

Goss • Samford PLLC



Attorneys at Law

September 21, 2012

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PUBLIC SERVICE
COMMISSION

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

Dear Mr. Derouen:

Re: Case No. 2012-00149

Please find enclosed for filing with the Commission an original and ten copies of East Kentucky Power Cooperative, Inc.'s responses to the Sierra Club's Motion to Compel EKPC to provide further responses to its June 8, 2012 Initial Request for Information (Responses to Items 19, 21, and 24) as outlined in the Commission's Order dated September 7, 2012.

Very truly yours,

Mark David Goss
Counsel

Enclosures

Cc: Parties of Record

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2012-00149
RESPONSE TO MOTION TO COMPEL

**UPDATED RESPONSES TO MOVANTS' INITIAL REQUESTS FOR
INFORMATION DATED 06/08/12**

REQUEST 19

RESPONSIBLE PERSON: Jerry Purvis

COMPANY: East Kentucky Power Cooperative, Inc.

Request 19. Refer to p. 172 of the IRP. With regards to the emissions testing that EKPC is conducting "to determine the best way to achieve compliance with the MATS rule":

Request 19a. Identify and produce the results of all emissions testing completed to date.

Request 19b. Identify any additional emissions testing that EKPC is undertaking or plans to undertake.

Request 19c. Identify the schedule by which EKPC expects to have all such emissions testing completed.

Response 19a-c. The Information Collection Request reports which are publicly available from the U.S. Environmental Protection Agency ("EPA") or the Kentucky Division of Air Quality ("KDAQ") are provided on the attached CD.

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2012-00149

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DATED 06/08/12**

REQUEST 21

RESPONSIBLE PERSON: Jerry Purvis

COMPANY: East Kentucky Power Cooperative, Inc.

Request 21. For each of EKPC's coal-fired electric generating units, identify the unit's emissions rate in lbs/mmBtu and total emissions in pounds or tons per year for each of 2009, 2010, and 2011 for each of the following pollutants:

- a. Mercury;
- b. Sulfur dioxide;
- c. HCl;
- d. Particulate matter.

Response 21. The 2009, 2010, and 2011 unit emissions information, which is publicly available from the EPA or the KDAQ, is provided on the attached CD.

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2012-00149

RESPONSE TO MOTION TO COMPEL

**UPDATED RESPONSES TO MOVANTS' INITIAL REQUESTS FOR INFORMATION
DATED 06/08/12**

REQUEST 24

RESPONSIBLE PERSON: Jerry Purvis

COMPANY: East Kentucky Power Cooperative, Inc.

Request 24. Refer to p. 176 of the IRP. With regards to the controls that EKPC "has committed" to installing on Cooper Unit 1:

Request 24a. Identify each such control EKPC has committed to installing.

Request 24b. Identify the projected capital cost for each such control.

Request 24c. Identify the projected annual O&M cost for each such control.

Request 24d. Identify the projected heat rate penalty for each such control.

Request 24e. Identify and produce any analysis comparing the cost of installing such controls and continuing to operate Cooper Unit 1 to the cost of retiring and replacing Cooper Unit 1.

Response 24a-e. In EKPC's response to the Movants' Initial Data Request, which was filed with the Commission on July 17, 2012, EKPC described its BART compliance plan. EKPC has included the protocols and analyses relating to its BART compliance plan on the attached CD. Please also note that EKPC discussed the cost differentials between wet and dry scrubbing technologies in its Application for a Certificate of Public Convenience and Necessity for the Construction of an Air Quality Control System at Cooper Power Station (Case No. 2008-00472.)