



PPL companies

Mr. Jeff DeRouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

September 10, 2015

**RE: *Application of East Kentucky Power Cooperative, Inc. for Approval of the Acquisition of Existing Combustion Turbine Facilities from Bluegrass Generation Company, LLC at the Bluegrass Generating Station in LaGrange, Oldham County, Kentucky and for Approval of the Assumption of Certain Evidences of Indebtedness***  
**Case No. 2015-00267**

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of Louisville Gas and Electric Company's and Kentucky Utilities Company's Supplemental Request for Information to East Kentucky Power Cooperative, Inc. in the above-referenced proceeding.

Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the attached copy.

Should you have any questions regarding the enclosed, please contact me at your convenience.

Sincerely,

A handwritten signature in blue ink that reads "Rick E. Lovekamp".

Rick E. Lovekamp

RECEIVED

SEP 10 2015

PUBLIC SERVICE  
COMMISSION

**LG&E and KU Energy LLC**  
State Regulation and Rates  
220 West Main Street  
PO Box 32010  
Louisville, Kentucky 40232  
lge-ku.com

Rick E. Lovekamp  
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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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SEP 10 2015

PUBLIC SERVICE  
COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY )  
POWER COOPERATIVE, INC. FOR APPROVAL )  
OF THE ACQUISITION OF EXISTING )  
COMBUSTION TURBINE FACILITIES FROM )  
BLUEGRASS GENERATION COMPANY, LLC AT )  
THE BLUEGRASS GENERATING STATION IN )  
LAGRANGE, OLDHAM COUNTY, KENTUCKY )  
AND FOR APPROVAL OF THE ASSUMPTION OF )  
CERTAIN EVIDENCES OF INDEBTEDNESS )

CASE NO. 2015-00267

**SUPPLEMENTAL REQUEST FOR INFORMATION OF  
LOUISVILLE GAS AND ELECTRIC COMPANY  
AND KENTUCKY UTILITIES COMPANY PROPOUNDED TO  
EAST KENTUCKY POWER COOPERATIVE, INC.**

Kentucky Utilities Company (“KU”) respectfully submits the following supplemental request for information to East Kentucky Power Cooperative, Inc. (“EKPC”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on July 31, 2015.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, email, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, EKPC, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if EKPC receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If EKPC objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of EKPC, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

### Data Requests

1. In response to LG&E/KU Initial Request for Information Question No. 2c, EKPC indicated that it already has the needed transmission service on the LG&E/KU system to support bids into the PJM Base Residual and incremental auctions through Transmission Service Requests #80522955 and #81128526.
  - a. Please explain how EKPC has the requisite “long-term firm transmission service” required to bid into the PJM auctions when LG&E/KU’s OATT does not allow network transmission service to be used for sales of capacity and energy to non-designated loads (i.e., loads connected to the EKPC transmission system).
  
2. In response to the Attorney General’s Initial Request for Information Question No. 20, Darrin Adams indicated that EKPC’s RFP process and analysis “did not specifically take into account any potential increased transmission rates EKPC would pay to LG&E/KU for Network Integration Transmission Service (“NITS”)” and that for the “certain periods when it is desirable due to economics or reliability to dispatch the Bluegrass Units at an output level that is greater than the amount of EKPC load directly connected to the LG&E/KU system...EKPC anticipates...that the incremental cost EKPC would pay, if any, would be relatively small.”
  - a. Please explain why EKPC anticipates that the incremental cost EKPC would pay may be relatively small if anything.
  
3. In response to LG&E/KU’s Initial Request for Information Question No. 3d, David Crews states “EKPC is rated by S&P and Fitch and expects to come to agreement with LGE/KU on the necessary creditworthiness guarantee.”
  - a. When does EKPC plan to begin and complete the process to “come to agreement with LGE/KU”?
  
4. In response to LG&E/KU’s Initial Request for Information Question No. 4b, David Crews states that “EKPC believes MFA as billed is consistent with the formula described in Appendix B. EKPC also believes that as-billed MFA is representative of how a fuel adjustment should work.” Given that the definition of Delivered Energy in the tolling agreement unambiguously includes the specific qualifying exclusion statement that “[a]ny MWHs generated before or after the start and end of any applicable Schedule is not included in the calculation of Delivered Energy”(emphasis added),

- a. Why does EKPC believe including the MWHs generated before and after the applicable Schedule for the calculation of Delivered Energy (which LS Power/Bluegrass has done in its billings) is “consistent with formula described in Appendix B”?
  - b. Please explain in what ways “the as-billed MFA is representative of how a fuel adjustment should work.”
  - c. Since it appears the MFA billing issue may be ongoing, which party (EKPC or Bluegrass/LS Power) will be responsible for resolving the billing issue with LG&E/KU for a) bills issued prior to the closing of the Bluegrass transaction and b) bills issued after the closing of the Bluegrass transaction?
5. Refer to response to KPSC Initial Request for Information Question No. 10c.
- a. Was Bluegrass Unit 3 scheduled to operate for LG&E/KU on May 11, 2015 from 13:00 EST to 17:00 EST?
  - b. Did Bluegrass Unit 3 become unavailable at approximately 14:30 EST on May 11, 2015?
  - c. Did Bluegrass Unit 3 become re-available at approximately 18:21 EST on May 11, 2015?
  - d. Was EKPC aware of the start and stop times of the following Trimble County Units on May 11, 2015?

Unit	EST	
	Start Time	Stop Time
Trimble County 05	11:17	21:29
Trimble County 06	9:32	21:00
Trimble County 07	12:02	20:05
Trimble County 08	12:26	15:11
Trimble County 09	9:44	20:20
Trimble County 10	12:03	16:36

Dated: September 10, 2015

Respectfully submitted,

A handwritten signature in blue ink that reads "Allyson K. Sturgeon". The signature is written in a cursive style and is positioned above a horizontal line.

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Allyson K. Sturgeon  
Senior Corporate Attorney  
LG&E and KU Services Company  
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*Counsel for Kentucky Utilities Company and  
Louisville Gas and Electric Company*

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing Initial Request for Information to East Kentucky Power Cooperative, Inc. has been served by United States mail, this 10<sup>th</sup> day of September, 2015 on the following:

Larry Cook  
Assistant Attorney General  
Office of the Attorney General Utility & Rate  
Intervention  
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*Counsel for Kentucky Utilities Company and  
Louisville Gas and Electric Company*