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MAY 15 2008

**PUBLIC SERVICE
COMMISSION**

May 15, 2008

HAND DELIVERED

Ms. Stephanie L. Stumbo
Executive Director
Public Service Commission
Post Office Box 615
211 Sower Boulevard
Frankfort, KY 40602

Re: Case No. 2008-00115

Dear Ms. Stumbo:

Please find enclosed for filing with the Commission in the above-referenced case an original and six copies of the responses of East Kentucky Power Cooperative, Inc., to the Commission Staff first data requests dated May 1, 2008, and the Kentucky Industrial Utility Customers, Inc. first data requests dated April 29, 2008.

Very truly yours,



Charles A. Lile
Corporate Counsel

Enclosures

Cc: Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY)	
POWER COOPERATIVE, INC., FOR)	CASE NO. 2008-00115
APPROVAL OF AN AMENDMENT TO ITS)	
ENVIRONMENTAL COMPLIANCE PLAN)	
AND ENVIRONMENTAL SURCHARGE)	

RESPONSES TO FIRST SET OF DATA REQUESTS OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.
TO EAST KENTUCKY POWER COOPERATIVE, INC.
DATED APRIL 29, 2008

**EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2008-00115
RESPONSES TO KIUC FIRST SET OF DATA REQUESTS**

KIUC'S FIRST SET OF DATA REQUESTS DATED 04/29/08

REQUEST 1

RESPONSIBLE PERSON: Ann F. Wood/James C. Lamb, Jr.

COMPANY: East Kentucky Power Cooperative, Inc.

Request 1. Refer to Exhibit WAB-3 page 1 of 2. Please describe the second numeric column on this exhibit entitled "Amount at end of Test Year (Millions \$)" and identify the source of the amounts in that column.

Response 1. The second numeric column on Exhibit WAB-3 Page 1 of 2 entitled "Amount at end of Test Year (Millions \$)" represents the CWIP project balances net of AFUDC, rounded to the nearest \$100K, as of September 30, 2006. The detailed amounts are reflected on page 2 of 2 of this response.

<u>Acct</u>	<u>Project Description</u>	<u>CWIP Project Balance net of AFUDC, @ 9/30/06</u>	<u>AFUDC charged to project for the test year ended 9/30/06</u>
10720	Spurlock Scrubber 1	\$ 1,372,495	\$ 19,721
10720	Spurlock 4	\$ 179,771,312	\$ 6,183,347

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REQUEST 2

RESPONSIBLE PERSON: James C. Lamb, Jr.

COMPANY: East Kentucky Power Cooperative, Inc.

Request 2. Refer to the response to the preceding question. If the amounts in the referenced column represent amounts at the end of the test year in Case No. 2006-00472, then please explain why these amounts are not included in the computation of the BESF factor detailed on Exhibit WAB-2.

Response 2. Although the amounts in the referenced column represent amounts at the end of the test year in Case No. 2006-00472, these amounts were not considered for calculation of the BESF factor detailed on Exhibit WAB-2. Case No. 2006-00472 was a TIER-based rate case, meaning return on CWIP was not explicitly considered in the Application or in the final Order. EKPC's base rate case was based on an income statement approach, versus a balance sheet (return) approach.

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REQUEST 3

RESPONSIBLE PERSON: James C. Lamb, Jr.

COMPANY: East Kentucky Power Cooperative, Inc.

Request 3. Refer to Exhibit WAB-3 page 1 of 2. Please provide the computation and all other support for the 15% pollution control portion of the Spurlock 4 pollution control facilities.

Response 3. Shown below is the computation for the 15% pollution control portion of the Spurlock 4 facilities.

	(dollars in thousands)	
Total capital cost for pollution control equipment (from Exhibit CAJ-1 of Johnson testimony)	\$84,747	(a)
Forecasted cost of Spurlock 4 (from Exhibit WAB-3, page 1 of 2 of Bosta testimony)	\$570,000	(b)
(a) divided by (b)	14.87% (rounded to 15%)	

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REQUEST 4

RESPONSIBLE PERSON: James C. Lamb, Jr.

COMPANY: East Kentucky Power Cooperative, Inc.

Request 4. Refer to Exhibit WAB-3 page 2 of 2. Please explain why the Company used the amount of \$474.3 million for the capital costs to determine the “Annual Revenue Requirement—New ES Projects” given that this amount includes AFUDC, which the Company states that it does not intend to include in the surcharge.

Response 4. Exhibit WAB-3 Page 2 of 2 was included simply to provide a broad estimate of annual cost recovery associated with the new projects.

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REQUEST 5

RESPONSIBLE PERSON: James C. Lamb, Jr.

COMPANY: East Kentucky Power Cooperative, Inc.

Request 5. Refer to Exhibit WAB-3 page 2 of 2. Please provide the computation of the 14.3% fixed charge rate.

Response 5. The computation of and support for the 14.3% fixed charge rate are provided on pages 2 through 5.

**EAST KENTUCKY POWER COOPERATIVE
COMPUTATION OF FIXED CHARGE RATE**

I. Derivation of Fixed Charge Rate

	<u>FCR</u>	<u>Source</u>
Interest	5.29	Average interest cost of existing projects, plus Spurlock #4 pollution control and scrubbers. See Pages 2 and 3.
TIER (Based on 1.35)	1.85	Based on TIER level for Case 2006-00472.
Depreciation	2.96	See Page 4.
Taxes & Insurance	0.43	See Page 4.
Sub-Total	<u>10.53</u>	
Fixed O & M	1.39	See Page 4.
Sub-Total	<u>11.92</u>	
Variable O & M	2.38	See Page 4.
Total	<u><u>14.30</u></u>	

ADJUSTMENT FOR INTEREST ON LONG-TERM DEBT

INDEBTEDNESS

Type of Debt Issue	Loan #	Date of Issue	Date of Maturity	Outstanding 09/30/2006	Amount Issued	Interest Rate	Gilbert SCR's	Weighted Average SCR's	Interest Expense	Weighted Average Gilbert Interest Expense
HO-720	Y-8 - Spur 1/2 SCR	07-03-2003	12-31-2032	24,274,565.97	25,000,000.00	4.460%	25,000,000	1,115,000.00	1,115,000.00	2,372,000.00
HO-725	Y-8 - Spur 1/2 SCR	07-17-2003	12-31-2032	24,313,057.79	25,000,000.00	4.819%	25,000,000	1,204,750.00	1,204,750.00	2,412,500.00
HO-730	Y-8 - Spur 1/2 SCR	07-24-2003	12-31-2032	24,132,051.65	24,800,000.00	4.950%	24,800,000	1,227,600.00	1,227,600.00	2,473,000.00
HO-735	T62 - Misc. transm	08-26-2003	12-31-2024	3,631,864.55	3,938,000.00	5.055%				1,164,500.00
HO-740	W-8 - misc. transm	10-02-2003	12-31-2030	2,423,363.88	2,550,000.00	4.753%				1,124,250.00
HO-745	X-8 - CT4-5	10-02-2003	12-31-2024	2,454,928.56	2,660,000.00	4.501%				1,176,250.00
HO-750	Y-8 - Spur 1/2 SCR	10-23-2003	12-31-2032	24,341,052.08	25,000,000.00	5.091%	25,000,000	1,272,750.00	1,272,750.00	2,372,000.00
HO-755	Y-8 - Spur 1/2 SCR	11-04-2003	12-31-2032	24,346,892.90	25,000,000.00	5.149%	25,000,000	1,287,250.00	1,287,250.00	2,412,500.00
HO-760	Y-8 - Spur 1/2 SCR	11-14-2003	12-31-2032	24,338,419.18	25,000,000.00	5.065%	25,000,000	1,266,250.00	1,266,250.00	2,473,000.00
HO-765	Y-8 - Spur 1/2 SCR	11-25-2003	12-31-2032	24,332,921.94	25,000,000.00	5.011%	25,000,000	1,252,750.00	1,252,750.00	2,473,000.00
HO-770	Y-8 - Spur 1/2 SCR	12-04-2003	12-31-2032	26,294,644.32	27,000,000.00	5.149%	27,000,000	1,390,230.00	1,390,230.00	2,473,000.00
HO-775	W-8 - misc. transm	02-05-2004	12-31-2030	6,211,049.25	6,500,000.00	4.854%				1,176,250.00
HO-780	W-8 - misc. transm	05-06-2004	12-31-2030	2,174,865.63	2,260,000.00	5.240%				2,372,000.00
HO-785	X-8 - CT4-5	05-06-2004	12-31-2024	3,883,084.29	4,130,000.00	5.020%				2,372,000.00
HO-790	W-8 - misc. transm	08-26-2004	12-31-2030	16,308,638.51	16,900,000.00	4.921%				2,412,500.00
HO-795	W-8 - misc. transm	11-01-2004	12-31-2030	6,486,471.24	6,700,000.00	4.672%				2,473,000.00
HO-800	W-8 - misc. transm	11-16-2004	12-31-2030	3,138,499.09	3,240,000.00	4.795%				2,473,000.00
HO-805	X-8 - CT4-5	11-16-2004	12-31-2024	5,368,924.60	5,644,000.00	4.577%				2,473,000.00
HO-810	Z-8 - Gilbert	12-16-2004	12-31-2038	49,644,827.18	50,000,000.00	4.744%	50,000,000		50,000,000	2,372,000.00
HO-815	Z-8 - Gilbert	12-22-2004	12-31-2038	49,649,604.66	50,000,000.00	4.825%	50,000,000		50,000,000	2,412,500.00
HO-820	Z-8 - Gilbert	12-29-2004	12-31-2038	49,656,611.97	50,000,000.00	4.946%	50,000,000		50,000,000	2,473,000.00
HO-825	Z-8 - Gilbert	02-02-2005	12-31-2038	24,819,839.04	25,000,000.00	4.658%	25,000,000		25,000,000	1,164,500.00
HO-830	Z-8 - Gilbert	02-08-2005	12-31-2038	24,814,911.87	25,000,000.00	4.497%	25,000,000		25,000,000	1,124,250.00
HO-835	Z-8 - Gilbert	05-10-2005	12-31-2038	24,821,250.97	25,000,000.00	4.705%	25,000,000		25,000,000	1,176,250.00

HO-840	Z-8 - Gilbert	06-02-2005	12-31-2038	24,809,715.20	25,000,000.00	4.332%	25,000,000	1,083,000.00
HO-845	Z-8 - Gilbert	06-07-2005	12-31-2038	18,855,189.15	19,000,000.00	4.324%	19,000,000	821,560.00
HO-850	AAS - LFGTE	06-09-2005	12-31-2030	12,937,581.98	13,192,000.00	4.353%		
HO-855	Z-8 - Gilbert	08-26-2005	12-31-2038	29,776,811.24	30,000,000.00	4.468%	30,000,000	1,340,400.00
HO-860	Z-8 - Gilbert	08-30-2005	12-31-2038	29,776,886.10	30,000,000.00	4.470%	30,000,000	1,341,000.00
HO-865	W-8 - misc. transm	08-19-2005	12-31-2030	3,613,604.69	3,675,000.00	4.485%		
HO-870	Z-8 - Gilbert	10-14-2005	12-31-2038	29,787,785.51	30,000,000.00	4.769%	30,000,000	1,430,700.00
HO-875	W-8 - misc. transm	11-09-2005	12-31-2030	2,051,776.92	2,075,000.00	4.858%		
HO-880	X-8 - CT4-5	11-09-2005	12-31-2024	556,287.10	566,000.00	4.789%		
HO-885	Y-8 - Spur 1/2 SCR	03-27-2006	12-31-2032	6,472,752.87	500,000.00	4.890%	500,000.00	24,450.00
HO-890	Z-8 - Gilbert	05-03-2006	12-31-2038	15,000,000.00	15,000,000.00	5.345%	15,000,000	801,750.00
HO-895	Z-8 - Gilbert	05-09-2006	12-31-2038	10,000,000.00	10,000,000.00	5.333%	10,000,000	533,300.00
FO-900	AB-8 - CT 6-7	08-23-2006	12-31-2034	15,000,000.00	15,000,000.00	5.070%		
FO-905	AB-8 - CT 6-7	08-25-2006	12-31-2034	15,000,000.00	15,000,000.00	5.061%		
FO-910	AB-8 - CT 6-7	08-29-2006	12-31-2034	23,000,000.00	23,000,000.00	5.053%		

Gilbert Portion Pertaining to Pollution Control

384,000,000	202,300,000	10,041,030	18,074,210
57,600,000			2,711,132

Total FFB

Weighted Average
SCR's

Weighted Average - Gilbert &
SCR's

4.91

(15% of Gilbert)

New Projects

Spur #1 Scrubber	172,890,000	5.500%	9,508,950
Spur #2 Scrubber	207,400,000	5.500%	11,407,000
Spur Unit #4	85,470,000	5.500%	4,700,850

Totals

25,616,800

465,760,000

Weighted Avg
All -

SCR's, Gilbert, Scrubbers & Spur #4

5.29

EAST KENTUCKY POWER COOPERATIVE
ENVIRONMENTAL SURCHARGE
EXHIBIT WAB-3

FIXED CHARGE RATE WEIGHTED AVERAGE CALCULATION

Weighted	Average	Total	Total Cost			Spurlock 4 SNCR			Spurlock 2 Scrubber			Spurlock 1 Scrubber		
			of New Projects	FCR	Cost of Project	FCR	Cost of Project	FCR	Cost of Project	FCR	Cost of Project			
		(\$000)	(\$000)	(\$000)	(\$000)	(\$000)	(\$000)	(\$000)	(\$000)	(\$000)	(\$000)	(\$000)	(\$000)	
Depreciation	2.96%	13,771	465,760	2.50	207,400	2.96	207,400	6,145	172,890	3.17	5,489	172,890	3.17	
Taxes & Insurance	0.43%(a)	2,026	465,760	0.35	207,400	0.44	207,400	907	172,890	0.47	816	172,890	0.47	
Fixed O & M	1.39%	6,479	465,760	0.00	207,400	1.93	207,400	4,006	172,890	1.43	2,473	172,890	1.43	
Variable O & M	2.38%	11,048	465,760	5.33	4,560	1.83	207,400	3,805	172,890	1.55	2,683	172,890	1.55	

(a) Based on actual

**EAST KENTUCKY POWER COOPERATIVE, INC.
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KIUC'S FIRST SET OF DATA REQUESTS DATED 04/29/08

REQUEST 6

RESPONSIBLE PERSON: Ann F. Wood/James C. Lamb, Jr.

COMPANY: East Kentucky Power Cooperative, Inc.

Request 6. Please provide the September 30, 2006 and March 30, 2007 CWIP balances for each of the Company's environmental compliance projects 3- 10. Reconcile the Spurlock 1 and 4 environmental CWIP amounts to the CWIP amounts shown in the second numeric column on Exhibit WAB-3 page 1 of 2.

Response 6. The September 30, 2006 and March 31, 2007 CWIP balances for the Spurlock Scrubber 1, Spurlock Scrubber 2, and Spurlock 4 are included on page 2 of this response. The remaining projects in this Application have no CWIP balances as of the referenced dates. The second numeric column on Exhibit WAB-3 page 1 of 2 represents the CWIP project balances net of AFUDC, rounded to the nearest \$100K, as of September 30, 2006 for Spurlock Scrubber 1 and Spurlock Unit 4.

KIUC Request 6

Page 2 of 2

Acct	Project Descr	Gross CWIP Balance @ 9/30/06	AFUDC as of 9/30/06	Net CWIP Balance @ 9/30/06
10720	Spurlock Scrubber 1	1,392,216	19,721	1,372,495
10720	Spurlock Scrubber 2	21,003,802	436,263	20,567,539
10720	Spurlock Unit 4	185,954,659	6,183,347	179,771,312

Acct	Project Descr	Gross CWIP Balance @ 3/31/07	AFUDC as of 3/31/07	Net CWIP Balance @ 3/31/07
10720	Spurlock Scrubber 1	9,592,817	183,790	9,409,027
10720	Spurlock Scrubber 2	56,640,723	1,389,459	55,251,264
10720	Spurlock Unit 4	260,340,962	12,068,049	248,272,913

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REQUEST 7

RESPONSIBLE PERSON: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

Request 7. Please confirm that the Company will discontinue AFUDC on all CWIP amounts included in rate base in the environmental surcharge. If this will not be the case, please explain why the Company should earn a current return through the surcharge and defer another return on the same CWIP balance and add it to the CWIP cost for accounting purposes.

Response 7. EKPC is neither including CWIP, nor AFUDC, in the cost of projects currently being recovered under the surcharge. This filing is requesting future recovery of a return on CWIP net of AFUDC.

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REQUEST 8

RESPONSIBLE PERSON: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

Request 8. Refer to Exhibit AFW-2 page 1 of 2. Please provide all support for the operation and maintenance expense associated with the old Spurlock 2 scrubber.

Response 8. Support for the operation and maintenance expense associated with the old Spurlock 2 scrubber is included on page 2 of this response. This detail reflects the activity for the test year ended September 30, 2006.

KIUC First Data Request 8 Scrubber O and M.xls

Acct	Department	Prod	Proj	Journal Date	GL Journal ID	Journal Line Description	Monetary Amount	Account Description
51243 007	1800	03500	2005-12-31	AL00000001	BENEFITS ALLOCATION - TAXES	15.03	Maint of Boiler Plant Scrubber	
51243 010	1800	03500	2005-12-31	AL00000003	BENEFITS ALLOCATION - LBR HRS	-27.74	Maint of Boiler Plant Scrubber	
51243 010	1800	03500	2005-12-31	AL00000002	BENEFITS ALLOCATION - LABOR \$	16.62	Maint of Boiler Plant Scrubber	
51243 400	1000	03500	2005-12-31	PR00011265	Payroll	0.00	Maint of Boiler Plant Scrubber	
51243 400	1100		2005-12-31	YEPRACCRL	Payroll Accrual True Up	29.59	Maint of Boiler Plant Scrubber	
51243 400	3000	03500	2005-12-31	MR00011280	Material	32.12	Maint of Boiler Plant Scrubber	
51243 400	1000	03500	2005-12-31	PR00011265	Payroll	223.12	Maint of Boiler Plant Scrubber	
51243 400	3000	03703	2005-12-31	AP00011378	Accounts Payable Accruals	3,185.88	Maint of Electric Plant Scrubb	
51343 400	3000	03703	2005-12-31	AP00011428	Accounts Payable Accruals	3,423.59	Maint of Electric Plant Scrubb	
51343 400	1800	03500	2006-01-31	AL00000001	BENEFITS ALLOCATION - TAXES	39.66	Maint of Boiler Plant Scrubber	
51243 007	1800	03500	2006-01-31	AL00000003	BENEFITS ALLOCATION - LBR HRS	16.54	Maint of Boiler Plant Scrubber	
51243 010	1800	03500	2006-01-31	AL00000002	BENEFITS ALLOCATION - LABOR \$	27.06	Maint of Boiler Plant Scrubber	
51243 010	1800		2006-01-31	YEPRACCRL	Payroll Accrual True Up	-29.59	Maint of Boiler Plant Scrubber	
51243 400	1400	03500	2006-01-31	PR00011480	Payroll	0.00	Maint of Boiler Plant Scrubber	
51243 400	1000	03500	2006-01-31	PR00011605	Payroll	0.00	Maint of Boiler Plant Scrubber	
51243 400	1100	03500	2006-01-31	PR00011605	Payroll	58.57	Maint of Boiler Plant Scrubber	
51243 400	1000	03500	2006-01-31	PR00011605	Payroll	83.67	Maint of Boiler Plant Scrubber	
51243 400	1400	03500	2006-01-31	PR00011480	Payroll	359.68	Maint of Boiler Plant Scrubber	
51243 400	1100	03500	2006-02-28	PR00011711	Payroll	-58.57	Maint of Boiler Plant Scrubber	
51243 400	3000	03500	2006-04-30	MR00012054	Material	40.57	Maint of Boiler Plant Scrubber	
51243 400	3000	03500	2006-06-30	MR00012334	Material	23.26	Maint of Boiler Plant Scrubber	
51243 400				O&M		7,459.06		

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REQUEST 9

RESPONSIBLE PERSON: Craig A. Johnson

COMPANY: East Kentucky Power Cooperative, Inc.

Request 9. Please provide a copy of all economic studies, e-mails, or other documents that address in any respect savings, particularly in operation and maintenance expenses, resulting from replacing the Spurlock 2 scrubber.

Response 9. Please see attached information.

East Kentucky Power Cooperative
Limestone Scrubber Study
Detailed Savings (Costs) Due to Scrubber Operation

	Year 2008 - 2036 NAP-WV - Piffs 6.0 lb.
Fuel Savings	\$810,203,360
Emission Allowance Savings	138,927,516
Operation Labor & Benefits for Scrubber	(61,806,250)
Scrubber Maintenance	(84,071,000)
Fixed Costs Related to Scrubber Capital Expenditures	(291,019,364)
Limestone for Scrubber	(55,506,162)
Landfill Cost Including Ash Disposal	(7,032,327)
Energy Replacement	(61,712,000)
Total Savings (Costs) Due to Scrubber Operation	\$387,983,773

Assumptions:

Fuel comparisons are between the scenarios of Compliance Coal (CAPP - Pike 1.2 lb.) without scrubber operation versus burning Non-compliance Coal (NAP-WV - Piffs 6.0 lb.) with scrubber operation.

Fuel prices and SO2 allowance prices are from EVA projections.

Year	Escalated @ 3%	Labor - 25 people @ \$55,000 + Benefits 1.55x	Escalated @ 3% (beginning with Stanley Consultants \$)	Escalated Lime @ 3%	EVA SO2 Allowances	Escalated Scrubber Landfill @ 3%	Escalated Capacity Repl. @ 3%	Escalated Ash Penalty for Boiler Maint. @ 3%	Escalated Ash Landfill @ 3%	Escalated Limestone Cost @ 3%	Fixed Costs Rate %
2008	2,195,187.50	2,985,970.00	55.11	\$600.00	2.58	195.70	0.167	2.58	9.06	11.13	11.13
2009	2,261,043.13	3,075,549.10	56.76	\$562.00	2.65	201.57	0.172	2.65	9.34	11.05	11.05
2010	2,328,874.42	3,167,815.57	58.46	\$662.00	2.73	207.62	0.177	2.73	9.62	10.97	10.97
2011	2,398,740.65	3,262,850.04	60.21	\$806.00	2.81	213.85	0.182	2.81	9.90	10.88	10.88
2012	2,470,702.87	3,360,735.54	62.02	\$929.00	2.90	220.26	0.188	2.90	10.20	10.78	10.78
2013	2,544,823.96	3,461,557.61	63.88	\$1,069.00	2.99	226.87	0.193	2.99	10.51	10.68	10.68
2014	2,621,168.68	3,565,404.34	65.80	\$953.00	3.07	233.68	0.199	3.07	10.82	10.57	10.57
2015	2,699,803.74	3,672,366.47	67.77	\$1,078.00	3.17	240.69	0.205	3.17	11.15	10.45	10.45
2016	2,780,797.85	3,782,537.46	69.81	\$1,102.00	3.26	247.91	0.211	3.26	11.48	10.32	10.32
2017	2,864,221.78	3,896,013.58	71.90	\$896.00	3.36	255.34	0.218	3.36	11.83	10.18	10.18
2018	2,950,148.44	4,012,893.99	74.06	\$730.00	3.46	263.00	0.224	3.46	12.16	10.03	10.03
2019	3,038,652.89	4,133,280.81	76.28	\$594.00	3.56	270.89	0.231	3.56	12.55	9.87	9.87
2020	3,129,812.48	4,257,279.24	78.57	\$483.00	3.67	279.02	0.238	3.67	12.92	9.70	9.70
2021	3,223,706.85	4,384,997.61	80.92	\$394.00	3.78	287.39	0.245	3.78	13.31	9.52	9.52
2022	3,320,418.06	4,516,547.54	83.35	\$321.00	3.89	296.01	0.252	3.89	13.71	9.32	9.32
2023	3,420,030.60	4,652,043.97	85.85	\$261.00	4.01	304.89	0.260	4.01	14.12	9.11	9.11
2024	3,522,631.52	4,791,605.29	88.43	\$213.00	4.13	314.04	0.268	4.13	14.55	8.88	8.88
2025	3,628,310.46	4,935,353.44	91.08	\$173.00	4.26	323.46	0.276	4.26	14.98	8.64	8.64
2026	3,737,159.78	5,083,414.05	93.81	\$141.00	4.38	333.17	0.284	4.38	15.43	8.38	8.38
2027	3,849,274.57	5,235,916.47	96.63	\$115.00	4.52	343.16	0.293	4.52	15.89	8.10	8.10
2028	3,964,752.81	5,392,993.96	99.53	\$103.00	4.65	353.46	0.301	4.65	16.37	7.79	7.79
2029	4,083,695.39	5,554,783.78	102.51	\$91.00	4.79	364.06	0.310	4.79	16.86	7.47	7.47
2030	4,206,206.25	5,721,427.30	105.69	\$79.00	4.93	374.98	0.320	4.93	17.37	7.12	7.12
2031	4,332,992.44	5,893,070.11	108.75	\$67.00	5.08	386.23	0.329	5.08	17.89	6.75	6.75
2032	4,462,364.21	6,069,862.22	112.02	\$55.00	5.23	397.82	0.339	5.23	18.43	6.35	6.35
2033	4,596,235.14	6,251,958.08	115.38	\$43.00	5.39	409.75	0.349	5.39	18.98	5.92	5.92
2034	4,734,122.19	6,439,516.83	118.84	\$31.00	5.55	422.04	0.360	5.55	19.55	5.46	5.46
2035	4,876,145.86	6,632,702.33	122.40	\$19.00	5.72	434.71	0.371	5.72	20.13	4.96	4.96
2036	5,022,430.23	6,831,683.40	126.08	\$7.00	5.89	447.75	0.382	5.89	20.74	4.43	4.43

Scrubber Cost Analysis
Year 2008 through Year 3036
Escalation Rates
SO2 Allowances Based on EVA Projections

Spurlock Station

Revised Price Forecast (2-25-05)

Year	Region	CAPP Pike	NAP-WV Pitts
	Btu/lb	12,000	12,200
	#SO2/MMBtu	1.2	6
	% Ash	11	10
	<u>Trans.</u>	<u>TK/BG</u>	<u>Rate</u>
2008		1.941	1.333
2009		1.945	1.378
2010		1.978	1.416
2011		2.050	1.418
2012		2.101	1.426
2013		2.168	1.420
2014		2.222	1.438
2015		2.290	1.432
2016		2.340	1.440
2017		2.390	1.450
2018		2.440	1.460
2019		2.490	1.470
2020		2.540	1.480
2021		2.590	1.490
2022		2.640	1.500
2023		2.690	1.510
2024		2.740	1.520
2025		2.790	1.530
2026		2.840	1.540
2027		2.890	1.550
2028		2.940	1.560
2029		2.990	1.570
2030		3.040	1.580
2031		3.090	1.590
2032		3.140	1.600
2033		3.190	1.610
2034		3.240	1.620
2035		3.290	1.630
2036		3.340	1.640
	Average from 2008-2036	2.632	1.503
	Difference		1.129

East Kentucky Power Cooperative
Limestone Scrubber Study
Annual Savings (Costs) Due to Scrubber Operation

Year	Fixed Costs for Scrubber Capital Exp.		Limestone for Scrubber		Landfill Cost Including Ash Disposal		Energy Replacement	
	CAPP - Pike 1.2 lb.	NAP-WV Pits 6.0 lb.	CAPP - Pike 1.2 lb.	NAP-WV Pits 6.0 lb.	CAPP - Pike 1.2 lb.	NAP-WV Pits 6.0 lb.	CAPP - Pike 1.2 lb.	NAP-WV Pits 6.0 lb.
2008	\$0	\$18,275,460	\$0	\$1,971,426	\$477,644	\$727,413	\$0	\$2,181,840
2009	0	18,144,100	0	2,030,569	481,974	748,236	0	2,257,595
2010	0	18,012,740	0	2,091,486	506,733	771,713	0	2,325,323
2011	0	17,864,960	0	2,154,230	521,935	794,864	0	2,395,083
2012	0	17,700,760	0	2,218,857	537,593	818,710	0	2,466,935
2013	0	17,536,560	0	2,285,423	553,721	843,271	0	2,540,943
2014	0	17,355,940	0	2,353,985	570,332	868,570	0	2,617,172
2015	0	17,158,900	0	2,424,805	587,442	894,627	0	2,695,667
2016	0	16,945,440	0	2,497,343	605,066	921,465	0	2,776,557
2017	0	16,715,560	0	2,572,263	623,218	949,109	0	2,859,854
2018	0	16,469,260	0	2,649,431	641,914	977,583	0	2,945,650
2019	0	16,206,540	0	2,728,914	661,172	1,006,910	0	3,034,019
2020	0	15,927,400	0	2,810,782	681,007	1,037,118	0	3,125,040
2021	0	15,631,840	0	2,895,105	701,437	1,068,231	0	3,218,791
2022	0	15,303,440	0	2,981,958	722,480	1,100,278	0	3,315,355
2023	0	14,958,620	0	3,071,417	744,155	1,133,286	0	3,414,815
2024	0	14,580,960	0	3,163,560	766,479	1,167,285	0	3,517,260
2025	0	14,186,880	0	3,258,466	789,474	1,202,303	0	3,622,778
2026	0	13,759,960	0	3,356,220	813,158	1,238,373	0	3,731,461
2027	0	13,300,200	0	3,456,907	837,552	1,275,524	0	3,843,405
2028	0	12,791,180	0	3,560,614	862,679	1,313,789	0	3,958,707
2029	0	12,265,740	0	3,667,433	888,559	1,353,203	0	4,077,469
2030	0	11,691,040	0	3,777,456	915,216	1,393,799	0	4,199,792
2031	0	11,083,500	0	3,890,779	942,673	1,435,613	0	4,325,788
2032	0	10,426,700	0	4,007,503	970,953	1,478,682	0	4,455,559
2033	0	9,720,640	0	4,127,728	1,000,081	1,523,042	0	4,589,226
2034	0	8,965,320	0	4,251,560	1,030,084	1,568,733	0	4,726,903
2035	0	8,144,320	0	4,379,106	1,060,986	1,615,795	0	4,868,710
2036	0	7,274,060	0	4,510,480	1,092,816	1,664,269	0	5,014,771
Net Present Value	\$0	\$291,019,364	\$0	\$55,506,162	\$13,448,242	\$20,480,569	\$0	\$61,712,000
Savings (Cost)		(\$291,019,364)		(\$55,506,162)		(\$7,032,327)		(\$61,712,000)

East Kentucky Power Cooperative
 Limestone Scrubber Study
 Annual Savings (Costs) Due to Scrubber Operation

Year	Total	
	CAPP - Pike 1.2 lb.	NAP-WV Pits 6.0 lb.
2008	\$88,964,643	\$83,715,011
2009	88,511,806	85,617,103
2010	91,517,515	87,571,469
2011	96,830,419	88,165,892
2012	100,946,250	88,946,654
2013	105,991,509	89,210,946
2014	106,273,300	89,834,632
2015	111,111,702	90,051,305
2016	113,550,182	90,580,009
2017	112,181,770	90,660,205
2018	111,476,062	90,820,104
2019	111,267,536	91,046,390
2020	111,473,437	91,327,590
2021	112,044,121	91,656,966
2022	112,880,282	92,004,286
2023	113,932,277	92,379,253
2024	115,183,569	92,763,486
2025	116,567,984	93,164,346
2026	118,085,480	93,565,843
2027	119,703,030	93,963,678
2028	121,653,069	94,360,808
2029	123,403,861	94,757,414
2030	125,255,430	95,121,132
2031	127,107,799	95,468,872
2032	128,960,991	95,784,720
2033	130,815,031	96,099,199
2034	132,669,946	96,322,845
2035	134,525,760	96,529,789
2036	136,382,502	96,707,024
Net Present Value	\$2,138,229,111	\$1,750,245,341
Savings (Cost)		<u>\$387,983,770</u>

1.	Average Heat Rate	10,000 Btu/kWh	
2.	SO2 Removal Rate	98.00 %	
3.	Lbs Reagent/lb SO2 in gas (Lime/Limestone)	1.88 lbs. Limestone / lbs. SO2 Removed	
4.	SO2 Produced	1.95 (%S) / 100 = lbs. SO2 Produced / lb. Coal Fired	
5.	Process Plant Lime Consumption	0 lbs. Process Lime Used / ton Dry Sludge	
6.	Recycle Pumps Required per Absorber	3 per Absorber	
7.	Number of Absorbers	4 Absorbers	
8.	Average Spurtack Unit 2 Load	525 MW	
9.	Process Plant Hours of Operation	24 Hrs.	
10.	Scrubber & Process Plant Electrical Load	13.5 MW	
11.	Coal Burned in Unit 2 is based on the heat rate and mw produced.	11200 KW	
12.	FGD Energy Consumption (Lime/Limestone)	0.88	
13.	Plant Factor	8,760 hours	
14.	Operational hours per year	\$2,195,187.50 per year	
15.	Labor (25 people, \$55,000, Benefits 1.55)	\$9.06 per ton	
16.	Reagent Costs (Lime/Limestone)	\$600.00 per ton SO2	
17.	Current Price for SO2 Allowances	\$0.00 per ton	
18.	Process Lime Costs	\$2.58 per ton	
19.	Scrubber Landfill Costs	\$2,649,208.10 per year	
20.	Maintenance	16,554 year 2000 Phase II	
21.	Capacity Cost for 13.5 MW	\$0	
22.	C&M Allowances Spurtack Unit 2	\$195,700 /KWY	
23.	FRB Capital Expenditure	11.130 %	
24.	Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$0.167 / % Ash / ton of Coal	
25.	Capacity Replacement Cost	\$2.575 per ton of Ash	
26.	Carrying Cost (20 years)	\$0	
27.	Ash Penalty for Boiler Maintenance	\$18,275,460	
28.	Ash Landfill Cost	40,471,200 mmbWY	
29.	Annual payment for FRB Capital Expenditure (30 year)		
30.	Annual payment for Scrubber Capital Expenditure (20 year)		
31.	Annual Btu requirements for Unit 2 based on Heat Rate and Output		
CAPP	Pike	1.941	
NAP-WV	Pike	1.333	
Coal Suppliers	Coal	\$78,554,599	
Coal	Del. Price (\$/mmbtu)	\$53,948,110	
Coal	Del. Cost (\$/M)	1,658,658	
Coal	(Btu/lb.)	12,200	
Sulfur	(%)	0.74	
Ash	(%)	10.00	
Landfill	(\$/M)	\$427,104	
SO2 Scrubbed	(MM)	115,934	
SO2 Not Scrubbed	(T)	2,366	
Allowances Used	(\$)	\$1,419,605	
Lime-stone	(MM)	217,501	
Lime-stone	(\$/M)	\$1,971,426	
Dry LS Product	(MM)	116,625	
Landfill Cost incl ash (\$/M)		\$477,644	
Limestone Energy Cost (\$/M)		\$2,191,840	
O&M Lime-stone FGD	(\$/M)	\$0	
FRB+Var+Cap	(\$/mmbtu)	\$0.257	
Fuel+FGD	(\$/M)	\$0.736	
Total Cost		\$89,964,644	

10,000 Btu/kwh		Limestone >>>>>>		Coal	Coal	Coal	Coal	Sulfur	Ash	Ash	SO2	SO2	SO2 Not	Allowances	Lime-	Dry LS	Limestone	Limestone FGD	O&M Lime-	FGD Cost	Total Cost	
				(T/Y)	(Btu/lb.)	(T/Y)	(T/Y)	(%)	(%)	Landfill	Scrubbed	Scrubbed	Scrubbed	Used	stone	Product	Landfill Cost	Energy Cost	Stone FGD	Limestone	Limestone	
										(\$/mmBtu)	(T/Y)	(T/Y)	(T)	(\$)	(T/Y)	(T/Y)	incl ash (\$/Y)	(\$/Y)	(\$/Y)	(\$/mmBtu)	(\$/Y)	
1. Average Heat Rate	98.00 %																					
2. SO2 Removal Rate	1.88 lbs. Limestone / lbs. SO2 Removed																					
3. Lbs Reagent/Lb SO2 in gas (Lime/Limestone)	1.95 %(/GS) / 100 = lbs. SO2 Produced / lb. Coal Fired																					
4. SO2 Produced	0 lbs. Process Lime Used / ton Dry Sludge																					
5. Process Plant Lime Consumption	3 per Absorber																					
6. Recycle Pumps Required per Absorber	4 Absorbers																					
7. Number of Absorbers	525 MW																					
8. Average Spurluck Unit 2 Load	24 Hrs.																					
9. Process Plant Hours of Operation	13.5 MW																					
10. Scrubber & Process Plant Electrical Load	11200 KW																					
11. Coal Burned In Unit 2 is based on the heat rate and mw produced.	0.88																					
12. FGD Energy Consumption (Lime/Limestone)	8,760 hours																					
13. Plant Factor	\$2,261,043.13 per year																					
14. Operational hours per year	\$9.34 per ton																					
15. Labor (25 people, \$55,000, Benefits 1.55)	\$562.00 per ton SO2																					
16. Reagent Costs (Lime/Limestone)	\$0.00 per ton																					
17. Current Price for SO2 Allowances	\$2.65 per ton																					
18. Process Lime Costs	\$3,075,549.10 per year																					
19. Scrubber Landfill Costs	\$2,728,684.35 per year																					
20. Maintenance	16,554 year 2000 Phase II																					
21. Capacity Cost for 13.5 MW	\$0																					
22. CAAA Allowances Spurluck Unit 2	\$164,200,000																					
23. PRB Capital Expenditure	\$201,571 /KWY																					
24. Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$11,050 %																					
25. Capacity Replacement Cost	\$0.172 / % Ash / ton of Coal																					
26. Carrying Cost (20 years)	\$2,652 per ton of Ash																					
27. Ash Penalty for Boiler Maintenance	\$0																					
28. Ash Landfill Cost	\$18,144,100																					
29. Annual payment for PRB Capital Expenditure (30 year)	\$0.471,200 mmBtu/Y																					
30. Annual payment for Scrubber Capital Expenditure (20 year)																						
31. Annual Btu requirements for Unit 2 based on Heat Rate and Output																						
Coal Suppliers	Coal Price (\$/mmBtu)	Coal Del. Cost (\$/Y)	Coal (T/Y)	Coal (Btu/lb.)																		
Pike	1.945	\$78,716,484	1,686,300	12,000																		
Pitts	1.378	\$55,769,314	1,658,655	12,200																		

2010

1. Average Heat Rate 10,000 Btu/kwh
2. SO2 Removal Rate 98.00 %
3. Lbs Reagent/Lb SO2 in gas (Lime/Limestone) 1.88 lbs. Limestone / lbs. SO2 Removed
4. SO2 Produced 1.95 %(\$)/ 100 = lbs. SO2 Produced / lb. Coal Fired
5. Process Plant Lime Consumption 0 lbs. Process Lime Used / ton Dry Sludge
6. Recycle Pumps Required per Absorber 3 per Absorber
7. Number of Absorbers 4 Absorbers
8. Average Spurlock Unit 2 Load 525 MW
9. Process Plant Hours of Operation 24 Hrs.
10. Scrubber & Process Plant Electrical Load 13.5 MW
11. Coal Burned in Unit 2 is based on the heat rate and mw produced. 11200 KW
12. FGD Energy Consumption (Lime/Limestone) 0.88
13. Plant Factor 8,760 hours
14. Operational hours per year 8,760 hours
15. Labor (25 people, \$55,000, Benefits 1.55) \$2,328,874.42 per year
16. Reagent Costs (Lime/Limestone) \$9.62 per ton
17. Current Price for SO2 Allowances \$662.00 per ton SO2
18. Process Lime Costs \$0.00 per ton
19. Scrubber Landfill Costs \$2.73 per ton
20. Maintenance \$3,167,815.57 per year
21. Capacity Cost for 13.5 MW \$2,810,544.88 per year
22. CAAA Allowances Spurlock Unit 2 16,554 year 2000 Phase II \$
23. PRB Capital Expenditure \$
24. Scrubber Capital Expenditure (per J. Brandt 7/15/04) Limestone >>>>>> \$164,200,000
25. Capacity Replacement Cost \$207,618 /KWH Gilbert Unit based for Replacement Power
26. Carrying Cost (20 years) 16,970 %
27. Ash Penalty for Boiler Maintenance \$0.177 / % Ash / ton of Coal
28. Ash Landfill Cost \$2,732 per ton of Ash
29. Annual payment for PRB Capital Expenditure (30 year) \$18,012,740 \$0
30. Annual payment for Scrubber Capital Expenditure (20 year) 40,471,200 mmbtu/y
31. Annual Btu requirements for Unit 2 based on Heat Rate and Output

	Coal Suppliers Del. Prices (\$/mmBtu)	Coal Del. Cost (\$/M)	Coal (TY)	Coal (Btu/lb.)	Sulfur (%)	Ash (%)	Ash Landfill (\$/Y)	SO2 Scrubbed (TY)	SO2 Not Scrubbed (T)	Allowances Used (\$)	Lime-stone (TY)	Lime-stone (\$/Y)	Dry LS Product (TY)	Limestone Landfill Cost incl ash (\$/Y)	Limestone Energy Cost (\$/Y)	O&M Lime-Stone FGD (\$/Y)	FGD Cost Lime-stone Fix-Vari-Cap (\$/mmBtu)	Total Cost Lime-stone Fuel+FGD (\$/Y)
	1,978	\$80,052,034	1,666,300	12,000	0.74	11.00	\$508,733	0	16,564	\$10,958,748	0	\$0	0	\$506,733	\$0	\$11,465,481	\$0.283	\$31,517,515
	1,416	\$57,307,219	1,658,656	12,200	3.75	10.00	\$453,114	115,994	2,366	\$1,566,298	217,501	\$2,091,486	116,625	\$771,713	\$2,325,323	\$30,264,249	\$0.748	\$37,571,468

2011

Item	Unit	Value	SO2 Scrubbed (T/Y)	SO2 Not Scrubbed (T)	Allowances Used (\$)	Limestone (T/Y)	Limestone Energy Cost (\$/Y)	Dry LS Product (T/Y)	Limestone Landfill Cost incl ash (\$/Y)	O&M Lime Stone FGD (\$/Y)	FGD Cost Limestone Fix+Var+Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)
1. Average Heat Rate	10,000 Btu/kWh											
2. SO2 Removal Rate	98.00 %											
3. Lbs Reagent/Lb SO2 in gas (Lime/Limestone)	1.88											
4. SO2 Produced	1.95 % (S) / 100 = lbs. SO2 Produced / lb. Coal Fired											
5. Process Plant Lime Consumption per Absorber	0 lbs. Process Lime Used / ton Dry Sludge											
6. Recycle Pumps Required	3 per Absorber											
7. Number of Absorbers	4 Absorbers											
8. Average Spurrlock Unit 2 Load	525 MW											
9. Process Plant Hours of Operation	24 Hrs.											
10. Scrubber & Process Plant Electrical Load	13.5 MW											
11. Coal Burned in Unit 2 is based on the heat rate and mw produced.	11200 KW											
12. FGD Energy Consumption (Lime/Limestone)	0.88											
13. Plant Factor	8,760 hours											
14. Operational hours per year	\$2,398,740.65 per year											
15. Labor (25 people, \$55,000, Benefits 1.55)	\$9.90 per ton											
16. Reagent Costs (Lime/Limestone)	\$806.00 per ton SO2											
17. Current Price for SO2 Allowances	\$0.00 per ton											
18. Process Line Costs	\$2.81 per ton											
19. Scrubber Landfill Costs	\$3,262,850.04 per year											
20. Maintenance	\$2,894,861.22 per year											
21. Capacity Cost for 13.5 MW	16,554 year 2000 Phase II											
22. CAAA Allowances Spurrlock Unit 2	\$0											
23. PRB Capital Expenditure	\$164,200,000											
24. Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$213,847 /KWY											
25. Capacity Replacement Cost	10,880 %											
26. Carrying Cost (20 years)	\$0.182 / % Ash / ton of Coal											
27. Ash Penalty for Boiler Maintenance	\$2,814 per ton of Ash											
28. Ash Landfill Cost	\$0											
29. Annual payment for PRB Capital Expenditure (30 year)	\$17,864,960											
30. Annual payment for Scrubber Capital Expenditure (20 year)	\$0											
31. Annual Btu requirements for Unit 2 based on Heat Rate and Output	40,471,200 mmBtu/Y											

2013

Item	Unit	Value	Coal	Coal Del. Price (\$/mmBtu)	Coal Del. Cost (\$/T)	Coal (T/Y)	Coal (Btu/lb.)	Sulfur (%)	Ash (%)	SO2 Scrubbed (T/Y)	SO2 Not Scrubbed (T)	Allowances Used (\$)	Limestone (T/Y)	Limestone (\$/T)	Dry LS Product (T/Y)	Limestone Landfill Cost incl ash (\$/T)	Limestone Energy Cost (\$/T)	O&M Lime-Stone FGD (\$/T)	FGD Cost Limestone Fix+Var+Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/T)	
1. Average Heat Rate	10,000 Btu/kWh	98.00 %																			
2. SO2 Removal Rate	1.88 lbs. Limestone / lbs. SO2 Removed																				
3. Lbs Reagent/Lb SO2 in gas (Lime/Limestone)	1.95 %(\$S) / 100 = lbs. SO2 Produced / lb. Coal Fired																				
4. SO2 Produced	0 lbs. Process Lime Used / Ton Dry Sludge																				
5. Process Plant Lime Consumption	3 per Absorber																				
6. Recycle Pumps Required per Absorber	4. Absorbers																				
7. Number of Absorbers	525 MW																				
8. Average Spurlcock Unit 2 Load	24 Hrs.																				
9. Process Plant Hours of Operation	13.5 MW																				
10. Scrubber & Process Plant Electrical Load	11200 KW																				
11. Coal Burned in Unit 2 is based on the heat rate and mw produced.	0.88																				
12. FGD Energy Consumption (Lime/Limestone)	8,760 hours																				
13. Plant Factor	\$2,544,823.96 per year																				
14. Operational hours per year	\$10.51 per ton																				
15. Labor (25 people, \$65,000, Benefits 1.55)	\$1,069.00 per ton SO2																				
16. Reagent Costs (Lime/Limestone)	\$0.00 per ton																				
17. Current Price for SO2 Allowances	\$2.99 per ton																				
18. Process Lime Costs	\$3,461,557.61 per year																				
19. Scrubber Landfill Costs	\$3,071,156.27 per year																				
20. Maintenance	16,554 year 2000 Phase II																				
21. Capacity Cost for 13.5 MW	\$0																				
22. CAAA Allowances Spurlcock Unit 2	\$164,200,000																				
23. PRB Capital Expenditure	\$226,870 /KWY Gilbert Unit based for Replacement Power																				
24. Scrubber Capital Expenditure (per J. Brandt 7/15/04)	10.680 %																				
25. Capacity Replacement Cost	\$0.193 / % Ash / ton of Coal																				
26. Carrying Cost (20 years)	\$2.985 per ton of Ash																				
27. Ash Penalty for Boiler Maintenance	\$0																				
28. Ash Landfill Cost	\$17,536,560																				
29. Annual payment for PRB Capital Expenditure (30 year)	40,471,200 mmBtu/Y																				
30. Annual payment for Scrubber Capital Expenditure (20 year)																					
31. Annual Btu requirements for Unit 2 based on Heat Rate and Output																					
CAPP	Coal Suppliers	Coal Del. Price (\$/mmBtu)	Coal Del. Cost (\$/T) <td>Coal (T/Y)</td> <td>Coal (Btu/lb.)</td> <td>Sulfur (%)</td> <td>Ash (%)</td> <td>SO2 Scrubbed (T/Y)</td> <td>SO2 Not Scrubbed (T)</td> <td>Allowances Used (\$)</td> <td>Limestone (T/Y)</td> <td>Limestone (\$/T)</td> <td>Dry LS Product (T/Y)</td> <td>Limestone Landfill Cost incl ash (\$/T)</td> <td>Limestone Energy Cost (\$/T)</td> <td>O&M Lime-Stone FGD (\$/T)</td> <td>FGD Cost Limestone Fix+Var+Cap (\$/mmBtu)</td> <td>Total Cost Limestone Fuel+FGD (\$/T)</td>	Coal (T/Y)	Coal (Btu/lb.)	Sulfur (%)	Ash (%)	SO2 Scrubbed (T/Y)	SO2 Not Scrubbed (T)	Allowances Used (\$)	Limestone (T/Y)	Limestone (\$/T)	Dry LS Product (T/Y)	Limestone Landfill Cost incl ash (\$/T)	Limestone Energy Cost (\$/T)	O&M Lime-Stone FGD (\$/T)	FGD Cost Limestone Fix+Var+Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/T)			
NAP-WV	Pike	2,168	\$87,741,562	1,686,300	12,000	0.74	11.00	0	16,554	\$17,696,226	0	\$0	0	\$553,721	\$0	\$18,249,947	\$0.451	\$105,991,508			
	Pitts	1,420	\$57,469,104	1,658,656	12,200	3.75	10.00	115,934	2,366	\$2,529,263	217,501	\$2,285,423	116,625	\$843,271	\$7,540,943	\$31,741,842	\$0.784	\$89,210,946			

2015

Item	Description	Unit	Value	SO2 Not Scrubbed (T)	SO2 Scrubbed (T/Y)	Ash Landfill (\$/Y)	Ash (%)	Sulfur (%)	Coal (T/Y)	Coal Del. Cost (\$/mmBtu)	Coal Del. Price (\$/mmBtu)	FGD Energy Cost (\$/Y)	O&M Limestone FGD (\$/Y)	Dry LS Product (T/Y)	Limestone Landfill Cost incl ash (\$/Y)	Limestone (\$/Y)	Allowances Used (\$)	SO2 Not Scrubbed (T)	SO2 Scrubbed (T/Y)	Ash Landfill (\$/Y)	Ash (%)	Sulfur (%)	Coal (T/Y)	Coal Del. Cost (\$/Y)	Coal Del. Price (\$/mmBtu)	FGD Cost Limestone Fix+Var+Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)
1.	Average Heat Rate	10,000 Btu/kwh	98.00																								
2.	SO2 Removal Rate	98.00 %																									
3.	Lbs Reagent/Lb SO2 in gas (Lime/Limestone)	1.88 lbs. Limestone / lbs. SO2 Removed																									
4.	SO2 Produced	1.95 (%S) / 100 = lbs. SO2 Produced / lb. Coal Fired																									
5.	Process Plant Lime Consumption	0 lbs. Process Lime Used / ton Dry Sludge																									
6.	Recycle Pumps Required per Absorber	3 per Absorber																									
7.	Number of Absorbers	4 Absorbers																									
8.	Average Spurlcock Unit 2 Load	525 MW																									
9.	Process Plant Hours of Operation	24 Hrs.																									
10.	Scrubber & Process Plant Electrical Load	13.5 MW																									
11.	Coal Burned In Unit 2 is based on the heat rate and mw produced.																										
12.	FGD Energy Consumption (Lime/Limestone)	11200 KW																									
13.	Plant Factor	0.88																									
14.	Operational hours per year	8,760 hours																									
15.	Labor (25 people, \$55,000, Benefits 1.55)	\$2,699,803.74 per year																									
16.	Reagent Costs (Lime/Limestone)	\$11.15 per ton																									
17.	Current Prices for SO2 Allowances	\$1,078.00 per ton SO2																									
18.	Process Lime Costs	\$0.00 per ton																									
19.	Scrubber Landfill Costs	\$3.17 per ton																									
20.	Maintenance	\$3,672,366.47 per year																									
21.	Capacity Cost for 13.5 MW	\$3,256,191.81 per year																									
22.	CAAA Allowances Spurlcock Unit 2	16,554 year 2000 Phase II																									
23.	PRB Capital Expenditure	\$0																									
24.	Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$164,200,000																									
25.	Capacity Replacement Cost	\$240,666 /KWY																									
26.	Carrying Cost (20 years)	10.450 %																									
27.	Ash Penalty for Boiler Maintenance	\$0.205 / % Ash / ton of Coal																									
28.	Ash Landfill Cost	\$3.167 per ton of Ash																									
29.	Annual payment for PRB Capital Expenditure (30 year)	\$0																									
30.	Annual payment for Scrubber Capital Expenditure (20 year)	\$17,158,900																									
31.	Annual Btu requirements for Unit 2 based on Heat Rate and Output	40,471,200 mmBtuY																									
CAPP	Pike		2,290		1,686,300		11.00	0.74																		\$0	\$18,432,654
NAP-WV	Pitts		1,432		1,658,656		10.00	3.75																		\$0	\$22,096,546

2018

Item	Description	Units	Value	Sulfur (%)	SO2 Scrubbed (TY)	SO2 Not Scrubbed (T)	Ash Landfill (\$/Y)	Ash (%)	Lime-stone (TY)	Lime-stone (\$/Y)	Dry LS Product (TY)	Limestone Landfill Cost incl ash (\$/Y)	Limestone FGD Energy Cost (\$/Y)	O&M Limestone FGD (\$/Y)	FGD Cost Limestone Fix+Var+Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)	
																	Allowances Used (\$)
1.	Average Heat Rate	10,000 Btu/kwh															
2.	SO2 Removal Rate	98.00 %															
3.	Lbs Resagent/Lb SO2 in gas (Lime/Limestone)	1.88 lbs. Limestone / lbs. SO2 Removed															
4.	SO2 Produced	1.95 (%S) / 100 = lbs. SO2 Produced / lb. Coal Fired															
5.	Process Plant Lime Consumption	0 lbs. Process Lime Used / ton Dry Sludge															
6.	Recycle Pumps Required per Absorber	3 per Absorber															
7.	Number of Absorbers	4 Absorbers															
8.	Average Spurlcock Unit 2 Load	525 MW															
9.	Process Plant Hours of Operation	24 Hrs.															
10.	Scrubber & Process Plant Electrical Load	13.5 MW															
11.	Coal Burned in Unit 2 is based on the heat rate and mw produced.																
12.	FGD Energy Consumption (Lime/Limestone)	11200 KW															
13.	Plant Factor	0.88															
14.	Operational hours per year	8,760 hours															
15.	Labor (25 people, \$55,000, Benefits 1.55)	\$2,950,148.44 per year															
16.	Reagent Costs (Lime/Limestone)	\$12.18 per ton															
17.	Current Price for SO2 Allowances	\$730.00 per ton SO2															
18.	Process Lime Costs	\$0.00 per ton															
19.	Scrubber Landfill Costs	\$3.46 per ton															
20.	Maintenance	\$4,012,893.99 per year															
21.	Capacity Cost for 13.5 MW	\$3,560,314.16 per year															
22.	CAAA Allowances Spurlcock Unit 2	16,554 year 2000 Phase II															
23.	PRB Capital Expenditure	\$0															
24.	Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$164,200,000															
25.	Capacity Replacement Cost	\$283,004 /KWY															
26.	Carrying Cost (20 years)	10.030 %															
27.	Ash Penalty for Boiler Maintenance	\$0.224 / % Ash / ton of Coal															
28.	Ash Landfill Cost	\$3.461 per ton of Ash															
29.	Annual payment for PRB Capital Expenditure (30 year)	\$0															
30.	Annual payment for Scrubber Capital Expenditure (20 year)	\$16,469,260															
31.	Annual Btu requirements for Unit 2 based on Heat Rate and Output	40,471,200 mmBtu/Y															
CAPP	Pike	Coal Suppliers Del. Price (\$/mmBtu)	Coal Del. Cost (\$/Y)	Coal (TY)	Coal (Btu/lb.)												
NAP-WV	Pitts	2,440	\$88,749,728	1,685,300	12,000												
		1,460	\$59,087,952	1,658,656	12,200												

Item	Unit	Value	Limestone	Coal	Coal	Coal	Del. Price (\$/mmBtu)	Del. Cost (\$/Y)	Coal (TY)	Coal (Btu/lb.)	Sulfur (%)	Ash (%)	Ash Landfill (\$/Y)	SO2 Scrubbed (TY)	SO2 Net Scrubbed (TY)	SO2 Allowances Used (\$)	Limestone (TY)	Limestone (\$/Y)	Dry LS Product (TY)	Limestone Landfill Cost (TY)	Limestone Energy Cost (\$/Y)	O&M Stone FGD (\$/Y)	FGD Limestone Fix+Var+Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)	
1. Average Heat Rate	10,000 Btu/kWh	98.00 %																							
2. SO2 Removal Rate	1.88 lbs. Limestone / lbs. SO2 Removed	1.95 (%S) / 100 = lbs. SO2 Produced / lb. Coal Fired																							
3. Lbs Reagent/Lb SO2 in gas (Lime/Limestone)	0 lbs. Process Lime Used / ton Dry Sludge	3 per Absorber																							
4. SO2 Produced	4 Absorbers	525 MW																							
5. Process Plant Lime Consumption	24 Hrs.	13.5 MW																							
6. Recycle Pumps Required per Absorber	11200 KW	0.88																							
7. Number of Absorbers	8,760 hours	\$3,129,612.48 per year																							
8. Average Spurock Unit 2 Load	\$12.52 per ton	\$483.00 per ton SO2																							
9. Process Plant Electrical Load	\$0.00 per ton	\$3.67 per ton																							
10. Scrubber & Process Plant Electrical Load	\$4,257,279.24 per year	\$3,777,137.30 per year																							
11. Coal Burned in Unit 2 is based on the heat rate and mw produced.	16,554 year 2000 Phase II	\$0																							
12. FGD Energy Consumption (Lime/Limestone)	\$164,200,000	\$279,021 /KWY																							
13. Plant Factor	9.700 %	\$0.238 / % Ash / ton of Coal																							
14. Operational hours per year	\$3,671 per ton of Ash	\$15,927,400																							
15. Labor (25 people, \$55,000, Benefits 1.55)	\$0	\$0																							
16. Reagent Costs (Lime/Limestone)	\$0	\$0																							
17. Current Price for SO2 Allowances	\$0	\$0																							
18. Process Lime Costs	\$0	\$0																							
19. Scrubber Landfill Costs	\$0	\$0																							
20. Maintenance	\$0	\$0																							
21. Capacity Cost for 13.5 MW	\$0	\$0																							
22. CAAA Allowances Spurock Unit 2	\$0	\$0																							
23. PRB Capital Expenditure	\$0	\$0																							
24. Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$0	\$0																							
25. Capacity Replacement Cost	\$0	\$0																							
26. Carrying Cost (20 years)	\$0	\$0																							
27. Ash Penalty for Boiler Maintenance	\$0	\$0																							
28. Ash Landfill Cost	\$0	\$0																							
29. Annual payment for PRB Capital Expenditure (30 year)	\$0	\$0																							
30. Annual payment for Scrubber Capital Expenditure (20 year)	\$0	\$0																							
31. Annual Btu requirements for Unit 2 based on Heat Rate and Output	\$0	\$0																							
Coal Suppliers	Coal	Del. Price (\$/mmBtu)	Coal	Del. Cost (\$/Y)	Coal (TY)	Coal (Btu/lb.)	Sulfur (%)	Ash (%)	Ash Landfill (\$/Y)	SO2 Scrubbed (TY)	SO2 Net Scrubbed (TY)	SO2 Allowances Used (\$)	Limestone (TY)	Limestone (\$/Y)	Dry LS Product (TY)	Limestone Landfill Cost (TY)	Limestone Energy Cost (\$/Y)	O&M Stone FGD (\$/Y)	FGD Limestone Fix+Var+Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)					
Pike	2.540	\$102,796,848	1,686,300	1,686,300	12,000	12,000	0.74	11.00	\$681,007	0	16,554	\$7,995,582	0	\$0	0	\$681,007	\$0	\$8,676,589	\$0.214	\$111,473,437					
Pitts	1.460	\$59,897,376	1,658,655	1,658,655	12,200	12,200	3.75	10.00	\$608,948	115,934	2,365	\$1,142,782	217,501	\$2,810,782	116,625	\$1,037,118	\$3,125,040	\$31,430,213	\$0.777	\$91,327,589					

10,000 Btu/kwh
 98.00 %
 1.98 lbs. Limestone / lbs. SO2 Removed
 1.95 *(%S) / 100 = lbs. SO2 Produced / lb. Coal Fired
 0 lbs. Process Lime Used / ton Dry Sludge
 3 per Absorber
 4 Absorbers
 525 MW
 24 Hrs.
 13.5 MW
 11200 KW
 0.88
 8,760 hours
 \$3,420,030.60 per year
 \$14.12 per ton
 \$261.00 per ton SO2
 \$0.00 per ton
 \$4.01 per ton
 \$4,652,043.97 per year
 \$4,127,379.91 per year
 16,554 year 2000 Phase II
 \$0

\$164,200,000
 \$304,894 /KWY Gilbert Unit based for Replacement Power
 9.110 %
 \$0,260 / % Ash / ton of Coal
 \$4,012 per ton of Ash
 \$0
 \$14,959,620 \$0
 40,471,200 mmBtu/Y

Coal Suppliers	Coal Del. Price (\$/mmBtu)	Coal Del. Cost (\$/Y)	Coal (TY)	Coal (Btu/lb.)	Sulfur (%)	Ash (%)	Ash Landfill (\$/Y)	SO2 Scrubbed (TY)	SO2 Scrubbed (T)	SO2 Not Scrubbed	Allowances Used (\$)	Limestone (TY)	Limestone (\$/Y)	Dry L.S. Product (TY)	Limestone Landfill Cost incl ash (\$/Y)	Limestone FGD Energy Cost (\$/Y)	O&M Limestone FGD (\$/Y)	FGD Cost Limestone FGD (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)
Pike	2.690	\$108,867,528	1,686,300	12,000	0.74	11.00	\$744,155	0	16,554	\$4,320,594	0	217,501	\$3,071,417	0	\$744,155	\$0	\$5,064,749	\$0.125	\$119,932,277
Pitts	1.510	\$61,111,512	1,658,656	12,200	3.75	10.00	\$665,414	115,934	2,365	\$617,528	\$617,528	0	\$3,414,615	116,625	\$1,193,286	\$3,414,615	\$31,267,742	\$0.773	\$82,379,254

Average Heat Rate
 SO2 Removal Rate
 Lbs. Reagent/Lb. SO2 in gas (Lime/Limestone)
 SO2 Produced
 Process Plant Lime Consumption
 Recycle Pumps Required per Absorber
 Number of Absorbers
 Average Spurlock Unit 2 Load
 Process Plant Hours of Operation
 Scrubber & Process Plant Electrical Load
 Coal Burned in Unit 2 is based on the heat rate and mw produced.
 FGD Energy Consumption (Lime/Limestone)
 Plant Factor
 Operational hours per year
 Labor (25 people, \$55,000, Benefits 1.55)
 Reagent Costs (Lime/Limestone)
 Current Price for SO2 Allowances
 Process Lime Costs
 Scrubber Landfill Costs
 Maintenance
 Capacity Cost for 13.5 MW
 CAAA Allowances Spurlock Unit 2
 PRB Capital Expenditure
 Scrubber Capital Expenditure (per J. Brandt 7/15/04)
 Capacity Replacement Cost
 Carrying Cost (20 years)
 Ash Penalty for Boiler Maintenance
 Ash Landfill Cost
 Annual payment for PRB Capital Expenditure (30 year)
 Annual payment for Scrubber Capital Expenditure (20 year)
 Annual Btu requirements for Unit 2 based on Heat Rate and Output

2025

Item No.	Description	Quantity	Unit	Cost (\$)	SO2 Scrubbed (T/Y)	SO2 Not Scrubbed (T)	Ash Landfill (\$/Y)	Ash (%)	Sulfur (%)	Coal (T/Y)	Coal (Btu/lb.)	Coal Del. Cost (\$/Y)	Coal Del. Price (\$/mmBtu)	Lime Stone (T/Y)	Allowances Used (\$)	Lime Stone (T/Y)	Lime Stone (\$/T)	Dry LS Product (T/Y)	Limestone Landfill Ind Ash (\$/Y)	Limestone Energy Cost (\$/Y)	Limestone FGD Stone FGD (\$/Y)	O&M Stone FGD (\$/Y)	FGD Cost Limestone Fix+Var+Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)	
1.	Average Heat Rate	10,000	Btu/kWh																						
2.	SO2 Removal Rate	98.00	%																						
3.	Lbs Reagent/Lb SO2 in gas (Lime/Limestone)	1.88	lbs. Limestone / lbs. SO2 Removed																						
4.	SO2 Produced	1.95	(%S) / 100 = lbs. SO2 Produced / lb. Coal Fired																						
5.	Process Plant Lime Consumption	0	lbs. Process Lime Used / ton Dry Sludge																						
6.	Recycle Pumps Required per Absorber	3	per Absorber																						
7.	Number of Absorbers	4	Absorbers																						
8.	Average Spurluck Unit 2 Load	525	MW																						
9.	Process Plant Hours of Operation	24	Hrs.																						
10.	Scrubber & Process Plant Electrical Load	13.5	MW																						
11.	Coal Burned in Unit 2 is based on the heat rate and mw produced.																								
12.	FGD Energy Consumption (Lime/Limestone)	11200	KW																						
13.	Plant Factor	0.88																							
14.	Operational hours per year	8,760	hours																						
15.	Labor (25 people, \$55,000, Benefits 1.55)	\$3,628,310.46	per year																						
16.	Reagent Costs (Lime/Limestone)	\$14.98	per ton																						
17.	Current Price for SO2 Allowances	\$173.00	per ton SO2																						
18.	Process Lime Costs	\$0.00	per ton																						
19.	Scrubber Landfill Costs	\$4.26	per ton																						
20.	Maintenance	\$4,935,353.44	per year																						
21.	Capacity Cost for 13.5 MW	\$4,378,737.34	per year																						
22.	CAAA Allowances Spurluck Unit 2	16,554	year 2000 Phase II																						
23.	PRB Capital Expenditure	\$0																							
24.	Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$164,200,000																							
25.	Capacity Replacement Cost	\$323,462	/KWY																						
26.	Carrying Cost (20 years)	8.640	%																						
27.	Ash Penalty for Boiler Maintenance	\$0.276	/% Ash / ton of Coal																						
28.	Ash Landfill Cost	\$4.255	per ton of Ash																						
29.	Annual payment for PRB Capital Expenditure (30 year)	\$14,186,880	\$0																						
30.	Annual payment for Scrubber Capital Expenditure (20 year)	\$4,471,200	mmBtu/Y																						
31.	Annual Btu requirements for Unit 2 based on Heat Rate and Output																								
Pike	Coal Suppliers Del. Price (\$/mmBtu)	2,790																							
Pits	Coal Suppliers Del. Price (\$/mmBtu)	1,530																							

FGD Cost Limestone Fix+Var+Cap (\$/mmBtu) \$0.090
 Total Cost Limestone Fuel+FGD (\$/Y) \$116,567,984
 Lime Stone (\$/T) \$3,258,466
 Lime Stone FGD (\$/Y) \$3,622,778
 O&M Stone FGD (\$/Y) \$31,243,411
 Dry LS Product (T/Y) 116,625
 Limestone Landfill Ind Ash (\$/Y) \$1,202,303
 SO2 Scrubbed (T/Y) 115,934
 SO2 Not Scrubbed (T) 2,366
 Ash Landfill (\$/Y) \$705,938
 Ash (%) 10.00
 Sulfur (%) 3.75
 Coal (T/Y) 1,658,300
 Coal (Btu/lb.) 12,000
 Coal Del. Cost (\$/Y) \$61,920,936
 Coal Del. Price (\$/mmBtu) 1,530
 Allowances Used (\$) \$2,863,842
 Lime Stone (T/Y) 217,501
 Lime Stone (\$/T) \$3,258,466
 FGD Cost Limestone Fix+Var+Cap (\$/mmBtu) \$0.090
 Total Cost Limestone Fuel+FGD (\$/Y) \$93,164,347

2026

Average Heat Rate		10,000 Btu/kWh												FGD Cost	Total Cost									
SO2 Removal Rate		98.00 %												Limestone	Limestone Fuel+FGD (\$/Y)									
lbs Reagent/Lb SO2 in gas (Lime/Limestone)		1.88 lbs. Limestone / lbs. SO2 Removed												Limestone Energy Cost (\$/Y)	O&M Lime-Stone FGD (\$/Y)									
SO2 Produced		1.95 %CS2 / 100 = lbs. SO2 Produced / lb. Coal Fired												Limestone Landfill Cost ind ash (\$/Y)	Dry LS Product (TY)									
Process Plant Lime Consumption		0 lbs. Process Lime Used / ton Dry Sludge												Lime-stone (\$/Y)	Lime-stone (TY)									
Recycle Pumps Required per Absorber		3 per Absorber												SO2 Scrubbed (TY)	SO2 Not Scrubbed (T)									
Number of Absorbers		4 Absorbers												SO2 Scrubbed (TY)	Ash Landfill (\$/Y)									
Average Spurock Unit 2 Load		525 MW												Ash (%)	Sulfur (%)									
Process Plant Hours of Operation		24 Hrs.												Ash (mmBtu)	Sulfur (%)									
Scrubber & Process Plant Electrical Load		13.5 MW												Ash (%)	Sulfur (%)									
Coal Burned In Unit 2 is based on the heat rate and mw produced.		11200 KW												Ash (%)	Sulfur (%)									
FGD Energy Consumption (Lime/Limestone)		0.88												Ash (%)	Sulfur (%)									
Plant Factor		8,760 hours												Ash (%)	Sulfur (%)									
Operational hours per year		\$3,737,159.78 per year												Ash (%)	Sulfur (%)									
Labor (25 people, \$55,000, Benefits 1.55)		\$15.43 per ton												Ash (%)	Sulfur (%)									
Reagent Costs (Lime/Limestone)		\$141.00 per ton SO2												Ash (%)	Sulfur (%)									
Current Price for SO2 Allowances		\$0.00 per ton												Ash (%)	Sulfur (%)									
Process Lime Costs		\$4.38 per ton												Ash (%)	Sulfur (%)									
Scrubber Landfill Costs		\$5,083,414.05 per year												Ash (%)	Sulfur (%)									
Maintenance		\$4,510,099.46 per year												Ash (%)	Sulfur (%)									
Capacity Cost for 13.5 MW		16,554 year 2000 Phase II												Ash (%)	Sulfur (%)									
CAAA-allowances Spurock Unit 2		\$0												Ash (%)	Sulfur (%)									
PRB Capital Expenditure		\$164,200,000												Ash (%)	Sulfur (%)									
Scrubber Capital Expenditure (per J. Brandt 7/15/04)		\$333,165 /KWY												Ash (%)	Sulfur (%)									
Capacity Replacement Cost		8,380 %												Ash (%)	Sulfur (%)									
Carrying Cost (20 years)		\$0.284 /% Ash / ton of Coal												Ash (%)	Sulfur (%)									
Ash Penalty for Boiler Maintenance		\$4,384 per ton of Ash												Ash (%)	Sulfur (%)									
Ash Landfill Cost		\$0												Ash (%)	Sulfur (%)									
Annual payment for PRB Capital Expenditure (30 year)		\$13,759,980												Ash (%)	Sulfur (%)									
Annual payment for Scrubber Capital Expenditure (20 year)		\$0												Ash (%)	Sulfur (%)									
Annual Btu requirements for Unit 2 based on Heat Rate and Output		40,471,200 mmBtu/Y												Ash (%)	Sulfur (%)									
			Coal (TY)	Coal (Btu/lb.)	Coal Del. Cost (\$/Y)	Coal Del. Price (\$/mmBtu)	Coal Suppliers	Coal Price (\$/mmBtu)	Coal Del. Cost (\$/Y)	Coal (TY)	Coal (Btu/lb.)	Sulfur (%)	SO2 Scrubbed (TY)	SO2 Not Scrubbed (T)	Allowances Used (\$)	Lime-stone (TY)	Lime-stone (\$/Y)	Dry LS Product (TY)	Limestone Landfill Cost ind ash (\$/Y)	Limestone Energy Cost (\$/Y)	Limestone FGD Cost (\$/Y)	O&M Lime-Stone FGD (\$/Y)	FGD Cost Limestone FGD Fuel+Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)
JAPP	Pike	2,840	1,686,300	12,000	\$114,938,208	2,840	1,686,300	1,686,300	0.74	11.00	\$813,158	0	16,554	2,365	\$2,334,114	0	\$0	0	\$813,158	\$0	\$3,147,272	\$0.078	\$118,085,480	
VAP-WV	Pilts	1,540	1,658,656	12,200	\$62,325,648	1,540	1,658,656	1,658,656	3.75	10.00	\$727,116	0	115,934	2,365	\$333,607	217,501	\$3,356,220	116,625	\$1,238,373	\$3,731,461	\$31,240,195	\$0.772	\$93,565,843	

Item	Unit	Value	Coal	Coal Del. Price (\$/mmBtu)	Coal Del. Cost (\$/mmBtu)	Coal (T/Y)	Coal (Btu/lb.)	Sulfur (%)	Ash (%)	Ash Landfill (\$/Y)	SO2 Scrubbed (T/Y)	SO2 Not Scrubbed (T)	Allowances Used (\$)	Limestone (T/Y)	Limestone Energy Cost (\$/Y)	Limestone FGD Cost (\$/Y)	O&M Stone FGD (\$/Y)	Dry L.S. Product (T/Y)	Limestone Landfill Cost incl ash (\$/Y)	FGD Cost Limestone Fb+Vart-Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)											
1. Average Heat Rate	10,000 Btu/kWh																															
2. SO2 Removal Rate	98.00 %																															
3. Lbs Reagent/Lb SO2 in gas (Lime/Limestone)	1.88 lbs. Limestone / lbs. SO2 Removed																															
4. SO2 Produced	1.95 (%S) / 100 = lbs. SO2 Produced / lb. Coal Fired																															
5. Process Plant Lime Consumption	0 lbs. Process Lime Used / ton Dry Sludge																															
6. Recycle Pumps Required per Absorber	3 per Absorber																															
7. Number of Absorbers	4 Absorbers																															
8. Average Spurlcock Unit 2 Load	525 MW																															
9. Process Plant Hours of Operation	24 Hrs.																															
10. Scrubber & Process Plant Electrical Load	13.5 MW																															
11. Coal Burned in Unit 2 is based on the heat rate and mw produced.	11200 KW																															
12. FGD Energy Consumption (Lime/Limestone)	0.88																															
13. Plant Factor	8,760 hours																															
14. Operational hours per year	8,760 hours																															
15. Labor (25 people, \$55,000, Benefits 1.55)	\$3,849,274.57 per year																															
16. Reagent Costs (Lime/Limestone)	\$15.89 per ton																															
17. Current Price for SO2 Allowances	\$115.00 per ton SO2																															
18. Process Lime Costs	\$0.00 per ton																															
19. Scrubber Landfill Costs	\$4.52 per ton																															
20. Maintenance	\$5,235,916.47 per year																															
21. Capacity Cost for 13.5 MW	\$4,645,402.45 per year																															
22. CAAA Allowances Spurlcock Unit 2	16,554 year 2000 Phase II																															
23. PRB Capital Expenditure	\$0																															
24. Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$164,200,000																															
25. Capacity Replacement Cost	\$343,161 /KWY																															
26. Carrying Cost (20 years)	8,100 %																															
27. Ash Penalty for Boiler Maintenance	\$0.293 / % Ash / ton of Coal																															
28. Ash Landfill Cost	\$4,515 per ton of Ash																															
29. Annual payment for PRB Capital Expenditure (30 year)	\$0																															
30. Annual payment for Scrubber Capital Expenditure (20 year)	\$13,300,200																															
31. Annual Btu requirements for Unit 2 based on Heat Rate and Output	40,471,200 mmBtu/Y																															
Coal Suppliers	Coal Del. Price (\$/mmBtu)	2.890	Coal Del. Cost (\$/Y)	\$116,991,768	Coal (T/Y)	1,686,300	Coal (Btu/lb.)	12,000	Sulfur (%)	0.74	SO2 Scrubbed (T/Y)	0	SO2 Not Scrubbed (T)	16,554	Allowances Used (\$)	\$1,903,710	Limestone (T/Y)	217,501	Limestone Energy Cost (\$/Y)	\$3,843,465	Limestone FGD Cost (\$/Y)	\$0	O&M Stone FGD (\$/Y)	\$2,741,252	Dry L.S. Product (T/Y)	116,625	Limestone Landfill Cost incl ash (\$/Y)	\$837,552	FGD Cost Limestone Fb+Vart-Cap (\$/mmBtu)	\$0.068	Total Cost Limestone Fuel+FGD (\$/Y)	\$119,703,030
Pike Pits		1.550		\$52,730,360		1,658,656		12,200		3.75		0	2,366		\$272,091				\$3,843,465											\$0.772	\$93,963,677	

1.	Average Heat Rate	10,000 Btu/kwh	98.00 %	
2.	SO ₂ Removal Rate	1.88 lbs. Limestone / lbs. SO ₂ Removed	1.95 %S) / 100 = lbs. SO ₂ Produced / lb. Coal Fired	
3.	Lbs Reagent/Lb SO ₂ in gas (Lime/Limestone)	4 Absorbers	0 lbs. Process Lime Used / ton Dry Sludge	
4.	SO ₂ Produced	3 per Absorber		
5.	Process Plant Lime Consumption	525 MW		
6.	Recycle Pumps Required per Absorber	24 Hrs.		
7.	Number of Absorbers	13.5 MW		
8.	Average Spurtack Unit 2 Load	11200 KW		
9.	Process Plant Hours of Operation			
10.	Scrubber & Process Plant Electrical Load			
11.	Coal Burned in Unit 2 is based on the heat rate and mw produced.			
12.	FGD Energy Consumption (Lime/Limestone)			
13.	Plant Factor	8,760 hours		
14.	Operational hours per year	\$3,964,752.81 per year		
15.	Labor (25 people, \$55,000, Benefits 1.55)	\$16,37 per ton		
16.	Reagent Costs (Lime/Limestone)	\$103.00 per ton SO ₂		
17.	Current Price for SO ₂ Allowances	\$0.00 per ton		
18.	Process Lime Costs	\$4.65 per ton		
19.	Scrubber Landfill Costs	\$5,392,993.56 per year		
20.	Maintenance	\$4,784,764.52 per year		
21.	Capacity Cost for 13.5 MW	16,554 year 2000 Phase. II		
22.	CAA Allowances Spurtack Unit 2	\$0		
23.	PRB Capital Expenditure	\$164,200,000		
24.	Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$353,456 /KWY	Gilbert Unit based for Replacement Power	
25.	Capacity Replacement Cost	7.790 %		
26.	Carrying Cost (20 years)	\$0.301 / % Ash / ton of Coal		
27.	Ash Penalty for Boiler Maintenance	\$4.651 per ton of Ash		
28.	Ash Landfill Cost	\$0		
29.	Annual payment for PRB Capital Expenditure (30 year)	\$12,791,180	40,471,200 mmbtu/yr	
30.	Annual payment for Scrubber Capital Expenditure (20 year)			
31.	Annual Btu requirements for Unit 2 based on Heat Rate and Output			
	Coal Suppliers			
	Coal	Del. Price (\$/mmbtu)	2,940	\$118,985,328
	Coal	Del. Cost (\$/M)	1,560	\$63,135,072
	Coal	(Btu/lb.)	1,658,656	12,200
	Sulfur	(%)	0.74	3.75
	Ash	(%)	10.00	11.00
	Landfill	(\$/Y)	\$82,679	\$771,397
	SO ₂	(T/M)	115,934	15,934
	SO ₂ Not	(T)	2,366	16,554
	Allowances Used	(\$)	\$243,699	\$1,705,062
	Lime-stone	(T/M)	217,501	0
	Lime-stone	(\$/M)	\$3,560,614	0
	Dry LS Product	(T/M)	116,625	0
	Limestone Landfill Cost incl ash (\$/Y)		\$1,313,789	\$82,679
	Limestone Energy Cost (\$/M)		\$3,958,707	0
	FGD O&M Lime-Fix+Var+Cap	(\$/M)	\$31,225,736	\$2,567,741
	FGD Cost (\$/mmbtu)		\$0.772	\$0.053
	Limestone Fuel+FGD Total Cost (\$/M)		\$121,553,069	\$4,350,806

Item	Unit	Value	Item	Unit	Value
1. Average Heat Rate	10,000 Btu/kWh	98.00 %	2. SO2 Removal Rate	lbs SO2 Removed / lbs. Limestone	1.88
2. SO2 Removal Rate	lbs SO2 Removed / lbs. Limestone	1.88	3. SO2 Reagent/Lb SO2 in gas (Lime/Limestone)	1.95 % (S) / 100 = lbs. SO2 Produced / lb. Coal Fired	0
4. SO2 Produced	Process Plant Lime Consumption	0 lbs. Process Lime Used / ton Dry Sludge	5. Process Plant Lime Consumption	3 per Absorber	4 Absorbers
6. Recycle Pumps Required per Absorber	Number of Absorbers	525 MW	7. Number of Absorbers	24 Hrs.	13.5 MW
8. Average Spurlock Unit 2 Load	Process Plant Hours of Operation	525 MW	9. Process Plant Hours of Operation	24 Hrs.	13.5 MW
10. Scrubber & Process Plant Electrical Load	Coal Burned in Unit 2 is based on the heat rate and mw produced.	11200 KW	11. Coal Burned in Unit 2 is based on the heat rate and mw produced.	11200 KW	0.88
13. Plant Factor	Operational hours per year	8,760 hours	14. Operational hours per year	Operational hours per year	\$4,208,208.25 per year
15. Labor (25 people, \$55,000, Benefits 1.55)	Reagent Costs (Lime/Limestone)	\$17.37 per ton	16. Reagent Costs (Lime/Limestone)	Current Price for SO2 Allowances	\$79.00 per ton SO2
17. Current Price for SO2 Allowances	Process Lime Costs	\$0.00 per ton	18. Process Lime Costs	Scrubber Landfill Costs	\$4.93 per ton
19. Scrubber Landfill Costs	Maintenance	\$5,721,427.30 per year	20. Maintenance	Capacity Cost for 13.5 MW	\$5,078,156.68 per year
21. Capacity Cost for 13.5 MW	CAA Allowances Spurlock Unit 2	16,554 year 2000 Phase II	22. CAA Allowances Spurlock Unit 2	Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$164,200,000
23. PRB Capital Expenditure	Capacity Replacement Cost	\$374,981 /KWV	25. Capacity Replacement Cost	Carrying Cost (20 years)	7.120 %
26. Carrying Cost (20 years)	Ash Penalty for Boiler Maintenance	\$0.320 / % Ash / ton of Coal	27. Ash Penalty for Boiler Maintenance	Ash Landfill Cost	\$4.934 per ton of Ash
28. Ash Landfill Cost	Annual payment for Scrubber Capital Expenditure (20 year)	\$11,691,040	30. Annual payment for Scrubber Capital Expenditure (20 year)	Annual Btu requirements for Unit 2 based on Heat Rate and Output	40,471,200 mmbtu/yr
31. Annual Btu requirements for Unit 2 based on Heat Rate and Output	Coal	12,000	Coal	Del. Price (\$/mmbtu)	1,580
Coal	Del. Cost (\$/M)	\$123,032,448	Coal	Del. Price (\$/mmbtu)	1,580
Coal	(Btu/b.)	1,658,656	Coal	Del. Cost (\$/M)	\$63,944,496
Sulfur	(%)	0.74	Sulfur	(%)	3.75
Ash	(%)	10.00	Ash	(%)	10.00
Ash	(\$/M)	\$818,375	Ash	(\$/M)	\$915,216
SO2	(T)	115,934	SO2	(T)	0
SO2 Not Scrubbed	(T)	2,366	SO2 Not Scrubbed	(T)	16,554
Allowances Used	(S)	\$186,915	Allowances Used	(S)	\$1,307,765
Lime-stone	(T)	217,501	Lime-stone	(T)	0
Lime-stone	(\$/M)	\$3,777,456	Lime-stone	(\$/M)	\$0
Dry LS Product	(T)	116,625	Dry LS Product	(T)	0
Limestone Landfill Cost	(\$/M)	\$1,393,799	Limestone Landfill Cost	(\$/M)	\$915,216
Limestone Energy Cost	(\$/M)	\$4,199,792	Limestone Energy Cost	(\$/M)	\$0
Q&M Lime-Stone FGD	(\$/M)	\$2,222,982	Q&M Lime-Stone FGD	(\$/M)	\$0
FGD Coal	(\$/mmbtu)	\$0.770	FGD Coal	(\$/mmbtu)	\$0.055
Total Cost	(\$/M)	\$95,121,131	Total Cost	(\$/M)	\$125,255,430

Item	Unit	Value	SO2 Scrubbed (T/Y)	SO2 Not Scrubbed (T)	Allowances Used (\$)	Limestone (T/Y)	Dry LS Product (T/Y)	Limestone Landfill Cost incl ash (\$/Y)	Limestone FGD Energy Cost (\$/Y)	O&M Limestone FGD (\$/Y)	FGD Cost Limestone Fix-Vary-Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)				
1. Average Heat Rate	10,000 Btu/kWh															
2. SO2 Removal Rate	98.00 %															
3. Lbs Reagent/Lb SO2 in gas (Lime/Limestone)	1.88 lbs. Limestone / lbs. SO2 Removed															
4. SO2 Produced	1.95 (%S) / 100 = lbs. SO2 Produced / lb. Coal Fired															
5. Process Plant Lime Consumption	0 lbs. Process Lime Used / ton Dry Sludge															
6. Recycle Pumps Required per Absorber	3 per Absorber															
7. Number of Absorbers	4 Absorbers															
8. Average Spurtlock Unit 2 Load	525 MW															
9. Process Plant Hours of Operation	24 Hrs.															
10. Scrubber & Process Plant Electrical Load	13.5 MW															
11. Coal Blended in Unit 2 is based on the heat rate and mw produced.	11200 KW															
12. FGD Energy Consumption (Lime/Limestone)	0.88															
13. Plant Factor	8,760 hours															
14. Operational hours per year	8,760 hours															
15. Labor (25 people, \$95,000, Benefits 1.55)	\$4,332,392.44 per year															
16. Reagent Costs (Lime/Limestone)	\$17.89 per ton															
17. Current Price for SO2 Allowances	\$67.00 per ton SO2															
18. Process Lime Costs	\$0.00 per ton															
19. Scrubber Landfill Costs	\$5.08 per ton															
20. Maintenance	\$5,893,070.11 per year															
21. Capacity Cost for 13.5 MW	\$5,228,441.38 per year															
22. CAAA Allowances Spurtlock Unit 2	16,554 year 2000 Phase II															
23. PRB Capital Expenditure	\$0															
24. Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$164,200,000															
25. Capacity Replacement Cost	\$386,231 /KWY															
26. Carrying Cost (20 years)	6.750 %															
27. Ash Penalty for Boiler Maintenance	\$0.329 / % Ash / ton of Coal															
28. Ash Landfill Cost	\$5.082 per ton of Ash															
29. Annual payment for PRB Capital Expenditure (30 year)	\$0															
30. Annual payment for Scrubber Capital Expenditure (20 year)	\$11,063,500															
31. Annual Btu requirements for Unit 2 based on Heat Rate and Output	40,471,200 mmBtu/Y															
Coal Suppliers	Coal	Coal (Btu/lb.)	Coal (T/Y)	Ash Landfill (\$/Y)	Ash (%)	Sulfur (%)	SO2 Scrubbed (T/Y)	SO2 Not Scrubbed (T)	Allowances Used (\$)	Limestone (T/Y)	Dry LS Product (T/Y)	Limestone Landfill Cost incl ash (\$/Y)	Limestone FGD Energy Cost (\$/Y)	O&M Limestone FGD (\$/Y)	FGD Cost Limestone Fix-Vary-Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)
Pike	3.090	1,688,300	1,688,300	\$942,673	11.00	0.74	0	16,554	\$1,109,118	0	0	\$942,673	\$0	\$2,051,791	\$0.051	\$127,107,799
Pitts	1.590	1,658,656	1,658,656	\$842,926	10.00	3.75	115,934	2,366	\$158,523	217,501	116,625	\$1,435,613	\$4,325,786	\$31,119,663	\$0.769	\$95,468,871

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Item	Unit	Value	Coal	Coal	Coal	Sulfur	Ash	Ash	Ash	Lime- stone (T/Y)	Lime- stone (T/Y)	Dry LS Product (T/Y)	Limestone Landfill Cost incl ash (\$/Y)	Limestone FGD Energy Cost (\$/Y)	O&M Lime- stone FGD (\$/Y)	FGD Cost Limestone Fix-Vari-Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)
1. Average Heat Rate	10,000 Btu/kWh																
2. SO2 Removal Rate	98.09 %																
3. Lbs Reagent/Lb SO2 In gas (Lime/Limestone)	1.85 lbs Limestone / lbs. SO2 Removed																
4. SO2 Produced	1.95 T(Y.S) / 100 = lbs. SO2 Produced / lb. Coal Fired																
5. Process Plant Lime Consumption	0 lbs. Process Lime Used / ton Dry Sludge																
6. Recycle Pumps Required per Absorber	3 per Absorber																
7. Number of Absorbers	4 Absorbers																
8. Average Spoutlock Unit 2 Load	525 MW																
9. Process Plant Hours of Operation	24 Hrs.																
10. Scrubber & Process Plant Electrical Load	13.5 MW																
11. Coal Burned in Unit 2 is based on the heat rate and mw produced.																	
12. FGD Energy Consumption (Lime/Limestone)	11200 KW																
13. Plant Factor	0.88																
14. Operational hours per year	8,760 hours																
15. Labor (25 people, \$55,000, Benefits 1.55)	\$4,462,364.21 per year																
16. Reagent Costs (Lime/Limestone)	\$18.43 per ton																
17. Current Prices for SO2 Allowances	\$55.00 per ton SO2																
18. Process Lime Costs	\$0.00 per ton																
19. Scrubber Landfill Costs	\$5.23 per ton																
20. Maintenance	\$6,069,862.22 per year																
21. Capacity Cost for 13.5 MW	\$5,385,294.62 per year																
22. CAAA Allowances Spoutlock Unit 2	16,554 year 2000 Phase II																
23. PRB Capital Expenditure	\$0																
24. Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$164,200,000																
25. Capacity Replacement Cost	\$397,818 /KWY																
26. Carrying Cost (20 years)	6,350 %																
27. Ash Penalty for Boiler Maintenance	\$0.339 / % Ash / ton of Coal																
28. Ash Landfill Cost	\$5,234 per ton of Ash																
29. Annual payment for PRB Capital Expenditure (30 year)	\$0																
30. Annual payment for Scrubber Capital Expenditure (20 year)	\$10,425,700																
31. Annual Btu requirements for Unit 2 based on Heat Rate and Output	40,471,200 mmBtu/Y																
			Coal	Coal	Coal	Sulfur	Ash	Ash	Ash	Lime- stone (T/Y)	Lime- stone (T/Y)	Dry LS Product (T/Y)	Limestone Landfill Cost incl ash (\$/Y)	Limestone FGD Energy Cost (\$/Y)	O&M Lime- stone FGD (\$/Y)	FGD Cost Limestone Fix-Vari-Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)
Coal Suppliers Del. Price (\$/mmBtu)	3.140	1,600	12,000	1,686,300	1,558,656	0.74	11.00	\$970,953	\$668,214	0	217,501	0	\$970,953	\$0	\$1,891,423	\$0.046	\$128,960,991
Pike						3.75	10.00					116,625	\$1,478,682	\$4,455,559	\$31,030,801	\$0.767	\$95,784,721
Pits																	

10,000 Btu/RWH

98.00 %
1.88 lbs. Limestone / lbs. SO2 Removed
1.95 %/(\$S) / 100 = lbs. SO2 Produced / lb. Coal Fired
0 lbs. Process Lime Used / ton Dry Sludge
3 per Absorber
4 Absorbers
525 MW
24 Hrs.
13.5 MW
11200 KW
0.88
8,760 hours
\$4,734,122.19 per year
\$19.55 per ton
\$31.00 per ton SO2
\$0.00 per ton
\$5.55 per ton
\$6,439,516.83 per year
\$5,713,259.06 per year
16,554 year 2000 Phase II
\$0
\$164,200,000
\$422,045 KWY Gilbert Unit based for Replacement Power
5,460 %
\$0.360 / % Ash / ton of Coal
\$5.553 per ton of Ash
\$0
\$4,965,320
40,471,200 mmBtu/Y

11. Coal Burned in Unit 2 is based on the heat rate and mw produced.

12. FGD Energy Consumption (Lime/Limestone)

1. Average Heat Rate	Sulfur	Ash	SO2 Scrubbed	SO2 Not Scrubbed	Allowances Used	Lime-stone (T/Y)	Lime-stone (\$/Y)	Dry LS Product (T/Y)	Limestone Landfill Cost incl ash (\$/Y)	Limestone FGD Energy Cost (\$/Y)	O&M Lime-Stone FGD (\$/Y)	FGD Cost Limestone Fix+Var+Cap (\$/mmBtu)	Total Cost Limestone Fuel+FGD (\$/Y)
2. SO2 Removal Rate	(%)	(%)	(T/Y)	(T/Y)	(\$)	(T/Y)	(\$/Y)						
3. Lbs Reagent/Lb SO2 in gas (Lime/Limestone)	0.74	11.00	0	16,554	\$513,174	0	\$0	0	\$1,030,084	\$0	\$1,543,258	\$0.038	\$132,669,946
4. SO2 Produced	3.75	10.00	115,934	2,365	\$73,346	217,501	\$4,251,560	116,625	\$1,568,733	\$4,726,903	\$30,759,501	\$0.760	\$98,322,845
5. Process Plant Lime Consumption													
6. Recycle Pumps Required per Absorber													
7. Number of Absorbers													
8. Average Spurock Unit 2 Load													
9. Process Plant Hours of Operation													
10. Scrubber & Process Plant Electrical Load													
11. Coal Burned in Unit 2 is based on the heat rate and mw produced.													
12. FGD Energy Consumption (Lime/Limestone)													
13. Plant Factor													
14. Operational hours per year													
15. Labor (25 people, \$55,000, Benefits 1.55)													
16. Reagent Costs (Lime/Limestone)													
17. Current Prices for SO2 Allowances													
18. Process Lime Costs													
19. Scrubber Landfill Costs													
20. Maintenance													
21. Capacity Cost for 13.5 MW													
22. CAAA Allowances Spurock Unit 2													
23. PRB Capital Expenditure													
24. Scrubber Capital Expenditure (per J. Brandt 7/15/04)													
25. Capacity Replacement Cost													
26. Carrying Cost (20 years)													
27. Ash Penalty for Boiler Maintenance													
28. Ash Landfill Cost													
29. Annual payment for PRB Capital Expenditure (30 year)													
30. Annual payment for Scrubber Capital Expenditure (20 year)													
31. Annual Btu requirements for Unit 2 based on Heat Rate and Output													

Item #	Description	Unit	Value
1.	Average Heat Rate	10,000 Btu/kwh	
2.	SO2 Removal Rate	98.00 %	
3.	Lbs Reagent/lb SO2 in gas (Lime/Limestone)	1.88 lbs. Limestone / lbs. SO2 Removed	
4.	SO2 Produced	1.95 (%S) / 100 = lbs. SO2 Produced / lb. Coal Fired	
5.	Process Plant Lime Consumption.	0 lbs. Process Lime Used / ton Dry Sludge	
6.	Recycle Pumps Required per Absorber	3 per Absorber	
7.	Number of Absorbers	4 Absorbers	
8.	Average Spurtack Unit 2 Load	525 MW	
9.	Process Plant Hours of Operation	24 Hrs.	
10.	Scrubber & Process Plant Electrical Load	13.5 MW	
11.	Coal Burned in Unit 2 is based on the heat rate and mw produced.	11200 KW	
12.	FGD Energy Consumption (Lime/Limestone)	0.88	
13.	Plant Factor	8,760 hours	
14.	Operational hours per year	\$4,875,145.86 per year	
15.	Labor (25 people, \$55,000. Benefits 1.55)	\$20.13 per ton	
16.	Reagent Costs (Lime/Limestone)	\$19.00 per ton SO2	
17.	Current Prices for SO2 Allowances	\$0.00 per ton	
18.	Process Lime Costs	\$0.00 per ton	
19.	Scrubber Landfill Costs	\$5.72 per ton	
20.	Maintenance	\$6,632,702.33 per year	
21.	Capacity Cost for 13.5 MW	\$5,884,656.84 per year	
22.	CAA Allowances Spurtack Unit 2	16,554 year 2000 Phase II	
23.	PRB Capital Expenditure	\$0	
24.	Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$164,208,000	
25.	Capacity Replacement Cost	\$434,705 /KW	Gilbert Unit based for Replacement Power
26.	Carrying Cost (20 years)	4.950 %	
27.	Ash Penalty for Boiler Maintenance	\$0.371 / % Ash / ton of Coal	
28.	Ash Landfill Cost	\$5.720 per ton of Ash	
29.	Annual payment for PRB Capital Expenditure (30 year)	\$8,144,320	
30.	Annual payment for Scrubber Capital Expenditure (20 year)	\$0	
31.	Annual Btu requirements for Unit 2 based on Heat Rate and Output	40,471,200 mmBtu/Y	
Coal Suppliers			
Coal Del. Price (\$/mmBtu)			
CAP	Pike	3,290	\$133,150,248
NAP/MV	Pike	1,630	\$65,968,056
Coal	Coal	1,686,300	1,658,656
Sulfur			
Ash (%)			
		0.74	11,000
Ash Landfill (\$/M)		10.00	\$948,721
SO2 Scrubbed (T)		115,934	0
SO2 Not Scrubbed (T)		2,366	16,554
Allowances Used (\$)		\$44,954	\$314,626
Lime- stone (T/M)		217,501	0
Lime- stone (SM)		\$4,379,106	0
Dry LS Product (T/M)		116,625	0
Limestone Ind ash (\$/M)		\$1,615,795	\$1,060,986
Limestone Energy Cost (\$/M)		\$4,668,710	\$0
O&M Lime- Stone FGD (\$/M)		\$30,561,734	\$1,375,512
Limestone Fuel+Var+Cap (\$/M)		\$0.755	\$0.034
Limestone Total Cost (\$/M)		\$134,525,760	\$96,529,790

1.	Average Heat Rate	10,000 Btu/kWh	98.00 %
2.	SO2 Removal Rate	1.88 lbs. Limestone / lbs. SO2 Removed	1.95 %(\$) / 100 = lbs. SO2 Produced / lb. Coal Fired
3.	Lbs Reagent/Lb SO2 in gas (Lime/Limestone)	0 lbs. Process Lime Used / ton Dry Sludge	3 per Absorber
4.	SO2 Produced	4 Absorbers	525 MW
5.	Process Plant Lime Consumption	24 Hrs.	13.5 MW
6.	Recycle Pumps Required per Absorber	Process Plant Hours of Operation	10. Scrubber & Process Plant Electrical Load
7.	Number of Absorbers	Average Spurtack Unit 2 Load	9. Process Plant Hours of Operation
8.	Average Spurtack Unit 2 Load	525 MW	11. Coal Burned in Unit 2 is based on the heat rate and mw produced.
9.	Process Plant Hours of Operation	13.5 MW	12. FGD Energy Consumption (Lime/Limestone)
10.	Scrubber & Process Plant Electrical Load	13.5 MW	13. Plant Factor
11.	Coal Burned in Unit 2 is based on the heat rate and mw produced.	11200 KW	14. Operational hours per year
12.	FGD Energy Consumption (Lime/Limestone)	11200 KW	15. Labor (25 people, \$55,000, Benefits 1.55)
13.	Plant Factor	0.88	16. Reagent Costs (Lime/Limestone)
14.	Operational hours per year	8,760 hours	17. Current Price for SO2 Allowances
15.	Labor (25 people, \$55,000, Benefits 1.55)	\$5,022,430.23 per year	18. Process Lime Costs
16.	Reagent Costs (Lime/Limestone)	\$20.74 per ton	19. Scrubber Landfill Costs
17.	Current Price for SO2 Allowances	\$7.00 per ton SO2	20. Maintenance
18.	Process Lime Costs	\$0.00 per ton	21. Capacity Cost for 13.5 MW
19.	Scrubber Landfill Costs	\$5.69 per ton	22. CAA Allowances Spurtack Unit 2
20.	Maintenance	\$6,631,663.40 per year	23. FRB Capital Expenditure
21.	Capacity Cost for 13.5 MW	\$6,061,196.54 per year	24. Scrubber Capital Expenditure (per J. Brandt 7/15/04)
22.	CAA Allowances Spurtack Unit 2	16,554 year 2000 Phase II	25. Capacity Replacement Cost
23.	FRB Capital Expenditure	\$0	26. Carrying Cost (20 years)
24.	Scrubber Capital Expenditure (per J. Brandt 7/15/04)	\$164,200,000	27. Ash Penalty for Boiler Maintenance
25.	Capacity Replacement Cost	\$447,747 /KWY Gilbert Unit based for Replacement Power	28. Ash Landfill Cost
26.	Carrying Cost (20 years)	4.430 %	29. Annual payment for FRB Capital Expenditure (30 year)
27.	Ash Penalty for Boiler Maintenance	\$0.382 / % Ash / ton of Coal	30. Annual payment for Scrubber Capital Expenditure (20 year)
28.	Ash Landfill Cost	\$5.891 per ton of Ash	31. Annual Btu requirements for Unit 2 based on Heat Rate and Output
29.	Annual payment for FRB Capital Expenditure (30 year)	\$0	
30.	Annual payment for Scrubber Capital Expenditure (20 year)	\$7,274,060	
31.	Annual Btu requirements for Unit 2 based on Heat Rate and Output	40,471,200 mmbtu/Y	
CAPP	Pike	3,340	\$135,173,808
NAP-MV	Pike	1,640	\$66,372,768
		1,658,656	12,200
		12,000	12,000
		0.74	11.00
		11.00	\$1,092,816
		115,934	\$977,183
		0	2,366
		16,554	\$16,562
		217,501	\$4,510,480
		0	\$1,092,816
		\$0	\$1,664,269
		116,625	\$1,664,269
		0	\$1,092,816
		\$0	\$1,208,694
		\$0	\$30,334,256
		\$0	\$30,334,256
		\$0.030	\$0.750
		\$136,362,502	\$96,707,024

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2008-00115
RESPONSES TO KIUC FIRST SET OF DATA REQUESTS

KIUC'S FIRST SET OF DATA REQUESTS DATED 04/29/08

REQUEST 10

RESPONSIBLE PERSON: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

Request 10. Please explain how the Company tracks the operation and maintenance expense associated with the Spurlock 2 scrubber in its accounting system. Provide a copy of documentation that supports your response, such as relevant pages from an accounting procedures manual.

Response 10. EKPC tracks the operation and maintenance expense associated with the Spurlock 2 scrubber in its accounting system by a subaccount in the general ledger. Page 2 of this response is taken from the Uniform System of Accounts issued by the Rural Utilities Service, and defines account 512. EKPC uses subaccount 43 (meaning 51243) to distinguish scrubber accounts. Please see the detail on Response 8 page 2 of 2.

field supervision of specific jobs shall be charged to the appropriate maintenance account. (See § 1767.17 (a).)

511 Maintenance of Structures.

This account shall include the cost of labor, employee pensions and benefits, social security and other payroll taxes, injuries and damages, and materials used and expenses incurred in the maintenance of steam structures, the book cost of which is includible in Account 311, Structures and Improvements. (See § 1767.17 (b).)

512 Maintenance of Boiler Plant.

A. This account shall include the cost of labor, employee pensions and benefits, social security and other payroll taxes, injuries and damages, and materials used and expenses incurred in the maintenance of steam plant, the book cost of which is includible in Account 312, Boiler Plant Equipment. (See § 1767.17 (b).)

B. For the purpose of making charges hereto and to Account 513, Maintenance of Electric Plant, the point at which steam plant is distinguished from electric plant is defined as follows:

1. Inlet flange of throttle valve on prime mover.
2. Flange of all steam extraction lines on prime mover.
3. Hotwell pump outlet on condensate lines.
4. Inlet flange of all turbine-room auxiliaries.
5. Connection to line side of motor starter for all boiler-plant

equipment.

513 Maintenance of Electric Plant.

This account shall include the cost of labor, employee pensions and benefits, social security and other payroll taxes, injuries and damages, and materials used and expenses incurred in the maintenance of electric plant, the book of which is includible in Account 313, Engines and Engine-Driven Generators; Account 314, Turbogenerator Units; and Account 315, Accessory Electric Equipment. (See § 1767.17 (b) and Paragraph B of Account 512.)

514 Maintenance of Miscellaneous Steam Plant.

This account shall include the cost of labor, employee pensions and benefits, social security and other payroll taxes, injuries and damages, and materials used and expenses incurred in maintenance of miscellaneous steam generation plant, the book cost of which is includible in Account 316, Miscellaneous Power Plant Equipment. (See § 1767.17 (b).)

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2008-00115
RESPONSES TO KIUC FIRST SET OF DATA REQUESTS

KIUC'S FIRST SET OF DATA REQUESTS DATED 04/29/08

REQUEST 11

RESPONSIBLE PERSON: Ann F. Wood

COMPANY: East Kentucky Power Cooperative, Inc.

Request 11. Please provide a copy of all monthly financial reports filed with the Commission for January 2007 through the most recent month available, including, but not limited to, the additional financial information required by the interim and final orders in Case No. 2006-00472.

Response 11. Copies of monthly financial reports (January 2007 through March 2008, the most recent month available) filed with the Commission as required by the interim and final orders in Case No. 2006-00472 are included on pages 2 through 16. Copies of the Variable Rates on EKPC Debt reports (January 2007 through March 2008, the most recent month available) filed with the Commission monthly are included on pages 17 through 31. Additionally, EKPC submits the RUS Form 12 to the PSC monthly. These reports (January 2007 through March 2008, the most recent month available) are included on the enclosed CD.

12-Month Period Ended	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Jan-07	Feb-07	Mar-07	31-Mar-07
	41,739,825	47,911,442	51,937,411	56,776,741	61,257,079	45,448,378	47,093,950	47,479,761	59,612,208	65,603,087	70,912,050	61,452,013	657,223,943
Electric Energy Revenues													
Power Sales-Member Cooperatives													
Power Sales-Off-System	53,400	5,800	167,286	434,283	716,236	50,629	52,236	712,806	424,289	271,253	637,381	1,458,107	5,459,968
Total Electric Energy Revenue	41,793,225	47,917,242	52,104,697	57,211,024	61,973,315	45,499,010	47,625,667	48,192,567	60,036,495	65,874,340	71,549,431	62,910,120	662,713,911
Other Operating Revenue-Income	335,210	1,203,234	839,532	1,144,536	1,061,899	1,116,760	1,347,361	1,124,490	1,218,588	1,285,859	1,288,098	1,464,643	13,430,209
Total Operating Revenue & Patronage Capital	42,128,435	49,120,476	52,944,229	58,355,560	63,035,213	46,615,770	48,999,806	49,317,057	61,255,083	67,160,199	72,837,528	64,374,763	676,144,120
Operation Expenses													
Production Costs Excluding Fuel	4,286,916	4,736,732	7,020,592	7,164,886	7,461,031	6,546,690	5,358,814	5,405,973	5,587,258	5,624,209	5,696,189	5,832,819	70,722,109
Fuel	19,651,805	21,465,724	22,803,646	29,179,841	29,847,023	19,505,381	20,308,013	22,460,533	24,975,732	26,574,373	29,294,570	23,312,108	288,378,750
Other Power Supply	5,633,946	7,160,931	4,880,749	5,176,384	6,270,957	4,394,466	3,373,457	6,593,216	10,235,055	12,268,680	21,217,547	4,375,825	91,581,212
Transmission	1,043,219	1,669,955	2,204,507	1,894,481	2,022,738	1,190,706	1,298,903	1,551,231	1,836,673	1,687,316	3,074,037	100,013	19,573,777
Distribution	58,985	100,134	105,366	86,094	67,196	67,500	68,069	123,871	48,069	41,770	41,770	60,987	907,729
Customer Service & Information	409,923	413,424	444,432	265,633	368,108	420,450	317,286	340,966	698,950	252,903	216,025	353,093	4,501,192
Sales	11,699	10,452	10,908	10,143	10,814	11,550	9,691	10,466	7,858	8,702	6,839	6,475	115,596
Administration & General	2,445,491	2,432,875	2,546,737	2,857,431	2,326,331	2,669,015	1,975,947	3,251,940	3,122,426	2,790,825	2,106,164	2,288,509	30,813,431
Total Operation Expenses	33,541,983	37,990,027	40,016,939	45,627,892	48,393,096	34,805,454	32,709,611	39,682,988	46,587,823	49,255,076	61,653,141	36,329,628	506,593,657
Production	3,227,071	4,132,789	6,445,252	3,885,888	3,021,073	2,979,927	2,496,152	2,675,755	2,874,911	1,356,227	1,644,212	2,283,237	37,022,493
Transmission	356,402	254,760	329,843	235,211	350,565	517,372	375,611	428,058	310,659	172,040	211,463	292,311	3,856,293
Distribution	73,666	67,991	79,963	185,678	114,589	127,200	113,558	109,303	80,207	89,272	84,597	92,972	1,229,625
General Plant	53,454	83,170	40,553	51,506	55,829	66,502	53,499	43,170	27,610	84,597	35,586	42,702	638,178
Total Maintenance Expenses	3,712,594	4,538,710	6,936,823	4,252,568	3,613,144	3,676,390	3,052,463	3,260,539	3,322,483	1,693,071	1,957,583	2,708,222	42,726,589
Operating Expenses													
Depreciation/Amortization	4,588,732	4,602,897	4,634,049	4,624,175	4,598,617	4,607,297	4,707,961	4,715,600	(11,409,928)	3,354,016	3,369,309	3,382,836	35,775,560
Taxes	(218)	-	-	-	(22)	(22)	(22)	(22)	(22)	(22)	(22)	(22)	(22)
Interest on Long-Term Debt	6,388,060	6,834,194	6,910,439	7,498,985	7,546,799	7,517,325	7,698,073	7,705,876	8,145,403	8,305,782	7,623,568	8,506,118	90,680,624
Other Interest Expense	29,944	26,424	30,234	25,426	20,449	20,449	26,958	(25,080)	(19,258)	14,013	11,047	13,310	180,556
Other Deductions	139,619	(521,744)	203,175	132,342	213,864	177,935	105,251	170,519	(13,727)	95,463	189,555	118,477	1,011,329
Total Operating Expenses	11,146,336	10,942,289	11,775,135	12,285,736	12,384,706	12,323,006	12,537,321	12,566,915	(3,249,676)	11,769,273	11,193,879	12,010,332	127,685,251
Total Cost of Electric Service	48,400,913	53,471,025	58,728,897	62,166,195	64,390,946	50,806,849	48,299,394	55,510,442	46,660,631	62,717,420	74,804,602	51,048,382	677,005,697
Operating Margins (Deficit)	(6,272,478)	(4,950,550)	(5,784,667)	(3,810,636)	(1,355,733)	(4,191,079)	700,412	(6,193,385)	14,594,452	4,442,780	(1,967,074)	13,326,381	(861,577)
Non-Operating Items													
Interest Income	470,493	633,020	728,597	914,922	904,681	1,032,763	825,033	854,959	877,597	845,803	798,559	937,681	9,824,107
Allowance for Funds Used	570,914	618,274	720,779	747,050	857,119	920,378	994,724	1,168,888	1,227,167	1,488,026	1,504,575	1,434,484	12,252,379
Dunning Construction	(241)	(15,542)	3,875	1,482	1,482	216,837	(18,425)	5,037	472	40,637	20,352	303,318	514,743
Other Non-Operating Income	1,041,166	1,241,367	1,453,527	1,646,725	1,764,068	2,475,676	1,801,394	1,996,558	2,110,273	2,374,465	2,323,707	2,693,845	22,922,772
Total Non-Operating Items	(5,231,312)	(3,109,183)	(4,331,140)	(2,163,911)	408,336	(1,715,403)	2,501,806	(4,196,827)	16,704,726	6,817,245	358,633	16,020,226	22,061,195
Net Patronage Capital & Margins (Deficit)													

EAST KENTUCKY POWER COOPERATIVE, INC.
STATEMENT OF OPERATIONS

EAST KENTUCKY POWER COOPERATIVE, INC.
STATEMENT OF OPERATIONS

	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	12 month period ended 6/30/07
Electric Energy Revenues	56,776,741	61,257,079	45,448,378	47,093,950	47,479,761	59,612,206	65,603,087	70,912,050	61,452,013	52,298,829	59,745,511	53,785,949	681,465,554
Power Sales--Member Cooperatives	434,283	716,236	50,632	558,495	712,805	424,269	271,253	637,361	1,456,107	36,748	185,531	349,717	5,835,479
Power Sales--Off-System	57,211,024	61,973,315	45,499,010	47,652,445	48,192,567	60,036,495	65,874,340	71,549,431	62,910,120	52,335,577	59,931,042	54,135,666	687,301,033
Total Electric Energy Revenue	1,144,536	1,061,899	1,116,760	1,347,361	1,124,490	1,218,568	1,285,859	1,288,098	1,464,643	1,168,529	1,388,367	1,316,498	14,925,627
Other Operating Revenue--Income	58,355,560	63,035,213	46,615,770	48,999,806	49,317,057	61,255,083	67,160,199	72,837,528	64,374,763	53,504,106	61,319,410	55,452,164	702,226,660
Total Operating Revenue & Patronage Capital	7,164,886	7,461,031	6,546,690	5,358,614	5,405,973	5,587,259	5,624,209	5,696,199	5,632,819	4,158,399	5,541,168	5,996,225	70,373,660
Operation Expenses	28,179,841	29,847,023	19,505,381	20,308,013	22,460,533	24,975,732	26,574,373	29,294,570	23,312,108	18,285,472	22,209,615	25,300,327	290,262,988
Production Costs Excluding Fuel	5,176,384	6,270,957	4,394,466	3,373,457	6,593,216	10,235,055	12,268,860	21,217,547	4,375,825	18,834,645	4,162,502	6,012,166	102,914,899
Fuel	1,894,481	2,022,738	1,190,706	1,298,903	1,551,231	1,836,673	1,687,316	3,074,037	100,013	2,444,594	1,638,514	1,481,841	20,221,036
Other Power Supply	79,093	66,094	67,196	67,500	68,664	123,871	48,069	41,770	60,987	65,722	79,210	68,985	657,181
Transmission	265,633	368,108	420,450	317,286	340,965	698,950	252,903	216,025	353,093	281,881	352,587	92,103	3,989,983
Distribution	10,143	10,814	11,550	9,691	10,466	7,858	8,702	6,839	6,475	5,962	5,324	5,437	99,261
Customer Service & Information	2,857,431	2,326,331	2,669,015	1,975,947	3,251,940	3,122,426	2,790,825	2,106,164	2,288,509	2,154,798	2,738,100	2,115,487	30,396,982
Sales	45,627,892	48,383,096	34,805,454	32,709,611	39,682,988	46,587,823	49,255,076	61,653,141	36,329,828	46,241,462	36,727,021	41,072,580	519,085,972
Administration & General	3,885,888	3,021,073	2,979,927	2,496,152	2,675,755	2,674,911	1,356,227	1,644,212	2,283,237	4,088,733	4,659,666	3,674,034	35,639,814
Total Operation Expenses	235,211	350,565	517,372	375,611	428,056	310,659	172,040	211,463	282,311	188,504	234,448	294,084	3,610,324
Maintenance Expenses	79,963	185,678	114,589	127,200	113,558	109,303	80,207	66,321	89,972	86,126	135,461	137,663	1,328,042
Production	51,506	55,829	66,502	53,499	43,170	27,610	84,597	35,666	42,702	48,143	54,232	142,113	705,490
Transmission	4,252,568	3,613,144	3,678,390	3,052,463	3,260,539	3,322,483	1,693,071	1,957,583	2,708,222	4,413,507	5,083,808	4,247,894	41,263,670
Distribution	4,624,175	4,598,617	4,607,297	4,707,961	4,715,600	(11,409,826)	3,354,016	3,369,309	3,382,836	3,426,846	3,368,040	3,345,513	32,090,282
General Plant	7,498,985	7,546,799	7,517,325	7,696,073	7,705,876	8,145,403	8,305,782	7,823,568	8,506,118	8,302,227	8,566,274	8,268,196	85,684,628
Total Maintenance Expenses	30,234	25,425	20,449	26,058	(25,080)	14,013	11,047	13,310	(66,744)	9,932	13,217	13,217	52,604
Operating Expenses	132,342	213,864	177,935	105,251	170,519	(13,727)	95,463	189,955	118,477	154,404	(114,867)	168,996	1,399,611
Depreciation/Amortization	12,285,736	12,384,706	12,323,006	12,537,321	12,566,915	(3,249,676)	11,769,273	11,793,879	12,010,332	11,816,753	11,829,379	11,796,220	129,263,624
Taxes	62,166,195	64,390,946	50,806,849	48,299,394	55,510,442	46,660,631	62,717,420	74,804,802	51,048,382	62,471,702	53,640,209	57,116,695	689,633,467
Interest on Long-Term Debt	(3,810,636)	(1,355,733)	(4,191,079)	700,412	(6,193,385)	14,594,452	4,442,780	(1,967,074)	13,326,381	(8,967,596)	7,679,201	(1,664,531)	12,593,193
Other Interest Expense	914,922	904,681	1,032,763	825,033	854,959	877,587	845,803	798,559	937,621	827,621	760,704	640,899	10,221,222
Other Deductions	747,050	857,119	920,378	994,724	1,168,888	1,227,167	1,488,026	1,504,575	1,434,484	1,717,357	1,572,579	1,731,572	15,363,920
Total Cost of Electric Service	(15,298)	1,482	216,837	(18,425)	(27,290)	5,037	40,637	20,352	303,318	20,957	6,290	(5,996)	548,802
Operating Margins (Deficit)	51	786	305,698	63	-	472	221	18,361	3,270	3,482	17,223	349,626	349,626
Interest Income	1,646,725	1,764,068	2,475,676	1,801,394	1,996,558	2,110,273	2,374,465	2,323,707	2,853,845	2,569,205	2,343,055	2,384,598	26,483,568
Allowance for Funds Used During Construction	(2,163,911)	408,336	(1,715,403)	2,501,806	(4,198,827)	16,704,726	6,817,245	356,633	16,020,226	(6,398,391)	10,022,256	720,067	39,076,762
Other Non-Operating Income													
Other Capital Credits/Patronage													
Total Non-Operating Items													
Net Patronage Capital & Margins (Deficit)													
													1.41
													1.11

TIER
DSC

12 month period ended 12/31/07	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07
Electric Energy Revenues	65,603,087	70,912,050	61,452,010	52,298,829	59,745,511	53,785,949	57,606,169	67,360,609	62,723,609	51,327,037	55,184,534	62,372,044
Power Sales—Member Cooperatives	271,253	637,381	1,458,107	36,748	185,531	349,717	355,827	1,021,864	764,843	1,472,832	606,703	580,912
Power Sales—Off-System	720,371,300	720,371,300	720,371,300	720,371,300	720,371,300	720,371,300	720,371,300	720,371,300	720,371,300	720,371,300	720,371,300	720,371,300
Total Electric Energy Revenue	65,674,340	71,549,431	62,910,120	52,335,577	59,931,042	54,135,666	57,961,936	68,381,832	63,488,452	52,799,869	55,791,237	62,952,956
Other Operating Revenue—Income	1,285,859	1,288,098	1,464,643	1,168,529	1,388,367	1,316,498	1,153,032	1,113,884	1,264,889	1,197,537	994,400	1,277,807
Total Operating Revenue & Patronage Capital	67,160,199	72,837,528	64,374,763	53,504,106	61,319,410	55,452,164	59,114,958	69,495,716	64,753,941	53,997,408	56,785,637	64,230,763
Production Costs Excluding Fuel	5,624,209	5,656,189	5,832,819	4,158,399	5,541,168	5,956,225	6,600,429	6,684,491	6,141,225	5,523,167	6,096,988	(1,080,296)
Other Power Supply	26,574,373	29,294,570	23,312,108	18,295,472	22,209,615	25,300,327	24,454,112	32,625,390	23,604,127	21,094,824	25,568,836	293,755,784
Fuel	12,268,680	11,687,316	10,074,037	2,444,584	1,638,514	1,481,841	1,940,948	6,829,765	2,377,694	1,678,064	1,348,972	1,270,854
Transmission	48,069	41,770	60,987	65,722	79,210	68,985	67,292	70,551	58,097	63,577	50,870	46,934
Distribution	48,069	41,770	60,987	65,722	79,210	68,985	67,292	70,551	58,097	63,577	50,870	46,934
Customer Service & Information	252,903	216,025	353,093	281,881	352,587	92,103	151,218	307,154	155,682	248,903	278,591	758,487
Sales	8,702	6,875	5,962	6,475	5,324	5,437	5,777	5,883	4,994	8,692	5,621	10,015
Administration & General	2,790,825	2,106,164	2,288,509	2,154,798	2,738,100	2,116,497	3,190,707	2,094,248	1,758,997	1,917,384	2,168,263	2,433,815
Total Operation Expenses	49,255,076	61,653,141	36,329,828	46,241,462	36,727,021	41,072,580	43,240,248	58,205,271	39,091,076	37,946,652	40,385,332	46,723,985
Maintenance Expenses	1,356,227	1,644,212	2,283,237	4,088,733	4,659,666	3,674,034	2,586,533	2,897,666	2,289,984	4,794,726	6,633,390	10,353,162
Production	172,040	221,463	292,311	188,504	234,448	279,260	878,010	288,578	484,363	274,085	543,228	4,140,373
Transmission	80,207	66,321	89,972	88,126	135,461	137,663	182,663	130,804	61,230	183,758	139,233	1,424,112
Distribution	84,597	35,586	42,702	48,143	54,232	47,236	104,872	76,023	62,882	37,951	37,951	785,231
General Plant	1,957,583	2,708,222	4,413,507	5,083,808	4,247,894	3,095,592	4,071,351	2,883,358	5,403,201	7,140,126	11,073,573	53,711,285
Total Maintenance Expenses	1,957,583	2,708,222	4,413,507	5,083,808	4,247,894	3,095,592	4,071,351	2,883,358	5,403,201	7,140,126	11,073,573	53,711,285
Operating Expenses	3,354,016	3,369,309	3,382,836	3,426,846	3,368,040	3,345,513	3,376,430	3,358,054	3,409,487	3,416,540	3,431,562	3,324,148
Depreciation/Amortization	40,562,780	40,562,780	40,562,780	40,562,780	40,562,780	40,562,780	40,562,780	40,562,780	40,562,780	40,562,780	40,562,780	40,562,780
Taxes	(9,918)	(9,918)	(9,918)	(9,918)	(9,918)	(9,918)	(9,918)	(9,918)	(9,918)	(9,918)	(9,918)	(9,918)
Interest on Long-Term Debt	8,305,882	7,623,568	8,506,118	8,302,227	8,566,274	8,268,196	8,729,688	8,780,908	8,736,876	9,123,407	8,839,071	9,161,512
Other Interest Expense	14,013	11,047	(66,744)	9,932	13,217	8,275	12,131	9,966	3,332	4,706	3,332	4,248
Other Deductions	95,463	189,955	118,477	154,404	168,996	126,795	87,941	2,443,360	206,998	165,986	(6,088,934)	(2,405,438)
Total Operating Expenses	11,769,273	11,193,879	12,010,332	11,816,733	11,829,379	11,798,220	12,241,158	12,239,174	14,594,979	12,756,940	12,441,378	6,440,057
Total Cost of Electric Service	62,717,420	74,804,602	51,048,382	62,471,702	53,640,209	57,116,695	58,576,998	74,455,797	56,573,413	56,106,793	59,966,836	64,237,615
Operating Margins (Deficit)	4,442,780	(1,967,074)	13,326,381	(8,967,596)	7,679,201	(1,664,531)	538,000	(4,960,381)	8,180,528	(2,109,387)	(3,181,199)	(6,852)
Non-Operating Items	845,803	798,559	937,681	827,621	760,704	640,899	656,036	536,154	567,539	449,015	404,865	435,420
Interest on Funds Used	1,488,026	1,504,575	1,434,484	1,717,357	1,572,579	1,815,574	1,998,734	2,134,736	2,174,388	2,174,388	2,353,547	2,349,195
During Construction	40,637	20,352	303,318	20,957	6,290	(5,056)	4,829	(7,196)	(2,196)	(3,141)	6,260	340,087
Other Non-Operating Income	1,488,026	1,504,575	1,434,484	1,717,357	1,572,579	1,815,574	1,998,734	2,134,736	2,174,388	2,174,388	2,353,547	2,349,195
Other Capital Credits/Patronage	30,610,615	2,323,707	2,693,845	2,569,205	2,343,055	2,384,588	2,476,999	2,477,475	2,799,421	2,621,272	2,755,708	2,790,965
Total Non-Operating Items	2,374,465	2,323,707	2,693,845	2,569,205	2,343,055	2,384,588	2,476,999	2,477,475	2,799,421	2,621,272	2,755,708	2,790,965
Net Patronage Capital & Margins (Deficit)	6,817,245	356,633	16,020,226	(6,398,391)	10,022,256	720,067	3,014,898	(2,482,806)	10,979,949	511,885	(425,492)	2,784,114
TER	1.41											
DSC	1.15											

EAST KENTUCKY POWER COOPERATIVE, INC.
STATEMENT OF OPERATIONS

1.56
1.25

12 month period ended 2/29/08	Feb-08	Jan-08	Dec-07	Nov-07	Oct-07	Sep-07	Aug-07	Jul-07	Jun-07	May-07	Apr-07	Mar-07
Electric Energy Revenues	61,452,013	52,298,829	59,745,511	53,785,949	57,606,169	67,360,468	62,722,609	51,327,037	55,184,534	62,372,044	82,124,839	72,272,889
Power Sales—Member Cooperatives	1,458,107	36,748	185,531	349,717	355,827	1,021,364	764,643	1,472,832	609,703	580,912	587,865	1,385,050
Power Sales—Off-System	62,910,120	52,235,577	59,931,042	54,135,666	57,961,986	68,381,832	63,488,452	52,799,869	55,791,237	62,952,956	82,712,704	73,657,939
Total Electric Energy Revenue	1,464,643	1,168,629	1,888,367	1,316,498	1,153,002	1,113,584	1,265,489	1,197,537	994,400	1,277,807	1,591,481	1,458,756
Other Operating Revenue—Income	64,374,763	53,504,106	61,319,410	55,452,164	59,114,998	69,495,416	64,753,941	53,997,406	56,785,637	64,230,763	84,304,185	75,116,735
Total Operating Revenue & Patronage Capital	66,839,306	54,672,735	63,207,827	56,768,666	60,267,004	70,609,000	65,043,931	54,194,943	57,990,349	65,508,570	85,895,666	76,575,491
Production Expenses	5,832,819	4,158,359	5,541,168	5,996,225	6,600,429	6,684,491	6,141,225	5,523,167	6,096,988	(1,080,296)	4,302,983	4,560,287
Fuel	23,312,108	18,295,472	22,209,615	25,300,327	24,454,112	23,604,127	21,094,824	21,422,029	25,568,836	28,109,779	25,519,295	29,515,914
Other Power Supply	4,375,825	18,834,645	4,162,502	6,012,166	6,829,765	14,040,361	5,692,289	7,023,385	9,013,999	17,514,742	22,667,505	15,949,719
Transmission	100,013	2,444,584	1,638,514	1,481,841	1,940,948	2,377,694	1,676,064	2,066,718	1,348,972	1,371,452	2,941,345	2,254,677
Distribution	60,987	65,722	79,210	68,985	67,292	70,551	68,097	63,577	50,870	46,934	51,198	33,464
Customer Service & Information	353,093	281,681	352,587	151,218	307,154	155,682	248,903	278,591	758,487	260,104	88,558	3,328,362
Sales	6,475	5,962	5,244	5,777	5,283	4,944	8,692	5,621	10,015	(2,233)	1,543	62,990
Administration & General	2,288,509	2,154,798	2,738,100	2,115,497	3,190,707	2,094,248	1,758,997	1,917,384	2,168,263	2,433,815	2,490,872	2,713,983
Total Operation Expenses	36,329,828	46,241,462	36,727,021	41,072,580	43,240,248	58,205,271	39,091,076	37,946,652	40,385,332	46,723,985	60,821,552	53,759,468
Production	2,283,237	4,088,733	4,659,666	3,674,034	2,586,533	2,897,666	2,389,984	4,794,726	6,633,390	10,353,162	1,638,752	2,513,720
Transmission	292,311	188,504	234,448	294,084	279,260	876,010	288,578	484,363	274,085	543,228	244,162	4,251,105
Distribution	89,972	88,126	135,461	182,563	130,804	126,773	61,230	183,758	139,233	131,887	93,968	1,503,438
General Plant	42,702	48,143	54,232	47,236	47,072	76,023	62,882	48,893	37,951	59,130	66,264	810,461
Total Maintenance Expenses	2,708,222	4,413,507	5,083,808	4,247,894	3,095,592	4,011,351	2,883,358	5,403,201	7,140,126	11,073,573	2,069,841	55,078,606
Depreciation/Amortization	3,382,836	3,426,846	3,368,040	3,345,513	3,376,430	3,358,054	3,409,487	3,416,540	3,431,562	3,324,148	3,434,665	40,716,659
Taxes	(10,408)	8,302,227	8,566,274	8,268,196	8,729,658	8,780,908	8,736,876	9,123,407	8,839,071	9,161,194	9,074,194	104,592,641
Interest on Long-Term Debt	8,506,118	8,302,227	8,566,274	8,268,196	8,729,658	8,780,908	8,736,876	9,123,407	8,839,071	9,161,194	9,074,194	104,592,641
Other Interest Expense	13,310	(66,744)	9,932	13,217	8,275	12,131	9,266	4,706	4,706	3,332	2,705	20,127
Other Deductions	118,477	154,404	168,996	168,996	126,755	87,941	2,443,350	2,069,988	1,659,986	(6,048,934)	114,888	(2,485,395)
Total Operating Expenses	12,010,332	11,816,733	11,829,379	12,241,158	12,239,174	14,598,979	12,756,940	12,441,378	6,440,057	12,626,752	12,028,558	142,825,661
Total Cost of Electric Service	51,048,382	62,471,702	53,640,209	57,116,695	58,576,998	74,455,197	56,573,413	56,106,793	59,966,836	64,237,615	75,518,145	65,785,152
Operating Margins (Deficit)	13,326,381	(8,967,596)	7,679,201	(1,664,531)	538,000	(4,960,381)	8,180,528	(2,109,387)	(3,181,199)	(6,852)	8,786,040	9,331,582
Non-Operating Items	937,681	827,621	760,704	640,899	656,036	536,154	567,539	449,015	404,865	435,420	339,371	422,392
Interest Income	1,434,484	1,717,357	1,572,579	1,815,574	1,998,734	2,134,736	2,174,388	2,353,547	2,349,195	2,609,056	2,536,399	2,427,623
Allowance for Funds Used During Construction	303,318	20,957	6,290	(5,096)	5,289	(57,413)	4,829	(2,186)	6,260	11,604	(288)	290,414
Other Non-Operating Income	18,361	3,270	3,462	17,223	92,317	92,317	436	(3,141)	91	231	135,476	
Total Non-Operating Items	2,693,845	2,569,205	2,343,055	2,384,598	2,476,699	2,477,475	2,799,421	2,621,272	2,755,708	2,790,965	2,958,503	31,831,210
Net Patronage Capital & Margins (Deficit)	16,020,226	(6,398,391)	10,022,256	720,067	3,014,898	(2,462,906)	10,879,949	511,886	(425,492)	2,784,114	11,746,304	12,290,085

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EAST KENTUCKY POWER COOPERATIVE, INC.
STATEMENT OF OPERATIONS

1.40
1.15

12 month period ended 3/31/08	Mar-08	Feb-08	Jan-08	Dec-07	Nov-07	Oct-07	Sep-07	Aug-07	Jul-07	Jun-07	May-07	Apr-07
Electric Energy Revenues	52,298,829	59,745,511	53,785,949	57,606,169	67,360,468	62,723,609	51,327,037	55,184,534	62,372,044	62,124,839	72,272,889	64,847,294
Power Sales--Member Cooperatives	36,748	185,531	349,717	355,827	1,021,364	764,843	1,472,832	608,703	580,912	587,855	1,385,050	275,937
Power Sales--Off-System	15,235,577	59,931,042	54,135,666	57,961,996	68,381,832	63,488,452	52,799,869	55,791,237	62,952,956	82,712,704	73,657,939	65,123,231
Total Electric Energy Revenue	1,168,529	1,388,367	1,316,498	1,153,002	1,113,584	1,265,469	1,197,537	994,400	1,277,807	1,591,481	1,458,795	1,412,388
Other Operating Revenue--Income	53,504,105	61,319,410	55,452,164	59,114,998	69,495,416	64,753,941	53,997,408	56,785,637	64,230,763	84,304,185	75,116,735	66,535,619
Total Operating Revenue & Patronage Capital	46,241,462	36,727,021	41,072,580	43,240,248	58,205,271	39,091,076	37,946,652	40,385,332	46,723,985	60,821,552	50,808,461	53,427,938
Administration & General	2,154,798	2,738,100	2,115,497	3,190,707	2,094,248	1,758,597	1,917,384	2,168,263	2,433,815	2,490,872	1,789,063	1,959,893
Sales	5,962	5,324	5,437	5,383	4,964	8,692	5,621	10,015	10,015	(2,233)	1,543	2,053
Customer Service & Information	281,881	352,587	307,154	151,218	155,682	155,591	278,591	758,487	758,487	260,104	88,558	198,876
Distribution	65,722	79,210	68,965	67,292	58,097	63,577	50,870	46,934	46,934	51,198	33,464	39,029
Transmission	2,444,584	1,638,514	1,481,841	2,377,694	1,676,064	2,066,718	1,348,972	1,371,452	2,941,345	2,866,531	2,079,030	24,233,694
Other Power Supply	18,834,645	4,162,502	6,012,166	6,829,765	14,040,361	5,692,289	7,023,385	9,013,999	17,614,742	22,667,505	15,949,719	23,369,523
Fuel	18,295,472	22,209,615	25,300,327	24,454,112	32,625,390	23,604,127	21,094,824	21,422,829	25,568,836	26,109,779	25,519,295	21,425,750
Production Costs Excluding Fuel	4,158,399	5,541,168	5,996,225	6,600,429	6,684,491	6,141,225	5,523,167	6,096,888	(1,060,296)	4,302,983	4,560,287	4,353,783
Production	4,088,733	4,659,666	3,674,034	2,586,533	2,897,666	2,389,984	4,794,726	6,633,390	10,353,162	1,638,752	2,513,720	3,486,154
Transmission	188,504	234,448	294,084	279,260	878,010	288,578	274,085	274,085	543,228	240,072	254,162	258,669
Distribution	88,126	135,461	130,804	182,563	130,804	128,773	183,230	139,233	131,887	93,968	93,968	93,694
General Plant	48,143	54,232	142,113	47,296	104,872	76,023	62,882	48,893	37,951	59,130	66,264	48,244
Total Maintenance Expenses	4,413,507	5,083,808	4,247,894	3,095,592	4,011,351	2,883,358	5,403,201	7,140,126	11,073,573	2,069,841	2,948,134	3,886,761
Depreciation/Amortization	3,426,846	3,368,040	3,345,513	3,376,430	3,358,054	3,409,487	3,416,540	3,431,562	3,324,148	3,434,965	3,442,237	3,460,188
Taxes	298	140	-	-	140	53	53	53	53	-	(8,452)	9,252
Interest on Long-Term Debt	8,302,227	8,566,274	8,268,196	8,729,658	8,780,908	8,736,876	9,123,407	8,839,071	9,161,122	9,074,194	8,504,201	105,089,043
Other Interest Expense	(66,744)	9,332	13,217	8,275	12,131	9,266	9,996	4,705	3,332	2,705	-	1,420
Other Deductions	154,404	(174,867)	168,996	126,795	87,941	2,443,350	2,059,988	165,986	(6,048,934)	114,888	90,571	150,264
Total Operating Expenses	11,816,733	11,829,379	11,796,220	12,241,158	12,239,174	14,598,979	12,756,940	12,441,378	6,440,057	12,626,752	12,028,558	12,623,644
Total Cost of Electric Service	62,471,702	53,640,209	57,116,895	58,576,998	74,455,797	56,573,413	56,106,793	59,966,836	64,237,615	75,518,145	65,785,152	69,938,343
Operating Margins (Deficit)	(8,967,596)	7,679,201	(1,664,531)	538,000	(4,960,381)	8,180,528	(2,109,387)	(3,181,199)	(6,852)	8,786,040	9,331,582	(3,402,724)
Non-Operating Items	827,621	760,704	640,899	656,036	536,154	567,539	449,015	404,865	435,420	339,371	422,392	506,932
Interest Income	827,621	760,704	640,899	656,036	536,154	567,539	449,015	404,865	435,420	339,371	422,392	506,932
Allowance for Funds Used	1,717,357	1,572,579	1,731,572	1,815,574	1,998,734	2,134,736	2,353,547	2,349,195	2,609,058	2,536,399	2,438,416	25,431,555
During Construction	20,957	6,290	(5,096)	5,289	(57,413)	4,829	(2,196)	6,260	2,604	11,604	(288)	(15,697)
Other Non-Operating Income	2,270	3,482	17,223	92,317	92,317	436	436	91	231	231	37,177	154,292
Total Non-Operating Items	2,569,205	2,343,055	2,384,598	2,476,899	2,477,475	2,799,421	2,621,272	2,755,708	2,790,665	2,958,503	2,979,733	32,117,097
Net Patronage Capital & Margins (Deficit)	(6,398,391)	10,022,256	720,067	3,014,898	(2,482,906)	10,979,949	511,885	(425,492)	2,784,114	11,746,304	12,290,085	(422,992)

EAST KENTUCKY POWER COOPERATIVE, INC.
STATEMENT OF OPERATIONS

12 month period ended 3/31/08

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of March 31, 2008:

Smith Pollution Control Bonds	3.50%
Spurlock Pollution Control Bonds	2.18%
Cooper Solid Waste Disposal Bonds	1.85%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of February 29, 2008:

Smith Pollution Control Bonds	3.50%
Spurlock Pollution Control Bonds	3.31%
Cooper Solid Waste Disposal Bonds	1.85%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of January, 2008:

Smith Pollution Control Bonds	3.50%
Spurlock Pollution Control Bonds	2.10%
<i>Cooper Solid Waste Disposal Bonds</i>	<i>3.75%</i>

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of December, 2007:

Smith Pollution Control Bonds	3.50%
Spurlock Pollution Control Bonds	3.49%
Cooper Solid Waste Disposal Bonds	3.75%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of November, 2007:

Smith Pollution Control Bonds	3.50%
Spurlock Pollution Control Bonds	3.67%
Cooper Solid Waste Disposal Bonds	3.75%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of October, 2007:

Smith Pollution Control Bonds	3.50%
Spurlock Pollution Control Bonds	3.29%
Cooper Solid Waste Disposal Bonds	3.75%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of September, 2007:

Smith Pollution Control Bonds	3.70%
Spurlock Pollution Control Bonds	3.91%
Cooper Solid Waste Disposal Bonds	3.75%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of August, 2007:

Smith Pollution Control Bonds	3.70%
Spurlock Pollution Control Bonds	4.08%
Cooper Solid Waste Disposal Bonds	3.75%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of July, 2007:

Smith Pollution Control Bonds	3.70%
Spurlock Pollution Control Bonds	3.71%
Cooper Solid Waste Disposal Bonds	3.73%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of June, 2007:

<i>Smith Pollution Control Bonds</i>	3.70%
<i>Spurlock Pollution Control Bonds</i>	3.81%
<i>Cooper Solid Waste Disposal Bonds</i>	3.73%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of May, 2007:

Smith Pollution Control Bonds	3.70%
Spurlock Pollution Control Bonds	3.88%
Cooper Solid Waste Disposal Bonds	3.73%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of April, 2007:

Smith Pollution Control Bonds	3.70%
Spurlock Pollution Control Bonds	4.04%
Cooper Solid Waste Disposal Bonds	3.73%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of March, 2007:

Smith Pollution Control Bonds	3.55%
Spurlock Pollution Control Bonds	3.74%
Cooper Solid Waste Disposal Bonds	3.73%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of February, 2007:

Smith Pollution Control Bonds	3.55%
Spurlock Pollution Control Bonds	3.61%
Cooper Solid Waste Disposal Bonds	3.73%

Variable Rates on EKPC Debt

As requested by the KPSC in Case Number 95-135, dated May 26, 1995, East Kentucky Power Cooperative, Inc. is providing the current interest rates on its outstanding variable rate loans as of January 31, 2007:

Smith Pollution Control Bonds	3.55%
Spurlock Pollution Control Bonds	3.59%
Cooper Solid Waste Disposal Bonds	3.68%