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FEDERAL ENERGY
REGULATORY COMMISSION

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

East Kentucky Power Cooperative, Inc.) Docket No. ~~EL05-~~ **TX05-1-000**

**APPLICATION OF EAST KENTUCKY POWER COOPERATIVE, INC. FOR
ORDER REQUIRING INTERCONNECTIONS WITH THE TENNESSEE
VALLEY AUTHORITY UNDER SECTIONS 210 AND 212 OF THE FEDERAL
POWER ACT, AND MOTION FOR EXPEDITED CONSIDERATION**

East Kentucky Power Cooperative, Inc. ("EKPC"), pursuant to sections 210 and 212 of the Federal Power Act,¹ respectfully submits this application for an order requiring the Tennessee Valley Authority ("TVA") to interconnect the TVA transmission system with EKPC's transmission system. EKPC has recently acquired a new member cooperative, Warren Rural Electric Cooperative Corporation ("Warren"), that is currently served by TVA. EKPC is to begin serving Warren its full requirements of power and energy on April 1, 2008, upon expiration of Warren's current agreement with TVA.

In order to initiate service to Warren without challenging TVA's refusal to provide wheeling service, EKPC plans to construct new transmission facilities to interconnect EKPC's transmission system with Warren's system at locations where Warren is connected to TVA. Commission action is required because having already refused to wheel, TVA is now also refusing to grant the requested interconnections necessitated by EKPC's construction of new transmission facilities.

¹ 16 U.S.C. §§ 824i, 824k.

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EKPC has been working closely with Warren and TVA to get the necessary agreements in place so that it can commence construction of the needed transmission facilities. EKPC is facing demanding time limitations; it must begin construction of the needed transmission facilities as soon as possible in order to be ready to provide service to Warren upon the expiration of Warren's agreement with TVA on April 1, 2008. TVA has delayed this process over the past six months, leaving EKPC with no alternative but to initiate this proceeding. TVA just recently came forward with untenable claims in denying EKPC's request for physical interconnections of the EKPC, TVA and Warren facilities, and related requested agreements, even while continuing to state that it does not oppose interconnection.

EKPC intends to continue its efforts to negotiate with TVA, but requires timely resolution of this matter so that it may stay on schedule with the construction of its new transmission facilities. EKPC therefore requests that the Commission issue an order requiring TVA to interconnect with the new EKPC transmission facilities at three points on the EKPC system and to enter into an interconnection agreement addressing such operating arrangements as are typically associated with such interconnections.

More specifically, EKPC is requesting that the Commission issue a proposed interconnection order as soon as possible, with direction to the parties to negotiate the specific terms and conditions of the interconnection agreement (and related coordination services) within sixty (60) days of the issuance of such proposed order. EKPC believes that with such direction, the need for further Commission action should be reduced in scope, if not rendered altogether unnecessary. If, however, the parties do not come to agreement on all issues within such period, the proposed order should direct the parties to

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brief unresolved issues, upon review of which the Commission can either issue a further order resolving such issues or establishing further proceedings to address them.

I. COMMUNICATIONS

EKPC requests that communications and correspondence concerning this matter be directed to the following individuals, whom EKPC requests be included on the official service list compiled for this proceeding:

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EKPC requests waiver of Rule 203(b)(3) to allow the designation of all of the above addresses for inclusion in the official service list in this proceeding so that EKPC and its consultant and counsel may be included.

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II. BASIS OF REQUEST FOR INTERCONNECTION

A. The Parties

EKPC is an electric generation and transmission cooperative utility, organized and existing under the laws of the Commonwealth of Kentucky. EKPC's members are electric distribution cooperatives in central and eastern Kentucky. EKPC supplies to its sixteen member cooperatives the electric power and energy they require to serve their respective retail electric customers. EKPC and each of its member cooperatives are not-for-profit organizations that are obligated to provide electric service at the lowest cost reasonably possible. As a cooperative with outstanding Rural Utilities Service debt, EKPC is not a FERC-jurisdictional entity, although EKPC has voluntarily filed² a reciprocity open access transmission tariff with the Commission pursuant to Order No. 888.³

TVA is a wholly-owned corporate agency and instrumentality of the United States government, organized and existing under the Tennessee Valley Authority Act of 1933, as amended, 16 U.S.C. §§ 831-831dd. TVA provides electric generation and wholesale transmission to distributors in the states of Tennessee, Kentucky, Georgia, Virginia, North Carolina, Mississippi, and Alabama. TVA's transmission system is currently interconnected with EKPC at six different locations.

² *East Kentucky Power Cooperative Inc.*, Letter Order, Docket No. NJ97-14-000 (Dec. 17, 1997).

³ *Promoting Wholesale Competition Through Open Access Non-discriminatory Transmission Services by Public Utilities and Recovery of Stranded Costs by Public Utilities and Transmitting Utilities*, Order No. 888, FERC Stats. & Regs. ¶ 31,036 at 31,665 (1996), *order on reh'g*, Order 888-A, FERC Stats. & Regs. ¶ 31,048, 30,301(1997), *order on reh'g*, Order No. 888-B, 81 FERC Stats. & Regs. ¶ 61,248 (1997), *order on reh'g*, Order No. 888-C, 82 FERC ¶ 61,064 (1998) *aff'd in relevant part sub nom. Transmission Access Policy Study Group, et al. v. FERC*, 225 F. 3d 667 (D.C. Cir. 2000); *aff'd sub nom. New York v. FERC*, 535 U.S. 1 (2002).

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B. Background

Warren is a distribution cooperative that serves approximately 54,000 customers in south central Kentucky. Warren owns and operates some 5000 miles of 13 kV distribution facilities, 200 miles of 69 kV sub-transmission facilities, and 37 substations, including 8 delivery point substations. Warren currently receives its full requirements for electric power and energy from TVA under an agreement dated May 7, 1982, as amended most recently on October 1, 1997 ("Warren/TVA Agreement") (attached hereto as Exhibit A). The Warren/TVA Agreement provides that either party may terminate the agreement on five years' prior written notice. For a number of reasons, including that continued service from TVA is expected to be substantially more expensive than that available from other resources, in March, 2003, Warren issued notice of termination of the Warren/TVA Agreement, to become effective on April 1, 2008. After considering proposals submitted in response to Warren's public request for proposals for new power supply upon expiration of the Warren/TVA Agreement, Warren decided to become a member of EKPC and signed a 33-year full-requirements wholesale power contract with EKPC, pursuant to which EKPC is to begin supplying Warren's electrical requirements on April 1, 2008.

EKPC's transmission system is not currently connected with Warren; the two parties have been working closely to plan transmission arrangements upon termination of the Warren/TVA Agreement. EKPC officially contacted TVA on February 19, 2004 in order to coordinate these arrangements. Sometime earlier, when TVA declined EKPC's request to voluntarily wheel power for EKPC to Warren over the TVA transmission

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system, EKPC began planning the construction of the necessary transmission facilities to connect its system to Warren's.⁴ The current configuration for these facilities requires interconnection at three existing delivery points between TVA and Warren.

On March 4, 2004, representatives from EKPC, Warren and TVA met to discuss the proposed EKPC interconnection. TVA reiterated that it would not provide wheeling services to EKPC, but requested that EKPC send TVA a letter formally requesting interconnections so that TVA could begin the process of preparing the necessary system impact and facilities studies. During that meeting, EKPC emphasized that time was of the essence in order for EKPC to complete such construction and be ready to commence service to Warren upon expiration of the Warren/TVA Agreement.

EKPC sent the formal request for this interconnection to TVA on March 10, 2004. (Exhibit B). TVA acknowledged receipt of this request in a letter dated April 2, 2004 (Exhibit C), and requested additional information, which EKPC provided by telephone on April 15, 2004 and by letter dated May 4, 2004. (Exhibit D).

On May 21, 2004, TVA informed EKPC by telephone that it had all of the information needed to complete the studies, and that it expected to have the results of these studies in six weeks. The parties discussed the initial results of the studies in a conference call on July 16, 2004, at which time it was determined that additional information was needed to finalize the studies.

⁴ TVA has claimed that it lacks authority to provide wheeling service to or for EKPC. EKPC does not agree with that position, but thus far has elected to respect that position rather than contest it. Thus, EKPC is planning to build the new transmission lines necessary to enable it to serve Warren directly without seeking wheeling service from TVA.

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However, in a subsequent telephone conversation on July 16, 2004, TVA reversed course and informed EKPC that it may not provide the requested interconnections. TVA for the first time informed EKPC that, in TVA's view, the studies must demonstrate "mutual benefits" to all systems involved in order for TVA to be compelled to provide EKPC with the requested interconnections. TVA erroneously assumes that no such "mutual benefit" will arise from the proposed interconnection. To the contrary, however, studies conducted by EKPC have shown that the proposed interconnections would actually relieve constraints on the TVA system.⁵

Representatives from EKPC, Warren and TVA met again on August 17, 2004, to discuss EKPC and TVA's study results and the possibility of moving forward with the interconnection. However, the parties could not agree on the actual impact that EKPC's proposal would have on TVA's system, and therefore were unable to agree on the necessary terms and conditions of the interconnection. On August 20, 2004, TVA provided a written response to EKPC's March 10, 2004 letter, attached hereto as Exhibit E, again refusing to supply EKPC with the requested interconnections.

C. The System Impact Study

One key disagreement between the parties is the methodology utilized by TVA to study system impacts. The TVA study is premised on a "base case" that assumes *no* Warren load on the TVA system and *no* TVA interconnections with Warren (i.e., as if Warren and its load simply do not exist insofar as the TVA system is concerned). TVA's "change case" then reintroduces the Warren load and the existing TVA interconnections

⁵ EKPC is aware of and could find no statutory or decisional authority indicating that a "mutual benefit" standard applies to interconnections.

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with Warren, and further adds the new EKPC facilities and interconnections with TVA, and finds “reduced” Available Transfer Capacity (“ATC”). Of course, the ATC “reduction” is only a reduction as compared to the TVA “base case” which shows an artificially high ATC because it is premised on the fiction that Warren’s interconnections with TVA, through which Warren is served by TVA today, have vanished.⁶

In contrast to TVA’s approach, the study conducted by EKPC uses TVA’s currently existing system configuration as the base case (i.e., a base case that accounts for the status quo), and then compares that base case to the changed case that assumes the new transmission lines and interconnections have been completed. EKPC’s study results confirm that its proposed interconnections will actually relieve a number of constraints on the TVA system that would otherwise exist.

TVA has remained unpersuaded by EKPC’s explanations of why TVA’s methodology is flawed. It must be remembered, however, that the EKPC and TVA systems are already interconnected at six separate locations and that, to date, TVA has never said it would refuse further interconnections with EKPC. Nevertheless, TVA has drawn out discussions to such an extent as to place in jeopardy EKPC’s construction of facilities to serve Warren.

⁶ Commission policy requires the inclusion of “foreseeable and reasonably certain change[s]” in both base and test cases. *Oklahoma Gas and Electric Company*, 105 FERC ¶ 61,297 at P 32 (2003). It is neither reasonable nor foreseeable that TVA would completely disconnect from Warren upon expiration of the Warren/TVA Agreement. TVA has said it could continue to serve Warren after April 1, 2008, in the event EKPC was not in a position to provide transmission service at that time. Furthermore, TVA could not lawfully disconnect from Warren without Warren’s consent or Commission approval, neither of which is “foreseeable” or “reasonably certain.”

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The studies performed demonstrate that EKPC's proposed interconnections will not adversely affect the TVA transmission system. EKPC strongly disagrees with TVA's concept of a "mutual benefit" standard. Even so, EKPC's studies demonstrate benefits to TVA's system resulting from the proposed interconnections. Furthermore, EKPC is willing to pay for any system upgrades legitimately needed to accommodate its proposal.

D. Description Of Services Requested

In order to extend its transmission system to Warren, EKPC is planning to construct the following facilities:

- a) 25 miles of 161 kV line from EKPC's Barren County Substation to the Warren System at the General Motors Substation. This line connects the Warren System to the western edge of the EKPC System;
- b) 25 miles of 161 kV line from the Aberdeen Substation to the Big Rivers Electric Corporation's Wilson 161 kV Substation; and
- c) 40 miles of 161 kV line between the General Motors, Memphis Junction, and Aberdeen Substations to form a 161 kV network between Barren County and Wilson.

EKPC requests free-flowing interconnections⁷ between EKPC and TVA at three existing substations to serve Warren: (1) East Bowling Green, (2) Memphis Junction, and (3) Franklin. A one-line diagram showing these interconnections is attached hereto as Exhibit F. EKPC further requests any additional coordination services required to maintain these interconnections. The requested interconnections with TVA are included in the proposed plan to avoid the unnecessary construction of duplicate facilities.

⁷ A free flowing interconnection is generally defined as a connection between electric utilities which could potentially permit the transfer of electric power and energy in either direction.

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III. THE REQUIREMENTS OF THE FEDERAL POWER ACT

A. Section 210 Requirements are Satisfied

1. EKPC's request meets the requirements of Section 210(a)

Section 210 of the Federal Power Act ("FPA") provides that "Upon application of any electric utility..., the Commission may issue an order requiring — (A) the physical interconnection of ... the transmission facilities of any electric utility with the facilities of such applicant." 16 U.S.C. 824i(a)(1). An "electric utility," as defined by the FPA, is "any person or State agency (including any municipality) which sells electric energy; *such term includes the Tennessee Valley Authority*, but does not include any Federal power marketing agency." 16 U.S.C. § 796(22) (emphasis added). TVA and EKPC each fall under the definition of "electric utility" and, as such, are subject to the provisions of Section 210.

2. EKPC's Proposed Interconnection Serves The Public Interest And Will Optimize The Efficient Use Of Facilities And Resources

Section 210(c) of the FPA prohibits the Commission from issuing an interconnection order unless such order,

- (1) is in the public interest,
- (2) would –
 - (A) encourage overall conservation of energy or capital,
 - (B) optimize the efficiency of use of facilities and resources, or
 - (C) improve the reliability of any electric utility system or Federal power marketing agency to which the order applies, and
- (3) meets the requirements of section 212.

16 U.S.C. §§ 824i(c).

The Commission in *City of Corona, California v. Southern California Edison Company*, found that "An interconnection that would enable [an electric utility] to

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develop new geographic areas is in the public interest and optimizes the efficiency of [the electric utility's] resources.”⁸ The Commission has also found that interconnections “generally meet the public interest test by making transmission service available....” *Kiowa Power Partners, LLC*, 99 FERC ¶ 61,251 at p. 62,096 (2002). The Commission has determined “that as a general matter, the availability of transmission service enhances competition in power markets by increasing power supply options of buyers and sales options of sellers, and that this should result in lower costs to customers.” *Id.* at pp. 62,096-97 (citing *Florida Municipal Power Agency v. Florida Power & Light*, 65 FERC ¶ 61,615 (1993)). The interconnections requested by EKPC are in the public interest for a number of reasons, satisfy the requirements of section 210(c), and are consistent with the foregoing Commission decisions.

The requested arrangements will allow EKPC to enlarge its membership and the geographic scope of its transmission system. Such expansion optimizes the efficient use of resources and encourages the conservation of energy and capital by providing Warren with access to more economical sources of power, which will ultimately result in lower costs to Warren's customers. The interconnections are thus conserving capital and optimizing the use of facilities and resources. The proposed facilities are also designed to optimize the efficient use of resources and conserve capital by building that which is needed to serve Warren's load, but without building unnecessary and excessively expensive facilities that it seems TVA would have EKPC construct.

This arrangement also provides added reliability by alleviating constraints on the TVA system and providing increased reliability to Warren and EKPC. The studies

⁸ 101 FERC ¶ 61,240 at P 31 (2002).

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performed indicate that with the existing transmission configuration, seven TVA 161 kV transmission lines and one TVA 161-69 kV transformer would exceed their capacities on a first-contingency basis. EKPC's proposed arrangement reduces power flows on these facilities such that none of these capacities would be exceeded. These benefits make clear that the instant request is in the public interest and fully compliant with Section 210(c).

By refusing to interconnect with EKPC, TVA is acting contrary to the public interest by denying Warren its rights under the Warren/TVA Agreement. TVA has agreed to the provision of the Warren/TVA Agreement that permits either party to terminate the agreement upon five years' notice. This provision, among others, demonstrates TVA's understanding that Warren may exercise this termination right in order to seek alternative sources of power supplies. By refusing to provide wheeling services, TVA has forced Warren to make other transmission arrangements, which it has done by joining EKPC. By further refusing the interconnection of EKPC's transmission facilities with the TVA transmission system, TVA is, in essence, prohibiting Warren from exercising its rights to terminate the Warren/TVA agreement by keeping Warren isolated from the rest of the transmission grid. If TVA will not provide wheeling service to Warren and refuses to allow the necessary interconnections to allow another supplier to serve Warren, how else can Warren obtain power supply other than to continue to buy from TVA? Furthermore, even with the substantial investment needed to construct the necessary transmission facilities, this arrangement is still more economical for Warren than continuing to take its full requirements from TVA.

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In short, all of the standards and requirements of Section 210 of the Federal Power Act are met by this application.

B. The Requested Order Meets the Requirements of Section 212

1. The Order Requested By EKPC Will Not Violate Section 212(f)

Section 212(f) contains certain requirements specific to interconnection orders involving TVA. This section provides that,

No order under section 824i or 824j of this title requiring the Tennessee Valley Authority (hereinafter in this subsection referred to as the "TVA") to take any action shall take effect for 60 days following the date of issuance of the order. Within 60 days following the issuance by the Commission of any order under section 824i or of section 824j of this title requiring the TVA to enter into any contract for the sale or delivery of power, the Commission may on its own motion initiate, or upon petition of any aggrieved person shall initiate, an evidentiary hearing to determine whether or not such sale or delivery would result in violation of the third sentence of section 15d(a) of the Tennessee Valley Authority Act of 1933 (16 U.S.C. 831n-4), hereinafter in this subsection referred to as the TVA Act (16 U.S.C. 831 et seq.).

16 U.S.C. §§ 824k(f)(1).

The instant request for interconnection with TVA will not result in any violation of the cited provision of the TVA Act. That section states that,

Unless otherwise specifically authorized by Act of Congress the Corporation shall make no contracts for the sale or delivery of power which would have the effect of making the Corporation or its distributors, directly or indirectly, a source of power supply outside the area for which the Corporation or its distributors were the primary source of power supply on July 1, 1957, and such additional area extending not more than five miles around the periphery of such area as may be necessary to care for the growth of the Corporation and its distributors within said area: Provided, however, That such additional area shall not in any event increase by more than 2 1/2 per centum (or two thousand square miles, whichever is the lesser) the area for which the Corporation and its distributors were the primary source of power supply on July 1, 1957: And provided further, That no part of such additional area may be in a State not now served by the Corporation or its distributors or in a municipality

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receiving electric service from another source on or after July 1, 1957, and no more than five hundred square miles of such additional area may be in any one State now served by the Corporation or its distributors.

16 U.S.C. § 831n-4(a).

EKPC has contracted with Warren to provide Warren its full requirement of electric energy and power for a 33-year term. EKPC, not TVA, will supply power to Warren. Therefore, the requested interconnection will not cause TVA to be a source of power outside the protected area.

2. The Order Requested By EKPC Will Not Be Inconsistent With Any State Law Governing Retail Marketing Areas

Section 212(g) provides that “No order may be issued under this chapter which is inconsistent with any State law which governs the retail marketing areas of electric utilities.” 16 U.S.C. § 824k(g). The Commonwealth of Kentucky has no laws addressing retail marketing. Therefore, the requested transmission service will not implicate any Kentucky laws governing retail marketing.

3. The Order Requested By EKPC Does Not Implicate Sections 212(h) or 212(j)

EKPC is requesting an interconnection order under Section 210, not an order for transmission service under section 211. The Commission has expressly found that the prohibitions of section 212(h) do not apply to interconnection orders. *See Laguna Irrigation District*, 88 FERC ¶ 61,164 (1999) (Final Order); *reh’g denied*, 95 FERC ¶ 61,305 (2001); *aff’d sub nom. Pacific Gas & Electric Co. v. FERC*, 44 Fed. Appx. 170 (9th Cir. 2002). Therefore, the Requested Order would not violate section 212(h).

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Likewise, section 212(j) specifically applies to wheeling orders under section 211, not to interconnection orders under section 210. As such, the Requested Order would not violate section 212(j).

IV. MOTION FOR EXPEDITED CONSIDERATION

It is essential that EKPC initiate all pre-construction and construction activities relative to the transmission facilities needed to serve Warren immediately in order that they may be operational by the time the Warren/TVA agreement expires on April 1, 2008. EKPC must obtain a certificate of public convenience and necessity from the Kentucky Public Service Commission and must begin other preparations for construction such as line siting and securing rights of way. EKPC must have assurance that the planned interconnections requested in this Application will be available in order to adequately serve Warren.

EKPC therefore respectfully requests that the Commission promptly issue a proposed order directing TVA to interconnect with EKPC, and then afford the parties a reasonable period of time (perhaps sixty days) to negotiate the terms of the interconnection agreement and related coordination services. If the parties cannot resolve any such issues, then the disputed matters may be presented to the Commission for resolution in its Order Directing Interconnection. Because Section 212(f)(1) does not permit such orders to become effective prior to sixty days following the date of issuance, it is all the more imperative that this proceeding be considered on an expedited basis.

Because of the parties' difference of opinion regarding what the "base case" should be when studying the impacts of the requested interconnections, EKPC believes

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that the parties would benefit greatly if the Commission would include in the proposed order guidance on the core question of whether the base case should reflect the status quo (EKPC's position), or whether the base case should assume (contrary to reality) that Warren's load on the TVA system and its interconnections with TVA do not exist (TVA's position).

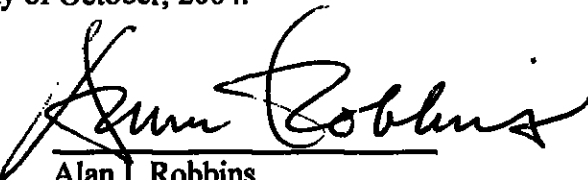
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V. CONCLUSIONS

For the foregoing reasons, EKPC respectfully requests that the Commission:

1. Issue on an expedited basis a proposed order directing the physical interconnection of EKPC transmission facilities to the TVA transmission system at the designated points described in the body of this application;
2. Allow the parties sixty days following issuance of the proposed order to negotiate the terms and conditions of the applicable interconnection and coordination services and then a reasonable period of time to submit to the Commission any matters not resolved by the parties' negotiations; and,
3. Issue a final Order Directing Interconnection at the earliest date reasonably possible taking into account the lead time necessary for EKPC to plan, obtain authorizations for, and construct the new transmission lines and interconnections necessary for EKPC to be able to begin serving Warren as of April 1, 2008.

Respectfully submitted this 1st day of October, 2004.



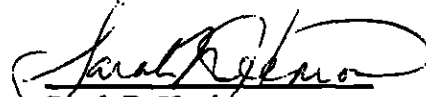
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CERTIFICATE OF SERVICE

I hereby certify that I have on this day served the foregoing document upon the Tennessee Valley Authority by first class mail, postage prepaid.

Dated at Washington, D.C. this 1st day of October, 2004.



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Exhibit A

Agreement between Warren and TVA, dated October 1, 1997

AGREEMENT
Between
WARREN RURAL ELECTRIC COOPERATIVE CORPORATION
And
TENNESSEE VALLEY AUTHORITY

DATE: October 1, 1997TV-59578A, Supp. No. 54

THIS AGREEMENT, made and entered into between WARREN RURAL ELECTRIC COOPERATIVE CORPORATION (Distributor), a cooperative corporation created and existing under and by virtue of the laws of the Commonwealth of Kentucky, and TENNESSEE VALLEY AUTHORITY (TVA), a corporation created and existing under and by virtue of the Tennessee Valley Authority Act of 1933, as amended,

WITNESSETH:

WHEREAS, TVA and Distributor have entered into a contract dated May 7, 1982, as amended (Power Contract), under which Distributor purchases its entire requirements for electric power and energy from TVA for resale; and

WHEREAS, the parties wish to amend the provisions of the Power Contract relative to its term;

NOW, THEREFORE, for and in consideration of the premises and of the mutual agreements set forth below, and subject to the Tennessee Valley Authority Act of 1933, as amended, the parties mutually agree as follows:

SECTION 1 - EFFECTIVE DATE

This agreement shall become effective as of the date first above written (Effective Date) and shall continue for the term of the Power Contract.

SECTION 2 - POWER CONTRACT AMENDED

From and after the Effective Date of this agreement, the second sentence of the section of the Power Contract entitled "Term of Contract" is hereby amended in the respects necessary to provide that the Power Contract may be terminated by either TVA or Distributor at any time upon not less than 5 years' prior written notice.

SECTION 3 - NOTICE OF POWER CONTRACT TERMINATION

Notwithstanding the provisions of the section of the Power Contract entitled "Term of Contract" (as amended by section 2 of this agreement, neither TVA nor Distributor shall exercise its right to give notice of termination under that section before the date occurring five years after the Effective Date of this agreement.

SECTION 4 - COST RECOVERY

- (a) It is recognized that in providing service to Distributor, TVA has made investments, thereby incurring fixed costs, in generation, transformation, and transmission facilities. In consideration of the agreements set out in sections 2 and 3 above, TVA fully releases and discharges all claims against Distributor for the recovery of those fixed costs to the extent they are not recovered through payment of charges billed for service during the term of the Power Contract. Without limiting the foregoing release and discharge, TVA represents and covenants that, following the termination of the Power Contract in accordance with the notice provisions set out in the Power Contract and in this agreement, TVA will neither charge nor impose upon Distributor (or any retail customer of Distributor) charges for unrecovered fixed costs (commonly referred to as "stranded investment"), whether such charges are denominated as exit fees, wire su charges, transmission surcharges, or terms having similar effect, nor shall such costs be otherwise assigned by TVA to Distributor or any retail customer of Distributor; provided, however, that with respect to any retail customer of Distributor, the provisions of this sentence are expressly made subject to the provisions of (c) below. Accordingly, nothing in this agreement shall be construed to relieve any retail customer of Distributor of any obligation to Distributor or TVA for unrecovered investment in the event that retail open access occurs in Distributor's service area and the retail customer of Distributor discontinues the retail purchase of power and energy from Distributor. It is further understood and agreed that nothing in this agreement shall be construed to (i) relieve Distributor from the obligation to pay all invoices submitted by TVA in accordance with the terms of the Power Contract for power, energy, property, materials or services furnished to Distributor during the term of the Power Contract, or (ii) relieve Distributor from paying the agreed-upon price for any power, energy, property, materials or services (including, but not limited to, transmission service) that TVA may furnish to Distributor after the termination of the Power Contract.
- (b) Notwithstanding any provision of (a) above, there shall be no discharge or release of any claim for any investment made in connection with additions to or changes in facilities as provided under the last sentence of the section of the Power contract entitled Term of Contract (as amended by section 2 above).
- (c) It is further understood and agreed that if retail open access occurs in Distributor's service area, TVA and Distributor will work together to (i) identify the amount of unrecovered investment by Distributor and TVA in generation, transformation, transmission, and distribution facilities and (ii) collect such amounts from departing retail customers of Distributor or the successor power supplier of the departing retail customer to the extent allowed by law. It is expressly understood and agreed that neither TVA nor Distributor by this agreement releases or discharges any claim that either may have against any retail customer of Distributor or of TVA for any such amounts.
- (d) For the purposes of this section 4, the words "retail customer of Distributor" shall mean a person or entity who purchases from Distributor electric power and energy that Distributor has purchased from a wholesale supplier and which Distributor in turn sells at retail to such person or entity connected to its distribution lines.

SECTION 5 - FUTURE ADJUSTMENTS AND CHANGE IN RATES AND CHARGES

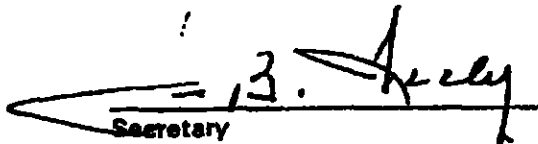
In evaluating whether there is any need for future rate increases to recover its fixed costs, TVA will (a) abide by the requirements of the TVA Act, including particularly section 15d(f), having due regard for the primary objectives of the Act, including the objective now set out in that section that power shall be sold at rates as low as are feasible and (b) meet all tests and comply with the provisions of TVA's bond resolutions (as from time to time adopted and amended) in such a manner as to assure TVA's ability to continue to finance and operate its power program at the lowest feasible cost.

SECTION 6 - POWER CONTRACT AFFIRMED

The Power Contract, as supplemented and amended by this agreement, is ratified and confirmed as the continuing obligation of the parties.

IN WITNESS WHEREOF, the parties have caused this agreement to be executed by their duly authorized officers, as of the day and year first above written.

Attest:


Secretary

**WARREN RURAL ELECTRIC
COOPERATIVE CORPORATION**

By 
Vice Chairman

TENNESSEE VALLEY AUTHORITY

By 
Manager, Pricing
Customer Service and Marketing

**East Kentucky Power Cooperative, Inc.
Section 210 Application for Interconnection**

Exhibit B

EKPC March 10, 2004 Letter to TVA



EAST KENTUCKY POWER COOPERATIVE

March 10, 2004

**David Hall, Vice President, Electric System Projects
Tennessee Valley Authority
1101 Market Street, MR3F
Chattanooga, TN 37402**

Dear Mr. Hall:

Subject: System Impact Studies & Facilities Studies-Request

East Kentucky Power Cooperative, Inc., (EKPC) hereby requests the initiation of studies (System Impact Studies and Facilities Studies) by Tennessee Valley Authority (TVA) to initiate free flowing interconnections between EKPC and TVA at the following locations on the proposed EKPC System to serve the Warren Rural Electric Cooperative Corporation (WRECC) system. The locations are listed in priority order.

- 1. East Bowling Green**
- 2. Memphis Junction**
- 3. Franklin**

These interconnections are needed for EKPC to become the power supplier for WRECC. I have enclosed a one-line diagram indicating the system improvements we propose and details of the respective interconnection points.

Please note that EKPC has also requested studies with Big Rivers Electric Corporation (BREC) for a 161 kV transmission interconnection between Aberdeen and the BREC Wilson Plant. This reconfiguration is indicated on the one-line diagram and should be modeled accordingly in the study. We believe this connection will eliminate the need for a fourth interconnection between EKPC and TVA at Aberdeen (as originally considered), and provide enough support for the East Bowling Green area to eliminate dependence on your existing 161 kV line from Paradise to East Bowling Green. This plan will also enhance reliability by providing a second major feed to the WRECC system that would be critical in the event of an outage of the proposed Barren County -Magna line, which is to serve as the main tie to EKPC's system.

**4775 Lexington Road 40391
P.O. Box 707, Winchester,
Kentucky 40392-0707**

**Tel. (859) 744-4812.
Fax: (859) 744-6008
<http://www.ekpc.com>**

A Touchstone Energy Cooperative 

Mr. David Hall
Tennessee Valley Authority
March 10, 2004
Page - 2

In addition to the three, free flowing interconnections requested above, we would like to maintain the normally open tie at Bristow after the Barren County-Magna 161 kV line is added. If you prefer, these switches could be interlocked, so they could never be closed at the same time and become free flowing.

For the transition period from December 2004 until the Barren County-Magna 161 kV Line is completed, we request the configuration shown on the attached single line diagram labeled Bristow Transition Plan. The first step in this plan is for Warren to build one mile of 161 kV transmission line from Bristow to Magna. The in-service date for this line is December 2004. As soon as possible thereafter, Warren will build the 2.5-mile section of 161 kV line from General Motors to Magna. Warren plans to operate this system as a free flowing loop until the Barren County-Magna Line is completed.

Please contact us as soon as possible to discuss your study plan and schedule, any other parties that should participate and additional data we may need to provide. Our primary contact for model information will be Mike Spurlock (mikes@ekpc.com) and I would like for you to copy our consultant, Bob Rusch (ruschrobert@stanleygroup.com) and me (mj@ekpc.com) with each communication.

Sincerely,



Mary Jane Warner, P.E., Manager
Power Delivery-Expansion

MJW:jkr

Attachments

c: Gerald Hayes
Roy Palk

(h:admin\TVADavidHalltr.doc)

East Kentucky Power Cooperative, Inc.
Section 210 Application for Interconnection

Exhibit C

TVA April 2, 2004 Letter to EKPC

Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

W. David Hall, P.E.
Vice President
Electric System Projects
Transmission/Power Supply Group

April 2, 2004

Mrs. Mary Jane Warner, P.E.
Manager, Power Delivery-Expansion
East Kentucky Power Cooperative
P.O. Box 707
Winchester, KY 40392-0707

Dear Mrs. Warner:

Subject: Request for System Impact Studies and Facilities Studies

This letter acknowledges the receipt of your March 10, 2004, letter requesting three free flowing interconnections between Tennessee Valley Authority (TVA) and East Kentucky Power Cooperative (EKPC). We will handle this request as a joint study (with such additional follow-up studies, as are necessary) among EKPC, TVA, Big Rivers Electric Cooperative (BREC), and Warren Rural Electric Cooperative Corporation (WRECC) to determine impacts on any of the systems associated with your proposal.

We are in the process of reviewing the details of your request to ensure that all information required to perform the study is included. So far, we have determined that more information is needed on the following items:

- Proposed load at the new Magna substation. WRECC has been asked for this information.
- The type of transmission conductor to be used between Bristow and Magna.
- The design sag of all new transmission lines.
- The manufacture data sheet or the proposed specifications for the transformers that will be installed at Magna.

Mrs. Mary Jane Warner

Page 2

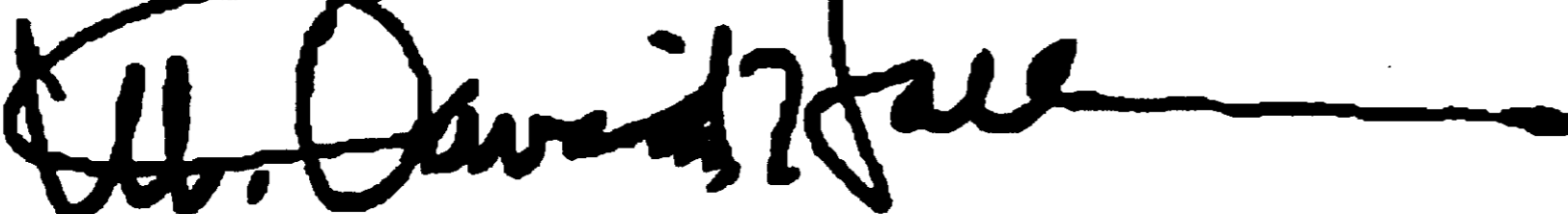
April 2, 2004

- Your internal planning model in PTI RAW data format. It should include your control area number, along with all model data of your control area including tie lines for the proposed system configuration.
- More detailed information concerning the connection to BREC.
- The proposed in-service date of the new facilities and the interconnections.
- A contact at BREC to include in the study process.
- The proposed voltage schedule for this area.
- Plans for maintenance and any future additions to the area (such as capacitor banks, additional transmission lines, etc.) for the planned study horizon to 2017.

The type of study that you asked for can and will likely be fairly complex due in part to the uncertainty of future system conditions covering multiple systems that may already be considering a number of different projects. This is further complicated by the fact that the study covers an extensive planning horizon. At this time, we cannot give you an estimate of the time it will take to complete the study. After the above data is received, hopefully, we will be in a better position to assess the scope of the study and the timeframe in which it can be performed.

Our Transmission Planning organization will be leading this study effort and the point of contact will be William (Billy) Tiller (WRTiller@tva.gov). I would appreciate being copied (WDHall@tva.gov) on electronic correspondence. Please contact Billy if you have any questions regarding the information requested above.

Sincerely,



W. David Hall, P. E.

Vice President

Electric System Projects

RECEIVED

APR 12 2003

East Kentucky Power Cooperative, Inc.
Section 210 Application for Interconnection

Exhibit D

EKPC May 4, 2004 Letter to TVA



May 4, 2004

Mr. W. David Hall
Vice President
Electric System Projects
Transmission/Power Supply Group
Tennessee Valley Authority
1101 market Street
Chattanooga, TN 37402-2801

Dear Mr. Hall:

Subject: Request for System Impact Studies and Facilities Studies

This letter is in response to your request for further information dated April 2, 2004 and related to the subject studies.

I spoke with Billy Tiller on April 15, 2004 and provided much of the information you requested. I understand that Warren Rural Electric Cooperative Corporation (WRECC) has also previously provided information in response to the same request. This letter will serve to confirm and supplement that information and the items are addressed individually below, as listed in the original letter of request.

- Proposed load at the new Magna substation. WRECC has been asked for this information.

WRECC provided the following.

Magna indicates that their load schedule will be as follows:

Oct 2004 - 3 to 5 MW
Jan 2005 - 6 to 7 MW
Apr 2005 - 7 to 9 MW
Jul 2005 - 9 to 11 MW
Oct 2005 - 11 to 12 MW
Jan 2006 - 12 to 13 MW
Apr 2006 - 14 to 15 MW
Jul 2006 - 16.5 MW

- The type of transmission conductor to be used between Bristow and Magna.

954 KCM ACSR 54/7 (Cardinal)

4775 Lexington Road 40391
P.O. Box 707, Winchester,
Kentucky 40392-0707

Tel. (859) 744-4812
Fax: (859) 744-6008
<http://www.ekpc.com>

- The design sag of all new transmission lines.

As indicated in the model, the following transmission lines are new, upgraded or reconducted.

LINE SECTION	CONDUCTOR	
UPGRADE EXISTING BARREN CO-SUMMERSHADE 161 KV LINE TO 212F	--	--
BARREN COUNTY-EAST BOWLING GREEN 161 KV LINE	954	ACSS
EAST BOWLING GREEN-MEMPHIS JCT 161 KV LINE (rebuild from 69kV existing)	954	ACSS
EAST BOWLING GREEN-ABERDEEN 161 KV LINE		
a - REBUILD BOWLING GREEN-MORGANTOWN 69 KV LINE TO 161 KV	954	ACSS
b - MORGANTOWN-ABERDEEN 161 KV LINE	954	ACSS

Operating characteristics for the conductors typical to this plan are listed in Table A, enclosed herein as an attachment to this letter.

- The manufacture data sheet or the proposed specifications for the transformers that will be installed at Magna.

WRECC provided the following.

The power transformers being installed at the Magna substation will have the following ratings:

15/20/25 MVA
161.0 - 13.09 kV
10% impedance

- Your internal planning model in PTI RAW data format. It should include your control area number, along with all model data of your control area including tie lines for the proposed system configuration.

On April 24, 2004, Mike Spurlock sent Billy Tiller a WINZIP file of the subject study case in PTI Version 26 raw data format.

- More detailed information concerning the connection to BREC

A planning study is currently underway for this tie. The study will be conducted by Commonwealth Associates, Inc. and will focus on a tie configured as follows.

WRECC Aberdeen – BREC Wilson 161kV (or possibly 345kV) – approx. 29 miles

954 KCM ACSS 54/7 – Cardinal

The point of contact for further details
Dave Shafer, Manager – Electrical System, Commonwealth Associates,
Inc. (517) 788-3242
dashofer@cai-engr.com

It is our intention to carefully coordinate this tie study with TVA during the course of the subject System Impacts and Facilities Studies.

- The proposed in-service date of the new facilities and the interconnections.

March 1, 2008

- A contact at BREC to include in the study process.

Chris Bradley, Senior Planning Engineer, BREC
(270) 827-2561 x2226
cbradley@bigrivers.coop

- The proposed voltage schedule for this area.

EKPC does not maintain transmission bus voltage schedules. Because the nearest EKPC generation is the Cooper power plant near Somerset, KY, the more relevant data may be the voltage schedule from BREC's Wilson Plant.

BREC's published voltage schedule at Wilson 161 kV is:

161.0 kV to 165.8 kV. (Typical operation is thought to be between 165 kV and 166 kV.)

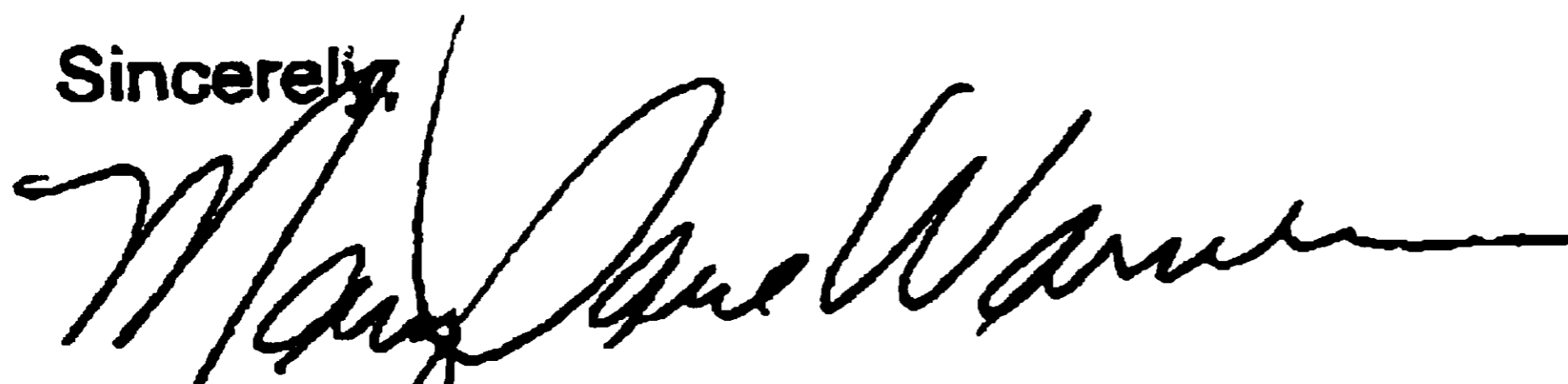
- Plans for maintenance and any future additions to the area (such as capacitor banks, additional transmission lines, etc.) for the planned study horizon to 2017.

Studies have not been conducted for this time frame. However, preliminary evaluations of the area indicate a possible need for the following facilities.

1. 2007 - Transmission capacitor at Franklin (12.25 MVAR)
2. 2010/2011 – Meredith (new load sub off the KU transmission system MW)

To the extent possible, please provide a scope and schedule for the studies based on this information. We understand that coordination between affected transmission owners will be an important part of this endeavor, and we are very interested in initiating those contacts and study activities at the earliest possible date.

Sincerely,



Mary Jane Warner, P.E.
Manager – Power Delivery Expansion

MJW:bcc

Attachment

cc: Billy Tiller w/ Tennessee Valley Authority
Paul Atchison w/ East Kentucky Power Cooperative
Thomas Martin w/ Warren RECC
Chris Bradley w/ Big Rivers
Dave Shafer w/ Commonwealth Associates, Inc.
Mike Spurlock w/ East Kentucky Power Cooperative

TABLE A

LINE MVA

AMBIENT TEMPERATURES(DEGREE F)

VOLT (KV)	COND.TYPE	TYPE OF COND. RATING	MAX TEMP.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		
161	954 ACSS		302	631	607	601	604	586	581	575	568	561	557	554											
161	954 ACSR	NORM	176	448	399	365	371	358	340	324	308	287	275	268											
161		EMER	212	485	443	432	420	408	395	382	368	354	345	338											

LINE AMPS

AMBIENT TEMPERATURES(DEGREE F)

COND.TYPE	TYPE OF COND. RATING	MAX TEMP.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		
954 ACSS		392	2262	2176	2154	2132	2108	2085	2061	2036	2011	1997	1985											
954 ACSR	NORM	176	1805	1429	1380	1329	1276	1219	1160	1097	1028	968	954											
	EMER	212	1799	1588	1548	1506	1462	1416	1369	1319	1268	1238	1213											

East Kentucky Power Cooperative, Inc.
Section 210 Application for Interconnection

Exhibit E

TVA August 20, 2004 Letter to EKPC

Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2661

W. David Hall, P.E.
Vice President
Electric System Projects
Transmission/Power Supply Group

August 20, 2004

Ms. Mary Jane Warner, P.E.
Manager
Power Delivery-Expansion
East Kentucky Power Cooperative
4775 Lexington Road
Winchester, Kentucky 40392-0707

Dear Ms. Warner:

This letter is in response to your March 10, 2004, letter requesting that TVA initiate system impact studies for three new "free flowing" interconnections between East Kentucky Power Cooperative (EKPC) and TVA or the proposed EKPC system to serve the Warren Rural Electric Cooperative Corporation (WRECC) system. EKPC's proposed locations for these three new interconnections are at Franklin, Memphis Junction, and East Bowling Green.

Since that letter, TVA provided EKPC with a listing of information needed to perform the requested studies, and that information has been provided. Extensive evaluations have been undertaken by TVA and your consultant CAI. As the studies produced preliminary results, those results have been shared and compared in several teleconferences in the last few weeks among TVA, EKPC, WRECC, Big Rivers Electric Cooperative, and CAI. At a meeting on August 17, 2004, we provided you with our findings from the studies and informed you that TVA is unable to agree to the requested interconnections. A summary of our findings follows.

In the base case, which consists of load flow analysis of the proposed EKPC system without the three requested new interconnection points, we find that a large part of WRECC's load continues to be served from the TVA system instead of EKPC's system. This occurs through increased flow from TVA onto EKPC at our existing interconnection at Summer Shade. Under certain contingencies, such as loss of the Wilson - Aberdeen line section on EKPC's proposed system, voltage collapse occurs on EKPC's proposed system with the potential for cascading outages on adjoining systems.

Ms. Mary Jane Warner, P.E.

Page 2

August 20, 2004

Further, in this base case, the increased flows on TVA lines feeding the existing interconnection at Summer Shade result in overloads on TVA line sections under certain single contingency events on TVA's system. These results indicate that EKPC's proposed system is not adequate to carry WRECC's load and meet accepted industry reliability standards.

In the test case, which consists of load flow analysis of the proposed EKPC system with the three requested new interconnection points, we find that even more of WRECC's load is served by TVA than in the base case. This analysis shows that the requested interconnection points would function exclusively as delivery points for TVA to serve WRECC's load at these locations. (The studies clearly show power consistently exiting the TVA system at the proposed interconnection points but never flowing into TVA under all of the scenarios we considered, thereby calling into question the "free flowing" characterization.) Under certain contingencies on the proposed EKPC system, such as loss of the Wilson - Aberdeen line section, all of WRECC's load would be served by TVA (except that part of the WRECC load served through the Rosine, Caneyville, and Leitchfield delivery points). These results indicate that EKPC is actually requesting transmission service. As TVA explained in response to EKPC's earlier transmission service request, this would be contrary to the clear congressional policy set out in the Anti-Cherry-picking Amendment to the Federal Power Act.

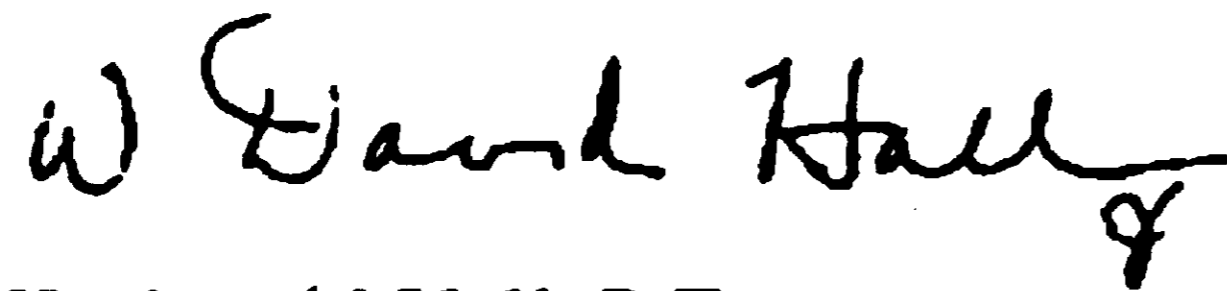
These considerations aside, establishing the proposed interconnection points would provide no benefits to TVA and its customers and could harm the public interest in the region. For example, TVA's studies show that the capability of the TVA system to transfer power would be eroded by the establishment of these three proposed interconnection points, with overall export capability reduced by over 700 MW. The proposed interconnections would undermine TVA's statutory mission to supply power to the people of the Tennessee Valley at the lowest feasible rates while threatening the reliability of transmission in the region.

TVA would be happy to work with EKPC on an alternate arrangement that does not result in the problems identified in our analysis of the current request. From our studies, it is clear that the transmission additions proposed by EKPC are not adequate to serve the WRECC loads in the area and meet industry reliability standards without transmission service from TVA. It appears to TVA that an additional source such as a strong tie to another transmission system to the north or a strong source of generation in the WRECC area is needed. If EKPC were to establish such a tie or build generation in the area, it is entirely possible that we could identify a site where an additional interconnection between EKPC and TVA would indeed provide benefits to both parties, as well as adjoining regions.

Ms. Mary Jane Warner, P.E.
Page 3
August 20, 2004

TVA values the relationship we have enjoyed over the years with EKPC, and we look forward to jointly exploring other opportunities to work together in ways more consistent with the needs of the transmission grid.

Very truly yours,

A handwritten signature in black ink that reads "W. David Hall". The signature is written in a cursive style with a small flourish at the end.

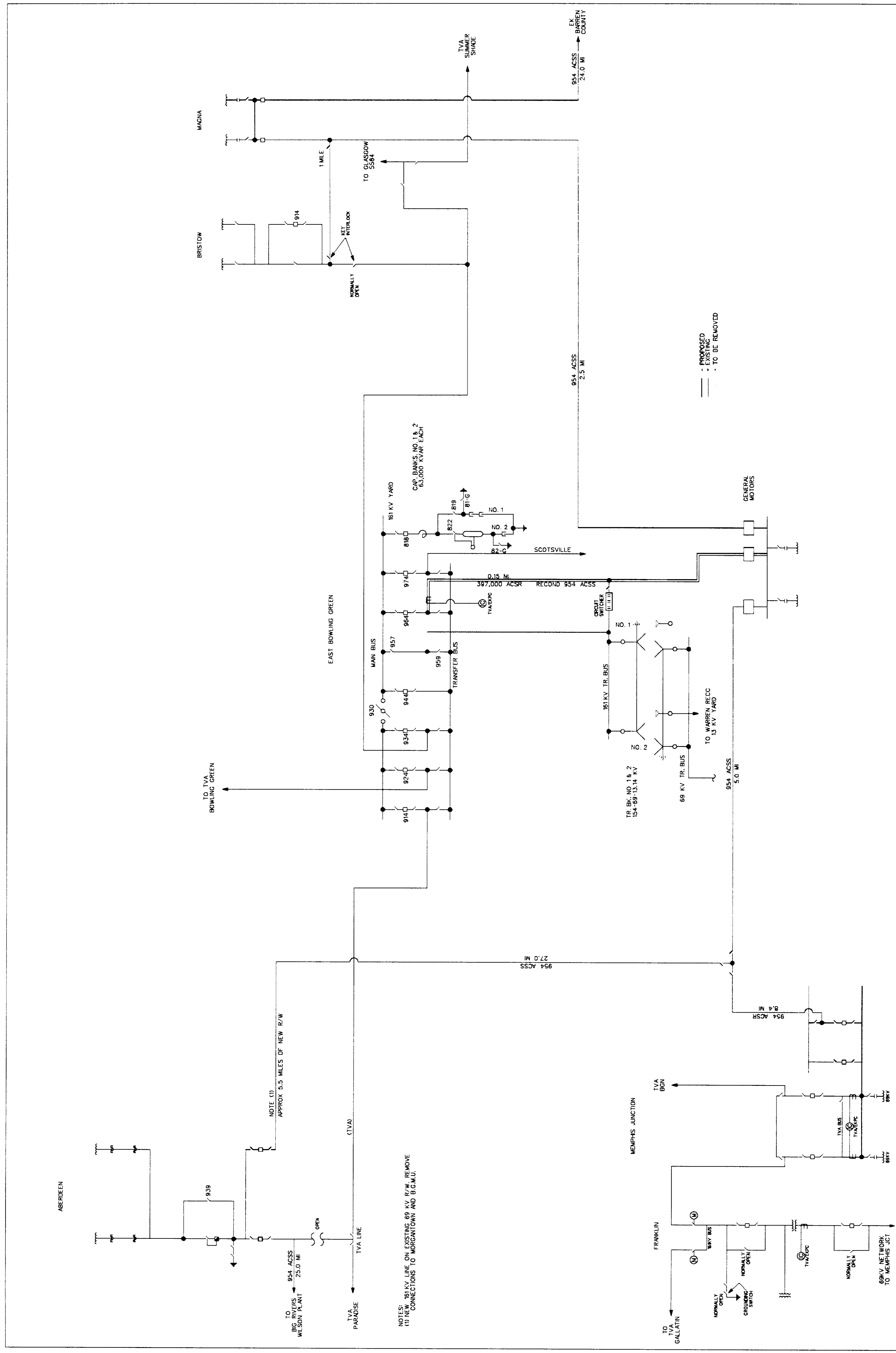
W. David Hall, P.E.

cc: Mr. Gerald W. Hayes, CPE
President & Chief Executive Officer
Warren Rural Electric Cooperative Corporation
951 Fairview Avenue
Bowling Green, Kentucky 42101

East Kentucky Power Cooperative, Inc.
Section 210 Application for Interconnection

Exhibit F

One-line Diagram of Requested Interconnections



EAST KENTUCKY POWER COOPERATIVE WINCHESTER, KENTUCKY 40391		PROPOSED EKPC/WARREN TRANSMISSION ADDITIONS	SCALE: NONE DWG NO TOL04-01 REV 4																
DRAWN DSGN CK'D APP'D DATE	DATE DWN/APP DATE DWN/APP	REVISIONS REVISIONS	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">1. UPDATE SOME NEW CONST</td> <td style="width: 15%;">1-13-04</td> <td style="width: 15%;">MEN</td> <td style="width: 15%;">PCA</td> </tr> <tr> <td>2. UPDATE DRAWING</td> <td>2-13-04</td> <td>MEN</td> <td>PCA</td> </tr> <tr> <td>3. TRANSMISSION MILEAGES</td> <td>2-19-04</td> <td>BT</td> <td>PCA</td> </tr> <tr> <td>4. ADD FEM SUB & BRCC IC</td> <td>3-10-04</td> <td>MEN</td> <td>PCA</td> </tr> </table>	1. UPDATE SOME NEW CONST	1-13-04	MEN	PCA	2. UPDATE DRAWING	2-13-04	MEN	PCA	3. TRANSMISSION MILEAGES	2-19-04	BT	PCA	4. ADD FEM SUB & BRCC IC	3-10-04	MEN	PCA
1. UPDATE SOME NEW CONST	1-13-04	MEN	PCA																
2. UPDATE DRAWING	2-13-04	MEN	PCA																
3. TRANSMISSION MILEAGES	2-19-04	BT	PCA																
4. ADD FEM SUB & BRCC IC	3-10-04	MEN	PCA																

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