

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

|                                       |   |            |
|---------------------------------------|---|------------|
| JOINT APPLICATION OF EAST KENTUCKY    | ) |            |
| POWER COOPERATIVE, INC., BLUE GRASS   | ) |            |
| ENERGY COOPERATIVE CORPORATION,       | ) |            |
| LICKING VALLEY RURAL ELECTRIC         | ) |            |
| COOPERATIVE CORPORATION, NOLIN RURAL  | ) |            |
| ELECTRIC COOPERATIVE CORPORATION, AND | ) | CASE No.   |
| OWEN ELECTRIC COOPERATIVE, INC. TO    | ) | 2013-00130 |
| CANCEL AND WITHDRAW THE EAST KENTUCKY | ) |            |
| WHOLESALE REAL-TIME PRICING PILOT     | ) |            |
| PROGRAM, SCHEDULE RTP-DA, AND THE     | ) |            |
| PARTICIPATING MEMBER COOPERATIVES'    | ) |            |
| REAL-TIME PRICING PILOT PROGRAM,      | ) |            |
| SCHEDULE RTP-DA                       | ) |            |

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION TO  
EAST KENTUCKY POWER COOPERATIVE, INC., BLUE GRASS ENERGY  
COOPERATIVE CORPORATION, LICKING VALLEY RURAL ELECTRIC  
COOPERATIVE CORPORATION, NOLIN RURAL ELECTRIC COOPERATIVE  
CORPORATION, AND OWEN ELECTRIC COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc., Blue Grass Energy Cooperative Corporation, Licking Valley Rural Electric Cooperative Corporation, Nolin Rural Electric Cooperative Corporation, and Owen Electric Cooperative, Inc. ("Joint Applicants"), pursuant to 807 KAR 5:001, are to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of 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.

Joint Applicants shall make timely amendment to any prior response if they obtain 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 Joint Applicants fail or refuse to furnish all or part of the requested information, Joint Applicants shall provide a written explanation of the specific grounds for their 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. Refer to the Evaluation of Real Time Pricing Pilot Program ("Report") filed March 29, 2013, pursuant to the Commission's Order in Case No. 2007-00165.<sup>1</sup>

---

<sup>1</sup> Case No. 2007-00165, Application of East Kentucky Power Cooperative, Inc. for an Order Approving a Pilot Real-Time Pricing Program for Large Commercial and Industrial Customers (Ky. PSC Feb. 1, 2008).

a. The second paragraph on the first page of the Report states that East Kentucky Power Cooperative, Inc. ("EKPC") had estimated there were only 70 eligible customers among its Member Cooperatives ("Members"). The third paragraph states that there have been informal discussions concerning the pilot program between potential participants and Members.

(1) Provide the number of potential participants involved in these discussions during each year of the pilot program.

(2) Identify the Members involved in the discussions with potential participants.

(3) Provide a current estimate of potential participants, broken down by Member service area, based on the pilot program eligibility requirements. The estimate should include customers of Members that did not participate in the pilot program as well as customers of Members that did participate.

(4) Explain whether the concern expressed by potential participants was due in any part to the pilot status of the program.

b. The fourth paragraph on the first page of the Report states that a secondary objective of the pilot program was to encourage participants to reduce demand during critical peak periods and shift variable demand to low peak hours. Identify other specific tariff options available to customers of the Joint Applicants that would permit them to fulfill this objective.

c. Explain whether there are any reasons other than the program cost and staff hours involved in administering the program, both mentioned in the first

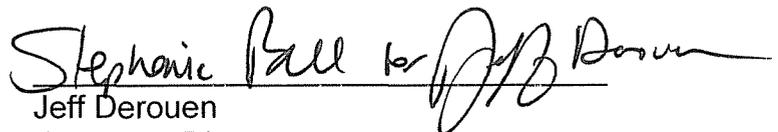
paragraph on the second page of the Report, that cause the Joint Applicants to request to terminate the pilot program.

2. In both the Report and the Application, Joint Applicants state that they are not abandoning the concept of Real-Time Pricing ("RTP") and are willing to consider a future RTP component for special contracts, similar to the approach authorized for Big Rivers Electric Corporation ("Big Rivers").

a. Explain whether EKPC and each Member offering Schedule RTP-DA tariffs is planning to propose a tariff similar to that of Big Rivers in the future. If yes, provide the expected filing date of such tariffs and the expected format thereof. If no, explain how each of the Joint Applicants plans to offer RTP to potential participants with no tariff schedule to promote its availability.

b. If the Joint Applicants have no plans to propose permanent tariff schedules under which RTP would be offered through special contracts, explain whether the Joint Applicants would be willing to do so by means of a three-year pilot.

3. Explain whether it is the Joint Applicants' intent to withdraw their RTP-DA tariffs 30 days from the filing date of their application, or 30 days from the date of a final order by the Commission approving their withdrawal request.

  
Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, Kentucky 40602

DATED APR 17 2013

cc: Parties of Record

Mark David Goss  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B130  
Lexington, KENTUCKY 40504