

# Goss ■ Samford PLLC



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PUBLIC SERVICE  
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November 6, 2015

**VIA HAND DELIVERY**

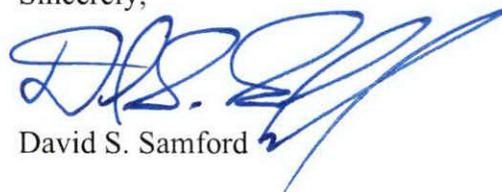
Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40602

Re: PSC Case No. 2015-00302

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten copies of the responses of East Kentucky Power Cooperative, Inc. ("EKPC"), to the information requests contained in the Second Request for Information of the Commission Staff dated October 27, 2015.

Sincerely,



David S. Samford

Enc.

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**PUBLIC SERVICE  
COMMISSION**

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**THE APPLICATION OF EAST KENTUCKY POWER )  
COOPERATIVE, INC. FOR AN ORDER APPROVING )  
THE ESTABLISHMENT OF A REGULATORY ASSET ) CASE NO.  
FOR THE UNDEPRECIATED BALANCE OF THE ) 2015- 00302  
WILLIAM C. DALE GENERATING STATION )**

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

**DATED OCTOBER 27, 2015**

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**PSC CASE NO. 2015-00302**

**STAFF'S SECOND REQUEST FOR INFORMATION DATED 10/27/15**

East Kentucky Power Cooperative, Inc. ("EKPC") hereby submits responses to the Second Request for Information of the Staff ("PSC") in this case dated October 27, 2015. Each response with its associated supportive reference materials is individually tabbed.



**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**PSC CASE NO. 2015-00302**  
**SECOND REQUEST FOR INFORMATION RESPONSE**

**STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/02/15**

**REQUEST 1**

**RESPONSIBLE PERSON:**           **Craig A. Johnson**

**COMPANY:**                       **East Kentucky Power Cooperative, Inc.**

**Request 1.**           Refer to EKPC's response to Commission Staff's Initial Request for Information, Item 1.d.

**Request 1a.**           Is it EKPC's expectation that at some future point, indefinite storage for Dale Units 3 and 4 will no longer be a viable option? Explain.

**Response 1a.**           EKPC still plans to condition the Dale 3 and 4 assets for indefinite storage after April 15, 2016. Pending EKPC's final analysis of the Clean Power Plan, the issuance by Kentucky of a federally approved State Implementation Plan, or the finalization of an Environmental Protection Agency-imposed Federal Implementation Plan on or around September, 2018, and the subsequent approval by EKPC's Board of Directors of the Cooperative's recommended compliance plan, the units must remain viable for repowering or other uses. Therefore, the minimum time the Dale Units 3 and 4 will remain in indefinite storage is through the end of 2018. After that time, EKPC believes it remains in our Owner-Members best interests to minimally maintain the assets

to keep all options available until the initial Clean Power Plan compliance window opens beginning in 2022 and ending in 2024.

**Request 1b.** Describe the options EKPC has considered for the ultimate disposition of the Dale Units 3 and 4 assets.

**Response 1b.** Please see response to 1.a. above.