

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY POWER)	
COOPERATIVE FOR CONTINUATION OF THE)	
TOUCHSTONE ENERGY MANUFACTURED HOME)	CASE NO.
PROGRAM REBATE)	2007-00266

COMMISSION STAFF'S THIRD 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 seven copies of the following information, with a copy to all parties of record. The information requested herein is due 10 days from the date of this request. 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, 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 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 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 applicable, the requested information shall be provided for total company operations and jurisdictional operations.

1. Refer to the response to the Commission Staff's Second Data Request dated September 28, 2007 ("Staff Second Request"), Item 1.

a. The proposed tariff does not include provisions for rebates if existing furnaces are replaced with new, high efficient heat pumps for manufactured homes. Explain in detail how the replacement of furnaces in existing manufactured homes can qualify for a rebate under the terms of the proposed tariff.

b. Provide the SEER for the new highly efficient heat pump that will be replacing the inefficient existing furnace.

2. Refer to the response to the Staff's Second Request, Item 2.

a. Explain in detail why it is reasonable to use 5-year old data to project program participation for the next 5 years.

b. Given EKPC's experience with this program to date, explain in detail why the projected program participation for the next 5 years is reasonable and realistic.

3. Refer to the response to the Staff's Second Request, Item 3.

a. Does EKPC have a demand-side management program that provides rebate incentives for retail customers for the retrofitting of existing manufactured homes? If yes, provide a complete description of the program and a copy of the applicable tariff.

b. Provide a table for the member systems that shows the number of retrofitted manufactured homes with energy efficient equipment for the 2002-2006 period.

c. With the exception of the information provided for Blue Grass Energy, does the table provided in the response reflect the number of new manufactured homes that meet the program guidelines? If no, revise the response to provide the originally requested information.

4. Refer to the response to the Staff's Second Request, Item 4.

a. Provide a table for the member systems that shows the rebates paid for retrofitted manufactured homes with energy efficient equipment for the 2002-2006 period.

b. With the exception of the information provided for Blue Grass Energy, does the table provided in the response reflect the rebates paid for new manufactured homes that meet the program guidelines? If no, revise the response to provide the originally requested information.

5. Pursuant to the Touchstone Energy Manufactured Home Tariff the Commission approved in Case No. 2002-00313¹, EKPC was required to rebate \$250 per certified manufactured home to the member system.

a. Explain why the rebates paid by EKPC in 2003-2006, as shown in the response to Item 4 of Staff's Second Request, were not \$250 as stated in the tariff.

b. State who determined the amount of the rebates that were paid in 2003-2006.

c. Explain the criteria used to determine the amount of the rebates that were paid in 2003-2006.

6. Explain why EKPC is requesting the Commission to amend the rebate section of the tariff to add the words "up to".

7. State who will decide the rebate amount if the proposed language change is granted.

8. Explain what criteria will be used to determine the rebate amount that will be paid to each participant.



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED: October 30, 2007

cc: Parties of Record

¹ Case No. 2002-00313, Application of East Kentucky Power Cooperative, Inc. for a Determination of Reasonableness Pursuant to KRS 278.285 for a Demand Side Management Program.