

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF EAST KENTUCKY POWER)	
COOPERATIVE, INC. FOR APPROVAL TO)	
AMEND ITS ENVIRONMENTAL COMPLIANCE)	CASE NO.
PLAN AND RECOVER COSTS PURSUANT TO)	2018-00270
ITS ENVIRONMENTAL SURCHARGE, AND)	
FOR THE ISSUANCE OF A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY)	

COMMISSION STAFF'S SECOND 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 six copies of the following information, with a copy to all parties of record. The information requested herein is due on or before December 19, 2018. 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 document containing personal information, EKPC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to EKPC's response to Commission Staff's First Request for Information, Item 12, page 2 of 2. Explain why Project 17 has no accumulated depreciation.

2. Refer to the Direct Testimony of Isaac S. Scott, page 10, lines 2–9. Explain how recovering the costs of the Cooper and Spurlock landfill closures and asset retirement obligation settlements through the environmental surcharge after the costs are incurred is consistent with KRS 278.183(1), which provides that “a utility shall be entitled to the *current* recovery of its costs of compliance....” (emphasis added).

3. Refer to EKPC's response to the Attorney General's First Request for Information, Item 11. Explain whether EKPC intends to recover the costs of these projects through its environmental surcharge and if so, why EKPC is not proposing to include the two completed projects in the instant environmental compliance plan amendment.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED DEC 04 2018

cc: Parties of Record

Case No. 2018-00270

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