COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

2009 INTEGRATED RESOURCE PLAN OF OF EAST KENTUCKY POWER COOPERATIVE, INC.

INITIAL REQUESTS FOR INFORMATION OF THE ATTORNEY GENERAL

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Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Request for Information to East Kentucky Power Cooperative, Inc., to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

In each case where a request seeks data provided in response to a staff request, (1)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.

If any request appears confusing, please request clarification directly from the (4) 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.

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) CASE NO. 2009-00106

(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,

JACK CÓNWAY OF KENTUCKY ATTORNEY GEMERAL

DEŇNIS HOWARD II LAWRENCE W. COOK PAUL D. ADAMS ASSISTANT ATTORNEYS GENERAL FRANKFORT KY 40601-8204 (502) 696-5453 FAX: (502) 573-8315 dennis.howard@ag.ky.gov

CERTIFICATE OF SERVICE AND NOTICE OF FILING

I hereby give notice that this the 24th day of July, 2009, I have filed the original and ten copies of the foregoing Attorney General's Request for Information with 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 those listed below.

Anthony Campbell President/CEO East Kentucky Power Cooperative, Inc. 4775 Lexington Road P.O. Box 707 Winchester, KY 40392-0707

Honorable Michael L Kurtz Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OH 45202 Honorable Robert Ukeiley 435R Chestnut St., Suite 1 Berea, KY 40403

Honorable Mark David Goss Frost, Brown, Todd, LLC 250 West Main Street Suite 2700 Lexington, KY 40507

Assistant Attorney General

2009 INTEGRATED RESOURCE PLAN OF EAST KENTUCKY POWER COOPERATIVE, INC. Case No.: 2009-00106 Initial Requests For Information of the Attorney General

- 1. Please refer to the 2008 Load Forecast Report, page 21, Table 3.1. IRP's recently filed by other electric utilities forecast much more modest growth (0.8 1.0%) than is forecasted by EKPC in its 2009 IRP filing. As EKPC's current customer mix leans more toward residential than industrial or commercial, please explain in detail why EKPC expects its growth rate will be approximately twice as much as is forecasted by other electric utilities over the same time period. Please include in your discussion what factors EKPC believes are driving this higher forecasted growth rate.
- 2. With regard to the forecasted load growth rates for EKPC, please discuss what generation options the company considered to meet this increase in total energy requirements.
- 3. Please discuss whether the company considered alternative or renewable energy generation sources or methods to meet the forecasted load growth and what specific alternative or renewable energy generation sources were considered along with the criteria used in the analysis.
- 4. With regard to the alternative or renewable energy generation sources or methods discussed in Question 3, please indicate whether the company considers any of the methods identified to be viable or reasonable. (The answer to this question should include copies of any cost benefit analysis if one was performed) If any are considered viable to meet this forecasted load growth, please indicate which sources or methods the company intends to pursue along with an estimate of the generation capacity the company expects from the sources or methods identified.
- 5. Please indicate what generation sources or methods the company intends to pursue going forward to meet the forecasted increases in total energy requirements. Please include in the description the expected capacity of such sources, the fuel source, the year such generation is expected to be placed in service and the expected serviceable life of each generation source or method.
- 6. Please describe each current generation source or method utilized by the company and its capacity. Please include in the description the fuel source, the year such generation source or method was placed in service and the expected serviceable life of each generation source or method.