COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION OF) THE FUEL ADJUSTMENT CLAUSE OF EAST) CASE NO. KENTUCKY POWER COOPERATIVE, INC. FROM) 2003-00454 MAY 1, 2003 TO OCTOBER 31, 2003)

<u>COMMISSION STAFF'S INTERROGATORIES AND REQUESTS</u> <u>FOR PRODUCTION OF DOCUMENTS TO</u> <u>EAST KENTUCKY POWER COOPERATIVE, INC.</u>

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that East Kentucky Power Cooperative, Inc. ("East Kentucky") file the original and 4 copies of the following information with the Commission within 14 days of the date of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility. 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 applicable, the requested information should be provided for total company operations and jurisdictional operations, separately.

1. Refer to East Kentucky's response to Item 6 of the Commission's December 19, 2003 Order. East Kentucky lists five long-term contracts that either expired in the second half of 2003 or will expire in early 2004. Explain East Kentucky's strategy for replacing the coal that was being delivered under the contracts.

2. Refer to East Kentucky's response to Item 12 of the Commission's December 19, 2003 Order. Provide the amount of the recovery expected under the performance bonds for each of the terminated contracts.

3. Refer to East Kentucky's response to Item 17 of the Commission's December 19, 2003 Order. Comparing the number of responses to solicitations made during this review period to the number of responses to solicitations made during the previous 6-month review period, it appears that the number of vendor responses has declined. Explain whether East Kentucky has in fact experienced a decline in the number of responses to solicitations. Include in the explanation East Kentucky's observations concerning the current state of the coal market, especially as related to the availability of low-sulfur coal.

4. Refer to East Kentucky's response to Item 18 of the Commission's December 19, 2003 Order. The response reflects that a large number of oral solicitations occurred during the review period and that these solicitations were necessary due to the need for an immediate response as a result of delivery shortfalls.

a. Explain whether East Kentucky believes that the shortfalls have since been adequately addressed, or if it foresees additional delivery problems.

b. If additional delivery problems are foreseen, explain East Kentucky's strategy for addressing the problem.

Thomas M. Dorman Executive Director Public Service Commission Post Office Box 615

Frankfort, Kentucky 40602-0615

DATED: <u>January 28, 2004</u>

cc: Parties of Record

Case No. 2003-00454