

KENTUCKY · OHIO · INDIANA · TENNESSEE · WEST VIRGINIA

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APR 3 0 2010

PUBLIC SERVICE COMMISSION

April 30, 2010

Via Hand-Delivery

Mr. Jeff Derouen Executive Director Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: PSC Case No. 2010-00021

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case, an original and ten copies of the responses of East Kentucky Power Cooperative, Inc., ("EKPC") to the Commission Staff's Information Requests from the Informal Conference held on March 23, 2010, and Supplemental Testimony of Ann F. Wood.

Very truly yours,

Roger Cowden

Enclosures

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION BY THE PUBLIC SERVICE)	
COMMISSION OF THE ENVIRONMENTAL)	
SURCHARGE MECHANISM OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. FOR THE)	CASE NO.
SIX-MONTH BILLING PERIOD ENDING)	2010-00021
DECEMBER 31, 2009; AND THE PASS-THROUGH)	
MECHANISM FOR ITS SIXTEEN MEMBER)	
DISTRIBUTION COOPERATIVES)	

RESPONSES OF EAST KENTUCKY POWER COOPERATIVE, INC. TO COMMISSION STAFF'S INFORMATION REQUESTS FROM INFORMAL CONFERENCE HELD ON MARCH 23, 2010

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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AN EXAMINATION BY THE PUBLIC SERVICE)	
COMMISSION OF THE ENVIRONMENTAL)	
SURCHARGE MECHANISM OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. FOR THE)	CASE NO.
SIX-MONTH BILLING PERIOD ENDING)	2010-00021
DECEMBER 31, 2009; AND THE PASS-THROUGH)	
MECHANISM FOR ITS SIXTEEN MEMBER)	
DISTRIBUTION COOPERATIVES)	

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Ann F. Wood, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff Information Requests from the Informal Conference held on March 23, 2010 in the above-referenced case, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

Subscribed and sworn before me on this 29th day of Cipil, 2010.

Lun M. Willey M. Willey Motary Public

MY COMMISSION EXPIRES NOVEMBER 30, 2013 NOTARY ID #409352

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2010-00021 ENVIRONMENTAL SURCHARGE RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INFORMATION REQUEST FROM INFORMAL CONFERENCE HELD ON 03/23/10 REQUEST 1

RESPONSIBLE PARTY:

Refer to the pass-through calculation for Owen for the October 2009 and November 2009 expense months. Provide a more expansive calculation of the revenue requirement allocated to Gallatin, to Schedule B customers and to all other customer classes.

Ann F. Wood

Response 1. EKPC's monthly pass-through calculation for Owen, as originally filed, contained an Excel formula error. Please see page 2 of this response for a revised pass-through calculation for the period under review. Owen's pass-through calculations for the next review period (6-month period ending June 30, 2010) will reflect the correction of this formula error.

Page 3 of this response contains a revised calculation of Owen's over or under recoveries for the period under review. Please note that page 3 represents a revision to PSC Request 2, Page 13 of 17, originally filed on March 3, 2010.

Owen
Pass
Through
Mechanism
Factor, Net of
Gallain + Sch B
Col (10) / Col (14) 6.47% 7.05% 6.29% 2.07% 5.43% (14)
12-months
ended
Avg. Retail
Revenues,
Net Exclusive of
Gallalin + Sch B 7,141,672 7,149,196 7,173,900 7,217,571 7,228,310 7,062,691 (13)

Net Monthly
Reto)
Reto) (12) On-Peak Retail Revenue Adjustment \$7,548,551 \$7,681,563 \$7,887,303 \$6,011,527 \$6,105,800 \$6,354,144 Owen
Total
Monthly Retail
Revenues
exclusive of
Gallatin + Sch B \$488,948 \$503,430 \$449,442 \$148,778 \$391,901 \$768,082 (9)
Amortization
of
(Over Wunder
Recovery
excl. of
Gallatin + Sch B (\$77,452) (\$77,305) (\$28,792) (61)

Vitableon Orwan

Orwan (\$9,372) (\$9,264) (\$4,290) (Be)
Amodization
of EKPC
Schedule B
(Over)/Under
Recovery of
Revenues \$73,476 \$75,213 \$78,545 \$69,786 \$50,118 \$60,988 (8d) EKPC Schedule B Surcharge Revenues (\$24,739) (\$24,994) (\$13,053) (BC)
Amortization
of
(Over)Under
Recovery
of Gallatin
Revenues \$285,280 \$317,024 \$354,915 \$331,154 \$190,488 \$270,278 (8b) Gallatin Surcharge Revenues Col (3) x Col (7) \$847,704 \$895,667 \$882,902 \$593,058 \$675,554 \$1,110,797 (8a) Owen Revenue Requirement EKPC 12-months Ended Average Monthiy Revenue from Soles to Owen \$8,451,686 \$8,386,392 \$8,376,677 \$8,319,458 \$8,215,798 \$8,301,858 Col. (4) - Col. (5) S8,382,025 S8,982,488 S9,433,946 S7,498,779 S7,369,940 S9,711,966 (6) EKPC Net Monthly Sales to to Owen \$8,382,025 \$8,982,488 \$8,433,946 \$7,498,779 \$7,369,940 \$9,711,966 EKPC Monthly Revenues from Sales to Owen EKPC MESF% Cot (1) - Cot (2) 10.03% 10.68% 7.13% 8.22% 13.38% EKPC BESF % 1.21% 1.21% 1.21% 1.21% 1.21% EKPC CESF % 11.24% 11.89% 11.75% 8.34% 9.43% 14.59% Jul-09 Aug-09 Sep-09 Oct-09 Nov-09 Dec-09 Surcharge Factor Expense Month

East Kentucky Power Cooperative, Inc. - Distribution Cooperatives Pass Through Mechanism Report for Owen Electric Cooperative

Amended Filing: July - December 2009

									4 - 0	September 1	ole Constitution of the	There Electric Cameration of Owner Index w. 2-month 120 - All Others	der w/ 2-month lan	All Others
Owen Elect	ric Cooperative - C.	Owen Electric Cooperative - Calculation of (Over)/Under w/ 2-month lag - Gallatin	Inder w/ 2-month la	g - Gallatin	Owen Electr	ic Cooperative - C	ic Cooperative - Calculation of (Over)/Under w/ 2-month lag - 3ch B	Juder w/ 2-month lat	a - scu B	Owen Electric	c cooperative can	culation of total from	The state of the s	
	EKPC	Billed to				EKPC	Billed to				EKPC	Billed to		
	Invoire	Retail				Invoice	Retail				Invoice	Retail		
	Month	Consumer &				Month	Consumer &				Month	Consumer &		
	haprocar	recorded on	Monthly	Cumulative		recorded	recorded on	Monthly	Cumulative		recorded	recorded on	Monthly	Cumulative
	יביטומפת	ייטבוריים מון	(Overlor	(Over) or		S,CHO no	OFC's	(Over) or	(Over) or		on OEC's	OEC's	(Over) or	(Over) or
	S OHO CHO	Dooks Books	inder!	- Index		Rooks	Books	Under	Under		Books	Books	Under	Under
h/o/Vr	DOORS (4)	COORS	Olinci (3)	(4)	Mo/Yr	(1)	(2)	(3)	(4)	Mo/Yr	(1)	(2)	(3)	(4)
MO/11		(7)	(0)			100000	000 000	(110 00)	193000	00 1:1	\$534 OB4	\$580 030	(828 AGQ)	(\$26 BE9)
60-lnf	\$215.909	\$226,772	(\$10,863)	(\$10,863)	10-lnc	\$66,684	\$70,039	(\$3,335)	(665,54)	en-inc	100,4000	000000	(000,000)	(000,034)
00-0114	\$233 833	\$249,090	(\$15.257)	(\$26.120)	Aug-09	\$67,087	\$71,465	(\$4,377)	(\$7,732)	Ang-09	\$561,787	\$598,443	(\$36,656)	(\$63,526)
on Go		\$279.248	(\$13.053)		Sep-09	\$87.482	\$91,771	(\$4,290)		Sep-09	\$587,161	\$615,953	(\$28,792)	
So-t-So			0\$		Oct-09	\$72,068	\$77,254	(\$5,186)		Oct-09	\$473,763	\$507,856	(\$34,093)	
200			S &		90-you	\$69.786	\$57,504	\$12,282		60-voN	\$389,429	\$395,350	(\$5,921)	
60-200	\$270.278	\$270.278	0\$		Dec-09	\$50,118	\$50,118	\$0		Dec-09	\$284,874	\$145,054	\$139,820	

PSC Request 1
Page 3 of 3
(Revised)

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2010-00021 ENVIRONMENTAL SURCHARGE RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INFORMATION REQUEST FROM INFORMAL
CONFERENCE HELD ON 03/23/10
REQUEST 2
RESPONSIBLE PARTY: Ann F. Wood

Refer to the pass-through calculation for Fleming-Mason for the October 2009 and November 2009 expense months. Provide a more expansive calculation of the revenue requirement allocated to Schedule C customers and special contracts and to all other customer classes.

Response 2. EKPC's monthly pass-through calculation for Fleming-Mason, as originally filed, contained an Excel formula error. Please see page 2 of this response for a revised pass-through calculation for the period under review. Fleming-Mason's pass-through calculations for the next review period (6-month period ending June 30, 2010) will reflect the correction of this formula error.

Page 3 of this response contains a revised calculation of Fleming-Mason's over or under recoveries for the period under review. Please note that page 3 represents a revision to PSC Request 2, Page 7 of 17, originally filed on March 3, 2010.

| Fleming Mason | Para-shrough | Machanism | Pactor | Pac 12-months ended Avg. Retail Revenues, net of Sch C & Spec Chitetis \$3,243,205 \$3,233,867 \$3,221,369 \$3,216,819 \$3,133,703 \$3,090,636 Cal. (11) - Cal. (12) \$2,944,554 \$2,974,168 \$2,664,523 \$2,666,408 \$2,556,554 \$3,763,202 Net Monthly
Retail
Revenues
net of Sch C &
Spec Chircis \$106,160 \$94,918 \$219 \$62,846 \$37,921 \$102,024 (12) On-Peak Retail Revenue Adjustment \$3,050,714 \$3,069,086 \$2,642,742 \$2,669,254 \$2,594,475 \$3,865,226 Total
Monthly Retai
Revenues
net of Sch C &
Spec Cntrcts (10)

Reming Mason
Merenue
Recenue
Requirement
net of Set C & Spec Centro
Spec Centro
Col (Bd) + Col (9)
S272, 155
S272, 155
S431, 153 \$5,650 \$4,566 \$16,805 of (Over)Under Recovery net of Sch C & Spec Cntrets" (Bc)
Amortization
of (Over) Under
Recovery of
Seh C & Special
Contracts
Revenues* \$5,613 \$7,697 \$21,361 \$277,763 \$270,597 \$288,962 \$286,851 \$191,973 \$241,351 (8b)
Schedule C
and Special
Contracts
Surcharge
Revenues Col(3) x Col(7) \$542,157 \$574,944 \$561,117 \$373,223 \$421,354 \$677,060 EKPC 12-months
Ended Average
Monthly Revenue
from Sales to
Fleming Mason \$5,405,352 \$5,383,375 \$5,323,691 \$5,235,587 \$5,124,332 \$5,060,202 Cot (4)-Cot (5) S4,657,036 S4,689,918 S4,426,283 S4,409,868 S4,556,055 S5,598,263 (6) EKPC Net Monthly Sates to to Fleming Mason \$106,160 \$94,918 \$219 \$62,846 \$37,921 \$102,024 (5) On-peak Revenue Adjustment \$4,763,196 \$4,784,836 \$4,426,502 \$4,472,714 \$4,593,976 \$5,700,287 (4) EKPC Monthly Revenues from Safes to Fleming Mason EKPC MESF % A.(1) - Col (2) 10.03% 10.68% 10.54% 7.13% 8.22% 13.38% EKPC BESF % 2 EKPC CESF % Jul-09 Aug-09 Sep-09 Oct-09 Nov-09 Dec-09 Surcharge Factor Expense Month

East Kentucky Power Cooperative, Inc. - Distribution Cooperatives Pass Through Mechanism Report for Fleming Mason RECC

Amended Flow Through Mechanism: July - December 2009

Monthly

(Over) or

Under

(3)

\$3,465

(\$9,829)

\$16,805 (\$7,839) (\$163,869) \$119,114 Cumulative

(Over) or

Under

(4)

\$3,465

(\$6,364)

Fleming-Mason - Calc of (Over)/Under w/ 2-month lag - Sch C + Spec Contracts

Fleming-Mason - Calc of (Over)/Under w/ 2-month lag - All Others

	EKPC	Billed to				EKPC	Billed to
}	Invoice	Retail				Invoice	Retail
	Month	Consumer &				Month	Consumer &
	recorded	recorded on	Monthly	Cumulative		recorded	recorded on
	on Member's	Member's	(Over) or	(Over) or		on Member's	Member's
	Books	Books	Under	Under		Books	Books
Mo/Yr	(1)	(2)	(3)	(4)	Mo/Yr	(1)	(2)
Jul-09	\$242,068	\$238,229	\$3,839	\$3,839	Jul-09	\$218,520	\$215,055
Aug-09	\$234,130	\$243,870	(\$9,740)	(\$5,901)	Aug-09	\$236,269	\$246,098
Sep-09	\$264,583	\$243,222	\$21,361		Sep-09	\$208,144	\$191,339
Oct-09	\$240,348	\$248,742	(\$8,394)		Oct-09	\$224,453	\$232,292
Nov-09	\$191,973	\$191,973	\$0		Nov-09	\$132,873	\$296,742
Dec-09	\$241,362	\$241,362	\$0	-	Dec-09	\$218,828	\$99,714

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2010-00021 ENVIRONMENTAL SURCHARGE RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INFORMATION REQUEST FROM INFORMAL CONFERENCE HELD ON 03/23/10 REQUEST 3

RESPONSIBLE PARTY:

Ann F. Wood

Refer to Commission Staff's First Data Request No. 4. Account 50144 reflects expenditures for ash disposal on the Gilbert Unit. Identify the following:

- a. The supplier contracted to perform ash disposal;
- b. The date this supplier was contracted by EKPC;
- c. Whether or not this supplier nets the sale of ash by-products from the invoice; and
- d. Whether or not it is possible to "gross up" the ash disposal expense and the sale of ash by-products.

Response 3.

- a. EKPC's ash disposal supplier is Headwaters Resources, Inc.
- b. EKPC's contract with this supplier began April 1, 2009.
- c. EKPC receives no proceeds from the sale of ash by-products.
- d. This is not applicable. Please see the response to 3c.

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	COMMONWEALTH OF KENTUCKY
	BEFORE THE PUBLIC SERVICE COMMISSION
In the	e Matter of:
	AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIRONMENTAL SURCHARGE MECHANISM OF EAST KENTUCKY) POWER COOPERATIVE, INC. FOR THE SIX-MONTH BILLING PERIOD ENDING DECEMBER 31, 2009; AND THE PASS-THROUGH) MECHANISM FOR ITS SIXTEEN MEMBER DISTRIBUTION COOPERATIVES
	SUPPLEMENTAL TESTIMONY OF ANN F. WOOD ON BEHALF OF EAST KENTUCKY POWER COOPERATIVE, INC.
Q.	Are you the same Ann F. Wood who submitted direct testimony in this
	proceeding?
Α.	Yes. I am the same Ann F. Wood who submitted testimony dated March 3, 2010.
Q.	Have there been any changes in your background information or duties at
	EKPC?
A.	The only change from my original testimony is that I now report directly to the
	Chief Financial Officer.
Q.	What is the purpose of this supplemental testimony?
A.	The purpose of this supplemental testimony is to discuss concerns associated with
	the two-month "true-up" adjustment at the retail level, and request that this
	practice be ceased effective with the date of the Commission's Order in this
	proceeding.

1	Q.	How did EKPC become aware of problems with the two-month "true-up"
2		adjustment at the retail level?

- 3 In Case No. 2009-00039, EKPC requested, and the Commission approved, a two-A. 4 month "true-up" adjustment of over and under recoveries at both the wholesale and retail levels. During an Informal Conference in this proceeding (Case No. 5 2010-00021), Commission Staff made EKPC aware of an Excel formula error 6 associated with the pass-through calculations for Fleming-Mason and Owen. At 7 8 the same time when EKPC was correcting these formula errors, EKPC and 9 several member systems were observing that the retail over/under recoveries were 10 fluctuating drastically. Such dramatic fluctuations were not anticipated when EKPC requested the retail two-month "true-up" in Case No. 2009-00039. There 11 12 have been instances during the period subsequent to this review period that the 13 member systems' retail environmental surcharge factor has exceeded EKPC's wholesale environmental surcharge factor. In other cases, member systems have 14 15 experienced negative retail surcharge factors.
- 16 Q. How are these fluctuations impacting the member system?
- 17 A. Such extreme fluctuations in the retail pass-through mechanism have negatively
 18 impacted cash flows at the member system level and made it impossible for the
 19 member systems to forecast their environmental surcharge factors.
- Q. What is EKPC proposing to address the over/under recovery variances at the retail level?
- A. EKPC respectfully requests that the Commission issue an Order in thisproceeding discontinuing the two-month "true-up" adjustment at the retail level.

1		Although EKPC has not been able to isolate the reason for the variances, the
2		elimination of the retail two-month "true-up" adjustment will avoid the continuing
3		significant fluctuations in the retail surcharge factor. EKPC will continue to
4		analyze the reasons for the fluctuations. The member systems request that
5		accumulated over/under recoveries be addressed during the Commission's six-
6		month review periods, as was done prior to the issuance in the final Order in Case
7		No. 2009-00039.
8	Q.	Does this proposed change impact the environmental surcharge tariffs at the
9		retail level?
10	A.	Yes. The elimination of the two-month "true-up" adjustment at the retail level
11		will require a change to the retail environmental surcharge tariffs. Exhibit AFW-
12		1 reflects an example of the change required in the member system's tariff.
13	Q.	Do the Member Systems plan to change the proposed amortization period
14		relating to accumulated over or under recoveries in this proceeding?
15	A.	No. The Member Systems plan to use a two-month amortization period in the
16		first month following the Commission's Final Order in this proceeding.
17	Q.	Does EKPC propose any changes to its wholesale calculation or to the
18		wholesale environmental surcharge mechanism as is currently in place?
19	A.	No, EKPC does not propose any changes at the wholesale level.
20	Q.	Does this conclude your testimony?
21	A.	Yes.

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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AN EXAMINATION BY THE PUBLIC SERVICE)	
COMMISSION OF THE ENVIRONMENTAL)	
SURCHARGE MECHANISM OF EAST KENTUCKY	')	
POWER COOPERATIVE, INC. FOR THE)	CASE NO.
SIX-MONTH BILLING PERIOD ENDING)	2010-00021
DECEMBER 31, 2009; AND THE PASS-THROUGH)	
MECHANISM FOR ITS SIXTEEN MEMBER)	
DISTRIBUTION COOPERATIVES)	

AFFIDAVIT

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Ann F. Wood, being duly sworn, states that she has read the foregoing prepared testimony and that she would respond in the same manner to the questions if so asked upon taking the stand, and that the matters and things set forth therein are true and correct to the best of her knowledge, information and belief.

Subscribed and sworn before me on this 29^{μ} day of April, 2010.

MY COMMISSION EXPIRES NOVEMBER 30, 2013 NOTARY ID #409352

FOR ENTIRE TERRITORY SERVED

Community, Town or City

Page 1 of 2

P.S	.C. KY. NO.
	SHEET NO
Name of Member System	
CLASSIFICATION OF SEI	RVICE
CLASSIFICATION OF SEL	VVICE
RATES SCHEDULE ES – ENVIRONME	NTAL SURCHARGE
AVAILABILITY	
In all of the Company's service territory.	
APPLICABILITY	
This rate schedule shall apply to all electric rate schedules ar	nd special contracts.
RATE	
CES(m) = ES(m)	
where CES(m) = Current Month Environmental Surchar ES(m) = Current Month Environmental Surchar	
ES(m) = [((WESF) x (Average of 12-months ended revenues excluding environmental surcharge)) + (Over)/Under Recove [Average of 12-months ending Retail Revenue (excluding ending ending Retail Revenue)]	ery] divided by
where WESF = Wholesale Environmental Surcharge Factor	for Current Expense Month
DATE OF ISSUE	
Month / Date / Year DATE EFFECTIVE	
Month / Date / Year	
ISSUED BY(Signature of Officer)	
TITLE President and General Manager	
BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION	
IN CASE NO DATED	

FOR ENTIRE TERRITORY SERVED

Community, Town or City

Page 2 of 2

	P.S.C. KY. NO.
	SHEET NO
Name of Member System	
CLASSIFICATION OF	SERVICE
(Over)/Under Recovery =	
(over)/under recovery as defined by amount billed by EK amount billed by Member System to retail customer. Over the amortization of amounts determined by the Commiss reviews and the two-month "true-up" adjustment.	er or under recoveries result from
BILLING	
The current expense month (m) shall be the second mont Environmental Surcharge is billed.	h preceding the month in which the
DATE OF ISSUE	
Month / Date / Year	-
DATE EFFECTIVE	-
Month / Date / Year	
ISSUED BY(Signature of Officer)	-
TITLE President and General Manager	
BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION	
IN CASE NO. DATED	