

South Kentucky Rural Electric Cooperative Corporation

Case No. 2018-00050

Distribution Cooperatives Second Request for Information

18. Did South Kentucky perform any study or analysis of EKPC's ability to mitigate the loss of South Kentucky's load if the Commission approves the PPA, beyond relying on alleged statements of EKPC's CEO Tony Campbell made August 7, 2017 and August 21, 2017, and the December 29, 2017 email and attached memo? If yes, please describe any such study and analysis. If no, please explain why South Kentucky did not do so.

Response:

Objection: South Kentucky objects to the request insofar as it serves as a collateral attack on the Commission's December 18, 2015 order in Case No. 2012-00503, as well as Amendment 3 and the MOU (which have been accepted for filing by the Commission). Without waiving the foregoing objection, South Kentucky states that no formal analysis was performed prior to giving EKPC notice. South Kentucky CEO, Dennis Holt, has since examined the 2013 EKPC Load Forecast and believes that the projected load growth of EKPC is sufficient to offset the reduction.