

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC.)	
AND INTER-COUNTY ENERGY)	
COOPERATIVE CORPORATION FOR)	CASE NO.
APPROVAL OF AN INDUSTRIAL POWER)	2020-00193
AGREEMENT WITH ECONOMIC)	
DEVELOPMENT RIDER AND RENEWABLE)	
ENERGY PURCHASES)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO EAST KENTUCKY POWER COOPERATIVE, INC. AND
INTER-COUNTY ENERGY COOPERATIVE CORPORATION

East Kentucky Power Cooperative, Inc. (EKPC) and Inter-County Energy Cooperative Corporation (Inter-County), pursuant to 807 KAR 5:001, are to file with the Commission an electronic version of the following information. The information requested herein is due on August 17, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, EKPC and Inter-County (jointly Joint Applicants) SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Applicants shall make timely amendment to any prior response if Joint Applicants obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Joint Applicant fail or refuse to furnish all or part of the requested information, Joint Applicant shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. 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. When filing a paper containing personal information, Joint Applicants shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the application, paragraph 15. For each billing period, provide a sample of the bill from EKPC to Inter-County and from Inter-County to Diageo Americas Supply, Inc. (Diageo).

2. Refer to the application, paragraph 20. Provide support for the statement that EKPC and Inter-County will recover all variable costs associated with providing electric energy to Diageo and that additional incremental revenues will contribute to both utilities' fixed costs that would otherwise have been paid by EKPC's other Owner-Members and Inter-County's retail members.

3. Refer to the Industrial Power Agreement with Economic Development Rider and Renewable Energy Purchases (Agreement), Section 4(a)(5). Explain what the last sentence is referring to when it references EKPC's administrative fee under Rate H – Wholesale Renewable Energy Program.

4. Refer to the application, Exhibit 3, Direct Testimony of David Crews (Crews Testimony), page 6, line 7. Explain which electric utility serves the existing Diageo facility.

5. Refer to the Crews Testimony, page 13, lines 9–23 and page 14, lines 1–11. Even though EKPC's capacity reserve margin satisfies PJM's summer peak requirements, EKPC is a winter peaking utility. Explain how Finding 5 is satisfied relative to EKPC's winter peak.

6. Refer to the application, Exhibit 4, page 5 of 5. Confirm that the applicable FAC Rates in the table are the rates charged to customers in each of the months listed in the table.



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DATED AUG 06 2020

cc: Parties of Record

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