

David S. Samford (859) 368-7740 david@gosssamfordlaw.com

October 5, 2016

VIA HAND DELIVERY

Dr. Talina Mathews, Ph.D. Executive Director Kentucky Public Service Commission P.O. Box 615 211 Sower Boulevard Frankfort, KY 40602

Re:

PSC Case No. 2016-00231

RECEIVED
OCT 5 2016

PUBLIC SERVICE COMMISSION

Dear Dr. Mathews:

Enclosed, please find for filing with the Commission in the above-referenced case an original and eight redacted copies of the responses of East Kentucky Power Cooperative, Inc. ("EKPC"), to the Commission Staff's Second Request for Information, dated September 21, 2016.

Also enclosed for filing are an original and eight copies of EKPC's Motion for Confidential Treatment of Information ("Motion"). One unredacted copy of the designated confidential portions of these responses, which are the subject of the Motion, is enclosed in a sealed envelope.

Please return a file-stamped copy of these filings to my office.

Very truly yours,

David S. Samford

Enclosures

RECEIVED

OCT 5 2016

PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:		
AN EXAMINATION OF THE APPLICATION OF)	
THE FUEL ADJUSTMENT CLAUSE OF EAST)	CASE NO.
KENTUCKY POWER COOPERATIVE, INC.	ĺ	2016-00231
FROM NOVEMBER 1, 2015 THROUGH APRIL	Ś	
30, 2016)	

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

DATED SEPTEMBER 21, 2016

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2016-00231

PUBLIC SERVICE COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION DATED 09/21/16

East Kentucky Power Cooperative, Inc. ("EKPC") hereby submits responses to the information requests contained in the Appendix to the Order of the Public Service Commission ("PSC") in this case dated September 21, 2016. Each response with its associated supportive reference materials is individually tabbed.

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN	THE	MAT	LTER	OF.
111	$\mathbf{I}\mathbf{\Pi}\mathbf{\Gamma}$	VIA	LINK	Ur:

AN EXAMINATION OF THE APPLICATION OF)	
THE FUEL ADJUSTMENT CLAUSE OF EAST)	CASE NO.
KENTUCKY POWER COOPERATIVE, INC.)	2016-00231
FROM NOVEMBER 1, 2015 THROUGH APRIL)	
30, 2016)	

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Mark Horn, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff's Second Request for Information dated September 21, 2016, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Mark How

Subscribed and sworn before me on this 4th day of October 2016.

Notary Public

Jeannie M. Jones
Notary Public, ID No. 502954
State at Large, Kentucky
My Commission Expires on Jan. 15, 2018

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN	THE	MATT	ER	OF:

AN EXAMINATION OF THE APPLICATION OF)	
THE FUEL ADJUSTMENT CLAUSE OF EAST)	CASE NO.
KENTUCKY POWER COOPERATIVE, INC.)	2016-00231
FROM NOVEMBER 1, 2015 THROUGH APRIL)	
30, 2016)	

CERTIFICATE

STATE OF KENTUCKY)
COUNTY OF CLARK)

Julia J. Tucker, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff's Second Request for Information dated September 21, 2016, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

Subscribed and sworn before me on this

day of

2016

Notary Public



EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2016-00231 FUEL ADJUSTMENT CLAUSE RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION DATED 09/21/16 REQUEST 1

RESPONSIBLE PARTY:

Mark Horn

Refer to East Kentucky's response to the Commission's August 12, 2016 Request for Information ("August 12, 2016 Request"), Item 25. Confirm that, for the review period, copies of the following have been filed with the Commission. If an item has not been filed, explain why it has not been filed and provide a copy.

Request 1a. Long-term purchase contracts for coal, natural gas, or fuel oil;

Response 1a. All long-term purchase contracts for coal, natural gas, or fuel oil have already been filed with the Commission.

Request 1b. Spot or short-term purchase contracts for coal, natural gas, or fuel oil;

Response 1b. All spot or short-term purchase contracts for coal, natural gas, or fuel oil have already been filed with the Commission.

Request 1c. Master agreements for coal, natural gas, or fuel oil;

Response 1c. EKPC does not have master agreements for coal based on the assumption a master agreement is a document agreed between two parties that sets out standard terms that apply to all transactions entered into between these parties. Therefore, each time a transaction is entered into, the terms of the master agreement do not need to be renegotiated and apply automatically. Master agreements for natural gas have already been filed with the Commission. The master agreements for the "rack-plus" fuel oil have already been filed with the Commission. The "fixed price" fuel oil is addressed in Response 1b. as a spot or short-term purchase contract.

Request 1d. Purchase confirmations relating to the master agreements for coal, natural gas, or fuel oil. (For voluminous natural gas purchases, if the utility filed documentation such as monthly invoices or a listing of transactions showing date, quantity purchased, and price in lieu of filing the purchase confirmations, confirm that such documentation was filed.);

Response 1d. EKPC does not have master agreements for coal. The purchase confirmations relating to the master agreements for natural gas are attached as pages 4 through 9. This item had not been filed previously because Appendix B Format 2 had been filed for natural gas each month. The purchase confirmations relating to the master agreements for fuel oil are attached as pages 10 through 13. This item had not been filed previously because Appendix B Format 2 had been filed for fuel oil each month, which showed both the "rack-plus" and "fixed price" (spot or short-term purchase contracts) purchases. Information contained on pages 4 through 13 is subject to a motion for confidential treatment.

Request 1e. Copies of all natural gas transportation agreements;

Response 1e. Copies of all natural gas transportation agreements have already been filed with the Commission. EKPC does not have any firm natural gas transportation agreements.

Request 1f. Copies of all transportation agreements relating to barging, trucking, rail, etc.

Response 1f. Copies of all transportation agreements relating to barging, trucking, rail, etc., have already been filed with the Commission.

REDACIED

PSC Request 1 Page 4 of 13

EKPC Trade Data



Flow Date	MMBTU	Price	Total Dollars	Execution	Counterparty	Location
11/24/2015				Natural Gas	Sequent Energy Management, LP	TGP-EKPC Smith
11/23/2015				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
11/22/2015				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
11/21/2015				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
11/10/2015				Natural Gas	Sequent Energy Management, LP	TGP-EKPC Smith
11/09/2015				Natural Gas	Sequent Energy Management, LP	TGP-EKPC Smith
11/09/2015				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
11/04/2015				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
11/03/2015				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
11/03/2015				Natural Gas	Sequent Energy Management, LP	TGP-EKPC Smith
11/02/2015				Natural Gas	Sequent Energy Management, LP	TGP-EKPC Smith
11/02/2015				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
11/02/2015				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith

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EKPC Trade Data



From: 12/01/2015 To 12/31/2015

Flow Date	MMBTU	Price	Total Dollars	Execution	Counterparty	Location
12/31/2015				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
12/17/2015				Natural Gas	Sequent Energy Management, LP	TGP-EKPC Smith

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EKPC Trade Data

From: 01/01/2016 To 01/31/2016

Flow Date	MMBTU	Price	Total Dollars	Execution	Counterparty	Location
01/29/2016				Natural Gas	Sequent Energy Management, LP	TGP-EKPC Smith
01/29/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
01/20/2016				Natural Gas	NJR Energy Services Company	Texas Gas-SL Pool
01/19/2016				Natural Gas	Tenaska Marketing Ventures	Texas Gas-Lebanon-REX
01/19/2016				Natural Gas	NJR Energy Services Company	Texas Gas-SL Pool
01/19/2016				Natural Gas	BP Energy Company	Texas Gas-SL Pool
1/18/2016				Natural Gas	Tenaska Marketing Ventures	Texas Gas-Lebanon-REX
01/15/2016				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
01/13/2016				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
01/13/2016				Natural Gas	NJR Energy Services Company	Texas Gas-SL Pool
01/13/2016				Natural Gas	Sequent Energy Management, LP	TGP-EKPC Smith
01/13/2016				Natural Gas	BP Energy Company	Texas Gas-SL Pool
01/13/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
01/12/2016				Natural Gas	NJR Energy Services Company	Texas Gas-SL Pool
01/12/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
01/12/2016				Natural Gas	Sequent Energy Management, LP	TGP-EKPC Smith
01/12/2016				Natural Gas	BP Energy Company	Texas Gas-SL Pool
01/11/2016				Natural Gas	BP Energy Company	Texas Gas-SL Pool
01/05/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
01/04/2016				Natural Gas	Atmos Energy Marketing, LLC	TGP-EKPC Smith

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EKPC Trade Data

From: 02/01/2016 To 02/29/2016

Flow Date	ммвти	Price	Total Dollars	Execution	Counterparty	Location
02/29/2016				Natural Gas	Sequent Energy Management, LP	TGP-EKPC Smith
02/27/2016				Natural Gas	Sequent Energy Management, LP	TGP-EKPC Smith
02/18/2016				Natural Gas	BP Energy Company	TGP-EKPC Smith
02/17/2016				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
02/16/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/16/2016				Natural Gas	Tenaska Marketing Ventures	Texas Gas-Zone 1 Pool
02/15/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/15/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
02/15/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/15/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
02/15/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/14/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/14/2016				Natural Gas	Tenaska Marketing Ventures	Texas Gas-Lebanon-REX
02/13/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/13/2016				Natural Gas	Tenaska Marketing Ventures	Texas Gas-Lebanon-REX
02/11/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/11/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
02/10/2016				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
02/10/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/09/2016				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith
02/08/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/08/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
02/07/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/06/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/05/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/05/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/04/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
02/03/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
02/02/2016				Natural Gas	Direct Energy Business Marketing, LLC	TGP-EKPC Smith

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EKPC Trade Data



Flow Date	MMBTU	Price	Total Dollars	Execution	Counterparty	Location
03/24/2016				Natural Gas	BP Energy Company	TGP-EKPC Smith
03/21/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
03/16/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
03/15/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
03/08/2016				Natural Gas	Sequent Energy Management, L.P.	TGP-EKPC Smith
03/07/2016				Natural Gas	Sequent Energy Management, L.P.	TGP-EKPC Smith
03/07/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
03/06/2016				Natural Gas	Sequent Energy Management, L.P.	TGP-EKPC Smith
03/05/2016				Natural Gas	Sequent Energy Management, L.P.	TGP-EKPC Smith
03/05/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
03/03/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
03/02/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith

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EKPC Trade Data



Flow Date	MMBTU	Price	Total Dollars	Execution	Counterparty	Location
04/27/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/25/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/25/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/24/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/24/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/22/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/22/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/21/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/21/2016				Natural Gas	BP Energy Company	TGP-EKPC Smith
04/21/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/20/2016				Natural Gas	BP Energy Company	TGP-EKPC Smith
04/20/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/19/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/19/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/18/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/18/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/18/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/18/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/12/2016				Natural Gas	Sequent Energy Management, L.P.	TGP-EKPC Smith
04/12/2016				Natural Gas	Sequent Energy Management, L.P.	TGP-EKPC Smith
04/11/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/11/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/11/2016				Natural Gas	Sequent Energy Management, L.P.	TGP-EKPC Smith
04/10/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/10/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/10/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/10/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/09/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/09/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/09/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/08/2016				Natural Gas	Tenaska Marketing Ventures	TGP-EKPC Smith
04/08/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/07/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith
04/05/2016				Natural Gas	NJR Energy Services Company	TGP-EKPC Smith

EAST KENTUCKY POWER COOPERATIVE FUEL OIL PURCHASES NOVEMBER 01, 2015 - APRIL 30, 2016

		COOPER	POWER :	STATION			COOPER POWER STATION						
				2015		· .					2015		
		KY Oil	& Refining	CO., Inc P	urchase Orde	er #43531				Petrole	um Traders	Corp. #43538	
			Rack	Contract	Total	Total				Fixed	Contract	Total	Total
Date	Invoice #	Gallons	Price	Adder	Price/Gal	Invoice	Date	Invoice #	Gallons	Price	Adder	Price/Gal	Invoice
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							11/12/2015	952202B					
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Invoice #	Gallons	Price	Adder	Price/Gal	Invoice					
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		Petro	leum Trade	ers Corp Pu	ırchase Order	#43537	
	• • • •		Fixed	Contract	Total	Total	
Date	Invoice #	Gallons	Price	Adder	Price/Gal	Invoice	
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February Tot	als	0.0	#DIV/0!	0.0000	#DIV/0!	\$0.00	

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Page 11 of 13	PSC Request
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•		Petro	Petroleum Traders Corp Purchase Order #43543			r #43543			Petro	leum Trade	ers Corp Pu	ırchase Order	#43537
D-4-		Callana	Rack	Contract	Total	Total				Fixed	Contract	Total	Total
Date	Invoice #	Gallons	Price	Adder	Price/Gal	Invoice	Date	Invoice #	Gallons	Price	Adder	Price/Gal	Invoice
3/1/2016	984767												
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April Totals		0.0	#DIV/0!	0.0000	#DIV/0!	\$0.00	April Totals		0.0	#DIV/0!	0.0000	#DIV/0!	\$0.00

EAST KENTUCKY POWER COOPERATIVE FUEL OIL PURCHASES NOVEMBER 01, 2015 - APRIL 30, 2016

		SPURLO	CK POWE	R STATION	J				SPURLO	OCK POW	ER STATIC	N	
				2015			_				2015		
		KY Pe	troleum Su	apply Inc., - I	Purchase Ord	der #43530]		кү о	il & Refinir	ig CO., Inc	Purchase Orde	er #43533
			Rack	Contract	Total	Total				Fixed	Contract	Total	Total
Date	Invoice #	Gallons	Price	Adder	Price/Gal	Invoice	Date	Invoice #	Gallons	Price	Adder	Price/Gal	Invoice
11/19/2015	0472869-IN) • (. (11/17/2015	316337					
11/19/2015	0472870-IN			. (11/17/2015	316338					
11/19/2015	0472871-IN						11/17/2015	316363					
11/20/2015	0473070-IN						11/18/2015	316367					
11/20/2015	0473072-IN						11/18/2015	316369					
11/27/2015	0473814-IN						11/18/2015	316385					
11/27/2015	0473810-IN												
11/21/2015	0473204-IN						ì	,					
11/24/2015	0473448-IN												
11/25/2015	0473640-IN												
11/25/2015	0473642-IN												
November To	otals						November T	otals					
12/4/2015	474725-IN						12/2/2015	316618					•
12/4/2015	474723-IN						12/2/2015	316619					
12/4/2015	474928-IN				•		12/2/2015	316648					
							12/3/2015	316679					
							12/4/2015	316694					
							12/3/2015	316737					. (
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December To	tals						December To	otals					

Harper Oil Products, Inc Purchase Order #43542							
	Rack	Contract	Total	Total			
llons	Price	Adder	Price/Gal	Invoice			
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2016

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Date	Invoice #	Gallons	Price	Adder	Price/Gal	Invoice	
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		Petroleum Traders Corp Purchase Order #43537							
			Fixed	Contract	Total	Total			
Date	Invoice #	Gallons	Price	Adder	Price/Gal	Invoice			
1/5/2016	966811								
1/5/2016	966817								
1/5/2016	966817								
1/5/2016	966817								
1/29/2016	975177								
1/29/2016	975177								
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		Harper Oil Products, Inc Purchase Order #43542				•		Petroleum Traders Corp Purchase Order #43537					
		Tiaip	Rack Contract				,						Total
Date	Invoice #	Gallons	Price	Adder	Price/Gal	Invoice	Date	Invoice #	Gallons	Price	Adder	Price/Gal	Invoice
2/1/2016	857713	4		1.000	()		2/16/2016	980999	and the same of th	11100	, lader	Trice, ear	anvoice .
2/1/2016	857714			1		•	2/16/2016	980999	+	\rightarrow	†	-	
2/1/2016	857715			1	*		2/16/2016	980999	7		†		
		,					2/16/2016	980999			`		
		-					2/26/2016	983329	+	\rightarrow			
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February Totals						February Totals							
							3/18/2016	991581					
							3/17/2016	991423					
			,				3/17/2016	991577		-			
						,	3/17/2016	991575					
,							3/21/2016	991579					
					·		3/18/2016	991428					
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March Totals		0.0	#DIV/0!	0.0000	#DIV/0!	\$0.00	March Total						
4/22/2016	862096						4/22/2016	103581					
4/23/2016	862097		•				4/22/2016	103581					
4/23/2016	862098						4/22/2016	103581					
4/24/2016	862099					. (4/22/2016	103581					
4/25/2016	862100						4/22/2016	103581		_ (. (
4/25/2016	862211									•			
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4/26/2016	862218						•						
4/27/2016	862219												
4/27/2016	862220						·				 		
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4/27/2016	862222	→ ⊰		· · · · · ·									
4/27/2016	862223			;;				<u> </u>					
4/28/2016	862225			;	,;		<u> </u>	•					
April Totals							April Totals						

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2016-00231 FUEL ADJUSTMENT CLAUSE RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION DATED 09/21/16
REQUEST 2

RESPONSIBLE PARTY:

Julia J. Tucker

Refer to East Kentucky's response to the August 12, 2016 Request,

Item 26, page 2 of 2. The response states, "[t]he fuel price is based on inventory prices and
the unit heat rate is based on average operational values for that month."

Request 2a. Explain in detail how the fuel cost (\$/MWh) is calculated for the unit suffering a forced outage.

Response 2a. EKPC calculates the actual fuel cost from the unit during the time that it ran during the month. The amount of coal burned plus any fuel oil required for supplemental heat is found from operating records. These volumes are then converted to equivalent MMBtu consumed. The cost for these fuels are calculated based on the average inventory cost and then divided by the amount of MMBtu volume consumed to develop an average \$/MMBtu fuel cost. EKPC then figures how many hours the unit was not available and how many MW the unit would have produced each hour if it had been available. This

calculation provides the amount of MWh that had to be replaced by an alternative source, namely the PJM market. Finally, the MWh lost due to the outage is multiplied by the average unit fuel cost (\$/MMBtu) and then multiplied by the unit's average heat rate (MMBtu/kWh) to get the total amount of fuel cost that would have been incurred if the unit had been available during the forced outage period. This total fuel cost divided by the lost MWh results in the average fuel cost (\$/MWh) during the outage period.

Request 2b. Provide an example of the calculation from an actual forced outage during the review period.

Response 2b. Spurlock 4 was out from November 11, 2015 at hour ending 20:00 through November 15, 2015 at hour ending 24:00, for a total of 101 hours. The amount of MWh lost from Spurlock 4 during this time period was 25,676 MWh or 25,676,000 kWh. During the month of November, 2015, Spurlock 4 generated a total of 97,473,000 kWh. Spurlock 4 consumed 93,832,000 pounds of coal and 67,369 gallons of fuel oil. Based on the heat content of these two fuels, Spurlock 4 consumed a total of 1,003,956.5434 MMBtu of fuel at a total cost of \$2,221,392.67, for an average fuel cost of \$2.21/MMBtu. (\$2,221,392.67 / 1,003,956.5434 MMBtu = \$2.21/MMBtu).

25,676,000 kWh lost from Spurlock 4 times the unit's average heat rate (see Response 2c) of 10,300 Btu/kWh divided by 1,000,000 Btu/MMBtu times the average fuel cost of

2.21/MMBtu equals 584,462.79 for the total cost of fuel that would have been consumed if the unit had been available and not forced out. (25,676,000 kWh * 10,300 Btu/kWh / 1,000,000 Btu/MMBtu * <math>2.21/MMBtu = 584,462.79.

EKPC purchased 25,676,000 kWh from the PJM market during the outage time period, instead of generating it from Spurlock 4, at an average cost of \$25.474/MWh for a total expenditure of \$654,061.94. The incremental cost of purchasing from the market as compared to generating the energy is \$69,599.15 (\$654,061.94 - \$584,462.79 = \$69,599.15).

Request 2c. Explain in detail how the heat rate is calculated for the unit suffering a forced outage.

Response 2c. The average heat rate for the unit, in this example Spurlock 4, is calculated by dividing the total number of Btu of fuel consumed divided by the net kWh generated to obtain the Net Unit Heat Rate. For November 2015, Spurlock 4 consumed 1,003,956,543,400 Btu and produced a net generation of 97,473,000 kWh. This results in an average net unit heat rate of 10,300 Btu/kWh (1,003,956,543,400 / 97,473,000 = 10,300).

Request 2d.

Provide an example from an actual forced outage during the review

period.

Response 2d.

Please refer to the response to Request 2b.