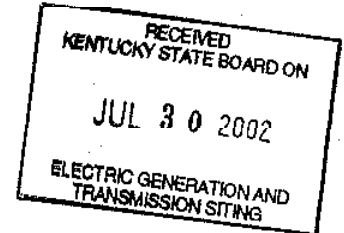


BEFORE THE KENTUCKY STATE BOARD
ON ELECTRIC GENERATION AND TRANSMISSION SITING
211 SOWER BOULEVARD
FRANKFORT, KENTUCKY 40601

In the Matter of:

THE APPLICATION OF KENTUCKY)
MOUNTAIN POWER, LLC /)
ENVIROPOWER, LLC FOR A)
MERCHANT POWER PLANT)
CONSTRUCTION CERTIFICATE IN)
KNOTT COUNTY, KENTUCKY)
NEAR TALCUM)

CASE NO.
2002-00149



**INTERVENOR PAULINE STACY'S FIRST DATA REQUEST
TO KENTUCKY MOUNTAIN POWER, LLC**

Intervenor Pauline Stacy requests that Kentucky Mountain Power, LLC (KMP) provide the Intervenor, the Board and all parties of record, the following information:

1. A description of the route(s) that will be used for gaining access to the proposed plant site:
 - a. for construction equipment, material and personnel;
 - b. for fuel and supply delivery, personnel and other traffic to and from the facility once it is in operation.
2. A description of the measures that are proposed and will be implemented to prevent the use of unauthorized coal haul roads or other access routes or roads to gain access to the power plant site.
3. A description of the route(s) that will be used for delivery of coal, waste coal and coal waste material to the proposed power plant site, including but not

limited to route(s) that will be used to deliver such material from the Starfire mining complex.

4. A description of the transmission line routing for all new lines associated with the KMP project, including those to be transferred to AEP, and including:

a. An assessment of alternative routes considered and basis for selection of the preferred route(s) for each line;

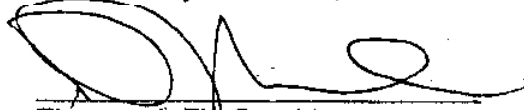
b. A description of the status of right-of-way acquisition for each line;

c. A description of impacts on properties associated with the line construction, operation and maintenance; and

d. A site assessment report for the transmission line routing.

5. A description of where water will be stored on site for facility operation, including the location, size, hazard classification, construction method, and ownership of the structure(s) to be used. For each structure, provide the size of the structure and acre-feet of storage, dam breach analysis, monitoring and engineering inspection protocols, and identify whether the structure is existing or proposed, who will be responsible for maintenance, upkeep and repair on the structure(s), who is responsible for compensation for any damage resulting from the failure of the structure(s), whether an insurance policy will be maintained insuring against losses associated with the structure and off-site damage resulting from the structure, and the limits of that policy for property and casualty related to that structure.

Respectfully submitted,



Thomas J. FitzGerald
P.O. Box 1070
Frankfort, KY 40602
(502) 875-2428

Date: July 30, 2002

Certificate of Service

I hereby certify that a true and correct copy of the forgoing was served this 30th day of July, 2002 by first-class mail to:

Mike Haydon
Office of the Governor
The Capitol, 700 Capitol Ave. Suite100
Frankfort, Kentucky 40001
Hon. Denny Ray Noble, Judge/Executive
Perry County Courthouse
P.O. Box 210
Hazard, Kentucky 41701

Hon. Donnie Newsome, Judge/Executive
Knott County Courthouse
P.O. Box 505
Hindman, Kentucky 41822

Hon. Paul H. Thompson, Judge/Executive
Floyd County Courthouse Annex
149 S. Central Avenue
Prestonsburg, KY 41653

Hon. Robert Cornett, Judge/Executive
Breathitt County Courthouse
1137 Main Street
Jackson, Kentucky 41399

J. R. Wilhite, Commissioner
Economic Development Cabinet
2300 Capital Plaza Tower
Frankfort, Kentucky 40601

Hank List, Deputy Secretary
Natural Resources & Env. Prot. Cabinet
5th Floor, Capital Plaza Tower
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Kentucky Mountain Power, LLC

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Randy Bird, P.E.
EnviroPower I I C
117 Lincoln Street
Hazard, Kentucky 41701

and that the original was lodged by mail and by fax, this 30th day of July, 2002,
with the offices of the Board, 211 Sower Boulevard, Frankfort, Kentucky 40601.



Thomas J. FitzGerald