

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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

East Kentucky Power Cooperative, Inc. ("EKPC"), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 5 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before September 21, 2007. Responses to requests for information shall be appropriately bound, tabbed and indexed. 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, shall 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 responses if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any requests to which EKPC fails or refuses to furnish all or part of the requested information, EKPC shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. State the current status of the construction of the modifications to the Cooper Power Station ("Cooper Station") cooling system.

2. How much has EKPC expended on the modifications? Give a detailed breakdown of construction expenditures for both the barge-mounted pumps and the cooling tower.

3. State your estimate of the costs necessary to complete the cooling system, including the barge-mounted pumps and cooling tower. Give a detailed breakdown of the estimated construction expenditures for both the barge-mounted pumps and the cooling tower.

4. How many more construction days will be required to make the cooling tower operational?

5. What is the anticipated in-service date for all of the barge-mounted pumps?

6. In the table below, provide plant capacity at the Cooper Station for the various lake levels and water temperatures as indicated, assuming only the barge-mounted pumps are in service and the cooling tower is not in service:

Water Temperature

Lake Elevation	Greater Than 80°F	80° F - 75°	80° F - 75°	75° F - 70°	70° F - 65°	65° F - 60°
670 feet						
650 feet						
Below 650 feet						

7. How many MWh of power did EKPC replace from May 1, 2007 to August 31, 2007 due to the derating of the Cooper Station, and what was the total cost of that replacement power?

8. How much does EKPC estimate expending for replacement power during the summer of 2008 if the cooling tower is not constructed by May 1, 2008 and the Corps of Engineers lowers Lake Cumberland below 670 feet?

9. How much power will the barge mounted pumps and the cooling tower each consume when they are operational? If the answer to this item is obtained from prior filings in this case, verify whether those prior estimates are still valid based on EKPC's current knowledge.

10. If EKPC delays the construction of the cooling tower beyond December 2007, how much will that delay add to the final cost of the project if the cooling tower is not operational by:

- a. December 31, 2007?
- b. November 30, 2008?
- c. May 31, 2009?

11. Given that the cooling tower for Cooper Station was to be diverted from the J. K. Smith Station, how will the delay in constructing the cooling tower at Cooper Station affect the construction schedule at the J. K. Smith Station?

12. When would EKPC need to order a new cooling tower in order to maintain the current construction schedule for the J. K. Smith CFB unit?

13. If the Army Corps of Engineers lowers Lake Cumberland below 670 feet prior to the completion of the cooling tower construction, how long would it take for the lake to fall below the current water intake level at the Cooper Station?

- a. At that time, how many construction days would be required to make the cooling tower operational?
- b. How much would the Cooper Station be derated during that period?
- c. How much does EKPC estimate purchased power would cost during the period that the Cooper Station is derated?



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
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DATED: September 14, 2007

cc: Parties of Record