



JUN 2 5 2007

 $S T O L L \cdot K E E N O N \cdot O G D E N PUBLIC SERVICE COMMISSION$ 

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ROBERT M. WATT, III 859-231-3043 robert.watt@skofirm.com

June 22, 2007

Hon. Elizabeth O'Donnell Executive Director Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602-0615

> Re: Case No. 2007-00155 Kentucky Power Company

Dear Ms. O'Donnell:

We enclose for filing an original and ten (10) copies of Equitable Resources, Inc.'s Response to Staff Data Requests at the June 20, 2007, Informal Conference in the above-captioned case. Thank you for your assistance.

Sincerely,

Robert Wan

Robert M. Watt, III

Rmw

Encl.

Cc: David K. Dewey, Esq. (w/encl.) Mark R. Overstreet, Esq. (w/encl.)

## **COMMONWEALTH OF KENTUCKY**

## **BEFORE THE PUBLIC SERVICE COMMISSION**

JUN 2 5 2007 PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF KENTUCKY)POWER COMPANY FOR A CERTIFICATE)OF CONVENIENCE AND NECESSITY)TO CONSTRUCT A 138 KV TRANSMISSION)LINE IN FLOYD COUNTY, KENTUCKY)

CASE NO. 2007-00155

## RESPONSES OF EQUITABLE RESOURCES, INC. TO STAFF DATA REQUESTS AT JUNE 20, 2007, INFORMAL CONFERENCE

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Equitable Resources, Inc. ("Equitable Resources") respectfully submits the following responses to the data requests of the Commission Staff propounded at the June 20, 2007, informal conference in this proceeding.

**Question No. 1**. Could Equitable utilize an energy source other than, or in addition to, electrical power to mitigate the power surge that will occur upon startup of the compressors at the Maytown Compressor Station?

**Response**. Equitable has no plans to have available compressors powered by energy other than electricity at the Maytown Compressor Station. Equitable believes that the maintenance, operation, and engineering design of additional gas engines or cogeneration plants sufficient to start the new electric units at the Compressor Station would amount to unnecessary duplication of the proposed five electric powered compressors. Moreover, the lead time for the acquisition of additional gas compressors is approximately 55 to 60 weeks, an unacceptable delay for the project. Equitable is taking all feasible steps to

mitigate the startup surge in the design by starting the compressors sequentially, rather than simultaneously, and by utilizing reactor starters on the large horsepower units to minimize voltage drop during starting and utilizing soft start drivers on 2 of the 3,000 horsepower units. The soft start drivers will minimize the startup electric load by bringing the units up slowly.

**Question No. 2**. Does Equitable have a backup energy source for the Maytown Compressor Station in the event of a loss of electrical power?

**Response**. Equitable does not have a backup energy source.

**Question No. 3**. Provide an estimate of the additional load for the Maytown Compressor Station if it is expanded.

**Response**. Customer need is still being compiled, but initial polling indicates the potential market for double the throughput of the proposed expansion project. Equitable has not performed a detailed calculation of the additional load if the throughput is doubled. It roughly estimates that the additional average load will be approximately equal to the projected average load for the proposed Maytown Compressor Station project.

Dated this  $\mathbb{Z}$  day of June 2007.

Respectfully submitted,

Robert M. Watt, III Stoll Keenon Ogden, PLLC 300 West Vine Street, Suite 2100 Lexington, KY 40507 859-231-3000 robert.watt@skofirm.com

By\_ Cobert Wan

Counsel for Equitable Resources, Inc.

## **CERTIFICATE OF SERVICE**

This is to certify that the foregoing pleading has been served by mailing a copy of same, postage prepaid, to the following persons on this  $\underline{\mathcal{Led}}$  day of June 2007:

Mark R. Overstreet, Esq. Stites & Harbison, PLLC P.O. Box 634 Frankfort, KY 40602-0634

By\_ Robert a an

Counsel for Equitable Resources, Inc.