2005 15:37 FAX 8597446008 EKPC 2001 East Kentucky Power Cooperative, Inc. 4775 Lexington Road (40391) Legal Department PO Box 707 Ainchester, KY 40392-0707 859.744.6008 - fax 859.737.8087 - Legal Div. fax RECEIVED DEC 1 2 2005 Elizabeth O'Donnell From: **Charles Lile** PUBLIC SERVICE Tor COMMISSION 502.564.7279 Pages: 7 Faxa <u>boue:</u> Date: December 12, 2005

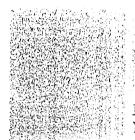
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CC:

PSC Case No. 2005-00053

Re;





ecember 12, 2005

Ms. Elizabeth O'Donnell Executive Director Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

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PUBLIC SERVICE

Re: PSC Case No. 2005-00053

Dear Ms. O'Donnell:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten (10) copies of the Motion of East Kentucky Power Cooperative, Inc., ("EKPC"), for an Enlargement of Time in Which to File Responses to Information Requests From the Hearing Held on November 29, 2005.

Also enclosed are an original and ten (10) copies of a historical schedule of the operation of EKPC's combustion turbines at the J. K. Smith Generating Station, which is a partial response to an information request made at the subject hearing.

Very truly yours,

ian a. Lib

Charles A. Lile Senior Corporate Counsel

Enclosures

Cc: Elizabeth E. Blackford, Esq. Michael L. Kurtz, Esq. Stephen M. Soble, Esq. Frederic J. Cowan, Esq.

4775 Lexington Road 40391 P.O. Box 707, Winchester, Kentucky 40392-0707 Tel. (859) 744-4812 Fax: (859) 744-6008 http://www.ekpc.coop



PUBLIC SERVICE

CONALAISSIO

CASE NO. 2005-00053

)

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY POWER COOPERATIVE, INC. FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY, AND A SITE COMPATIBILITY CERTIFICATE, FOR THE CONSTRUCTION OF A 278 MW (NOMINAL) CURCULATING FLUIDIZED BED COAL FIRED UNIT AND FIVE 90 MW (NOMINAL) COMBUSTION TURBINES IN CLARK COUNTY, KENTUCKY

MOTION OF EAST KENTUCKY POWER COOPERATIVE, INC., FOR AN ENLARGEMEMENT OF TIME IN WHICH TO FILE RESPONSES TO INFORMATION REQUESTS FROM THE HEARING HELD ON NOVEMBER 29, 2005

East Kentucky Power Cooperative, Inc., ("EKPC") hereby moves the Kentucky Public Service Commission (the "Commission") for an enlargement of time in which to respond to information requests made by the Commission staff at the hearing in this case, held on November 29, 2005. As grounds for this Motion, EKPC states as follows:

1. At the subject hearing, the Commission staff requested that EKPC submit an sconomic analysis concerning the timing of the commercial operation of proposed new combustion turbines at the Smith Station site, in light of the current schedule for the installation of new transmission capacity to support new generation at that site. EKPC is in the process of obtaining and evaluating information which is relevant to this analysis, and preliminary discussions between EKPC transmission and generation planning staff have taken place. These discussions have explored alternative transmission projects which could alleviate the timing concerns which were discussed at the hearing. Further EKPC

discussions of such measures will require additional meetings, which cannot take place until the week of December 12, 2005, due to pre-existing commitments of the EKPC staff involved. This will leave insufficient time to incorporate information regarding such alternative measures into the requested economic evaluation, and adequately review the evaluation before the scheduled filing date of December 13.

2. The response to a portion of the other information request at that hearing, made by the Chairman, regarding a schedule of the historic operation of EKPC's combustion turbines at the Smith Station site, has been filed along with this motion. The remainder of the response, regarding projected future use of both existing and proposed new combustion turbines, cannot be completed until the evaluation of alternative transmission measures, discussed above, is complete. Therefore, EKPC proposes to submit this information at the time that the economic analysis is filed.

WHEREFORE, EKPC respectfully moves the Commission for an enlargement of time through December 22, 2005, in which to respond to the subject information requests.

Respectfully submitted,

DALE W. HENLEY I.Lih

CHARLES A. LILE

ATTORNEYS FOR EAST KENTUCKY POWER COOPERATIVE, INC. P. O. BOX 707 WINCHESTER, KY 40392-0707 (859) 744-4812 005 13:38 FAX 8597446008

EKPC

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Motion of East Kentucky Power Cooperative, Inc. for an Enlargement of Time in Which to File Responses to Information Requests from the Hearing on November 29, 2005 in the above-referenced case, was transmitted by facsimile, and an original and ten copies were mailed, to Elizabeth O'Donnell, Executive Director, Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601, and copies were mailed to Parties of Record, on December 12, 2005.

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2005

CHARLES A. LILE

2006

PSC Request Page 1 of 2

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2005-00053 INFORMATION REQUEST RESPONSE

PUBLIC SERVICE COMMISSION DATA REQUEST AT HEARING ON NOVEMBER 29, 2005 RESPONDING PERSON: David Eames

<u>Request:</u> Please provide a schedule showing the operation of EKPC's

Combustion Turbines at the J. K. Smith Generating Station for the past five years.

Response: See Attached Schedule.

PSC Request

Page 2 of 2

| | 2004 | |
|------|--------------------|------------------------|
| Unit | Hours of Operation | Gross Generation (MWh) |
| 1 | 493 | 29,253 |
| 2 | 728 | 41,550 |
| 3 | 604 | 36,518 |
| 4 | 394 | 26,723 |
| 5 | 255 | 19,565 |
| | 2,474 | 153,609 |

| 2003 | | | | |
|------|--------------------|------------------------|--|--|
| Unit | Hours of Operation | Gross Generation (MWh) | | |
| 1 | 420 | 27,480 | | |
| 2 | 468 | 31,576 | | |
| 3 | 613 | 40,194 | | |
| 4 | 326 | 22,949 | | |
| 5 | 216 | 16,902 | | |
| - | 2,043 | 139,101 | | |

| 2002 | | | | |
|------|--------------------|------------------------|--|--|
| Urit | Hours of Operation | Gross Generation (MWh) | | |
| 1 | 633 | 42,979 | | |
| 2 | 468 | 34,904 | | |
| 3 | 1,229 | 87,442 | | |
| 4 | 705 | 49,783 | | |
| 5 | 581 | 43,547 | | |
| - | 3,616 | 258,655 | | |

| 2001 | | | |
|------|--------------------|------------------------|--|
| Unit | Hours of Operation | Gross Generation (MWh) | |
| 1 | 434 | 30,853 | |
| 2 | 464 | 35,714 | |
| 3 | 509 | 39,880 | |
| 4 | 133 | 11,230 | |
| 5 | 92 | 8,921 | |
| | 1,632 | 126,598 | |

| 2000 | | | | |
|------|--------------------|------------------------|--|--|
| Unit | Hours of Operation | Gross Generation (MWh) | | |
| 1 | 451 | 42,908 | | |
| 2 | 551 | 52,811 | | |
| 3 | 239 | 21,751 | | |
| | 1,2 <u>41</u> | 117,470 | | |