

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	)	
ALTERATION OF CERTAIN EQUIPMENT AT THE	)	CASE NO.
COOPER STATION AND APPROVAL OF A	)	2013-00259
COMPLIANCE PLAN AMENDMENT FOR	)	
ENVIRONMENTAL SURCHARGE COST	)	
RECOVERY	)	

COMMISSION STAFF'S REQUEST FOR INFORMATION  
TO SONIA MCELROY AND THE SIERRA CLUB

Sonia McElroy and the Sierra Club ("Sierra Club"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before December 18, 2013. 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 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 the 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.

The Sierra Club 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 request to which the Sierra Club 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 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.

1. Refer to page 12 of the Direct Testimony of Jeffrey Loiter (“Loiter Testimony”). Starting at line 6, Mr. Loiter states, “Rather than simply focus on air sealing measures, for example, the higher bills of electric heat customers may support more aggressive support of insulation upgrades and other investments such as switching from electric resistance heating to high-performance heat pumps.” Is Mr. Loiter aware that East Kentucky Power Cooperative, Inc.’s (“EKPC”) DSM-4 tariff, Button-Up Weatherization Program, includes insulation upgrades, and that its DSM-4b tariff, Heat Pump Retrofit Program, includes switching from electric resistance heating to high-performance heat pumps? If yes, state whether it is Mr. Loiter’s opinion that these programs are inadequate and provide the basis to support such an opinion.

2. Refer to pages 13-14 of the Loiter Testimony. Beginning at line 29 on page 13, Mr. Loiter states that “[u]sing the O&M spending for the environmental controls and fuel-based operating costs, more aggressive efficiency programs could acquire over 244,000 MWh of cumulative savings by 2017...” Provide the supporting calculation for the 244,000 MWh.

3. Refer to page 14 of the Loiter Testimony. Beginning at line 25, Mr. Loiter states that “[i]f the \$15 million capital cost of the Cooper unit 1 project was amortized over 15 years at 7.5%, the resulting \$1.7 million per year cost could produce a sustained additional 22 MW of summer peak demand reduction....” Provide the supporting calculation for the 22 MW.

4. Refer to the compact disc filed under seal with the Direct Testimony of Tyler Comings. Provide a description of each of the three files contained on the disc.

5. Refer to Item (V.) on page 12 of the Loiter Testimony wherein it states that “EKPC could support far greater levels of energy efficiency and demand response instead of retrofitting Cooper unit 1.” It further states, in relevant part, that based on data from the recently published ACEEE State Energy Efficiency Scorecard, other states are accomplishing much greater energy efficiency results. Identify and explain the analysis that was performed, if any, to determine whether EKPC’s service territory is comparable to the states identified in the response and thus could be expected to achieve similar energy-efficiency results.

6. Refer to the last sentence on page 12 of the Loiter Testimony wherein it states, “Second, it is only half of the cost-effective potential identified by a study completed in 2012, using data specific to Kentucky (Exhibit JML-2).” Identify and explain the analysis that was performed, if any, to determine whether EKPC’s service territory is comparable to the entire state of Kentucky and thus could be expected to achieve similar energy-efficiency results.

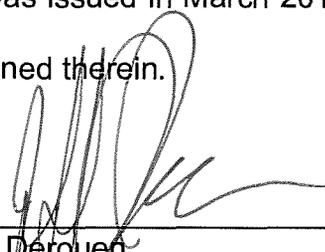
7. Refer to page 15 of the Loiter Testimony wherein it discusses the benefits to demand-side management (“DSM”) beyond the cost savings as compared to supply-

side resources. If EKPC were to opt for DSM expansion instead of retrofitting Cooper unit 1, what risks would it encounter if the projected DSM savings were not achieved?

8. Refer to page i of Exhibit JML-2 in the Loiter Testimony. The second paragraph of the Executive summary states, "This assessment is the first of three (3) documents that comprise ACEEE's energy efficiency potential study for Kentucky." If available, provide the other two documents.

9. Refer to page 2 of Exhibit JML-2 in the Loiter Testimony. The last paragraph states that "[t]he baseline home was computed using a variety of housing characteristics gathered from a local utility as well as national datasets." Identify the local utility referenced in this statement.

10. Refer to Exhibit JML-2 in the Loiter Testimony. Identify and explain any changes that have occurred since this document was issued in March 2012 that, in Mr. Loiter's opinion, would affect the conclusions contained therein.



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DATED DEC 09 2013

cc: Parties of Record

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