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SEP 17 2007

PUBLIC SERVICE COMMISSION

**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 FOR THE) CASE NO. 2007-00168
CONSTRUCTION OF MODIFICATIONS TO THE)
WATER INTAKE SYSTEM AT COOPER POWER)
STATION IN PULASKI COUNTY, KENTUCKY)**

**ATTORNEY GENERAL'S
INITIAL REQUEST FOR INFORMATION**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky ("Attorney General"), by and through his Office of Rate Intervention, and submits this Initial Request for Information to East Kentucky Power Cooperative, Inc. ("EKPC") to be answered on or before September 21, 2007 and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (4) If any request appears confusing, please request clarification directly from the Office of Attorney General.
- (5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

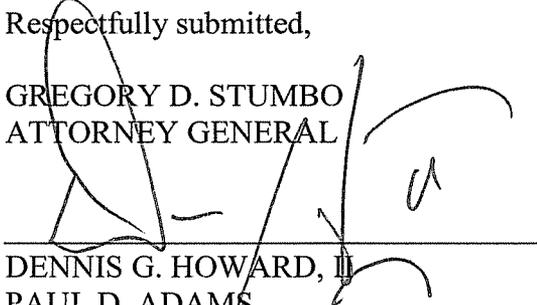
(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

Respectfully submitted,

GREGORY D. STUMBO
ATTORNEY GENERAL



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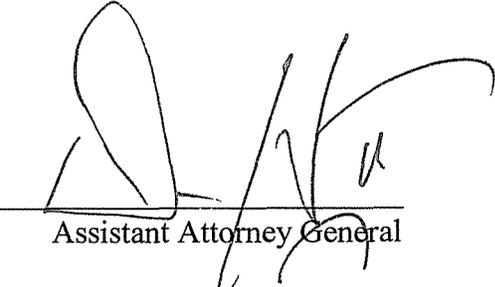
CERTIFICATE OF SERVICE AND NOTICE OF FILING

I hereby give notice that on this, the 17th day of September, 2007, I hand-delivered the original and ten copies of the foregoing Attorney General's Initial Request for Information to the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601, and certify that this same day I have served the parties by mailing a true copy of same, postage prepaid, to:

Honorable David A. Smart
Honorable Charles A. Lile
East Kentucky Power Cooperative, Inc.
P.O. Box 707
Winchester, Kentucky 40392-0707,

and further certify that a true and accurate copy was emailed to:

Honorable Charles A. Lile
East Kentucky Power Cooperative, Inc.
P.O. Box 707
Winchester, Kentucky 40392-0707.
charles.lile@ekpc.coop



Assistant Attorney General

INITIAL REQUEST FOR INFORMATION

1. Provide copies of any materials in the possession of EKPC which demonstrates the exercise of due diligence, or lack thereof, in the current construction.
2. Provide copies of all EKPC board minutes which have taken place since the PSC approved the certificate in this matter.
3. Provide copies of all documents, materials or information presented at the aforementioned meetings.
4. Provide copies of any EKPC sub-committee, special committee, or any other meeting's minutes which have taken place since the PSC approved the certificate in this matter.
5. Provide copies of all documents, materials or information presented at the aforementioned special meetings.
6. Provide copies of any materials or information from the Kentucky Division of Water or the Army Corps since the approval of the certificate in this matter.
7. Provide copies of any materials or information which EKPC has in its possession in regard to the coordination or advisement with any Commonwealth agency or federal agency on the lowering of the water at Lake Cumberland.
8. In detail, describe the decision process in determining the current construction schedule. This description should include timelines, decision makers, the basis for any and all decisions in the timetable, and the information relied upon for each and every decision.
9. Please provide a revised construction schedule including equipment and installation milestones. Please explain in detail any significant deviation from the original schedule.
10. Please describe whether the proposed delay of the cooling tower installation and installation of an additional pump will have any effect on the permits obtained for the project.
11. Please describe in detail the effects of the current drought conditions on lake water levels and temperatures and their effects on the generation capacity of the plant.
12. Given the long lead times noted in the application for the pump, please state whether this pump is to be re-routed from another EKPC project and the effects upon the schedule to that project.
13. Please provide any information as to whether the U.S. Army Corp of Engineers has made a decision on lowering water levels in the lake at the end of the year. If water levels are to be lowered, please provide the anticipated date for such levels to be reached.
14. If the water levels are lowered by the U. S. Army Corp of Engineers, how will the proposed delay in the installation of the cooling tower effect the plant generation capacity?
15. With the proposed delay of the cooling tower, does the Company intend to reconsider its decision to exclude Interest During Construction from the project budget? Does the Company intend to seek reimbursement of these funds?
16. Please describe in detail the Company's rationale for delaying the installation of the cooling tower.
17. Please describe in detail the Company's rationale for the additional pump.