Ernie Fletcher Governor

LaJuana S. Wilcher, Secretary Environmental and Public Protection Cabinet

Christopher L. Lilly Commissioner Department of Public Protection

Honorable Charles A. Lile Senior Corporate Counsel East Kentucky Power Cooperative, Inc. 4775 Lexington Road P. O. Box 707 Winchester, KY 40392-0707



Commonwealth of Kentucky **Public Service Commission**211 Sower Blvd.

P.O. Box 615 Frankfort, Kentucky 40602-0615 Telephone: (502) 564-3940 Fax: (502) 564-3460 psc.ky.gov

July 22, 2005

Mark David Goss Chairman

> Gregory Coker Commissioner

RE: Case No. 2005-00053

Please see enclosed data request from Commission Staff in the above case.

If you need further assistance, please contact Elie Russell at (502) 564-3940 ext. 422.

Sincerely,

Beth O'Donnell

Executive Director

BOD/jc Enclosure



Honorable Elizabeth E. Blackford Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive Suite 200 Frankfort, KY 40601-8204

Honorable Charles A. Lile Senior Corporate Counsel East Kentucky Power Cooperative, Inc. 4775 Lexington Road P. O. Box 707 Winchester, KY 40392-0707 Honorable Brent L. Caldwell Attorney McBrayer, McGinnis, Leslie and Kirkland, PLLC 201 East Main Street Suite 1000 Lexington, KY 40507 Honorable Michael L. Kurtz Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street Suite 2110 Cincinnati, OH 45202

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF EAST KENTUCKY)
POWER COOPERATIVE, INC. FOR)
A CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY,)
AND A SITE COMPATIBILITY CERTIFICATE,) CASE NO. 2005-00053
FOR THE CONSTRUCTION OF A)
278 MW (NOMINAL) CIRCULATING)
FLUIDIZED BED COAL FIRED UNIT AND)
FIVE 90 MW (NOMINAL) COMBUSTION)
TURBINES IN CLARK COUNTY, KENTUCKY)

COMMISSION STAFF'S SUPPLEMENTAL DATA REQUEST TO EAST KENTUCKY POWER COOPERATIVE, INC.

Pursuant to 807 KAR 5:001, Commission Staff requests that East Kentucky Power Cooperative, Inc. ("East Kentucky Power") file the original and 5 copies of the following information with the Commission within 10 days of the date of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility. 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.

- 1. Refer to the affidavit of Gregory J. Snyder ("Snyder Affidavit") attached to the motion to intervene filed by Siemens-Westinghouse Power Corporation ("Siemens-Westinghouse"). To the extent that the Snyder Affidavit contains facts and allegations that differ from those set forth by East Kentucky Power in its response to Item No. 7 of the March 18, 2005 data request, provide detailed explanations for each such difference.
- 2. Refer to East Kentucky Power's response to Item No. 7 of the March 18, 2005 data request.
- a. Provide copies of all analyses, reports, and other documentation to support the statements and conclusions therein that there are reliability, operational, and maintenance issues with the V84.3A units.
- b. Provide copies of the news article that discusses the experience of Calpine Corp. as referenced in the last paragraph of the data response.
- 3. Provide the following information regarding the General Electric LMS 100 combustion turbines:
- a. The date the units were first delivered to a buyer for commercial operation.
 - b. The number of units in commercial operation.
 - c. The reliability, operational, and maintenance history of the units.
- d. The actual efficiency rate achieved by the units in commercial operation.
- 4. Has Siemens-Westinghouse stopped production of the V84.3A units? If yes, when did production stop?

- 5. Is Siemens-Westinghouse currently offering the V84.3A units for sale?
- 6. Did the Siemens-Westinghouse bid propose to construct V84.3A units specifically for East Kentucky Power or furnish existing units from inventory?

Beth O'Donnell

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED: July 22, 2005

cc: Parties of Record