

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF EAST	)	
KENTUCKY POWER COOPERATIVE, INC. TO	)	CASE NO.
IMPLEMENT A NEW GREEN ENERGY OPTION	)	2019-00378
FOR NON-RESIDENTIAL RETAIL CUSTOMERS	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
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 in paper medium and an electronic version of the following information. The information requested herein is due on or before December 20, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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 amendments 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 request to which EKPC fails or refuses to furnish all or part of the requested information, it 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. When filing a document containing personal information, EKPC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Cover Letter, page 2, and EKPC's responses to Staff's First Request, Items 1.g. and 2.b. Explain in detail how the model shows that EKPC's proposed credits for the environmental surcharge (ES) and fuel adjustment clause (FAC) appropriately credits participants "without materially affecting non-participant bills" and meets EKPC's expressed goal that "Participants do not shift costs to non-participants."

2. Refer to EKPC's response to Staff's First Request, Items 1.d. through 1.g. Explain how EKPC's proposal to include credits from the Green Energy Tariff for base fuel and the FAC in the over- or under-recovery calculation in the next monthly FAC filing and for the variable environmental costs in the over- or under-recovery calculation in the next monthly ES filing would not result in cost-shifting to non-participants.

3. Refer to EKPC's response to Staff's First Request, Item 13. Using the same assumptions when reasonable, provide a calculation of the Green Bill and Standard Bill

for three months, including the effect EKPC's proposed Green Power Tariff credits would have on the ES and FAC factors in effect for the hypothetical months.



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Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED DEC 13 2019

cc: Parties of Record

\*L Allyson Honaker  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504

\*David S Samford  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504

\*Patrick Woods  
East Kentucky Power Cooperative, Inc.  
P. O. Box 707  
Winchester, KY 40392-0707

\*East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707