

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. FOR A)	CASE NO.
CERTIFICATE OF PUBLIC CONVENIENCE)	2007-00168
AND NECESSITY FOR THE CONSTRUCTION)	
OF MODIFICATIONS TO THE WATER INTAKE)	
SYSTEM AT COOPER POWER STATION IN)	
PULASKI COUNTY, KENTUCKY)	

COMMISSION STAFF'S DATA REQUEST TO
EAST KENTUCKY POWER COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc. ("EKPC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before May 4, 2007. Each copy of the data 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 person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible.

Each response shall be under oath or, for representatives of a public or private corporation, a partnership, an association or a governmental agency, be accompanied by a signed certification of the preparer or 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.

EKPC shall make timely amendment to any prior response if it obtains information upon the basis of which it knows that the response was incorrect when made, or though correct when made, is now incorrect in any material respect. For any request to which EKPC fails to furnish all or part of the requested information, EKPC shall provide a written explanation of the specific grounds for its failure to furnish.

Careful attention shall 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 shall be provided for total company operations and jurisdictional operations, separately.

1. Refer to the Application, Exhibit 7, the Testimony of John R. Twitchell, page 7. Mr. Twitchell indicates that EKPC plans to initially fund the construction of the project from general funds. Identify the source(s) of these general funds that EKPC has available for the funding of the project.

2. Exhibit 5 of the Application discusses the operating cost of the proposed solution. One of the itemized elements is the "Cost of Electric Service." Is this the production cost of the power used to run the equipment, or the opportunity cost of using the power?

3. Can the cooling tower built for unit 2 be switched during an outage of unit 2 to cool unit 1?

4. What is the minimal lake level at which the barge-mounted pumps providing water for unit 1 can operate?
5. What is the minimal lake level at which the makeup water system for the cooling tower can operate?
6. What modifications would be needed to the proposed construction so that at least one of the units will operate at a lake level equal to the original depth of the river channel?
7. Is the cooling water makeup system for the cooling tower capable of providing enough water for a cooling tower for unit 1 if one is built in the future?
8. Refer to the tables at the end of James C. Lamb, Jr.'s testimony which describe the contingency events and load shedding requirements. How frequently do these load conditions occur? During which months?
9. When does EKPC anticipate that the supplemental pumps to be used during the summer of 2007 will come online?



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
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DATED: April 30, 2007

cc: Parties of Record

Case No. 2007-00168