## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE FILING OF EAST KENTUCKY POWER COOPERATIVE CORPORATION FOR THE DETERMINATION OF REASONABLENESS OF A NEW DEMAND SIDE MANAGEMENT PROGRAM ENTITILED THE TOUCHTONE ENERGY MANUFACTURED HOME PROGRAM

CASE NO. 2002-00313

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## <u>COMMISSION STAFF S INTERROGATORIES TO</u> EAST KENTUCKY POWER COOPERATIVE CORPORATION

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that East Kentucky Power Cooperative Corporation (EKPC) file the original and 8 copies of the following information with the Commission no later than 14 days from the date of this request, with a copy to all parties of record. Each copy of the information requested shall be placed in a bound volume with each item tabbed.

1. Provide the following information relating to the proposed Touchstone Energy Manufactured Home Program (Manufactured Home Program):

a. When will the program be implemented and how long will it be in

effect?

b. For each year of operation, provide the program s estimated annual cost to EKPC.

c. Identify who developed the program and provide copies of any published material regarding the program.

2. Refer to the Application, Section I, fifth paragraph. Provide the source for the figures included in this paragraph. Include all supporting workpapers, calculations, assumptions, and other documentation.

3. Refer to the Application, Section III.

a. Refer to Assumption No. 2. Explain how EKPC derived both the summer and winter savings figures.

b. Refer to Assumption No. 4. Explain how EKPC determined the estimate of the fixed administrative costs. Include all supporting workpapers, calculations, assumptions, and other documentation.

c. Refer to Assumption No. 4. Explain how EKPC determined the estimate of the variable costs. Include all supporting workpapers, calculations, assumptions, and other documentation.

d. Refer to Assumption No. 10. Explain how the estimated average incremental investment of \$1,000 was determined. Include all supporting workpapers, calculations, assumptions, and other documentation.

4. Refer to the Application, Section IV, the response to 1(a). EKPC states that manufactured homes comprise a significant portion of its members housing stock.

a. Provide the number of manufactured homes that are served in each member system s service territories.

b. Of the total primary residences served by all of EKPC's member systems, what percentage are manufactured homes?

c. Describe the analysis performed by EKPC to determine anticipated new manufactured home purchases during the next 5-year period. Provide copies of any written analysis or explain in detail why no written analysis was performed.

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5. Has EKPC reviewed similar manufactured home programs in effect at other Touchstone Energy cooperatives or investor-owned utilities?

a. If yes, identify the utility and describe the program that was reviewed.

b. If no, explain in detail why EKPC has not undertaken such an analysis.

6. Refer to the Application, Section IV, the response to 1(f). Describe in detail the involvement of the Attorney General, the Kentucky Division of Energy, and the EKPC member systems in the development of the Manufactured Home Program.

Thomas M. Dorman Executive Director Public Service Commission 211 Sower Boulevard P. O. Box 615 Frankfort, Kentucky 40602

DATED September 26, 2002

cc: All Parties