

JAN 23 2015

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January 23, 2015

VIA HAND DELIVERY

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

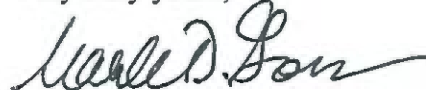
Re: *In the Matter of An Application of East Kentucky Power Cooperative, Inc. for a Certificate of Public Convenience and Necessity for Construction of an Ash Landfill at J. K. Smith Station to Receive Impounded Ash from William C. Dale Station, and for Approval of a Compliance Plan Amendment for Environmental Surcharge Recovery (PSC Case No. 2014-00252)*

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case: (1) an original and ten (10) copies of the Supplemental Response of East Kentucky Power Cooperative, Inc. ("EKPC"), to Commission Staff's First Request for Information (Request No. 20(c)) dated October 9, 2014; (2) an original and ten (10) copies of the Responses of EKPC to Commission Staff's Third Request for Information dated January 12, 2015; (3) an original and ten (10) copies of a Motion for Confidential Treatment; (4) a redacted original and ten (10) redacted copies of the Responses of EKPC to the Attorney General's Third Request for Information dated January 14, 2015; and (5) an un-redacted copy (with certain Confidential Information highlighted) of the Responses of EKPC to the Attorney General's Third Request for Information dated January 14, 2015, which is to be filed and kept under seal.

Please return file-stamped copies to me.

Very truly yours,



Mark David Goss

Enclosures

cc: Parties of Record

RECEIVED

JAN 23 2015

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN APPLICATION OF EAST KENTUCKY)
POWER COOPERATIVE, INC. FOR A)
CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY FOR CONSTRUCTION OF AN)
ASH LANDFILL AT J. K. SMITH STATION TO)
RECEIVE IMPOUNDED ASH FROM WILLIAM)
C. DALE STATION, AND FOR APPROVAL OF A)
COMPLIANCE PLAN AMENDMENT FOR)
ENVIRONMENTAL SURCHARGE RECOVERY)

CASE NO.
2014-00252

**SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S INITIAL REQUEST FOR
INFORMATION TO EAST KENTUCKY POWER COOPERATIVE, INC.**

DATED OCTOBER 9, 2014

[REQUEST NO. 20(c)]

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
SUPPLEMENTAL RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 20

RESPONSIBLE PARTY: Matt Clark

Request 20. Refer to the Purvis Testimony, page 12, regarding the two options for a bottom liner at the proposed special waste landfill at the Smith Station.

Request 20(c). Explain how each option would comply with the federally proposed Carbon Combustion Rule.

Response 20(c). The current Coal Combustion Residuals Rule provides design requirements for the subtitle D option (a relevant excerpt from the requirements is provided on the enclosed DVD). They list a composite liner system consisting of a 60 mil geomembrane and 24" low permeable compacted clay liner. It is a very short section and does not go into the detail on whether they will accept a GCL as equivalent to the 24" of clay as the industry has been doing for many years. If the GCL is considered equivalent in the final rule, then both options meet the new CCR, however, as written only the 24" clay option meets CCR. That is why EKPC permitted both options, either way Smith Landfill will have a liner system in the permit that meets the pending regulations.

Supplemental Response 20(c). In light of the EPA's finalization of the Disposal of Coal Combustion Residuals from Electric Utilities rule ("CCR Rule") on December 19, 2014, EKPC believes it appropriate to provide some additional information regarding the bottom liner options at the proposed Special Waste Landfill at Smith Station.

The CCR Final Rule applies to any landfill that will receive CCR for disposal on or after the effective date of the Final Rule, which is expected to be in July 2015. Both liner options available to EKPC will comply with the CCR Final Rule. Option 1 includes a minimum 24" low permeability soil liner with a 60 mil high-density polyethylene (HDPE) geomembrane and a leachate collection system, which is the minimum liner design criteria specified in the CCR Final Rule. Option 2 includes a 6" soil base with a geosynthetic clay liner and a 60 mil HDPE geomembrane, with a leachate collection system, which complies with the alternative liner specification in the CCR Final Rule. EKPC has not made a decision on which liner option to install at Smith Landfill.