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March 11, 2008

HAND DELIVERED

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

Re: PSC Administrative Case No. 2007-00477

Dear Ms. O'Donnell:

Please find enclosed for filing with the Commission in the above-referenced case an original and six copies of the Information Requests of East Kentucky Power Cooperative, Inc. ("EKPC") to Overland Consulting.

Very truly yours,



Charles A. Lile
Corporate Counsel

Enclosures

Cc: Service List
Overland Consulting

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

AN INVESTIGATION OF THE)	
ENERGY AND REGULATORY)	ADMINISTRATIVE
ISSUES IN SECTION 50 OF)	CASE NO. 2007-00477
KENTUCKY'S 2007 ENERGY ACT)	

**EAST KENTUCKY POWER COOPERATIVE, INC.
INFORMATION REQUESTS TO
OVERLAND CONSULTING**

Overland Consulting (“Consultant”), pursuant to the Procedural Schedule in this case dated November 20, 2007, is requested to file responses to the following requests for information by March 20, 2008, with copies to the Commission and to all parties of record, and in accordance with the following:

- (1) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.
- (2) If any request appears confusing, please request clarification directly from EKPC.
- (3) The responses provided should first restate the question asked and also identify the person(s) supplying the information.
- (4) Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

(5) To the extent that the specific document, workpaper or information does not exist as requested, 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 Respondent objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify EKPC 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) "Document" means the original and all copies (regardless of origin, and whether or not including additional writing thereon, or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence, investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in, or on whatever medium, including computerized memory or magnetic media. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), code number thereof, or other means of identifying it, and its present location and custodian. If any such document was, but is no longer

in the Respondent's possession or subject to its control, state what disposition was made of it, including the date of such disposition.

(10) "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, considering or evaluating a particular issue or situation, in whatever detail, whether or not the study of the issue or situation is in a preliminary stage, and whether or not the study was discontinued prior to completion.

(11) "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.

(12) "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

(13) Respondent means Consultant and/or any of its officers, directors, employees, or agents who may have knowledge of the particular matter addressed.

Respectfully submitted,

DAVID A. SMART

A handwritten signature in cursive script, appearing to read "Charles A. Lile".

CHARLES A. LILE

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(859) 744-4812

ATTORNEYS FOR EAST KENTUCKY
POWER COOPERATIVE, INC.

CERTIFICATE OF SERVICE

This is to certify that an original and 6 copies of the foregoing East Kentucky Power Cooperative, Inc. Information Requests to Overland Consulting in the above-styled case were delivered to the office of Elizabeth O'Donnell, Executive Director of the Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601, a copy was mailed and transmitted to Overland Consulting electronically, and copies were mailed to Parties of Record listed below, this 11th day of March, 2008.



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EKPC
Data Request To Overland Consulting
Administrative Case No. 2007-00477

Chapter 1

1. On page 1, the consultant states that Kentucky consumers use more energy per customer than most other states – is this true for electricity specifically? Do Kentucky residential consumers use more electricity than most other states?
2. Reference Figure 1-1. Based on the information for EKPC shown in Figure 1-3, should Figure 1-1 be revised to include EKPC's 11,425 GWh sales to its Members?
3. On page 5 of the report, it indicates that the state's fuel mix was over 70 percent coal-based, as measured by capacity, and that in 1995 the state's fuel mix was approximately 90 percent. Does the consultant agree that the above decline in coal-based fuel mix is relatively large? Is the consultant aware of any other states that have experienced a larger decline in coal-based fuel mix over the past 13 years?
4. In the Conclusion to Chapter 1, on page 14, the consultant states, "*Current prices, however, are likely to rise for a number of reasons. The recent rise in fuel costs are already impacting customer bills, albeit much less than other areas of the country relying more heavily on gas and oil supplies.*" Does the consultant believe that, relative to other neighboring states, Kentucky will shortly have electric prices that are no longer low? Please explain the answer.

Chapter 2

5. Reference page 22. The report states, "*Other states and the federal government are investing in the coal industry.*" Please provide evidence which supports the statement.

Chapter 4

6. On page 43, the consultant states, "*The relatively low cost of electricity in the state reduces consumer motivation to conserve.*" Please explain that statement in more detail. Is the consultant saying that the demand for DSM is directly related to the price of electricity? If Kentucky retail prices increase relatively quickly over the next few years, does the consultant believe that demand for DSM would likewise increase? If Kentucky retail prices decrease over the next few years, would the consultant expect to see a decline in the demand for DSM?

7. On page 50, the consultant states, "*All the jurisdictional utilities in Kentucky employ the California Standard Practice Manual for Economic Analysis of Demand Side Programs...The California SPM, at least in one instance, has been criticized in recent years, on the basis that the tests have a tendency to overstate the costs and undervalue the benefits of programs.*" Does the consultant believe that the California SPM tends to overstate costs and undervalue benefits of programs?
8. On page 53, the consultant argues that the Commission should develop a set of standards for how to evaluate DSM programs. Since all utilities examined by the consultant used the California SPM, please explain why the consultant believes that those tests don't represent a standard.
9. Reference the recommendation on page 58 for a procedural timeline for DSM Program review. Does the consultant recommend setting forth a defined timeline for review and approval of DSM filings, much like the time limit for adjudication of rate cases?

Chapter 5

10. Figure 5-8 on page 67 is taken from a recent EIA report. Does the consultant believe that the capital costs shown in this table are accurate to plus or minus 5%? If not, how accurate does the consultant believe this table to be?
11. Reference recommendation on page 71, would the consultant also recognize an equivalent "premium" TIER effect for cooperatives?

Chapter 7

12. Reference the recommendation on page 106.
 - a. Is there a dollar minimum threshold for capitalizing expenditures?
 - b. For cooperatives, would a premium return component or TIER effect be applicable for the DSM surcharge?
13. Reference the recommendation on page 108, would a premium return component or TIER effect be applicable to cooperatives?