

**Frost  
Brown Todd** LLC  
ATTORNEYS

RECEIVED

JUN 25 2010

PUBLIC SERVICE  
COMMISSION

KENTUCKY · OHIO · INDIANA · TENNESSEE · WEST VIRGINIA

June 25, 2010

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Post Office Box 615  
Frankfort, Kentucky 40602

RE: Case No. 2010-00166

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten redacted copies of East Kentucky Power Cooperative, Inc.'s ("EKPC") Responses to Commission Staff's two Information Requests provided at the Informal Conference held on June 24, 2010.

EKPC's Petition for Confidential Treatment of Information ("Petition"), as originally filed at the time of filing the Application, will attach in all respects to these Responses. One unredacted copy of the designated confidential portions of the Responses, which attach to the original Petition (copy provided as reference), is enclosed in a sealed envelope.

Please feel free to call if you have any questions.

Sincerely,

*Mark David Goss (by Royce R Cowden)*

Mark David Goss

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

**In the Matter of:**

**AN APPLICATION OF EAST KENTUCKY     )  
POWER COOPERATIVE, INC. FOR         )  
APPROVAL OF A THREE-YEAR SENIOR     )  
UNSECURED REVOLVING AND TERM        ) CASE NO. 2010-00166  
CREDIT FACILITY IN AN AMOUNT UP TO  )  
\$500,000,000                             )**

**RESPONSES OF EAST KENTUCKY POWER COOPERATIVE, INC.  
TO COMMISSION STAFF'S INFORMATION REQUESTS FROM  
INFORMAL CONFERENCE HELD ON JUNE 24, 2010**

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN APPLICATION OF EAST KENTUCKY )  
POWER COOPERATIVE, INC. FOR )  
APPROVAL OF A THREE-YEAR SENIOR )  
UNSECURED REVOLVING AND TERM ) CASE NO. 2010-00166  
CREDIT FACILITY IN AN AMOUNT UP TO )  
\$500,000,000 )

PETITION FOR CONFIDENTIAL  
TREATMENT OF INFORMATION

Comes now the petitioner, East Kentucky Power Cooperative, Inc. ("EKPC") and, as grounds for this Petition for Confidential Treatment of Information (the "Petition"), states as follows:

1. This Petition is filed in conjunction with the filing of certain information in Exhibit 2 of EKPC's Application for Approval of a Three-Year Senior Unsecured Revolving and Term Credit Facility in an Amount up to \$500,000,000, and relates to confidential information contained in that exhibit that is entitled to protection pursuant to 807 KAR 5:001 Section 7 and KRS §61.878(1)(c)1, §61.878(1)(c)2a, and §61.878(1)(c)2c.

2. The information designated as confidential in the subject Application describes anticipated interest rates and proprietary loan terms and conditions on the proposed credit facility. The open disclosure of such anticipated interest rates and loan terms could arm lenders with information that could allow such lenders an unfair commercial advantage over EKPC and its member systems. As such this information is confidential and not subject to public disclosure pursuant to KRS §61.878(1)(c)1. In

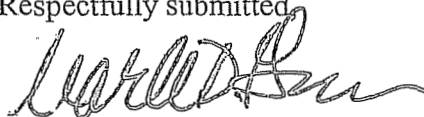
addition, these proprietary loan terms and conditions are also protected under §KRS 61.878(1)(c)2a, as it is a required disclosure to an agency in conjunction with an application for a loan.

3. The subject information is also entitled to protection pursuant to KRS §61.878(1)(c)2c, as records generally recognized as confidential or proprietary which are confidentially disclosed to an agency in conjunction with the regulation of a commercial enterprise.

4. Along with this Petition, EKPC has enclosed one copy of Exhibit 2, with the confidential information identified by highlighting or other designation, and 10 copies of the same exhibit, with the confidential information redacted. The identified confidential information is not known outside of EKPC and is distributed within EKPC only to persons with a need to use it for business purposes. It is entitled to confidential treatment pursuant to 807 KAR 5:001 Section 7 and the various sections of KRS 61.878 delineated above.

WHEREFORE, EKPC respectfully requests the Public Service Commission to grant confidential treatment to the identified information and deny public disclosure of said information.

Respectfully submitted



Mark David Goss  
Frost Brown Todd LLC  
250 West Main Street, Suite 2800  
Lexington, KY 40507-1749  
(859) 231-000—Telephone  
(859) 231-0011—Facsimile  
Counsel for East Kentucky Power Cooperative, Inc.

CERTIFICATE OF SERVICE

This is to certify that an original and 10 copies of the foregoing Petition for Confidential Treatment of Information in the above-styled case were hand-delivered to the Office of Jeffrey Derouen, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601 on April 26, 2010.



\_\_\_\_\_  
Counsel for East Kentucky Power Cooperative, Inc.

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN APPLICATION OF EAST KENTUCKY )  
 POWER COOPERATIVE, INC. FOR )  
 APPROVAL OF A THREE-YEAR SENIOR )  
 UNSECURED REVOLVING AND TERM ) CASE NO. 2010-00166  
 CREDIT FACILITY IN AN AMOUNT UP TO )  
 \$500,000,000 )

CERTIFICATE

STATE OF KENTUCKY )  
 )  
 COUNTY OF CLARK )

Frank J. Oliva, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff Information Requests from the Informal Conference held on June 24, 2010 in the above-referenced case, 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.

Frank J. Oliva

Subscribed and sworn before me on this 25 day of June, 2010.

Greg M. Walling  
 Notary Public

MY COMMISSION EXPIRES NOVEMBER 30, 2013  
 NOTARY ID #409352

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2010-00166

RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INFORMATION REQUEST FROM INFORMAL  
CONFERENCE HELD ON 06/24/10

REQUEST 1

RESPONSIBLE PARTY: Frank J. Oliva

**Request 1.** Identify all financial institutions participating in the unsecured credit facility, along with the amount of their respective financial commitments in such unsecured credit facility.

**Response 1.** The financial institutions and the amount committed by each are identified below.

<u>Financial Institution</u>	<u>Commitment</u> <u>(\$ in millions)</u>
██████████	\$ ██████
██████████	██████
██████	██████
██████████████████	██████
██████████	██████
██████████	██████
██████████████████	██████
██████████	██████
Total Commitment	\$450

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**PSC CASE NO. 2010-00166**

**RESPONSE TO INFORMATION REQUEST**

**COMMISSION STAFF'S INFORMATION REQUEST FROM INFORMAL  
CONFERENCE HELD ON 06/24/10**

**REQUEST 2**

**RESPONSIBLE PARTY: Frank J. Oliva**

**Request 2.** Quantify the total increase in interest expense and other costs from the unsecured credit facility term sheet as provided in the original April 26, 2010, filing to the updated filing on June 4, 2010, assuming that the total amount of \$450,000.000 is drawn by EKPC.

**Response 2.** Please see pages 2 and 3 of this response.



REDACTED

## EAST KENTUCKY POWER COOPERATIVE, INC.

### Summary of Pricing Changes

	April 2010 Pricing	June 2010 Pricing	Increase
Total Arranger Fees:	[REDACTED]		
Administrative Agent Fee:			
Upfront Fee Tiering (bps):	[REDACTED]		
Facility Fee (bps):			
LIBOR Margin (bps):			
ABR Margin (bps):	[REDACTED]		

**EAST KENTUCKY POWER COOPERATIVE, INC.**

*Pricing Increases*

INPUTS:

Estimated Facility Size	\$ 450,000,000
Estimated Facility Term (Years)	3.00
Estimated Facility Usage (%)	100%

ANNUALIZED

	\$	%
<b>'BBB-' Indicative Pricing</b>		
Admin Agent Fee (per year)		
Blended Upfront Fee (per year)		
Facility Fee (per year)		
Interest Expense (100% usage)		
<b>Total Cost</b>		

April 2010 Pricing

	\$	%
<b>'BB+' Indicative Pricing</b>		
Admin Agent Fee (per year)		
Blended Upfront Fee (per year)		
Facility Fee (per year)		
Interest Expense (100% usage)		
<b>Total Cost</b>		

June 2010 Pricing

LIFE OF FACILITY

	\$	%
<b>'BBB-' Indicative Pricing</b>		
Admin Agent Fee		
Blended Upfront Fee		
Facility Fee		
Interest Expense (100% usage)		
<b>Total Cost</b>		

April 2010 Pricing

	\$	%
<b>'BB+' Indicative Pricing</b>		
Admin Agent Fee		
Blended Upfront Fee		
Facility Fee		
Interest Expense (100% usage)		
<b>Total Cost</b>		

June 2010 Pricing

<b>Cost Increase</b>		
<b>% Increase</b>		

<b>Cost Increase</b>		
<b>% Increase</b>		