

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	
CLAUSE OF EAST KENTUCKY POWER)	CASE NO.
COOPERATIVE, INC. FROM NOVEMBER 1,)	2019-00003
2016 THROUGH OCTOBER 31, 2018)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
EAST KENTUCKY POWER COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc. (EKPC), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on March 25, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

EKPC shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct

when made, is now incorrect in any material respect. For any request to which EKPC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, EKPC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the response to Commission Staff's First Request for Information (Staff's First Request), Item 1.

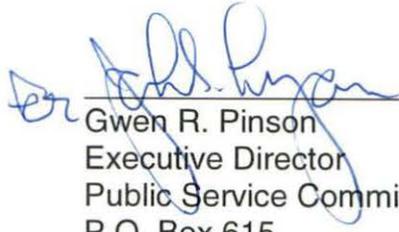
a. All of the Cooper unit's contracted coal continues to come from only one supplier. Describe any action taken by EKPC since the prior Fuel Adjustment Clause (FAC) review case¹ to diversify its coal procurement for Cooper.

b. Explain why the percentage of spot purchases exceeds contract purchases for Cooper and Spurlock Units 1 and 2.

c. Explain if EKPC is concerned with the amount of spot purchases over contract purchases during the period under review.

¹ Case No. 2018-00217, *Electronic Examination of the Application of the Fuel Adjustment Clause of East Kentucky Power Cooperative, Inc. from November 1, 2017 Through April 30, 2018* (Ky. PSC Dec. 3, 2018).

2. Refer to the response to Staff's First Request, Item 2, page 2 of 4 and page 3 of 4, column (f) for Contract No. 824 and No. 832. Explain the +\$.25/ ton trucking part of the charge.
3. Refer to the response to Staff's First Request, Item 5, page 2 of 3. Provide an explanation for the Test Purchase reasoning given.
4. Refer to the response to Staff's First Request, Item 9. Provide details on when EKPC last audited any of its fuel or transportation contracts.
5. Refer to the response to Staff's First Request, Item 22, page 1 of 5.
 - a. Provide a table listing the Fuel, Sales, and FAC factor rate for each expense month for the 24 months under review.
 - b. Confirm that the average total FAC for the 24 months under review is \$0.02523 per kWh.
6. Refer to the Direct Testimony of Mark Horn, page 3. Provide the steps EKPC has taken to address B & W Resources, Inc.'s shortfall of tonnage for the Cooper Power Station.
7. Refer to the Direct Testimony of Julia Tucker, page 2. For the total period under review, provide details on the PJM implemented changes and exactly how EKPC was able to meet the requirements.
8. For the period under review, describe how often the severance tax on Kentucky coal affects EKPC's decision to purchase coal mined in Kentucky.


Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED MAR 11 2019

cc: Parties of Record

*L Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*David S Samford
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*Isaac Scott
Pricing Manager
East Kentucky Power Cooperative, Inc.
P. O. Box 707
Winchester, KY 40392-0707

*East Kentucky Power Cooperative, Inc.
4775 Lexington Road
P. O. Box 707
Winchester, KY 40392-0707

*East Kentucky Power Cooperative, Inc
East Kentucky Power Cooperative, Inc.
4775 Lexington Road
P. O. Box 707
Winchester, KY 40392-0707