

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF EAST KENTUCKY POWER	)	
COOPERATIVE, INC. FOR AN ORDER	)	
DECLARING THE EXPANSION OF THE	)	CASE NO.
BAVARIAN LANDFILL GAS TO ENERGY	)	2015-00284
PROJECT TO BE AN ORDINARY EXTENSION	)	
OF EXISTING SYSTEMS IN THE USUAL	)	
COURSE OF BUSINESS	)	

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

East Kentucky Power Cooperative, Inc. ("EKPC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before October 23, 2015. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

EKPC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which EKPC fails or refuses to furnish all or part of the requested information, EKPC shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, EKPC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, numbered paragraph 6, where EKPC requests that the Commission render a decision in this matter on or before November 1, 2015.

a. Explain in specific detail why EKPC has requested that the Commission render a decision on or before November 1, 2015.

b. How would the project be affected if the Commission were not to render a decision until 120 to 150 days after the date the application was filed?

2. Refer to the Application, Exhibit 1.

a. Explain how the Caterpillar 3516 and 3520 engine generators differ.

b. Explain the performance issues that caused a 3520 engine to be replaced by a smaller engine, resulting in a spare 3520 engine.

3. Refer to the Application, the first page of Exhibit 2.

a. There are two items listed under the heading "From Mason County LFGTE." Explain the derivation of the costs indicated for each item.

- b. Refer to the table of expected O&M costs.
  - (1) Explain the items listed as "Top End (year 1,2,4,5)" and "In-frame (year 3)."
  - (2) For the line item "Top End (year 1,2,4,5)," explain why there are costs indicated in years 3 and 6.
  - (3) Provide a detailed breakdown of the items that make up "Miscellaneous."
- 4. Refer to the Application, the second page of Exhibit 2.
  - a. Explain why Interest Expense is zero for years 2013 through 2015.
  - b. Provide all assumptions and documentation that support the derivation of the amounts indicated.
  - c. Provide the schedule on page 2 in Excel spreadsheet format with all cells and formulas intact and unprotected.
- 5. Refer to the Application, the first page of Exhibit 3, which states that EKPC will "roll the Bavarian Expansion Project into a future RUS loan application." What is the expected application date and amount for the future RUS loan application?
- 6. Refer to the Application, Exhibit 5. Provide the \$/mmBtu that EKPC has paid Bavarian Landfill for the calendar year 2015.

DATED **OCT 07 2015** \_\_\_\_\_

cc: Parties of Record

  
Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

\*East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707

\*L Allyson Honaker  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504