

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

In the Matter of:

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

**SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION'S
POST-HEARING INFORMATION REQUESTS
TO EAST KENTUCKY POWER COOPERATIVE, INC.**

Comes now South Kentucky Rural Electric Cooperative Corporation (“South Kentucky”), by and through counsel, and submits these post-hearing information requests to East Kentucky Power Cooperative, Inc. (“EKPC”) to be answered by May 29, 2018, as specified in the Commission’s May 18, 2018 Order, and in accordance with the following:

1. The responses provided should first restate the questions asked and also identify the witness who will be prepared to answer questions concerning each request.
2. Please answer each designated part of each information request separately. If you do not have complete information with respect to any question, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
3. If you believe any request appears confusing, request clarification directly from counsel for South Kentucky.
4. These requests shall be deemed continuing so as to require further and supplemental responses if additional information within the scope of these requests is received or generated between the time of the response and the time of any hearing conducted hereon.

5. To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

6. To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout that would not be self-evident to a person not familiar with the printout.

7. For any document withheld on the basis of privilege, state the nature and legal basis for the privilege asserted.

8. For purposes of responding to these requests, the term "EKPC" shall be defined to include any member of EKPC's executive staff, financial leadership, operational leadership, board risk oversight committee, strategic issues committee, governance committee and audit committee, as well as any one acting as EKPC's agent or otherwise on its behalf or at its direction.

9. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), code number thereof, or other means of identifying it

and its present location and custodian. If any such document was, but is no longer in EKPC's possession or subject to its control, state what disposition was made of it, including the date of such disposition.

10. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.

11. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

12. "South Kentucky" means petitioner South Kentucky Rural Electric Cooperative Corporation, and its agents, representatives, employees, officers, and directors.

13. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, considering or evaluating a

particular issue or situation, in whatever detail, whether or not the study of the issue or situation is in a preliminary stage, and whether or not the study discontinued prior to completion.

Respectfully submitted,

/s/Matt Malone

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**SOUTH KENTUCKY RURAL ELECTRIC
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CERTIFICATE OF SERVICE

Pursuant to 807 KAR 5:001 Section 6, the undersigned certifies that consistent with 807 KAR 5:001 Section 4(8)(d)(3), a copy of this document has been electronically served upon the following:

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This 21st day of May, 2018.

/s/Matt Malone
ATTORNEY FOR SOUTH KENTUCKY

POST-HEARING INFORMATION REQUESTS

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