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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

AUG 24 2009

PUBLIC SERVICE  
COMMISSION

In the Matter of:

A REVIEW PURSUANT TO 807 K.A.R. 5:058 )  
OF THE 2009 INTEGRATED RESOURCE PLAN ) CASE NO. 2009-106  
FOR EAST KENTUCKY POWER )  
COOPERATIVE, INC. )

SIERRA CLUB, KENTUCKY ENVIRONMENTAL FOUNDATION AND  
KENTUCKIANS FOR THE COMMONWEALTH SECOND SET OF DATA  
REQUESTS TO EAST KENTUCKY POWER COOPERATIVE

Pursuant to the Commission’s July 2, 2009 Order in the above captioned case, the Sierra Club, Kentucky Environmental Foundation, and Kentuckians for the Commonwealth (collectively “Public Interest Groups”) respectfully submit the following interrogatories and requests for production of documents.

78. Reference Kentucky Power’s 2009 Integrated Resource Plan in which it states that “the residential customer growth has essentially ceased.” See [http://psc.ky.gov/pscscf/2009%20cases/2009-00339/20090818\\_AEP\\_App\\_Vol\\_A.PDF](http://psc.ky.gov/pscscf/2009%20cases/2009-00339/20090818_AEP_App_Vol_A.PDF) at page 1-13. Please provide a detailed explanation of why East Kentucky Power Cooperative’s (EKPC) load forecast predicts significantly more residential customer growth than Kentucky Powers?

79. Please explain whether EKPC uses the Statistically Adjusted End-use model to forecast residential and commercial energy.

80. Reference your response to Request 28a,<sup>1</sup> please explain what how the load impacts of all the existing DSM programs were embedded in the load forecast.

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<sup>1</sup> All references to “Request” without an additional descriptor are to KFTC, KEF and Sierra Club’s data requests.

81. Reference your response to Request 28a, please explain why there is no incremental load impacts projected.
82. Reference your response to Request 32. Please provide any data, reports, analysis or vendor information that establishes that SCRs and/or low NO<sub>x</sub> burners reduce N<sub>2</sub>O emissions. If no such information actual exists, please so state.
83. Reference your response to Request 33. Please provide a yes or no answer as to whether, for each federal energy standard listed, your energy and demand projections take that specific federal energy standard into account. If the answer is yes, please provide the amount of energy and demand reduction, per customer, identifying the customer class and in the aggregate, per year, that your energy and demand projections assumed attributed to each federal energy standard.
84. Reference your response to Request 34. Please provide the EIA projects upon which you relied.
85. Reference your response to Request 35. Note that there are two parts to that question but you only provided a response to one part. Please explain the basis for assuming that sales to Gallatin Steel will not decrease during the period covered by the 2009 IRP.
86. Reference your response to Request 37. Please explain the basis for excluding solar PV and solar hot water as a resource in your 2009 IRP. If the basis is supported by an data, please provide the data.
87. Reference Table 8.(4)(a)-1. Please categorize the capacity needs identified in this table by base load, intermediary load and peaking.

88. Reference your response to Request 44d-j. Please specifically identify the results of your attempt to simulate what might happen with environmental regulations. Please specifically identify what costs, in dollars, were added to all of the uncommitted generating capacity identified in Table 8.(4)(a)-2.

89. Reference your response to Request 50. Please explain why a 1.5% increase in customers does not equate to a 1.5% increase in population growth.

90. Reference your response to Request 53. Please state the demand and energy saving, in mw and mwh, that the 2009 IRP attributed to reduced losses from distribution transformers.

91. Reference your response to Request 54. Please identify who the seasonal power purchase contracts that will expire with and state whether there is an option to renew those contracts in future seasons.

92. Reference your response to Request 59. Please explain that basis for assuming an increase in homes using electric heat from the current level of 58% to the assumed level of 75%.

93. Reference your response to Request 59. Please provide energy and demand projections if you assume that 58% of new homes have electric heat.

94. Please state whether EKPC is a member of a regional transmission organization (RTO) and is so which one.

95. Please state the lowest annual heat rate determined for the LMS 100 combustion turbines for any scenario you ran.

96. Reference your response to Request 72 and IRP 2009 page 8-118. If the 2009 IRP does not assume that future combustion turbines will have a heat rate of over 12,000

btu/kwh, please explain why the heat rate listed for Future CT1 and Future CT2 on page 8-118 is at over 12,000 btu/kwh. If there is an error on page 8-118, please explain how the resource plan changes when you correct this error. If there is not an error on page 8-118, please provide a complete response to Request 72.

97. Reference your response to Request 73. Please explain what changes you have made to your prediction of future generation needs in light of your correction.

98. Reference your response to Staff Request 6. The Energy Information Agency reported that in May, 2009 the average price paid by power generators for natural gas was \$4.46. See <http://tonto.eia.doe.gov/ftproot/electricity/epm/02260908.pdf> at 67. You report that you paid \$15.70. Please explain why you paid over three times the national average in May, 2009 for natural gas. Also, please explain if the May 2009 price that you paid for natural gas is used in any other resource planning done by EKPC.

99. Reference your response to Staff Request 15 and Request 44d-j. Please explain why in response to Staff Request 15 you state that no new legislation or environmental rules were assumed in the 2009 IRP but in response to Request 44d-j, you state that scenario were modeled attempting to simulate what might happen with environmental regulation. Please also provide what these simulations assumed in terms of environmental simulation. Please explain whether this simulation assumed that the replacement rules for CAIR and CAMR will not be cap and trade programs.

100. Reference your response to Staff Request 15, second to last paragraph. Please state what the price of wind was in the renewable analysis was that lead to the conclusion that it was not an economic choice for EKPC members. Please include what the price is for, *e.g.* just for energy, for capacity, for renewable energy credits etc.

101. Reference your response to Staff Request 17. Please provide the basis for each score and any data, *e.g.* focus group results, surveys, assumed prices, that was used in creating the score.

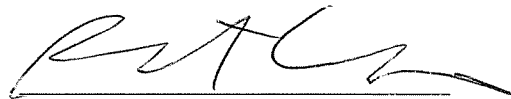
102. Reference your response to Staff Request 18c. Please explain what experience, if any, the people listed have with:

- a) Passive Solar
- b) Solar Hot Water
- c) Tax Equity Financing

103. Please provide all documents referenced or reviewed in responding to these requests.

104. Please identify all people involved in answering these requests.

Respectfully submitted,



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Dated: August 21, 2009

CERTIFICATE OF SERVICE

I certify that I mailed a copy of this above by first class mail on August 21, 2009 on the following:

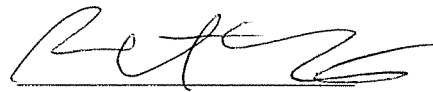
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