

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

APPLICATION OF SOUTH KENTUCKY RURAL)	
ELECTRIC COOPERATIVE CORPORATION)	CASE NO.
FOR APPROVAL OF MASTER POWER PURCHASE)	2018-00050
AND SALE AGREEMENT AND TRANSACTIONS)	
THEREUNDER)	

**RESPONSE OF EAST KENTUCKY POWER COOPERATIVE, INC.
TO SOUTH KENTUCKY'S POST-HEARING INFORMATION REQUESTS
DATED MAY 21, 2018**

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**APPLICATION OF SOUTH KENTUCKY RURAL)
ELECTRIC COOPERATIVE CORPORATION) CASE NO.
FOR APPROVAL OF MASTER POWER PURCHASE) 2018-00050
AND SALE AGREEMENT AND TRANSACTIONS)
THEREUNDER)**

CERTIFICATE

**STATE OF KENTUCKY)
)
COUNTY OF CLARK)**

Mike McNalley, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the South Kentucky Rural Electric Cooperative Corporation’s Post Hearing Information Requests in the above-referenced case dated May 21, 2018, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Subscribed and sworn before me on this 20th day of May 2018.

Gwyn M. Willoughby
Notary Public #590567

GWYN M. WILLOUGHBY
 Notary Public
 Kentucky – State at Large
 My Commission Expires Nov 30, 2021

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2018-00050
RESPONSE TO POST HEARING INFORMATION REQUEST

SOUTH KENTUCKY’S INFORMATION REQUEST DATED 05/21/18
REQUEST 1

RESPONSIBLE PARTY: **Mike McNalley**

Request 1. Produce all studies and documents developed by EKPC that estimate or project the potential costs that could be avoided by EKPC (including, but not limited to, avoided fuel costs, avoided capital investment (both new and maintenance capital), and avoided expenses) if South Kentucky were to be served under its alternate source beginning June 1, 2019.

Response 1. EKPC has not conducted any formal or in-depth studies beyond those provided in connection with its direct testimony, exhibits, and previous data responses of Mr. McNalley, including the December 27, 2017 “Mitigation of Amendment 3 Load Loss” memorandum and Exhibit MM-1.

EAST KENTUCKY POWER COOPERATIVE, INC.
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SOUTH KENTUCKY'S INFORMATION REQUEST DATED 05/21/18
REQUEST 2

RESPONSIBLE PARTY: **Mike McNalley**

Request 2. Produce all studies and documents developed by EKPC that estimate or project the potential revenues that EKPC could receive from off-system sales if South Kentucky were to be served under its alternate source beginning June 1, 2019.

Response 2. EKPC has not projected potential revenues from off-system sales beyond the estimates provided in the December 27, 2017 "Mitigation of Amendment 3 Load Loss" memorandum, which has been previously provided.

EAST KENTUCKY POWER COOPERATIVE, INC.
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SOUTH KENTUCKY'S INFORMATION REQUEST DATED 05/21/18
REQUEST 3

RESPONSIBLE PARTY: Mike McNalley

Request 3. Produce a copy of the effective EKPC tariffs applicable to Qualified Cogeneration and Small Power Production Facilities.

Response 3. The current Qualified Cogeneration and Small Power Production Facilities tariff ("Cogeneration tariff") is available on the Commission's website. In addition, EKPC provided to all its owner-members, including South Kentucky, a copy of the tariff on March 30, 2018. This was done so each owner-member could prepare its corresponding Cogeneration tariff filing with the Commission, which was required in the March 27, 2018 Order in Case No. 2017-00212.¹ South Kentucky filed its Cogeneration tariff with the Commission using the electronic tariff filing system on April 16, 2018, file reference TFS2018-00159.

¹ See *In the Matter of Tariff Filing of East Kentucky Power Cooperative, Inc. and Its Member Distribution Cooperatives for Approval of Proposed Changes to Their Qualified Cogeneration and Small Power Production Facilities Tariffs and the Implementation of Separate Tariffs for Power Purchases from Solar Generation Qualifying Facilities*, Order, Case No. 2017-00212, (Ky. P.S.C., Mar. 27, 2018).

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2018-00050
RESPONSE TO POST HEARING INFORMATION REQUEST

SOUTH KENTUCKY'S INFORMATION REQUEST DATED 05/21/18
REQUEST 4

RESPONSIBLE PARTY: **Mike McNalley**

Request 4. Produce a copy of any proposed EKPC tariffs applicable to Qualified Cogeneration and Small Power Production Facilities, regardless whether such tariffs have become effective.

Response 4. The latest proposed revision to the Cogeneration tariff is available on the Commission's website. EKPC filed its annual update to its Cogeneration tariff with the Commission utilizing the electronic tariff filing system on April 12, 2018, file reference TFS2018-00152. In addition, EKPC provided to all its owner-members, including South Kentucky, a copy of the pending tariff on April 13, 2018. This was done so each owner-member could prepare its corresponding Cogeneration tariff filing with the Commission, which is an annual update of the cogeneration rates. South Kentucky filed its annual update to the Cogeneration tariff with the Commission using the electronic tariff filing system on April 27, 2018, file reference TFS2018-00191.