky Power Cooperative, Inc. For a Certificate of Public Convenience and Necessity, and a Site Compatibility Certificate, For the Construction of a 278 MW (Nominal) Circulating Fluidized Bed Coal Fired Unit and Five 90 MW (Nominal) Combustion Turbines in Clark County, Kentucky (Ky. PSC Aug. 29, 2006).

3. A hearing shall be held in this matter on March 6, 2007, in Hearing Room 1 of the Commission's offices at 211 Sower Boulevard, Frankfort, Kentucky. This hearing shall begin upon the conclusion of the hearing in Case No. 2006-00472.³

4. At the scheduled hearing, the parties shall address the issues set forth in Appendix B to this Order.

5. EKPC shall, no later than February 23, 2007, file with the Commission the original and 8 copies of the information listed in Appendix C. Each copy of the requested information shall be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. EKPC shall include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

6. Any party wishing to move for the recusal of Commissioner Clay shall file its motion no later than Februray 21, 2007.

Done at Frankfort, Kentucky, this 13th day of February, 2007.

By the Commission

ATTEST:

Report a Comment for the Executive Director

³ Case No. 2006-00472, General Adjustment of Electric Rates of East Kentucky Power Cooperative, Inc.

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2006-00564 DATED February 13, 2007

Motions for recusal shall be filed no later than)7
EKPC's response to Commission Staff's third set of data requests shall be filed no later than) 7
EKPC's prefiled testimony shall be filed no later than	07
Public hearing is to be held in Hearing Room 1 of the Commission's offices at 211 Sower Boulevard, Frankfort, Kentucky, upon conclusion	07
of the hearing in PSC Case No. 2006-00472	U7

APPENDIX B

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2006-00564 DATED February 13, 2007

- 1. In light of Warren Rural Electric Cooperative Corporation's ("WRECC") decision to terminate its power supply agreement with EKPC, is the construction of a 278 MW circulating fluidized bed coal-fired unit ("Smith CFB Unit") by 2009 reasonable and necessary to meet EKPC's base load capacity requirements?
- 2. Will, given EKPC's present expected demand requirements, EKPC's present plan to construct and place into operation the Smith CFB Unit by 2009 result in the wasteful duplication of facilities or excessive investment?
 - 3. Should the proposed construction of the Smith CFB Unit be delayed?
- 4. Should, in light of WRECC's decision to terminate its power supply agreement with EKPC and EKPC's decision to delay construction of three 90 MW combustion turbines ("Smith CTs 10-12"), Commission authorization for the construction of these units be rescinded?
- 5. Does the public convenience and necessity require the immediate construction of two 90 MW combustion turbines at the J. K. Smith Power Station ("Smith CTs 8-9") if construction of the Smith CFB Unit is delayed or cancelled?
- 6. Is the immediate construction of two 90 MW combustion turbines at the J. K. Smith Power Station ("Smith CTs 8-9") reasonable if construction of the Smith CFB Unit is delayed or cancelled?
- 7. Does EKPC have a reasonable plan for selling excess power that is not needed to serve native load in the event that construction of any of the facilities for which the Commission issued a CPCN produces excess power?

8. Should any portion of the cost of EKPC's Spurlock No. 4 Unit, Smith CFB Unit, or Smith CTs 8-9 be excluded from recovery in EKPC's general rates if the construction of such unit(s) produces excessive power generation capacity unnecessary to serve native load?

APPENDIX C

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2006-00564 DATED February 13, 2007

- Refer to the response to Commission Staff's Supplemental Data Request,

 Item 4.
- a. For each of the following winter periods, provide the currently anticipated capacity deficit or surplus situation excluding and including the Smith CTs 8 and 9:
 - (1) 2007-2008.
 - (2) 2008-2009.
 - (3) 2009-2010.
- b. State when the current capacity deficit or surplus situation for the referenced winter periods was determined.
- c. Given the status of the contracts to procure the Smith CTs 8 and 9, state whether those CTs will be available by the 2008-2009 winter peak season? Explain.
- 2. Provide an analysis of the extent to which EKPC has relied on its fleet of CTs to meet its native load requirements since January 2003. The analysis should show the extent to which the CT fleet has been used for purposes other than peaking. State all assumptions and show all calculations used to develop this analysis.
- 3. Refer to the response to Commission Staff's Supplemental Data Request, Item 5. EKPC was requested to provide with its explanation a copy of all data underlying its position, including an analysis of the potential costs or penalties involved

in canceling the Smith contracts. EKPC did not provide the underlying data or an analysis of the potential costs or penalties associated with canceling the Smith contracts. Provide the originally requested information. If such information does not exist, explain in detail why the information is unavailable and how any recommendation regarding the continued construction of the Smith CFB Unit can be developed in the absence of such information.

- 4. Refer to the response to Commission Staff's Supplemental Data Request, Item 6.
- a. State when EKPC assembled and prepared the detailed economic analysis submitted with this response.
- b. Explain in detail why the Smith CTs 10-12 were included as of January 2010 in this analysis, given EKPC's statement that these CTs were being delayed to the 2012-2014 time period.
- c. For each scenario, provide the following information for the Smith CFB Unit as it was incorporated into the 2010 base case scenario, the 2012 delay scenario, the 2015 delay scenario, and the 2018 delay scenario:
 - (1) The total investment in the Smith CFB Unit.
- (2) The annual amounts for production fuel expense, production operation and maintenance expense, depreciation expense, property taxes, and interest expense.
- (3) A detailed explanation of how the amounts for the investment in the Smith CFB Unit and the annual expenses were escalated in the three

delay scenarios. If no escalation was incorporated in the analysis, explain in detail why an escalation was excluded.

- (4) The annual market purchases of power for the years 2007 through 2018. Provide the MWh and total dollars.
- d. Explain why an annual Times Interest Earned Ratio ("TIER") of 1.10 was included in the analysis
- e. Explain why a TIER of 1.10 was established as an apparent required level of earnings in the analysis.
 - f. Refer to pages 5-12 of the response.
- (1) EKPC has filed an application seeking an increase in base rates of \$43,364,219. The analysis, however, shows for 2007 a base rate increase of \$32,181,000. Explain this apparent discrepancy.
- (2) Describe how EKPC determined the level of off-system sales shown for 2007 through 2009.
- (3) In light of its actual experience in 2005 and the revised budget in 2006, explain in detail why the forecast of off-system sales for the entire analysis is reasonable.
- (4) On pages 5 and 6 of 12, the 2010 base case scenario, explain why the fuel adjustment revenues decrease significantly from previous levels from 2010 through 2014.
- (5) The analysis shows for the 2010 base case scenario a base rate increase of \$63,173,000 in 2010. The 2012 delay scenario shows a base rate increase of \$40,076,000 in 2012. The 2015 delay scenario shows a base rate increase

of \$31,599,000 in 2015. The 2018 delay scenario shows a base rate increase of \$39,594,000 in 2018. Explain how the year that the Smith CFB Unit goes on line impacts the base rate increase modeled for that year.

- 5. Prepare a revised detailed economic analysis, from a ratepayer's perspective, showing the effect of an in-service date for the Smith CFB Unit in 2010, 2012, 2015, and 2018. All assumptions used in the originally submitted analysis shall be utilized, with the following exceptions:
- a. The Smith CTs 8 and 9 are to be in commercial operation by January 2009, while the Smith CTs 10-12 are to be in commercial operation by January 2012, 2013, and 2014.
- b. TIER shall not be fixed in the analysis but, instead, shall reflect the expected results of operations.
- c. Base rate increases shall match the forecasted rate increases as shown in EKPC's current 20-year financial forecast.
- d. The revenues from off-system sales shall match the levels included in EKPC's current 20-year financial forecast.
- e. Fuel adjustment revenues and revenues from the environmental surcharge shall reflect the levels included in EKPC's current 20-year financial forecast.
- 6. Refer to the response to Commission Staff's Supplemental Data Request, Item 9. EKPC states that it plans to do a more comprehensive examination of plant retirements in the future, but that it is difficult to factor in the impact of future environmental regulations.

- a. The Clean Air Interstate Rule ("CAIR") was finalized by the Environmental Protection Agency in March 2005. The CAIR establishes limits for the emission of sulfur dioxide and nitrogen oxide in 2010 and 2015. Explain in detail why EKPC could not conduct a comprehensive examination of plant retirements in the future that reflected the currently known limits contained in the CAIR.
- b. In the response, EKPC states: "More analysis will be done as environmental legislation is formulated and has greater clarity." Does EKPC believe the requirements of the CAIR are not sufficiently clear as to what the emission limitations will be through at least 2015? Explain the response in detail.
- 7. a. State whether EKPC has estimated on a cents-per-kilowatt-hour basis, the cost of power generated by its proposed Smith CFB unit.
- b. If EKPC has calculated such an estimate, provide the estimate and all calculations and workpapers used in arriving at the estimate.
- c. State whether EKPC believes it can successfully market any excess power generated by its proposed Smith CFB Unit at a price equal to or exceeding the cost. Provide all calculations and workpapers needed to support EKPC's belief.
- d. If EKPC has not estimated the cost, explain how construction of the unit can be justified without knowing the cost of power generated.
- 8 State whether EKPC has investigated selling any excess power generated by the proposed Smith CFB Unit outside its system on a contract basis.

9. State whether EKPC has considered the sale of a portion of the capacity of the proposed Smith CFB Unit going to another entity. If EKPC is not interested in such sale, explain why not.

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:		
AN INVESTIGATION INTO EAST KENTUCKY)	CASE NO.
POWER COOPERATIVE, INC.'S CONTINUED)	2006-00564

NEED FOR CERTIFICATED GENERATION

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE 2006-00564 APPENDIX C DATA REQUEST RESPONSE

PUBLIC SERVICE COMMISSION'S REQUEST DATED 2/13/07

In response to the Public Service Commission's Appendix C data request, East Kentucky Power Cooperative, Inc. ("EKPC") submits its responses to the questions contained therein.

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2006-00564 APPENDIX C INFORMATION REQUEST RESPONSE

PUBLIC SERVICE COMMISSION REQUEST DATED 2/13/07

REQUEST 1

RESPONSIBLE PERSON: James C. Lamb, Jr.

COMPANY: East Kentucky Power Cooperative, Inc.

Request 1. Refer to the response to Commission Staff's Supplemental Data Request, Item 4.

Request 1a. For each of the following winter periods, provide the currently anticipated capacity deficit or surplus situation excluding and including the Smith CTs 8 and 9:

- (1) 2007-2008.
- (2) 2008-2009.
- (3) 2009-2010.

Response 1a. EKPC Load Requirements & Resources (MW) Excludes Smith CTs 8-9

Winter Season	Peak Forecast ¹	Reserves (12%)	Capacity Required (Includes Reserves)	Existing Capacity ² +Spur 4	Capacity Surplus/ (Deficit) (Based on Peak Forecast)	Capacity Surplus/ (Deficit) (Based on Capacity Required)
2007-08	2,848	342	3,190	2,754	(94)	(436)
2008-09	2,938	353	3,291	2,726	(212)	(565)
2009-10	3,021	362	3,383	3,004	(17)	(379)

Excludes WRECC Load, small interruptible loads, and Gallatin interruptible load.

²Adjusted for Scrubber deratings, assumes Spurlock 4 operation April 2009.

The table above shows the expected capacity surplus or deficit without Smith CTs 8-9 based on the winter peak and also the winter peak including reserves. As shown in the table, EKPC is 94 MW short of meeting the projected peak in Winter 2007-08 and 436 MW short of having a 12% reserve margin. With the addition of Spurlock 4 in April 2009, EKPC is 17 MW short of meeting the projected peak in Winter 2009-10 and 379 MW short of having a 12% reserve margin.

EKPC Load Requirements & Resources (MW)
Includes Smith CTs 8-9

(98 MW	eacn	beginning	June	2009)

Winter	Peak	Reserves	Capacity Required (Includes	Existing Capacity ² + Spur 4 & Smith	Capacity Surplus/ (Deficit) (Based on Peak	Capacity Surplus/ (Deficit) (Based on Capacity
Season	Forecast ¹	(12%)	Reserves)	CTs 8-9	Forecast)	Required)
2007-08	2,848	342	3,190	2,754	(94)	(436)
2008-09	2,938	353	3,291	2,726	(212)	(565)
2009-10	3,021	362	3,383	3,200	179	(183)

Excludes WRECC Load, small interruptible loads, and Gallatin interruptible load.

The table above shows the expected capacity surplus or deficit including Smith CTs 8-9 based on the winter peak and also the winter peak including reserves. The data has been adjusted for a change in CT units from the GE LMS100 (97 MW winter) to the GE 7EA (98 MW winter). The reasons for this change in CT units are discussed in more detail in the response to 1.c. below. Due to the expected in service dates of Smith CTs 8-9, there is no change in the data until the winter of 2009-10. As shown in the table, EKPC has a surplus of 179 MW compared to the projected peak in Winter 2009-10 but is still 183 MW short of having a 12% reserve margin.

²Adjusted for Scrubber deratings, assumes Spurlock 4 operation April 2009 and Smith CTs 8-9 in June 2009.

Request 1b. State when the current capacity deficit or surplus situation for the referenced winter periods was determined.

Response 1b. EKPC continuously evaluates its capacity and resource situation and makes long-term projections concerning its surplus or deficit of capacity. It is particularly important to update these projections when a new load forecast is developed and approved. The latest load forecast is the 2006 Load Forecast approved by EKPC's Board in August 2006. Extensive information on this forecast was filed with the 2006 IRP. The 2004 RFP issued in April 2004 that led to certification of Spurlock 4, Smith CTs 8-12, and Smith CFB 1 was intended to add capacity resources to meet the projected capacity needs of EKPC's existing members and WRECC in the 2007 to 2010 time period. The fact that WRECC is now excluded does not diminish the growing capacity needs of the existing members that EKPC planned for in 2004 when the RFP was issued.

Request 1c. Given the status of the contracts to procure the Smith CTs 8 and 9, state whether those CTs will be available by the 2008-2009 winter peak season? Explain.

Response 1c. Commercial operation of two General Electric ("GE") LMS100s, Smith CTs 8 & 9, by January 2009 is now considered by EKPC to be extremely unlikely. In order to meet the January 2009 commercial operation date, the units would need to be manufactured in 2007 and delivered in early 2008. The availability to EKPC of any of GE's limited 2007 LMS100 manufacturing time slots is currently in question, and the terms proposed by GE for these units have changed substantially from the original GE proposal.

GE has recently responded to EKPC's requests for a new proposal for 2 LMS100 Combustion Turbines with a budgetary price of \$140 million, installed, plus or minus 5 percent. The original contract price GE proposed in 2005 was approximately \$94 million

for two units, installed. This represents an approximate 49 percent increase in the capital cost of these units over a two-year period.

In order to meet the January 2009 commercial operation date, GE is requiring a full notice to proceed by March 6, 2007, with "no contingencies". A payment schedule accompanied GE's budgetary price, which requires over \$30 million be paid before September 2007, in order to keep the project on a January 2009 schedule.

EKPC faces two major contingencies in regard to the Smith CT Units 8 and 9: Rural Utilities Service ("RUS") project approval for funding, and the Commission's review of its Certificate of Public Convenience and Necessity in this proceeding. EKPC is not expected to receive project approval from RUS until September 2007, and EKPC is subject to a 10 percent project expenditure limit until that time. EKPC does not plan to make any payments to GE or any further commitments to the purchase of these units until the Commission's review in this case is completed.

EKPC's current re-evaluation of this situation has led to the conclusion that the purchase of the 2 LMS100s is no longer the best alternative. EKPC is now requesting a proposal from GE for 2 7EA combustion turbines. These are the type of combustion turbines most recently installed at the J. K. Smith site. Manufacturing slots for these units are more easily available from GE, and delivery times are shorter than for the LMS100 units. Switching from LMS100s to 7EAs will require an EPA Title V Air Permit revision, but EKPC believes that it can have contractual arrangements and permits for 2 GE 7EAs in place to allow a commercial operation date in second quarter of 2009.

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2006-00564 APPENDIX C INFORMATION REQUEST RESPONSE

PUBLIC SERVICE COMMISSION REQUEST DATED 2/13/07

REQUEST 2

RESPONSIBLE PERSON: James C. Lamb, Jr.

COMPANY: East Kentucky Power Cooperative, Inc.

Request 2. Provide an analysis of the extent to which EKPC has relied on its fleet of CTs to meet its native load requirements since January 2003. The analysis should show the extent to which the CT fleet has been used for purposes other than peaking. State all assumptions and show all calculations used to develop this analysis.

Response 2. The table below shows EKPC's CT generation by month for 2003 through 2006. This table includes CT generation for all purposes, which was virtually all for meeting native load requirements.

EKPC CT Generation (MWH)

(MWH)				
Month	2003	2004	2005	2006
January	32,405	21,371	42,894	4,889
February	9,805	6,436	18,742	6,657
March	10,549	9,361	27,028	6,002
April	4,284	8,303	6,326	553
May	4,329	10,919	27,816	17,149
June	3,359	14,688	61,802	18,684
July	15,544	15,309	67,981	50,869
August	31,746	18,533	103,971	53,876
September	3,325	8,083	43,507	190
October	1,380	3,601	8,227	3,651
November	10,764	8,584	11,386	17,874
December	11,073	34,798	14,668	20,537
Total	138,563	159,986	434,348	200,931

The table below is a summary of CT hours of operation for various purposes, but not including normal economic operation for meeting native load. A detailed listing of these operations is listed at the end of this response.

EKPC CT Operation Other Than Peaking (Hours of Operation)

	External System	Internal System	Sales			Unit	Voltage
Year	Support	Support	Sures	Testing	TLR	Loss	Regulation
2003	59	52	204	124	215	87	37
2004	62	95	344	149	871	168	9
2005	6	2375	830	233	775	111	46
2006	48	397	36	41	241	47	152
2007							
Thru	0	0	0	12	62	0	23
Feb10th							

External System Support: Reliability

Internal System Support: Internal TLR (Transmission Loading Relief)

Sales: Used to cover LGE's portion of Gallatin Load

Test: Unit, ECAR (reliability testing), GE, etc.

TLR: Transmission Loading Relief

Unit Loss: Supporting loss of coal unit

Voltage Regulation: Voltage support and regulation

As seen in the table, EKPC's CTs are very important for the reliability of the system. They provide a hedge against purchase power costs and constraints on imported power. They provide backup for forced outages of coal units or when non-firm power imports are cut.

_	Extermal System Support	Internal System Support	SALES	TEST	TLR	UNIT LOSS	Voltage Regulation
2003	59	52	204	124	215	87	37
2004	62	95	344	149	871	168	9
2005	6	2375	830	233	775	111	46
2006	48	397	36	41	241	47	152
2007	0	0	0	12	62	0	23

(hours of use)

Extermal System Support

Reliability

Internal System Support

Internal TLR

SALES

Sales - generally to cover LGE's portion of Gallatin

TEST

Test - Unit, ECAR, GE, etc

TLR UNIT LOSS Transmision Load Relief

Supporting loss of coal unit

Voltage Regulation

Voltage support and regulation

exfernal bystem support exfernal system support exfernal bystem support	infernal system support infernal system support	sales	sales sales sales sales sales sales sales sales sales sales sales sales sales sales	
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Con @ 8:08 - Off @ 9:36) (On @ 1 (1) Hourly market is above CT cost. (2) On line to cow sales on a 10:37 On line to cover the Lge portion of gallatin. SALE On @ 9:44 - Off @ 23:55 On line to cover the Ige portion of gallatin. SALE On @ 6:52 - Off @ 12:24 On line to cover the Ige portion of gallatin. SALE On @ 6:53 - Off @ 7:44 On line to cover the Ige portion of gallatin. SALE On @ 19:06 On line to cover the Ige portion of gallatin. SALE On @ 10:10 - Off @ 23:20 On line to cover the Ige portion of gallatin. SALE On @ 10:10 - Off @ 23:20 On line to cover the Ige portion of gallatin. SALE On @ 10:10 - Off @ 23:20 On line to cover the Ige portion of gallatin. SALE On line to cover the Ige portion of gallatin.	On line to cover the Ige portion of gallatin. On line to cover the Ige portion of gallatin. On line to cover the Lge portion of gallatin. On line to cover the Lge portion of gallatin. On line to cover the Lge portion of gallatin. On line to cover the Lge portion of gallatin. On line to cover the Lge portion of gallatin. On line to cover the Lge portion of gallatin. On line to cover the Lge portion of gallatin. On line to cover the Lge portion of gallatin. On line to cover the Lge portion of gallatin. On line to cover the Lge portion of gallatin. On line to cover the Lge portion of gallatin. Hourly market is above CT cost. Gallatin buythrough. Hourly market is above CT cost. Gallatin buythrough.	TEST (On @ 6:49 - Off @ 8:08) (On @ 1 (1) On line for test (2) On line for CPS. TEST (On @ 5:52 - Off @ 15:07) (On @ (1) On line for test. (2) On line for cover the Ige portion TEST (On @ 5:55 - Off @ 15:07) (On @ (1) On line for test. (2) On line to cover the Ige portion TEST (On @ 6:35 - Off @ 15:05) (On line for RATA test. (2) On line for RATA Test. (2) On line for RATA Test. (3) On line for RATA Test. (4) On line for RATA Test. (5) On line for RATA Test. (5) On line for RATA Test. (5) On line for test. (6) On line for
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On line for test @ 17:51 - Tripped 1 On line for test. On @ 13:39 - Off @ 19:22 (End Mi On line for test. On @ 0657-Off @ 0811 On @ 10:34 - Off @ 14:36 On @ 10:53 - Off @ 21:08 On @ 15:44 - Off @ 16:33 On @ 15:44 - Off @ 16:33 On @ 10:55 - Off @ 22:02 (Begin 1 On line to test. (On @ 11:36 - Off @ 12:27) (On @ On line to test. On @ 14:57 - Off @ 15:27 (Fully a On line to test. On @ 14:03 - Off @ 15:27 (Fully a On line to test.	On @ 1946-Off @ 17:21 On line to test. On @ 1946-Off @ 2051 On @ 2057-C Test from Outage On at 1024-Off @ 1933 Testing On @ 0917-Off @ 1528 Testing On @ 0817-Off @ 1747 Testing On @ 0833-Off @ 1835 Testing On @ 0833-Off @ 1835 Testing On @ 0833-Off @ 16:23 Hourly market is abo	On @ 15:12 - Off @ 20:52 (On @ 6:19 - Off @ 10:04) (On @ (1) (On @ 6:58 - Off @ 11:53) (On @ (1) (Off @ 1:39) (On @ 7:03 - Off @ 1(1) (On @ 6:04 - Off @ 8:30) (On @ 1(1) (On @ 6:04 - Off @ 8:51) (On @ 1(1) (On @ 6:35 - Off @ 8:51) (On @ (1) (On @ 6:35 - Off @ 8:43) (On @ (1) (On @ 6:36 - Off @ 10:45) (On @ (1) (On @ 6:46 - Off @ 11:05) (On @ (1) (On @ 6:44 - Off (0) 11:05) (On @ (1) (On @ 6:44 - Off (0) 11:05) (On @ (1) (On @ 6:44 - Off (0) 11:05) (On @ (1) (On @ 6:44 - Off (0) 11:05) (On @ (1) (On @ 6:44 - Off (0) 11:05) (On @ (1) (On @ 6:45 - Off @ 10:15) (On @ (1):25 On @ 10:16 - Off @ (1):25 On @ 10:25 - Off @ 21:36 On @ 17:52 - Off @ 21:39 On @ 17:52 - Off @ 19:24)
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COMMENTS On @ 0503—Off @ 1514 On @ 09:09.Off @ 10:27. For Testing. On @ 6:54.Off @ 7:37. Run for testing. 12.2	On @ 0554-Off @ 0913 On @ 0603-On @ 0913 On @ 0603-On @ 0913 On @ 1854 On @ 0723-Off @ 0758 On @ 0558-Off @ 0848 On @ 0501-Off @ 0917 On @ 0501-Off @ 0917 On @ 0502-Off @ 0804 On @ 0602-Off @ 0804 On @ 0518-Off @ 0804 On @ 0518-Off @ 0805 On @ 0518-Off @ 0805 On @ 0518-Off @ 0805 On @ 0553-Off @ 0812 On @ 0553-Off @ 0812 On @ 0553-Off @ 0812 On @ 0552-Off @ 1150 On @ 0552-Off @ 1150 On @ 0552-Off @ 1150 On @ 0554-Off @ 1232 On @ 0552-Off @ 1150 On @ 0554-Off @ 1232 On @ 1854-Off @ 171R's and Economics 61.75	Off @ 00:28—On @ 04:09 Off @ 22:31 Off @ 03:05 On @ 03:08 Off @04:38 On @ 0433—Off @ 1116 Off @ 1214 On @ 2109 Off @ 1114 On @ 1922 On @ 1824 On @ 0224—Off @ 1047
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PUBLIC SERVICE COMMISSION REQUEST DATED 2/13/07 REQUEST 3

RESPONSIBLE PERSON: James C. Lamb, Jr.

COMPANY: East Kentucky Power Cooperative, Inc.

Refer to the response to Commission Staff's Supplemental Data Request, Item 5. EKPC was requested to provide with its explanation a copy of all data underlying its position, including an analysis of the potential costs or penalties involved in canceling the Smith contracts. EKPC did not provide the underlying data or an analysis of the potential costs or penalties associated with canceling the Smith contracts. Provide the originally requested information. If such information does not exist, explain in detail why the information is unavailable and how any recommendation regarding the continued construction of the Smith CFB Unit can be developed in the absence of such information.

Response 3. Through January 31, 2007, EKPC has spent \$37,132,832 on the Smith CFB Project. These expenditures are outlined on the next page.

	~	m			1 10 1 10 0 0 7
Smith #1	Generation	Project	COSIS	inru '	1/3/1/2007

Number Purpose		auon Project Costs und 1/3/1/2007		Original	(thru 1/31/07)
61 TURRING EGNERATOR General Electric \$33,430,000 \$19,437.888 63 STEP REFARATON Allen Company 1,000,00 66 FEEDWATER HEATERS Yuba Heal Transfer 756,000 610 CONDENSER Thermal Engr. 1,600,000 191,415 616 CIRCULATING WATER PUMPS 1,500,000 191,415 617 CONDENSATE PUMPS 1,500,000 245,000 621 BOILER FEED PUMPS 1,500,000 4,000,000 636 DISTRIBUTED CONTROL SYSTEM 1,500,000 783,131 646 FANS & MOTORS 2,668,000 783,131 6101 ALLOY PIPING AND ALLOY SUPPORTS BendTec 2,268,000 783,131 6136 TRANS-FORMERS 4,625,000 10,509,428 6201 BOILER RISE SIAND 4,625,000 10,509,428 6204 BOILER RISE SIAND 4,625,000 10,509,428 6204 BOILER RISE SIAND 33,025,000 2,500,000 6221 STACK 4,625,000 3,000,000	Contract #	Contract	•	Design	Actual Recorded
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G6 FEEDWATER HEATERS Yuba Heal Transfer 75,00 68 DEAERATOR 200,000 611 CONDENSER 1,800,000 191,415 616 CIRCULATING WATER PUMPS 245,000 245,000 617 CONDENSATE PUMPS 245,000 245,000 621 BOILER FEED PUMPS 1,774,000 4,000,000 636 DISTRIBUTED CONTROL SYSTEM 4,000,000 783,131 646 FANS & MOTORS 2,686,000 783,131 671 ASH HANDLING EQ ONLY 1,500,000 783,131 6101 ALLOY PIPIRG AND ALLOY SUPPORTS BendTec 2,450,000 783,131 6118 TRANSFORMERS 4,625,000 783,131 6146 SWITCHGEAR 30,000 10,509,428 6201 BOILER ELAND Alstom Power 110,600,000 10,509,428 6201 BOILER SLAND Markey Cocling 2,454,000 10,509,428 6201 COLUAL MESTONE HANDLING 30,000 30,000 10,509,428 6201					\$19,437.888
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Project Total \$533 051 970 37.132.832				\$555,127,107	,,
Project Total \$533,051,970 37,132,832					

It is estimated that EKPC has up to \$11.5 million additional in commitments to date. Contracts awarded to date are listed in Response 1b. of the Supplemental Data Request dated 1/5/07.

The following exhibit shows the awarded contracts for Smith CFB Unit 1. The expenditures are the same as described in the previous exhibit. The cancellation cost is the estimated dollar amount that EKPC would have to expend in order to terminate each of the awarded contracts. The owner's cost listed below includes the interest that has accumulated to date on this project. EKPC is estimating that the total committed expenditures are \$48.7 million.

East Kentucky Power J.K. Smith Power Station

Smith CFB Unit 1

			Actual		TOTAL COMMITTED
CONTRACT		AWARDED	Expenditures	CANCELLATION	EXPENDITURES TO
NUMBER	AWARDED CONTRACTs	CONTRACT, \$	through 1/31/07	COST, \$	DATE
G1	TURBINE GENERATOR	\$34,015,105	\$19,437,888	\$2,500,000	\$21,937,888
G3	SITE PREPARATION	\$5,008,375	\$0	\$0	\$0
G6	FEEDWATER HEATERS	\$1,684,665	\$0	\$50,540	\$50,540
G11	CONDENSER	\$2,661,835	\$191,415	\$74,769	\$266,184
G21	BOILER FEED PUMPS	\$2,962,378	\$0	\$88,871	\$88,871
G101	ALLOY PIPING	\$4,099,933	\$783,131	\$3,316,802	
G201	BOILER ISLAND	\$229,967,207	\$10,509,428	\$4,392,447	\$14,901,875
G222	COOLING TOWER	\$3,489,900	\$0	\$104,697	\$104,697
	ENGINEERING	\$21,844,000	\$4,167,400	\$500,000	\$4,667,400
	OWNERS COST including IDC	\$84,000,000	\$2,043,570	\$500,000	\$2,543,570
	Total Cost as of January 31, 2007		\$37,132,832	\$11,528,126	\$48,660,958

PUBLIC SERVICE COMMISSION REQUEST DATED 2/13/07 REQUEST 4

RESPONSIBLE PERSON: James C. Lamb, Jr.

COMPANY: East Kentucky Power Cooperative, Inc.

Request 4. Refer to the response to Commission Staff's Supplemental Data Request, Item 6.

Request 4a. State when EKPC assembled and prepared the detailed economic analysis submitted with this response.

Response 4a. The analysis submitted in response to Item 6 of the Commission Staff's Supplemental Data Request was prepared from January 29th to February 1st, 2007.

Request 4b. Explain in detail why the Smith CTs 10-12 were included as of January 2010 in this analysis, given EKPC's statement that these CTs were being delayed to the 2012-2014 time period.

Response 4b. Item 6 requested for EKPC to "Provide a detailed economic analysis, from a ratepayer's perspective, as to why building the EKPC generation system as currently certificated is less expensive than delaying the service date of the Smith CFB unit..." EKPC interpreted "as certificated" to mean that Smith CTs 10-12 should go in service as close to the original schedule as possible. When EKPC developed the response to Item 6, January 2010 was expected to be about as early as Smith CTs 10-12 could go

in service. EKPC's plan to delay Smith CTs 10-12 to the 2012-2014 time period has not changed since it was established in early January.

Request 4c. For each scenario, provide the following information for the Smith CFB Unit as it was incorporated into the 2010 base case scenario, the 2012 delay scenario, the 2015 delay scenario, and the 2018 delay scenario:

Request 4c(1). The total investment in the Smith CFB Unit.

Request 4c(2). The annual amounts for production fuel expense, production operation and maintenance expense, depreciation expense, property taxes, and interest expense.

Response 4c(1)&(2).

Smith CFB Unit – June 2010 (Base Case)

(1) The total investment in the Smith CFB Unit is \$625,231,315.

(2)

Operating Expenses (\$ 000)	2010	2011	2012	2013	2014	2015	2016	2017	2018
Fuel Costs	17,876	29,761	31,870	32,846	34,060	34,898	35,923	36,793	38,094
Production O & M Expense	9,395	15,649	16,118	16,405	16,725	17,040	17,386	17,694	18,060
Depreciation .	9,118	15,631	15,631	15,631	15,631	15,631	15,631	15,631	15,631
Property tax	2,555	2,555	2,555	2,555	2,555	2,555	2,555	2,555	2,555
Total Operating Expense	38,944	63,596	66,173	67,436	68,971	70,123	71,494	72,673	74,339
Interest Charges (\$ 000)	25,982	44,083	43,593	43,066	42,501	41,895	41,243	40,545	39,794
Total Expenses (\$ 000)	64,926	107,678	109,766	110,503	111,472	112,018	112,738	113,218	114,133

Operating Expenses (\$ 000)	2019	2020	2021	2022	2023	2024	2025	2026
Fuel Costs	39,053	40,212	41,233	42,314	43,309	44,546	45,409	46,554
Production O & M Expense	18,365	18,730	19,072	19,430	19,787	20,172	20,508	20,883
Depreciation	15,631	15,631	15,631	15,631	15,631	15,631	15,631	15,631
Property tax	2,555	2,555	2,555	2,555	2,555	2,555	2,555	2,555
Total Operating Expense	75,604	77,128	78,490	79,929	81,282	82,904	84,102	85,622
Interest Charges (\$ 000)	38,989	38,125	37,197	36,200	35,131	33,983	32,751	31,429
Total Expenses (\$ 000)	114,593	115,252	115,687	116,129	116,413	116,887	116,854	117,050

Smith CFB Unit - August 2012

1) The total investment in the Smith CFB Unit is \$696,288,855.

2)

Operating Expenses (\$ 000)	2010	2011	2012	2013	2014	2015	2016	2017	2018
Fuel Costs			14,456	32,902	34,063	34,860	35,925	36,802	38,005
Production O & M Expense			7,253	16,469	16,778	17,086	17,439	17,749	18,097
Depreciation			7,253	17,407	17,407	17,407	17,407	17,407	17,407
Property tax			2,845	2,845	2,845	2,845	2,845	2,845	2,845
Total Operating Expense			31,808	69,623	71,094	72,198	73,616	74,803	76,355
Interest Charges (\$ 000)			20,667	49,093	48,547	47,961	47,331	46,656	45,931
Total Expenses (\$ 000)			52,475	118,716	119,641	120,159	120,947	121,459	122,285

Operating Expenses (\$ 000)	2019	2020	2021	2022	2023	2024	2025	2026
Fuel Costs	39,207	40,212	41,163	42,312	43,311	44,510	45,510	46,477
Production O & M Expense	18,445	18,783	19,113	19,482	19,841	20,219	20,578	20,923
Depreciation	17,407	17,407	17,407	17,407	17,407	17,407	17,407	17,407
Property tax	2,845	2,845	2,845	2,845	2,845	2,845	2,845	2,845
Total Operating Expense	77,904	79,247	80,528	82,046	83,404	84,982	86,341	87,651
Interest Charges (\$ 000)	45,152	44,317	43,420	42,457	41,424	40,315	39,124	37,846
Total Expenses (\$ 000)	123,057	123,564	123,948	124,504	124,828	125,296	125,465	125,497

Smith CFB Unit – August 2015

1) The total investment in the Smith CFB Unit is \$821,742,191.

2)

Operating Expenses (\$ 000)	2010	2011	2012	2013	2014	2015	2016	2017	2018
Fuel Costs						15,855	36,003	36,741	37,978
Production O & M Expense						9,486	17,547	17,831	18,186
Depreciation	· n han a constant					8,560	20,544	20,544	20,544
Property tax		***************************************				3,358	3,358	3,358	3,358
Total Operating Expense						37,259	77,451	78,473	80,065
Interest Charges (\$ 000)						24,391	57,938	57,294	56,602
Total Expenses (\$ 000)						61,650	135,389	135,767	136,667

	2019	2020	2021	2022	2023	2024	2025	2026
Fuel Costs	39,149	40,271	41,219	42,359	43,209	44,479	45,456	46,593
Production O & M Expense	18,528	18,887	19,216	19,584	19,917	20,307	20,662	21,036
Depreciation	20,544	20,544	20,544	20,544	20,544	20,544	20,544	20,544
Property tax	3,358	3,358	3,358	3,358	3,358	3,358	3,358	3,358
Total Operating Expense	81,578	83,058	84,337	85,844	87,027	88,687	90,019	91,530
Interest Charges (\$ 000)	55,859	55,062	54,206	53,288	52,302	51,243	50,107	48,888
Total Expenses (\$ 000)	137,438	138,121	138,543	139,132	139,329	139,931	140,126	140,417

Smith CFB Unit - August 2018

1) The total investment in the Smith CFB Unit is \$897,939,880.

2)

Operating Expenses (\$ 000)	2018	2019	2020	2021	2022	2023	2024	2025	2026
Fuel Costs	14,102	39,149	40,189	41,284	42,273	43,227	44,628	45,440	46,454
Production O & M Expense	9,524	18,585	18,929	19,284	19,626	19,977	20,390	20,716	21,069
Depreciation	9,354	22,448	22,448	22,448	22,448	22,448	22,448	22,448	22,448
Property tax	3,669	3,669	3,669	3,669	3,669	3,669	3,669	3,669	3,669
Total Operating Expense	36,649	83,851	85,235	86,685	88,016	89,321	91,135	92,274	93,641
Interest Charges (\$ 000)	26,653	63,311	62,606	61,850	61,039	60,168	59,233	58,229	57,152
Total Expenses (\$ 000)	63,302	147,161	147,841	148,535	149,055	149,489	150,368	150,503	150,792

Request 4c(3). A detailed explanation of how the amounts for the investment in the Smith CFB Unit and the annual expenses were escalated in the three delay scenarios. If no escalation was incorporated in the analysis, explain in detail why an escalation was excluded.

Response 4c(3). Future Smith costs are based on our existing contract with Alstom Power, Inc., which assumes the Smith CFB Unit will be in operation June 2010. Contracts are normally awarded three years before the projected date of operation of the unit. Approximately one-half of the cost of the project is assumed to be labor and one-half material. Interest during construction is estimated at 11% of the project cost, based on EKPC's experience with a previous CFB that went into operation in 2005. Based on projections from Alstom, material prices would increase by 8% per year through 2012 and labor prices should increase approximately 3% per year. After 2012, both material and labor were escalated at 3% per year. The Smith CFB Unit – June 2010 will be awarded in 2007; Smith CFB Unit – August 2012 awarded in 2009; Smith CFB Unit – August 2015 awarded in 2012 and Smith CFB Unit – August 2018 awarded in 2015.

Annual operation and maintenance ("O&M") rates are escalated @ 1.8% per year, based on projections from Global Insight – The Power Planner 2006-2026 - Long-Term Forecast. Insurance and property tax rates are kept constant throughout the forecast under the assumption that as insurance would increase over time, property taxes would decrease proportionately. Fuel prices are escalated based on a fuel price forecast from Energy Ventures Analysis, Inc. The depreciation rate is based on a study performed by

Gannett Fleming, Inc. and approved by both the Kentucky Public Service Commission and the Rural Utilities Service. In this study a 40-year life was approved for circulating fluidized bed units. Interest rates for long term debt in this forecast are estimated to be 6.5%, plus a TIER adder based on a constant 1.10 TIER.

Request 4c(4). The annual market purchases of power for the years 2007 through 2018. Provide the MWh and total dollars.

Response 4c(4).

Market Purchases	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Smith CFB Unit - June 2010 (Base Case)						
Market Purchases (\$ 000)	\$91,077	\$100,711	\$65,190	\$30,593	\$11,249	\$12,666
Market Purchases (MWh)	2,072,039	2,057,641	1,118,477	551,396	196,170	217,380
Smith CFB Unit - August 2012						
Market Purchases (\$ 000)	\$91,077	\$100,711	\$65,190	\$38,304	\$30,254	\$23,980
Market Purchases (MWh)	2,072,039	2,057,641	1,118,477	683,184	522,890	408,338
Smith CFB Unit - August 2015						
Market Purchases (\$ 000)	\$91,077	\$100,711	\$65,190	\$38,304	\$30,254	\$36,467
Market Purchases (MWh)	2,072,039	2,057,641	1,118,477	683,184	522,890	621,548
Smith CFB Unit - August 2015						
Market Purchases (\$ 000)	\$91,077	\$100,711	\$65,190	\$38,304	\$30,254	\$36,467
Market Purchases (MWh)	2,072,039	2,057,641	1,118,477	683,184	522,890	621,548
Market Purchases	<u>2013</u>	2014	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>
Market Purchases Smith CFB Unit - June 2010 (Base Case)	2013	2014	<u>2015</u>	<u>2016</u>	2017	2018
	2013 \$16,992		2015 \$30,806	***************************************	2017 \$37,058	
Smith CFB Unit - June 2010 (Base Case)				***************************************		
Smith CFB Unit - June 2010 (Base Case) Market Purchases (\$ 000)	\$16,992	\$20,771	\$30,806	\$30,227	\$37,058	\$43,856
Smith CFB Unit - June 2010 (Base Case) Market Purchases (\$ 000) Market Purchases (MWh)	\$16,992	\$20,771 336,558	\$30,806 441,752	\$30,227 463,372	\$37,058 541,478	\$43,856
Smith CFB Unit - June 2010 (Base Case) Market Purchases (\$ 000) Market Purchases (MWh) Smith CFB Unit - August 2012	\$16,992 284,082	\$20,771 336,558	\$30,806 441,752 \$31,167	\$30,227 463,372 \$29,735	\$37,058 541,478	\$43,856 633,292
Smith CFB Unit - June 2010 (Base Case) Market Purchases (\$ 000) Market Purchases (MWh) Smith CFB Unit - August 2012 Market Purchases (\$ 000)	\$16,992 284,082 \$17,054	\$20,771 336,558 \$20,705	\$30,806 441,752 \$31,167	\$30,227 463,372 \$29,735	\$37,058 541,478 \$37,073	\$43,856 633,292 \$44,080
Smith CFB Unit - June 2010 (Base Case) Market Purchases (\$ 000) Market Purchases (MWh) Smith CFB Unit - August 2012 Market Purchases (\$ 000) Market Purchases (MWh)	\$16,992 284,082 \$17,054	\$20,771 336,558 \$20,705	\$30,806 441,752 \$31,167 447,096	\$30,227 463,372 \$29,735 456,516	\$37,058 541,478 \$37,073 542,022	\$43,856 633,292 \$44,080
Smith CFB Unit - June 2010 (Base Case) Market Purchases (\$ 000) Market Purchases (MWh) Smith CFB Unit - August 2012 Market Purchases (\$ 000) Market Purchases (MWh) Smith CFB Unit - August 2015	\$16,992 284,082 \$17,054 285,032	\$20,771 336,558 \$20,705 335,316	\$30,806 441,752 \$31,167 447,096 \$55,645	\$30,227 463,372 \$29,735 456,516 \$29,946	\$37,058 541,478 \$37,073 542,022	\$43,856 633,292 \$44,080 635,262
Smith CFB Unit - June 2010 (Base Case) Market Purchases (\$ 000) Market Purchases (MWh) Smith CFB Unit - August 2012 Market Purchases (\$ 000) Market Purchases (MWh) Smith CFB Unit - August 2015 Market Purchases (\$ 000)	\$16,992 284,082 \$17,054 285,032 \$47,767	\$20,771 336,558 \$20,705 335,316 \$54,809	\$30,806 441,752 \$31,167 447,096 \$55,645	\$30,227 463,372 \$29,735 456,516 \$29,946	\$37,058 541,478 \$37,073 542,022 \$36,540	\$43,856 633,292 \$44,080 635,262 \$44,253
Market Purchases (\$ 000) Market Purchases (MWh) Smith CFB Unit - August 2012 Market Purchases (\$ 000) Market Purchases (\$ 000) Market Purchases (MWh) Smith CFB Unit - August 2015 Market Purchases (\$ 000) Market Purchases (\$ 000) Market Purchases (\$ 000)	\$16,992 284,082 \$17,054 285,032 \$47,767	\$20,771 336,558 \$20,705 335,316 \$54,809 899,296	\$30,806 441,752 \$31,167 447,096 \$55,645 825,640	\$30,227 463,372 \$29,735 456,516 \$29,946 458,458	\$37,058 541,478 \$37,073 542,022 \$36,540 534,756	\$43,856 633,292 \$44,080 635,262 \$44,253 636,474

Request 4d. Explain why an annual Times Interest Earned Ratio ("TIER") of 1.10 was included in the analysis

Response 4d East Kentucky Power routinely uses a constant annual Times Interest Earned Ratio ("TIER") when doing financial analysis comparing various cases to see which case would be more beneficial. This is meant to reduce the effect of extraneous variables and allow the differences between cases to be analyzed. In this instance, the emphasis is on the variances between the cases rather than the timing effects of projected rate increases.

Request 4e. Explain why a TIER of 1.10 was established as an apparent required level of earnings in the analysis.

Response 4e. A TIER of 1.10 was chosen simply because it is within the band of the minimum TIER required by RUS of 1.05 and the TIER allowed by the Commission in EKPC's most recent rate order of 1.15. No other significance was assigned to this TIER level. Using a higher or lower constant TIER yields the same project rankings.

Request 4f. Refer to pages 5-12 of the response.

Request 4f(1). EKPC has filed an application seeking an increase in base rates of \$43,364,219. The analysis, however, shows for 2007 a base rate increase of \$32,181,000. Explain this apparent discrepancy.

Response 4f(1). The application from EKPC seeking an increase in base rates of \$43,364,219 is based on a twelve-month test year. The analysis, which shows a base rate increase of \$32,181,000 in 2007, is calculated to include only an increase from April 1, 2007 through the end of the year.

Request 4f(2). Describe how EKPC determined the level of off-system sales shown for 2007 through 2009.

Response 4f(2). EKPC uses computer models to simulate expected hourly generation schedules. The models take the given native load levels and dispatch the units, along with the expected market prices, to the most economic schedules. The model dispatches on an "ideal" economic basis. It does not take into account physical transmission or sales constraints. Therefore, it will tend to overstate the value of offsystem sales. These results need to be adjusted when dealing with budget issues; however, for case comparisons they are appropriate. The dispatch assumptions are consistent across cases and provide full value for any generation differences between cases. The data presented has been to compare cases to establish the value of having generation in various time periods, and not to use as stand-alone financial forecasts.

Projections of market purchases and sales have a high degree of uncertainty due to the volatility in the prices of natural gas and market power. In addition, actual load data can vary greatly from load projections due to variances in weather and even the economy, and cause actual purchases and sales to vary greatly from projections.

Request 4f(3). In light of its actual experience in 2005 and the revised budget in 2006, explain in detail why the forecast of off-system sales for the entire analysis is reasonable.

Response 4f(3). As stated in Response 4f(2), the forecast of off-system sales for the entire analysis is based on dispatching on an ideal economic basis. This modeling, given the case comparison purposes for which it was used in responding to the previous data request, is reasonable and appropriate.

Request 4f(4). On pages 5 and 6 of 12, the 2010 base case scenario, explain why the fuel adjustment revenues decrease significantly from previous levels from 2010 through 2014.

Response 4f(4). The Smith CFB Unit goes into operation June 2010. Because of this, purchased power included in the FAC is reduced significantly since generation is coming off of the Smith CFB Unit. The fuel cost for the Smith CFB Unit is much lower than the cost of purchased power; therefore, the fuel adjustment rate decreases significantly for the first few years until the load increases and purchased power again becomes a significant part of the fuel adjustment rate.

Request 4f(5). The analysis shows for the 2010 base case scenario a base rate increase of \$63,173,000 in 2010. The 2012 delay scenario shows a base rate increase of \$40,076,000 in 2012. The 2015 delay scenario shows a base rate increase of \$31,599,000 in 2015. The 2018 delay scenario shows a base rate increase of \$39,594,000 in 2018. Explain how the year that the Smith CFB Unit goes on line impacts the base rate increase modeled for that year.

Response 4f(5). Because of the constant TIER level used in this analysis, the rate increases shown for each individual year are not actually indicative of the timing of projected rate increases. A more relevant indicator is the total revenue from members, which is used in the net present value analysis, comparing the different commercial operation dates of the CFB units.

PUBLIC SERVICE COMMISSION REQUEST DATED 2/13/07 REQUEST 5

RESPONSIBLE PERSON:

James C. Lamb, Jr.

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 5. Prepare a revised detailed economic analysis, from a ratepayer's perspective, showing the effect of an in-service date for the Smith CFB Unit in 2010, 2012, 2015, and 2018. All assumptions used in the originally submitted analysis shall be utilized, with the following exceptions:

Request 5a. The Smith CTs 8 and 9 are to be in commercial operation by January 2009, while the Smith CTs 10-12 are to be in commercial operation by January 2012, 2013, and 2014.

Request 5b. TIER shall not be fixed in the analysis but, instead, shall reflect the expected results of operations.

Request 5c. Base rate increases shall match the forecasted rate increases as shown in EKPC's current 20-year financial forecast.

Request 5d. The revenues from off-system sales shall match the levels included in EKPC's current 20-year financial forecast.

Request 5e. Fuel adjustment revenues and revenues from the environmental surcharge shall reflect the levels included in EKPC's current 20-year financial forecast.

Response 5a,b,c,d,e. EKPC performed a detailed production cost and financial analysis using the commercial operation dates provided in this request for Smith CFB 1. A base case was developed with Smith CFB 1 in operation in June 2011. The June 2011 startup date is based on the most current project schedule. Smith CTs 8-9 were assumed to be in commercial operation in June 2009, and Smith CTs 10-12 were assumed to be in commercial operation in October of 2011, 2012, and 2013, respectively. Additional cases were developed with commercial operation of Smith CFB 1 delayed to August 2012, August 2015, and August 2018, in accordance with this request. No other future generating resources were added in the study. The results of the study are provided following this explanation.

The results include a comparison of total revenue from members and net present value of revenue requirements, and income statements for each case. As the comparison shows, the base case with Smith CFB 1 in June 2011 has the lowest net present value cost, followed in order by the requested delay cases.

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It should be noted that since no future resources were added other than Spurlock 4, Smith CTs 8-12, and Smith CFB 1, a specific reserve margin target was not met throughout the study. Each case becomes roughly equivalent to the base case once Smith CFB 1 comes online in each respective case. In the years prior to Smith CFB 1 coming online, the base case has more capacity available and a higher reserve margin than the alternate cases with Smith CFB 1 delayed. Market purchases are made by the production cost model as necessary to meet its daily and hourly load obligations. However, if capacity were purchased to meet a specific reserve margin in each case, the alternate cases would be even higher cost compared to the base case than shown in the comparison.

Item 6 of the Commission's Supplemental Data Request dated January 26, 2007, the Commission specifies that EKPC's generation system "as currently certificated" should be used in the analysis. EKPC interpreted this to mean that the commission desired for EKPC to insert no additional generation units into the expansion plan beyond the certificated units. Using purchased power only to serve load beyond the certificated units causes unrealistically high net margins. In order to mitigate these distorted results, the TIER levels have been capped at 1.15 on an annual basis, based on the most recent TIER level allowed by the Commission to EKPC.

COMPARISON TOTAL REVENUE FROM MEMBERS PSC CASE NO. 2006-00564 (\$000)

Discount Rate

Net Present Value (2007 - 2026)

11,118,925	11,129,302	11,168,960	11,181,097
Smith Unit #1 - June 2011 - Basecase	Smith Unit #1 - August 2012	Smith Unit #1 - August 2015	Smith Unit #1 - August 2018

^{*} These Income Statements are to be used in response to PSC Case No. 2006-00564, Question No. 5 ONLY.

COMPARISON TOTAL REVENUE FROM MEMBERS PSC CASE NO. 2006-00564

(2000)

Discount Rate 6.00%

$\frac{2017}{2000}$ $\frac{2018}{2019}$ $\frac{2020}{2020}$ $\frac{2021}{2022}$ $\frac{2023}{2023}$	1,029,547 1,067,155 1,121,652 1,158,287 1,199,934 1,248,847 1,299,437 1,352,274 1,035,988 1,073,371 1,128,005 1,164,800 1,206,119 1,255,439 1,305,115 1,358,467 1,052,705 1,090,893 1,145,301 1,181,197 1,223,183 1,273,224 1,321,129 1,374,190 1,042,886 1,001,200 1,148,747 1,195,723 1,338,192 1,334,722 1,337,523
	Smith Unit #1 - June 2011 - Basecase Smith Unit #1 - August 2012 Smith Unit #1 - August 2015 Smith Unit #1 - August 2018

Net Present Value (2007 - 2026)

Smith Unit #1 - June 2011 - Basecase Smith Unit #1 - August 2012 Smith Unit #1 - August 2015 Smith Unit #1 - August 2018 * These Income Statements are to be used in response to PSC Case No. 2006-00564, Question No. 5 ONLY.

are based on assumptions using information available at the current time. Risks and uncertainties exist that may cause actual results to differ materially from projected results. This information is intended for use in this comparative analysis only. It is not intended to be a projection of EKPC's future rates or financial position. These projections

EAST KENTUCKY POWER COOPERATIVE PSC CASE NO. 2006-00564 SMITH UNIT #1 - JUNE 2011 (BASECASE) (2007-2026) STATEMENT OF OPERATIONS (\$000)

	ACTUAL 2005	ACTUAL 2006	BUDGET 2007	BUDGET 2008	2009	2010	2011	2012	2013	2014	2015
OPERATING REVENUE											
MEMBER COOPERATIVES BASE BATES	\$507.603	6500 776	6516 851	6508 154	2506 237	8638 461	\$667 105	\$711.184	8771 020	5787.785	\$814.656
DAME WATES	2004900	24467000	400,000	101000	1016000	100,000	201,100		() () ()		
FUEL ADJUSTMENT	90,599	81,057	96,130	151,68	56/,65	758,17	12,401	(4554)	7,300	12,333	CC/'97
ENVIRONMENTAL SURCHARGE	27,217	55,193	72,939	73,973	73,155	92,564	95,458	122,383	127,114	127,379	131,226
BASE RATE CHANGE	0	0	32,181	0	9,681	13,822	28,569	42,046	0	10,191	0
TOTAL FROMMEMBERS:	620,509	645,476	738,107	751,279	748,868	772,780	803,533	868,260	_ 705'006	802256	974,638
OFF SYSTEM SALES	7,469	3,458	32,043	39,717	20,677	31,510	40,060	48,593	44,715	43,739	41,080
TOTAL OPERATING REVENUE	627,978	648,934	770,150	966,962	769,545	804,289	843,593	916,852	945,218	981,447	1,015,718
EXPENSES											
PRODUCTION									;		
FUEL	257,348	270,750	302,747	299,618	265,320	286,641	301,458	308,559	316,963	327,512	336,904
O AND M	102,976	114,270	145,708	147,861	137,329	154,668	169,145	179,086	181,627	187,598	194,958
OTHER POWER SUPPLY	120,302	92,486	117,637	127,287	103,829	70,295	52,273	39,916	45,637	51,409	62,822
TRANSMISSION O AND M	15,413	16,377	19,003	19,959	20,572	21,340	22,757	24,326	25,012	32,390	33,133
ADMINISTRATIVE & GENERAL	72,027	39,830	34,589	35,487	35,501	36,636	37,808	39,017	40,265	41,553	42,883
DEPRECIATION	52,038	39,384	43,155	51,734	70,233	76,539	87,738	113,270	121,498	126,969	127,921
TAXES	235	~	10	10	0	0	0	0	0	0	0
INTEREST ON LONG TERM DEBT	69,571	84,634	110,235	128,024	146,969	173,698	186,035	197,220	199,117	198,632	196,463
INTEREST CHARGED TO CONSTR	(6,226)	(9,192)	(30,979)	(52,827)	(20,130)	(29,331)	(28,846)	9	0	0	0
OTHER DEBT COST	273	200	220	172	1,220	879	198	161	161	153	110
TOTAL EXPENSES	683,957	648,740	742,326	757,324	760,842	791,364	828,566	901,555	930,280	966,215	995,195
		ç	100 80	62) 06	r o	5000	16.036	15 207	14.030	15 222	10 573
OPERATING MARGINS	(6/6'60)	194	479,17	7/0,60	6,/62	14,743	070,61	12767	14,730	4C4(CY	40,604
OTHER REVENUE	9,972	10,980	7,254	6,720	6,141	4,619	3,763	4,622	4,806	4,830	5,991
NET MARGIN	(\$46,008)	\$11,174	\$35,078	\$46,391	\$14,844	\$17,543	\$18,790	\$19,919	\$19,745	\$20,062	\$26,514
TIMES INTEREST EARNED RATIO	0.34	1.13	1.32	1.36	1.10	1.10	1.10	1.10	1.10	1.10	1.13

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EAST KENTUCKY POWER COOPERATIVE
PSC CASE NO. 2006-00564
SMITH UNIT #1 - JUNE 2011 (BASECASE)
(2007-2026)
STATEMENT OF OPERATIONS
(\$000)

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
OPERATING REVENUE MEMBER COOPERATIVES											
BASE RATES	\$832,321	\$844,054	\$852,244	\$864,843	\$882,586	\$892,011	\$902,759	1613,191	\$926,821	\$945,775	\$956,259
FUEL ADJUSTMENT	44,325	63,543	84,041	114,243	142,058	172,115	208,587	243,778	278,251	325,217	335,169
ENVIRONMENTAL SURCHARGE	131,401	131,450	137,196	144,378	144,089	144,181	145,714	146,751	147,202	147,906	119,543
BASE RATE CHANGE	(6,443)	(9,500)	(6,326)	(1,811)	(10,446)	(8,373)	(8,213)	(4,283)	0	(6,663)	17,972
TOTAL FROM MEMBERS	1,001,604	1,029,547	1,067,155	4,121,652	1,158,287	1,199,934	1,248,847	1,299,437	1352.274	1,412,235	1,428,943
OFF SYSTEM SALES	42,266	39,651	36,493	33,473	31,892	29,581	24,980	21,221	21,338	18,835	20,193
TOTAL OPERATING REVENUE	1,043,869	1,069,198	1,103,649	1,155,125	1,190,179	1,229,515	1,273,827	1,320,659	1,373,612	1,431,070	1,449,136
HXPENSES											
PRODUCTION											
FUEL	359,795	376,047	391,876	411,381	430,092	448,374	466,532	484,984	505,553	526,347	553,629
O AND M	201,141	205,934	217,951	231,018	234,805	239,966	245,970	254,229	261,123	264,892	271,732
OTHER POWER SUPPLY	93,866	72,521	82,070	98,837	114,606	132,646	155,675	177,636	200,958	233,029	224,751
TRANSMISSION O AND M	33,640	35,063	36,533	41,861	43,554	45,304	47,112	48,981	55,371	57,510	59,721
ADMINISTRATIVE & GENERAL	44,255	45,672	47,134	48,644	50,202	51,811	53,471	55,185	56,955	58,782	899'09
DEPRECIATION	128,808	130,600	131,355	132,593	133,138	134,392	135,691	137,152	138,751	140,418	141,815
TAXES	0	0	0	0	0	0	0	0	0	0	0
INTEREST ON LONG TERM DEBT	191,402	185,227	179,747	174,601	168,958	163,432	156,750	150,048	143,118	136,761	130,614
INTEREST CHARGED TO CONSTR	0	0	0	0	0	0	0	0	0	0	0
OTHER DEBT COST	110	110	110	110	110	110	110	107	100	100	100
TOTAL EXPENSES	1,023,018	1,051,174	1,086,777	1,139,045	1,175,465	1,216,034	1,261,311	1,308,323	1,361,928	1,417,840	1,443,031
OPERATING MARGINS	20,852	18,025	16,871	16,080	14,714	13,480	12,516	12,336	11,685	13,230	6,105
OTHER REVENUE	8,050	9,944	10,271	10,285	10,799	11,198	11,153	10,322	8,596	7,421	7,087
					1		:				
NET MARGIN	\$28,902	\$27,969	\$27,142	\$26,365	\$25,513	\$24,678	\$23,669	\$22,657	\$20,281	\$20,651	\$13,192
TIMES INTEREST EARNED RATIO	1.15	1.15	1.15	1.15	1.15	1.15	1.15	1.15	1.14	1.15	1.10

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This information is intended for use in this comparative analysis only. It is not intended to be a projection of EKPC's future rates or financial position. These projections are based on assumptions using information available at the current time. Risks and uncertainties exist that may cause actual results to differ materially from projected results. EAST KENTUCKY POWER COOPERATIVE PSC CASE NO. 2006-00564 SMITH UNIT #1 - AUGUST 2012 (2007-2026)

STATEMENT OF OPERATIONS

																						PS		Rec	qu 8	est of	5 13
2015		\$809,803	28,601	131,224	0	969,628	41,258	1,010,887			337,015	195,126	62,821	33,137	42,883	128,841	0	199,826	0	110	999,759	11,128	5,105	616.333	310,232		1.08
2014		\$793,219	12,353	127,386	0	932,958	43,614	976,572			327,696	187,781	51,203	32,393	41,553	127,888	0	201,958	0	153	970,625	5,947	4,903	020 050	310,030		1.05
2013		\$734,678	2,065	127,126	41,684	. 905.553	44,937	950,490			316,918	181,817	45,700	25,015	40,265	122,417	0	202,373	0	161	934,665	15,825	4,614	630 440	370,440		1.10
2012		\$676,691	20,042	123,007	41,195	860,936	34,724	895,661			308,901	173,198	56,523	24,329	39,017	104,035	0	196,001	(21,992)	191	880,173	15,488	4,308	610 707	317,170		1.10
2011		\$664,736	36,638	99,765	(2,753)	986'864	26,134	824,520			302,630	160,445	65,774	22,761	37,808	78,121	0	176,978	(42,179)	198	802,535	21,985	3,832	275 017	\$43,017		1.15
2010		\$636,118	27,832	92,564	13,748	192024	31,510	801,771			286,641	154,668	70,295	21,226	36,636	76,455	0	162,339	(18,336)	879	790,803	10,969	5,428	616 206	310,370		1.10
2009		\$606,237	59,795	73,155	7,321	746,508	20,677	767,186			265,320	137,329	103,829	20,572	35,501	70,233	0	141,359	(11,242)	1,220	764,121	3,065	11,212	TPC 113	a		1.10
BUDGET 2008		\$598,154	85,151	73,973	0	757,279	39,717	966,962			299,618	147,861	127,287	19,959	35,487	51,734	10	128,024	(52,827)	172	757,324	39,672	6,720	646 301	3+0+571		1.36
BUDGET 2007		\$536,851	96,136	72,939	32,181	738,107	32,043	770,150			302,747	145,708	117,637	19,003	34,589	43,155	10	110,235	(30,979)	220	742,326	27,824	7,254	920 353	933,070		1.32
ACTUAL 2006		\$509,226	81,057	55,193	0	5= 645,476	3,458	648,934			270,750	114,270	92,486	16,377	39,830	39,384	-	84,634	(9,192)	200	648,740	194	10,980	611 174	311717		1.13
ACTUAL 2005		\$502,693	90,599	27,217	0	62020	7,469	627,978			257,348	102,976	120,302	15,413	72,027	52,038	235	69,571	(6,226)	273	683,957	(55,979)	9,972	(846,008)	(040,040)		0.34
	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	OPERATING MARGINS	OTHER REVENUE	NET MABCIN	INEA INTERNETION		TIMES INTEREST EARNED RATIO

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EAST KENTUCKY POWER COOPERATIVE PSC CASE NO. 2006-00564 SMITH UNIT #1 - AUGUST 2012 (2007-2026) STATEMENT OF OPERATIONS (\$000)

2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
	\$827,363 \$845,567	\$858,954	\$871,545	\$889,062	\$898,518	\$909,198	\$919,681	\$932,975	\$952,053	\$962,002
	43,853 63,383	83,713	114,243	142,230	171,940	208,587	243,231	278,251	324,838	335,555
	131,420 131,480	137,185	144,397	144,068	144,239	145,941	146,944	147,240	147,935	119,571
	0 (4,441)	(6,480)	(2,179)	(10,560)	(8,578)	(8,287)	(4,740)	0	(7,304)	17,682
	,002,636 = 1,035,988	1.073.371	1,128,005	- 1,164,800	1,206,119	1,255,439	1,305,115	1,358,467	1,417,522	1,434,810
	42,416 39,543	36,627	33,562	31,912	29,099	24,803	21,100	21,686	18,727	20,03
	1,045,053 1,075,531	1,109,998	1,161,568	1,196,712	1,235,218	1,280,242	1,326,215	1,380,153	1,436,248	1,454,903
	359,893 375,867	391,704	411,447	430,183	448,544	466,047	484,189	505,463	526,173	553,435
	201,344 206,134	218,089	231,247	234,970	240,195	246,619	254,585	261,284	265,132	271,861
	63,565 72,488	82,177	98,810	114,793	131,964	156,050	177,867	201,362	232,615	225,326
	33,644 35,066	36,537	41,866	43,558	45,308	47,117	48,986	55,376	57,515	59,726
	44,255 45,672	47,134	48,644	50,202	51,811	53,471	55,185	56,955	58,782	60,668
	129,728 131,519	132,275	133,512	134,057	135,311	136,610	138,071	139,670	141,338	142,734
	0 0	0	0	0	0	0	0	0	0	0
	194,768 188,595	183,116	177,970	172,326	166,797	160,110	153,403	146,464	140,097	133,937
	0 0	0	0	0	0	0	0	0	0	0
	110 110	110	110	110	110	110	107	100	100	100
	1,027,307 1,055,451	1,091,143	1,143,606	1,180,199	1,220,041	1,266,133	1,312,392	1,366,674	1,421,751	1,447,786
	17,746 20,080	18,856	17,961	16,514	15,177	14,109	13,823	13,479	14,497	7,116
	6,605 8,398	8,795	8,912	9,508	10,009	10,068	9,341	7,730	6,658	6,411
	\$24.351 \$28.478	\$27.651	826 874	\$26 021	825.186	274 177	233 164	621 200	\$21.155	613 578
	340,170	34/3031	340,017	340,041	942,100	347,11	342,104	341,407	341,133	313,340
	1.13 1.15	1.15	1.15	1.15	1.15	1.15	1.15	1.14	1.15	1.10

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are based on assumptions using information available at the current time. Risks and uncertainties exist that may cause actual results to differ materially from projected results. This information is intended for use in this comparative analysis only. It is not intended to be a projection of EKPC's future rates or financial position. These projections

EAST KENTUCKY POWER COOPERATIVE (2007-2026) STATEMENT OF OPERATIONS PSC CASE NO. 2006-00564 SMITH UNIT #1 - AUGUST 2015

	ACTUAL 2005	ACTUAL 2006	BUDGET 2007	BUDGET 2008	2009	2010	2011	2012	2012	7017	2000
OPERATING REVENUE									CYCT	+107	2013
MEMBER COOPERATIVES											
BASE RATES	\$502,693	\$509,226	\$536,851	\$598,154	\$606,237	\$635,771	\$663,005	\$671,402	\$687,256	\$715,590	\$746,677
FUEL ADJUSTMENT	665'06	81,057	96,136	85,151	59,795	27,832	36,638	41,671	55,902	69,448	65,660
ENVIRONMENTAL SURCHARGE	27,217	55,193	72,939	73,973	73,155	92,564	99,765	123,163	127,138	127,452	130,736
BASE RATE CHANGE	0	0	32,181	0	6,987	12,401	(6,315)	0	13,130	15,933	36,198
LOTAL EROM MEMBERS	620,509	645,476	738,107	757,279	746,174	695.892	793,093	836,236	883,426	928,424	979,271
OFF SYSTEM SALES	7,469	3,458	32,043	39,717	20,677	31,510	26,134	24,029	22,069	19,097	28,894
TOTAL OPERATING REVENUE	627,978	648,934	770,150	796,996	766,851	800,078	819,227	860,265	905,495	947,521	1,008,166
EXPENSES											
PRODUCTION											
FUEL	257,348	270,750	302,747	299,618	265,320	286,641	302,630	306,920	314,969	324,832	335,975
O AND M	102,976	114,270	145,708	147,861	137,329	154,668	160,445	162,125	163,706	169,339	188,138
OTHER POWER SUPPLY	120,302	92,486	117,637	127,287	103,829	70,295	65,774	72,078	84,042	92,416	91,319
TRANSMISSION O AND M	15,413	16,377	19,003	19,959	20,572	21,226	22,643	24,212	24,897	32,406	33,149
ADMINISTRATIVE & GENERAL	72,027	39,830	34,589	35,487	35,501	36,636	37,808	39,017	40,265	41,553	42,883
DEPRECIATION	52,038	39,384	43,155	51,734	70,233	76,455	78,035	969'96	104,924	110,489	120,001
TAXES	235		10	10	0	0	0	0	0	0	0
INTEREST ON LONG TERM DEBT	69,571	84,634	110,235	128,024	138,179	149,419	148,667	160,776	176,591	194,352	206,088
INTEREST CHARGED TO CONSTR	(6,226)	(9,192)	(30,979)	(52,827)	(8,075)	(5,684)	(15,250)	(5,404)	(17,443)	(33,118)	(25,779)
OTHER DEBT COST	273	200	220	172	1,220	879	198	191	161	153	110
TOTAL EXPENSES	683,957	648,740	742,326	757,324	764,107	790,535	800,949	856,582	892,112	932,421	991,884
OPERATING MARGINS	(55,979)	194	27,824	39,672	2,744	9.544	18.278	3.683	13.383	15.099	16.281
OTHER REVENUE	9,972	10,980	7,254	6,720	11,212	5,548	4,119	4,653	4,452	4,530	4.534
											Pa
NET MARGIN	(\$46,008)	\$11,174	\$35,078	\$46,391	\$13,956	\$15,091	\$22,397	\$8,336	\$17,836	\$19,630	\$20,815 to
TIMES INTEREST EARNED RATIO	0.34	1.13	1.32	1.36	1.10	1.10	7.	105	110	1.10	¹ 90∘6
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EAST KENTUCKY POWER COOPERATIVE
PSC CASE NO. 2006-00564
SMITH UNIT #1 - AUGUST 2015
(2007-2026)
STATEMENT OF OPERATIONS
(\$000)

																						PS	C Pa			est 5 1 of 13
2026		\$977,281	335,169	119,584	16,324	1,448,358	20,217	1,468,575			553,361	272,541	225,114	59,741	899'09	145,879	0	145,187	0	100	1,462,590	5,985			\$14,664	1.10
2025		\$968,289	325,028	147,939	(8,534)	1,432,721	18,445	1,451,166			525,628	265,684	233,337	57,530	58,782	144,482	0	151,341	0	100	1,436,883	14,284	8,569		\$22,852	1.15
2024		\$948,891	278,065	147,234	0	1,374,190	21,608	1,395,798			505,900	261,947	200,697	55,391	56,955	142,814	0	157,699	0	100	1,381,504	14,294	9,224		\$23,518	1.15
2023		\$935,818	243,596	146,978	(5,263)	1,321,129	21,242	1,342,371			484,754	255,245	177,829	49,000	55,185	141,215	0	164,628	0	107	1,327,963	14,408	10,451		\$24,859	1.15
2022		\$926,218	208,587	147,896	(9,477)	1,273,224	25,004	1,298,229			466,762	249,279	155,341	47,130	53,471	139,754	0	171,323	0	110	1,283,169	15,059	10,811		\$25,870	1.15
2021		\$915,464	171,940	144,656	(8,877)	1,223,183	28,911	1,252,095			448,733	241,594	131,584	45,322	51,811	138,456	0	177,995	0	110	1,235,604	16,491	10,387		\$26,877	1.15
2020		2306,377	142,058	144,078	(11,315)	1,181,197	32,042	1,213,239			430,272	235,653	114,518	43,572	50,202	137,201	0	183,508	0	110	1,195,037	18,202	9,508		\$27,710	1.15
2019		\$889,290	114,578	144,422	(2,988)	1,145,001	33,614	1,178,914			411,512	231,844	99,117	41,879	48,644	136,657	0	189,136	0	110	1,158,899	20,015	8,544		\$28,560	1.15
2018		\$876,031	83,877	137,181	(6,195)	1,090,893	36,544	1,127,437			391,828	218,708	82,157	36,549	47,134	135,419	0	194,265	0	110	1,106,169	21,268	8,066		\$29,334	1.15
2017		\$857,852	63,383	131,470		1,014,816	39,313	1,092,017			376,007	206,704	72,156	35,079	45,672	134,664	0	199,724	0	110	1,070,116	21,901	7,455	1	\$29,356	1.15
2016		\$799,684	44,011	131,408	39,713	1,014,816	42,598	1,057,414			360,147	201,973	63,471	33,656	44,255	132,872	0	205,879	0	110	1,042,364	15,050	5,743		\$20,794	1.10
	OPERATING REVENUE MEMBER COOPERATIVES	BASE RATES	FUEL ADJUSTMENT	ENVIRONMENTAL SURCHARGE	BASE RATE CHANGE	TOTALIFROMMEMBERS	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	OPERATING MARGINS	OTHER REVENUE		NET MARGIN	TIMES INTEREST EARNED RATIO

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PSC Request 5

EAST KENTUCKY POWER COOPERATIVE
PSC CASE NO. 2006-00564
SMITH UNIT #1 - AUGUST 2018
(2007-2026)
STATEMENT OF OPERATIONS

		696	93,646	926	0	242	17,240	782		657	847	841	33,004	883	347	0	571	(2,666)	110	593	15,188	P 226	кед age 111,028	12 of 13
	SIU2	\$740,969	93,	130,926	•	965,542	17,	982,782		331,657	175,847	114,841	33,	42,883	111,347		163,571	(5,0		967,593	15,1	4,9	\$20,1	H
7 200	4117	\$713,325	69,448	127,452	12,491	111,226	19,097	941,814		324,832	169,339	92,416	32,260	41,553	110,395	0	160,953	(1,458)	153	930,443	11,372	4,885	\$16,256	1.10
2013	6107	\$687,256	55,902	127,138	10,913	881,209	22,069	903,278		314,969	163,706	84,042	24,897	40,265	104,924	0	160,257	(1,458)	161	891,762	11,516	4,670	\$16,186	1.10
2012	7707	\$671,402	41,671	123,163	0	836,236	24,029	860,265		306,920	162,125	72,078	24,212	39,017	969'96	0	156,844	(1,458)	161	856,595	3,670	4,653	\$8,322	1.05
2011		\$663,005	36,638	99,765	(6,315)	793,093	26,134	819,227		302,630	160,445	65,774	22,643	37,808	78,035	0	148,667	(15,250)	198	800,949	18,278	4,119	\$22,397	1.15
2010		\$635,771	27,832	92,564	12,401	768,569	31,510	800,078		286,641	154,668	70,295	21,226	36,636	76,455	0	149,419	(5,684)	879	790,535	9,544	5,548	\$15,091	1.10
2009		\$606,237	59,795	73,155	6,987	746,174	20,677	766,851		265,320	137,329	103,829	20,572	35,501	70,233	0	138,179	(8,075)	1,220	764,107	2,744	11,212	\$13,956	1.10
BUDGET 2008		\$598,154	85,151	73,973	0	757,279	39,717	796,996		299,618	147,861	127,287	19,959	35,487	51,734	10	128,024	(52,827)	172	757,324	39,672	6,720	\$46,391	1.36
BUDGET 2007		\$536,851	96,136	72,939	32,181	738,107	32,043	770,150		302,747	145,708	117,637	19,003	34,589	43,155	10	110,235	(30,979)	220	742,326	27,824	7,254	\$35,078	1.32
ACTUAL 2006		\$509,226	81,057	55,193	0	5, 645,476	3,458	648,934		270,750	114,270	92,486	16,377	39,830	39,384	-	84,634	(9,192)	200	648,740	194	10,980	\$11,174	1.13
ACTUAL 2005		\$502,693	665,06	27,217	0	620,509	7,469	627,978		257,348	102,976	120,302	15,413	72,027	52,038	235	69,571	(6,226)	273	683,957	(55,979)	9,972	(\$46,008)	0.34
	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 DEBI COST	TOTAL EXPENSES	OPERATING MARGINS	OTHER REVENUE	NET MARGIN	TIMES INTEREST EARNED RATIO

PSC Request 5 Page 13 of 13

Smith 2018 Page 2 of 2

EAST KENTUCKY POWER COOPERATIVE
PSC CASE NO. 2006-00564
SMITH UNIT #1 - AUGUST 2018
(2007-2026)
STATEMENT OF OPERATIONS

2026		\$990,320	335,362	119,578	15,635	1,460,895	20,000	1,480,895			553,352	272,844	225,116	59,758	899,09	147,792	0	152,760	0	100	1,472,390	8,505	6,924 ₺	ag	\$15,429 (0	13	1.10
72																											
2025		\$982,030	325,217	147,929	(9,463)	1,48,713	18,924	1,464,636			526,508	266,069	232,931	57,547	58,782	146,396	0	158,793	0	100	1,447,125	17,511	6,466		\$23,978		1.15
2024		\$962,569	277,879	147,297	(222)	1,387,523	21,424	1,408,947			505,814	262,345	200,421	55,408	56,955	144,728	0	165,038	0	100	1,390,807	18,140	6,781		\$24,921		1.15
2023		\$949,774	243,778	146,968	(5,798)	1,334,722	21,134	1,355,855			484,860	255,607	177,777	49,015	55,185	143,129	0	171,860	0	107	1,337,539	18,316	7,634		\$25,951		1.15
2022		\$940,393	208,945	147,867	(9,982)	1,287,223	24,918	1,312,141			466,424	249,538	156,041	47,145	53,471	141,668	0	178,454	0	110	1,292,852	19,289	7,658		\$26,947		1.15
2021		\$930,105	171,765	145,951	(9,629)	1,238,192	29,124	1,267,316			448,301	243,307	132,059	45,337	51,811	140,369	0	185,033	O,	110	1,246,327	20,989	6,951		\$27,940		1.15
2020		\$910,065	141,887	144,456	(685)	1,105,723	32,066	1,227,789			430,281	236,798	114,457	43,587	50,202	139,115	0	190,458	0	110	1,205,009	22,780	5,979		\$28,759		1.15
2019		\$838,070	114,410	144,418	51,849	1,148,747	33,604	1,182,351			411,562	232,258	98,814	41,894	48,644	138,570	0	196,003	0	110	1,167,855	14,496	5,300		\$19,796		1.10
2018		\$788,139	135,153	136,130	31,778	1,091,200	22,266	1,113,466			387,059	209,643	126,852	36,563	47,134	124,238	0	194,909	(28,052)	110	1,098,457	15,010	4,676		\$19,686		1.10
2017		\$773,722	139,763	131,223	(1,822)	1,042,886	14,642	1,057,528	•		369,840	185,807	135,163	35,092	45,672	114,129	0	184,300	(35,942)	110	1,034,172	23,356	4,668		\$28,024		1.15
2016		8757,069	113,327	131,173	0	1,001,569	17,558	1,019,128			355,043	181,245	118,930	33,511	44,255	112,234	0	171,703	(18,750)	110	998,282	20,845	4,848		\$25,694		1.15
	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	OPERATING MARGINS	OTHER REVENUE		NET MARGIN		TIMES INTEREST EARNED RATIO

PUBLIC SERVICE COMMISSION REQUEST DATED 2/13/07

REQUEST 6

RESPONSIBLE PERSON:

James C. Lamb, Jr.

COMPANY:

East Kentucky Power Cooperative, Inc.

Refer to the response to Commission Staff's Supplemental Data Request, Item 9. EKPC states that it plans to do a more comprehensive examination of plant retirements in the future, but that it is difficult to factor in the impact of future environmental regulations.

Request 6a. The Clean Air Interstate Rule ("CAIR") was finalized by the Environmental Protection Agency in March 2005. The CAIR establishes limits for the emission of sulfur dioxide and nitrogen oxide in 2010 and 2015. Explain in detail why EKPC could not conduct a comprehensive examination of plant retirements in the future that reflected the currently known limits contained in the CAIR.

Response 6a. While EKPC has not conducted what would be characterized as an economic study of the retirement of older units, it routinely conducts economic evaluations of the alternatives for compliance with new environmental laws affecting its existing generating units. EKPC has conducted such evaluations of compliance requirements mandated by the CAIR. To date, none of EKPC's evaluations have shown that retirement of an older generating unit was the most economical course of action.

EKPC began to study the compliance impacts of CAIR on Spurlock Station in early 2004, before the final limitations were set. Economic evaluations of the sulfur dioxide compliance alternatives were conducted in 2004 and 2005, and did not show that plant retirement was a viable option.

As a result of CAIR and to satisfy its requirements for our system, EKPC has begun construction on two Flue Gas Desulfurization ("FGD" or "scrubber") Systems on our two largest pulverized coal units, Spurlock Units 1 & 2. These projects both received Certificates of Public Convenience and Necessity from the Commission in 2006. EKPC has also recently discussed "early reduction credits compliance" of the "Year-Around Operation" of Selective Catalytic Reduction ("SCR") equipment that was installed on these same two units, after similar evaluations of nitrogen oxide compliance in 2004, and has determined that it is economically marginal for EKPC to participate.

In 2006, a team was established to investigate the CAIR compliance options facing EKPC for the future of Cooper Station. Several options were considered including addition of SCR, FGD, repowering, and allowance purchases. Plant retirement was excluded as a viable option early in the process. Due to forecasted SO2 and NOx allowance prices, capital expenditures, and operation and maintenance costs it was determined that purchasing allowances was the best alternative for EKPC.

Recently, a team has been established to investigate the options facing EKPC for the future of Dale Station. To date, no conclusions have been drawn. Dale Station remains valuable to EKPC for voltage stability and power generation in the Central Kentucky area. While the addition of base load generation at Smith Station may make the system benefits of Dale Station less important, retirement of Dale Station would still require the replacement of its 200 MW of generation. This is the reason that, up to this time, plant

retirement has not been more economical than plant retrofit for compliance of environmental regulations affecting EKPC generating units.

Request 6b. In the response, EKPC states: "More analysis will be done as environmental legislation is formulated and has greater clarity." Does EKPC believe the requirements of the CAIR are not sufficiently clear as to what the emission limitations will be through at least 2015? Explain the response in detail.

Response 6b. As stated above, EKPC has evaluated CAIR requirements as they currently affect EKPC generating units. The subject response was directed toward future EKPC evaluations of plant retirements that would be based on anticipated future legislation regarding reduced limits on emissions such as mercury or carbon dioxide ("CO2"). Such future changes in environmental laws may require plant modifications that would be impossible or prohibitively expensive, and could lead EKPC, in some instances, to determine that unit retirement is the only feasible course. Extreme CO2 limits would have a tremendous impact on the direction EKPC takes in retirement of older units and replacement of these generating units with newer generation technologies such as IGCC with CO2 sequestration, or CO2 capture and sequestration retrofit of existing units.

PUBLIC SERVICE COMMISSION REQUEST DATED 2/13/07 REQUEST 7

RESPONSIBLE PERSON:

James C. Lamb, Jr.

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 7a. State whether EKPC has estimated on a cents-per-kilowatt-hour basis, the cost of power generated by its proposed Smith CFB unit.

Response 7a. EKPC has estimated on a cents-per-kilowatt-hour basis, the cost of power generated by its proposed Smith 1 CFB unit.

Request 7b. If EKPC has calculated such an estimate, provide the estimate and all calculations and workpapers used in arriving at the estimate.

Response 7b. The estimate on a cents-per-kilowatt-hour basis of the cost of power generated by EKPC's proposed Smith 1 CFB unit is shown below.

Total Fixed \$/MWh \$34.92

Total Variable \$/MWh \$18.82

Total All In Cost \$/MWh \$53.75

Request 7c. State whether EKPC believes it can successfully market any excess power generated by its proposed Smith CFB Unit at a price equal to or exceeding the cost. Provide all calculations and workpapers needed to support EKPC's belief.

Response 7c. From 7(b) above, the variable cost characteristics of Smith 1 are given. Attached is a forecast of monthly spot power prices. EKPC took a power forward curve that was provided by ACES Power Marketing, and converted it to expected spot price. As can be seen, Smith 1 would be in the money during every month. From this graph, EKPC believes it can successfully market any excess power generated by its proposed Smith 1 unit at a price equal to or exceeding the cost.

It should be noted, however, that Smith 1 output will virtually always be allocated to EKPC native load, due to its cost relative to other EKPC generating units. Any excess power that EKPC will sell on the wholesale market would be comprised of its more expensive generation.

Request 7d. If EKPC has not estimated the cost, explain how construction of the unit can be justified without knowing the cost of power generated.

Response 7d. Please see the answer to 7(a) above.

Total \$/MWh

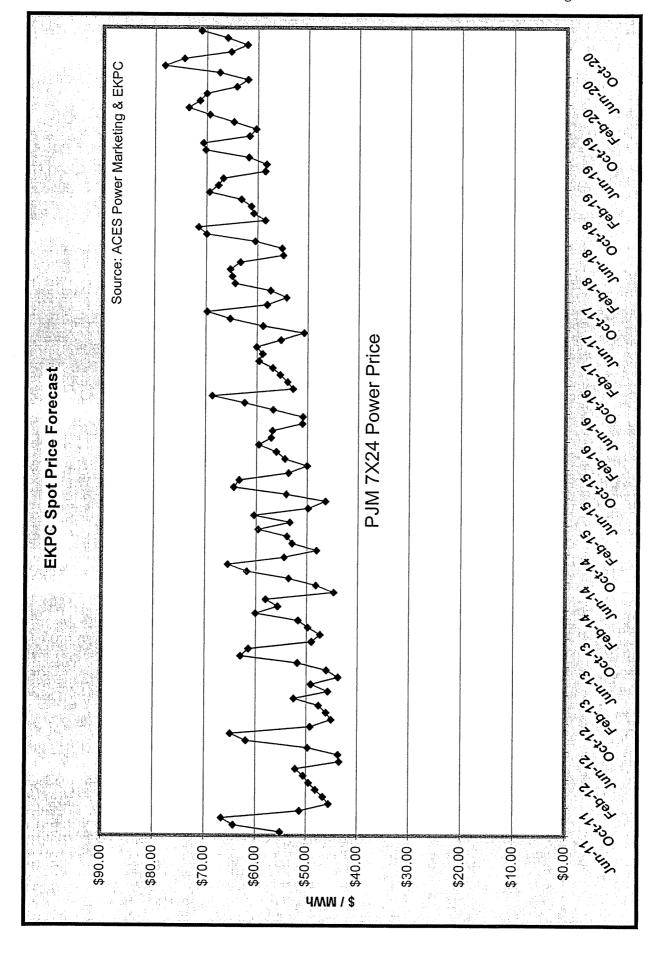
53.75

Smith 1 (2011)

		<u>Fixed</u>		<u>Variab</u>	<u>le</u>		
2011 Investment (2	2011)	659,619,037					\$/MWh
			Cap (MW)	278		MW	
Int	0.065		Cap Fact	0.9	2,191,752	MWh	
Depr	0.025		H.R.	9838			
Tax	0.004086		Fuel	1.511			14.87
Ins	0.000745		M&O				2.74
Tier @1.10	0.0065			Emis Rate	Tons	Rate (\$/T)	
	0.101331	66,839,857	SO2	0.2	2156.25		0.74
			NOx	0.07	754.69	1396	0.48
Fixed O&M	34.91						
	278	9,704,980					
	_			•	Total Var \$/	MWh	18.82
Fixed \$\$		76,544,837					
	MWh	2,191,752					

Tot Fix \$/MWh

34.92



PUBLIC SERVICE COMMISSION REQUEST DATED 2/13/07 REQUEST 8

RESPONSIBLE PERSON:

James C. Lamb, Jr.

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 8. State whether EKPC has investigated selling any excess power generated by the proposed Smith CFB Unit outside its system on a contract basis.

Response 8. During January and February 2007, EKPC has had discussions with 6 utilities relating to power sales and/or power purchases. These utilities are as follow:

- 1. E.on
- 2. Soyland Power
- 3. Big Rivers
- 4. North Carolina EMC
- 5. Duke Energy
- 6. City of Hamilton Municipal

The discussions have centered on (1) summer 2007, and/or (2) long-term needs by both parties. Several parties asked about whether EKPC would have excess capacity, due to Warren RECC withdrawing from its power supply arrangement. EKPC's response is that even with Warren exiting, there is no excess capacity available.

EKPC has not investigated an explicit sale of excess power generated by the proposed Smith CFB unit outside its system on a contract basis, for 2 reasons.

- 1. Smith 1's on-line date of June 2011 will not result in excess power generation from the unit.
- 2. Any power that EKPC would have to sell is going to be non-firm energy, a market product that is highly uncertain. Utilities contemplating the sale or purchase of non-firm energy would typically not enter into negotiations years ahead of the proposed transaction.

PUBLIC SERVICE COMMISSION REQUEST DATED 2/13/07 REQUEST 9

RESPONSIBLE PERSON:

James C. Lamb, Jr.

COMPANY:

East Kentucky Power Cooperative, Inc.

Request 9 State whether EKPC has considered the sale of a portion of the capacity of the proposed Smith CFB Unit going to another entity. If EKPC is not interested in such sale, explain why not.

Response 9. EKPC has not considered the sale of a portion of the capacity of the proposed Smith CFB unit not because of a lack of interest, but for the following reason: as the attached graph shows, EKPC will not have any excess capacity, either from Smith 1 or any other generator.

Please see 7c above for an explanation of the dispatch characteristics of Smith 1 – because it will dispatch ahead of most of EKPC's generating units, any times during the year where there is excess capacity, such excess will in all likelihood be its fleet of combustion turbines. The attached graph provides an illustration of this for the years 2007 - 2020.

