

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF EAST	)	
KENTUCKY POWER COOPERATIVE, INC.	)	
AND INTER-COUNTY ENERGY	)	
COOPERATIVE CORPORATION FOR	)	CASE NO.
APPROVAL OF AN INDUSTRIAL POWER	)	2020-00193
AGREEMENT WITH ECONOMIC	)	
DEVELOPMENT RIDER AND RENEWABLE	)	
ENERGY PURCHASES	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO EAST KENTUCKY POWER COOPERATIVE, INC. AND  
INTER-COUNTY ENERGY COOPERATIVE CORPORATION

East Kentucky Power Cooperative, Inc. (EKPC) and Inter-County Energy Cooperative Corporation (Inter-County Energy) (collectively, Joint Applicants), pursuant to 807 KAR 5:001, are to file with the Commission an electronic version of the following information. The information requested herein is due on September 9, 2020. The Commission directs the Joint Applicants to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 the 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.

Joint Applicants shall make timely amendment to any prior response if Joint Applicants obtain information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Joint Applicant fail or refuse to furnish all or part of the requested information, Joint Applicant shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall 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, Joint Applicants 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 Joint Applicants' response to Commission Staff's First Request for Information (Staff's First Request), Item 1, Excel spreadsheet titled "CONFIDENTIAL – Response 1 – EKPC – Inter-County – Diageo – Sample Billings". Also, refer to EKPC's current tariff on file with the Commission, P.S.C. No. 35, First Revised Sheet No. 37,

which states that owner–members will be billed at the rate of \$2.50 per increment for Renewable Energy Certificate (REC) purchases, and Inter-County Energy’s current tariff on file with the Commission, P.S.C. KY. No. 8, Revision #1, Sheet No. 44, which states that customers may make contributions of any amount in \$2.75 increments for REC purchases. Explain why the rates listed for REC purchases in the Excel spreadsheet do not match the amounts listed in EKPC’s and Inter-County Energy’s tariff.

2. Refer to the Joint Applicants’ response to Staff’s First Request, Item 1, Excel spreadsheet titled “CONFIDENTIAL – Response 1 – EKPC – Inter-County – Diageo – Sample Billings”. Explain why, for each of the billing periods, the number of months in operation is listed as 11.

3. Refer to the Joint Applicants’ response to Staff’s First Request, Item 3. Also, refer to EKPC’s current tariff on file with the Commission, P.S.C. No. 35, First Revised Sheet No. 37. Confirm that the administrative fee being waived is the \$0.25 per increment listed in the Monthly Program Contribution section of EKPC’s Rate H, Wholesale Renewable Energy Program. If not confirmed, explain.

4. Refer to the Joint Applicants’ response to Staff’s First Request, Item 3. Explain how the administrative fee places an unacceptable burden on Diageo.



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Acting Executive Director  
Public Service Commission  
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DATED   AUG 27 2020  

cc: Parties of Record

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