

May 31, 2022

***Via eFiling***

Hon. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: *East Kentucky Power Cooperative, Inc.***  
**Docket No. ER22-\_\_\_\_-000**  
**Revised Depreciation Rates in Transmission Formula Rate**

Dear Ms. Bose:

Pursuant to Section 205 of the Federal Power Act<sup>1</sup> and Part 35 of the Commission's regulations,<sup>2</sup> East Kentucky Power Cooperative, Inc. (EKPC) hereby files revised depreciation rates to be used when calculating EKPC's annual transmission revenue requirement (ATRR) and transmission rates under Attachment H-24A of the Open Access Transmission Tariff (Tariff) administered by PJM Interconnection, L.L.C. (PJM). As explained below, EKPC's revised depreciation rates have been approved by the Kentucky Public Service Commission (Kentucky PSC) for use in EKPC's retail rates for transmission, intangible, and general plant assets. Accordingly, the Commission should accept them as just, reasonable, and not unduly discriminatory.

EKPC respectfully requests waiver of the Commission's 60-day prior-notice requirement<sup>3</sup> to allow the revised depreciation rates to be accepted effective for the rate year that begins June 1, 2022. As explained below, good cause justifies such a waiver.

EKPC submits this request for authorization as a limited-scope or single-issue Section 205 filing. The Commission has explained that a single-issue Section 205 filing is appropriate

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<sup>1</sup> 16 U.S.C. § 824d (2018).

<sup>2</sup> 18 C.F.R. Pt. 35 (2021).

<sup>3</sup> 18 C.F.R. § 35.3 (2021).

when a proposed rate change only impacts the timing of revenue collection, not the overall amount of revenue recovered, such as with depreciation rates.<sup>4</sup> Consistent with Commission precedent,<sup>5</sup> EKPC submits this request for authorization to implement its state-approved revised depreciation rates as a limited-scope or single-issue Section 205 filing.

## I. Correspondence and Communications

All communications regarding this filing should be directed to the following persons, who should be included on the official service list established for this proceeding:<sup>6</sup>

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## II. Background

### A. EKPC

EKPC is a not-for-profit, member-owned state-regulated generation and transmission cooperative responsible for providing and delivering reliable energy to its 16 not-for-profit member-owner distribution cooperatives that power homes and businesses for over one million Kentucky residents in rural Kentucky. As a member-owned, not-for-profit cooperative, EKPC's costs are paid for by its member-owner distribution cooperatives and the retail consumers that they in turn serve. EKPC receives financing from the Rural Utilities Service (RUS), and therefore is not subject to the Commission's "public utility" rate regulation.<sup>7</sup>

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<sup>4</sup> *Depreciation Accounting*, Order No. 618, FERC Stats. & Regs., Regs. Preambles, ¶ 31,104, at 31,694-695 (2000).

<sup>5</sup> See, e.g., *Arizona Pub. Serv. Co.*, Docket No. ER11-4184-000, Letter Order (Sept. 26, 2011) (unpublished) (accepting revised depreciation rates as limited-scope or single-issue Section 205 filing); *Old Dominion Electric Coop.*, 133 FERC ¶ 61,261 (2010) (same); *Southern Co. Servs., Inc.*, Docket No. ER11-4284-000, Letter Order (Sept. 16, 2011) (unpublished) (same); *ITC Midwest LLC*, Docket No. ER10-2110-000, Letter Order (Sept. 2, 2010) (unpublished) (same); *Michigan Elec. Transmission Co., LLC*, Docket No. ER10-185, Letter Order (Dec. 18, 2009) (unpublished) (same).

<sup>6</sup> EKPC requests waiver of 18 C.F.R. §§ 385.203 and 385.2010 (2021) to the extent necessary to permit the designation of more than two individuals to receive service in this proceeding.

<sup>7</sup> See 16 U.S.C. § 824a(3) (2018) (FPA Section 201(f) exemption for cooperatives with RUS financing).

EKPC integrated into the PJM market in 2013 to harness the benefits of the large, regional wholesale market. On March 28, 2013, EKPC filed jointly with PJM revisions to the PJM Tariff to integrate EKPC's pricing zone into PJM and to implement a forward-looking formula rate (Formula Rate).<sup>8</sup> Attachment H-24A of the PJM Tariff contains the Formula Rate for establishing the ATRR and rates for transmission service over the facilities of EKPC; the ATRR and rates are updated annually. Appendix D of Attachment H-24A provides for depreciation rates used in calculating EKPC's ATRR and transmission rates. In its Formula Rate protocols, EKPC commits to seeking Commission approval prior to changing the depreciation rates used in its Formula Rate.<sup>9</sup> Consistent with that commitment, EKPC is seeking Commission approval in this filing to implement the revised depreciation rates that have already been approved by the Kentucky PSC.

### **B. EKPC's Kentucky PSC Rate Case**

On April 1, 2021, EKPC filed with the Kentucky PSC an application seeking approval of a general adjustment to rates, approval of a new depreciation study, amortization of certain regulatory assets, and other general relief.<sup>10</sup> In the Kentucky PSC Application, with respect to depreciation rates, EKPC requested that the Kentucky PSC approve a depreciation study as of December 31, 2019 that generally updated EKPC's depreciation rates, including the depreciation rates used to establish EKPC's ATRR and transmission rates. EKPC's depreciation rates were last updated based on a depreciation study conducted in 2005.<sup>11</sup> The Kentucky PSC approved a settlement of the Kentucky PSC Application, including the revised depreciation rates.<sup>12</sup>

### **III. EKPC's Revised Depreciation Rates**

#### **A. Revised Depreciation Rates**

The depreciation rates currently used in EKPC's Formula Rate in PJM Tariff Attachment H-24A were approved when EKPC integrated into PJM in 2013. Exhibit EKPC-

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<sup>8</sup> *PJM Interconnection, L.L.C., et al.*, "Joint Integration Filing," Docket Nos. ER13-1178-000, *et al.* (filed Mar. 28, 2013). The Commission accepted the settlement resolving the outstanding issues in EKPC's PJM dockets via letter order issued May 8, 2014. *East Kentucky Power Cooperative*, 147 FERC ¶ 61,097 (2014).

<sup>9</sup> PJM Tariff, Att. H-24, EKPC Formula Rate Protocols, Section 1(h).

<sup>10</sup> *In the Matter of: The Electronic Application of East Kentucky Power Cooperative, Inc. for a General Adjustment of Rates, Approval of Depreciation Study, Amortization of Certain Regulatory Assets and Other General Relief, "East Kentucky Power Cooperative, Inc.'s Application,"* Kentucky PSC Case No. 2021-00103 (filed April 1, 2021) (Kentucky PSC Application).

<sup>11</sup> *In the Matter of: The Electronic Application of East Kentucky Power Cooperative, Inc. for a General Adjustment of Rates, Approval of Depreciation Study, Amortization of Certain Regulatory Assets and Other General Relief, "Order,"* at 26-27, Kentucky PSC Case No. 2021-00103 (Sept. 30, 2021) (Kentucky PSC Order). The Kentucky PSC Order is included with this filing as Exhibit EKPC-04.

<sup>12</sup> Kentucky PSC Order at 26-27.

01 included with this filing sets forth the revised depreciation rates.<sup>13</sup> These rates fall into three categories of Commission accounts under 18 C.F.R. Part 101:

- Transmission Plant: Accounts 350-359;
- Intangible Plant: Account 303; and
- General Plant: Accounts 390-398.

In Order No. 618, the Commission determined that public utilities should use appropriate methods of depreciation to “allocate in a systematic and rational manner the cost of property to the periods during which the property is used in utility operations, i.e., over its estimated useful service life.”<sup>14</sup> The Commission has recognized that “the Commission does not impose one single method for depreciation accounting,”<sup>15</sup> but instead reviews a utility’s depreciation practices “on a case-by-case basis.”<sup>16</sup>

To support its revised depreciation rates, EKPC submits the testimony and depreciation study that were provided to the Kentucky PSC in EKPC’s Kentucky PSC Application. This includes the testimony of John J. Spanos, under whose supervision the depreciation study was prepared (Spanos Testimony); the Spanos Testimony is included with this filing as Exhibit EKPC-02. The Spanos Testimony explains that EKPC’s revised depreciation rates allocate facility costs “in a systematic and rational manner” over the service lives of the relevant facilities and is consistent with Order No. 618.<sup>17</sup>

## **B. Depreciation Study**

The Spanos Testimony explains that the revised depreciation rates approved by the Kentucky PSC and proposed to be used in EKPC’s Formula Rate in Attachment H-24A were determined using the “2019 Depreciation Study – Calculated Annual Depreciation Accruals Related to Electric Plant as of December 31, 2019” (Depreciation Study), which has been provided with this filing as Exhibit EKPC-03. The Depreciation Study was performed by Gannett Fleming Valuation and Rate Consultants, LLC (Gannett Fleming) on behalf of EKPC. It was filed on April 1, 2021 in Kentucky PSC Case No. 2021-00103 and approved by the Kentucky PSC on September 30, 2021.<sup>18</sup> The Depreciation Study details Gannett

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<sup>13</sup> The revised depreciation rates are included with this filing in clean and redlined form in Exhibit EKPC-01.

<sup>14</sup> Order No. 618 at 31,694.

<sup>15</sup> *La. Pub. Serv. Comm’n v. Entergy Corp.*, 153 FERC ¶ 61,188, at P 29 (2015) (citing Order No. 618 at 31,695).

<sup>16</sup> Order No. 618 at 31,695.

<sup>17</sup> Spanos Testimony at 4:12:15.

<sup>18</sup> Kentucky PSC Order at 26-27.

Fleming's process, reasoning and conclusions, including the life analysis for transmission and distribution assets by Commission account under 18 C.F.R. Part 101.

As explained in the Spanos Testimony, the proposed depreciation rates for all plant assets except some general plant accounts were calculated using the "straight line remaining life method of depreciation."<sup>19</sup> This method of depreciation aims to distribute the unrecovered cost of fixed capital assets over the remaining useful life of each unit or group of assets in a systematic and rational manner as required in the Commission's Uniform System of Accounts, and has been used in many depreciation studies before the Commission.<sup>20</sup> As Mr. Spanos explains, for General Plant Accounts 391.0, 391.1, 393.0, 394.0, 395.0, 397.0, 397.1, and 398.0, he "used the straight line remaining life method of amortization. The annual amortization is based on amortization accounting that distributes the unrecovered cost of fixed capital assets over the remaining amortization period selected for each account and vintage."<sup>21</sup>

Mr. Spanos explains that the Depreciation Study is presented in nine parts.<sup>22</sup> Part I, the Introduction, presents the scope and basis for the Depreciation Study. Part II, the Estimation of Survivor Curves, includes descriptions of the methodology of estimating survivor curves. Parts III and IV set forth the analysis for determining service life and net salvage estimates. Part V, the Calculation of Annual and Accrued Depreciation, includes the concepts of depreciation and amortization using the remaining life. Part VI, Results of Study, describes the results of Mr. Spanos's analysis and a summary of the depreciation calculations. Parts VII, VIII, and IX include graphs and tables that relate to the service life and net salvage analyses, and the detailed depreciation calculations by account.

As outlined in the Depreciation Study, the service life and net salvage estimates used in the depreciation and amortization calculations performed as part of the study "were based on informed judgment which incorporated a review of management's plans, policies and outlook, a general knowledge of the electric utility industry, and comparisons of the service life and net salvage estimates from our studies of other electric utilities."<sup>23</sup> Additionally, the "use of survivor curves to reflect the expected dispersion of retirement provides a consistent method of estimating depreciation for electric plant."<sup>24</sup> As explained by Mr. Spanos and

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<sup>19</sup> Spanos Testimony at 4:11-2.

<sup>20</sup> See, e.g., *Baltimore Gas and Elec. Co.*, Docket No. ER20-1929-000, Letter Order (Oct. 9, 2020) (unpublished); *Duke Energy Corp.*, Docket No. ER20-2571-000, Letter Order (Sept. 17, 2020) (unpublished); *Duke Energy Carolinas*, Docket No. ER18-2231-000, Letter Order (Oct. 11, 2018) (unpublished); *Duke Energy Progress, LLC*, Docket No. ER18-1228-000, Letter Order (May 18, 2018); *Kentucky Utils. Co.*, Docket No. ER16-1479-000, Letter Order (July 21, 2016) (unpublished).

<sup>21</sup> Spanos Testimony at 4:16-20.

<sup>22</sup> *Id.* at 4:12-21.

<sup>23</sup> Depreciation Study at I-4.

<sup>24</sup> *Id.*; Spanos Testimony at 6:11-14.

summarized in the Depreciation Study, the Depreciation Study used Iowa type survivor curves “to depict the estimated survivor curves for the plant accounts not subject to amortization accounting.”<sup>25</sup>

EKPC submits that the revised depreciation rates for Accounts 350-359, 303, and 390-398, as supported by the Depreciation Study, satisfy the requirements of Order No. 618 and other governing precedent because they systematically and rationally allocate the cost of property over their useful lives.<sup>26</sup>

### **C. The Revised Depreciation Rates Are Just and Reasonable**

EKPC respectfully submits that the revised depreciation rates for Accounts 350-359, 303, and 390-398 systematically and rationally allocate costs over EKPC’s assets’ lives. Therefore, the revised depreciation rates are just, reasonable, and not unduly discriminatory and should be used for purposes of calculating EKPC’s ATRR and transmission rates under EKPC’s Formula Rate included in Attachment H-24A.

Further, the use of EKPC’s Kentucky PSC-approved depreciation rates will allow EKPC to synchronize, to the extent possible, the depreciation rates in both its Attachment H-24A and retail rates, which simplifies EKPC’s depreciation accounting and avoids the burden and additional cost of maintaining two different sets of books and accounts to track differences between Kentucky PSC-jurisdictional and Commission-jurisdictional depreciation rates.

### **IV. Rate Impact of the Formula Rate Revisions**

EKPC’s Formula Rate in Attachment H-24A calculates EKPC’s ATRR and transmission rates on the basis of inputs from EKPC’s financial records and supporting work papers, which reflect the RUS’s Uniform System of Accounts and EKPC’s Form FF1.<sup>27</sup> Other than updating the depreciation rates, the Formula Rate included in EKPC’s Commission-approved Attachment H-24A will not be affected by this filing.

As shown in the rate impact analysis included with this filing as Exhibit EKPC-05, the revised depreciation rates have an overall impact of increasing transmission-related depreciation expense by approximately \$2,191,755 in 2021, and an increase in total accumulated depreciation of approximately \$3,944,311.<sup>28</sup> Turning to ATRR and

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<sup>25</sup> Depreciation Study at I-4; Spanos Testimony at 6:14-7:13.

<sup>26</sup> Order No. 618 at 31,694.

<sup>27</sup> EKPC is not subject to the Commission’s “public utility” rate regulation and therefore does not prepare or file with the Commission a FERC Form No. 1. However, EKPC annually prepares a report on its finances and expenses containing information that maps to the FERC Form No. 1. EKPC files that report with the Kentucky PSC. That document is designated as the EKPC Form FF1.

<sup>28</sup> As shown in Exhibit EKPC-05, the *monthly* change in transmission-related depreciation expense in 2021 is \$182,646.29 (which is shown in the column labeled “Monthly Change” and is derived by dividing the “3 Months

transmission rates, for 2021, the actual ATRR was \$1,321,111 higher due to the increase in depreciation expense (\$81,811,251 for 2021 including three months with the revised depreciation rates, less \$80,490,140 for 2021 without the change in depreciation rates). The corresponding network rates were \$2.401/kW-mo. in 2021 with the revised depreciation rates, and \$2.363/kW-mo. in 2021 without the revised depreciation rates, for a difference of \$0.038/kW-mo.<sup>29</sup>

In 2022, the actual ATRR is \$89,590,957 with the revised depreciation rates, and \$82,883,877 without the revised depreciation rates, for a change in ATRR of \$6,707,080 (i.e., the ATRR in 2022 is \$6,707,080 higher than what it would have been without the change in depreciation rates). The resulting network rate is \$2.356/kW-mo., compared to a network rate of \$2.180/kW-mo. (for a change of \$0.176/kW-mo.).<sup>30</sup> The network rate in 2022 is lower than the network rate in 2021 because the 1-CP for 2022, which is used in the calculation of the network rate, was higher than the 1-CP in 2021 (i.e., a bigger denominator in the calculation of the network rate).

## V. Requested Effective Date and Request for Waiver

Pursuant to Section 35.13(b)(2) of the Commission's regulations, EKPC respectfully requests that the revised depreciation rates be made effective for the rate year beginning June 1, 2022 (the day after the date of this filing).<sup>31</sup> Pursuant to Section 35.11 of the Commission's regulations, EKPC requests waiver of the 60-day prior-notice requirement to permit this effective date.<sup>32</sup> Good cause exists for this waiver.<sup>33</sup> In connection with preparation of its annual update to its Formula Rate for the rate year commencing June 1, 2022, EKPC became aware of the need to file with the Commission its revised depreciation rates. EKPC has endeavored to make this filing as expeditiously as possible and prior to the start of the rate

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Depr Rate Change Impact" figure of \$547,938.88 by 3). That results in an annual change in transmission-related depreciation expense in 2022 of \$2,191,755.48 (i.e., \$182,646.29 monthly increase times 12 months). The change in total accumulated depreciation is \$3,944,310.96, i.e., the use of the revised depreciation rates results in an increase in accumulated depreciation for 2021 of approximately \$3,944,311.

<sup>29</sup> The actual ATRR and network rate for 2021 are shown in the column labeled "Actual (9old, 3 new)" and reflects 9 months of 2021 using the existing depreciation rates and 3 months of the revised depreciation rates. As noted above, the Kentucky PSC approved the revised depreciation rates effective October 1, 2021. (The three months of the revised depreciation rates are therefore October, November, and December 2021.) For comparison, the ATRR and network rate for 2021 without the revised depreciation rates are shown in the column labeled "Restated (12mo old)" and reflects the use of the existing depreciation rates without implementing the revised depreciation rates.

<sup>30</sup> The actual ATRR and network rate for 2022 are shown in the column labeled "Actual." The ATRR and network rate for 2022 without use of the revised depreciation rates are shown in the column labeled "Restated."

<sup>31</sup> 18 C.F.R. § 35.13(b)(2) (2021).

<sup>32</sup> 18 C.F.R. § 35.11 (2021).

<sup>33</sup> See *Central Hudson Gas & Elec. Corp.*, 60 FERC ¶ 61,106, *order on reh'g*, 61 FERC ¶ 61,089 (1992).

year commencing June 1, 2022 to ensure that its ATRR and transmission rates can be calculated based on revised depreciation rates on file with the Commission.

EKPC is filing its revised depreciation rates to bring its Commission-approved depreciation rates in line with its Kentucky PSC-approved depreciation rates. Granting the requested waiver would also promote consistency in the depreciation rates used for federal and state ratemaking purposes, and avoid discrepancy between EKPC's state-approved depreciation rates and EKPC's depreciation rates used in its Formula Rate in PJM's Attachment H-24A.

EKPC also respectfully requests that it be allowed to make an adjustment during its 2021 Attachment H-24A true-up process, to recognize October 1, 2021 as the effective date for its revised depreciation rates for accounting purposes. That is the effective date granted by the Kentucky PSC for the revised depreciation rates.<sup>34</sup> This request is consistent with the Commission's finding in *Southwest Power Pool, Inc.*, in which the Commission allowed depreciation rates that were updated for accounting purposes or pursuant to state regulatory requirements to be reflected in a formula rate true-up.<sup>35</sup>

## **VI. Additional Information Required by Section 35.13**

### **A. Contents of Filing – Section 35.13(b)(1)**

EKPC provides the following materials with this filing:

- This transmittal letter;
- Exhibit EKPC-01 – Revised EKPC Depreciation Rates (clean and redline);
- Exhibit EKPC-02 –Spanos Testimony;
- Exhibit EKPC-03 – Depreciation Study;
- Exhibit EKPC-04 – Kentucky PSC Order; and
- Exhibit EKPC-05 – Rate Impact Analysis.

### **B. The Name and Address of Persons to Whom a Copy of the Rate Change Has Been Posted – Section 35.13(b)(3)**

EKPC has requested that PJM post this filing electronically on PJM's website for customers and other parties interested in this matter.

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<sup>34</sup> Kentucky PSC Order at 38, P 3.

<sup>35</sup> *Southwest Power Pool, Inc.*, 167 FERC ¶ 61,202, at PP 15-18 (2019).

**C. Brief Description of Rate Change – Section 35.13(b)(4)**

Section III above, the Spanos Testimony, and the Depreciation Study provide a detailed description of EKPC’s revised depreciation rates.

**D. Statement of Reason for Rate Change – Section 35.13(b)(5)**

As explained in Sections II and III above, EKPC is making this filing to ensure that EKPC has the necessary Commission approval to implement, in its Formula Rate under PJM Tariff Attachment H-24A, its Kentucky PSC depreciation rates that were developed pursuant to a new depreciation study.

**E. Requisite Agreement for Rate Change – Section 35.13(b)(6)**

As explained in Sections II and III above and as indicated in the Kentucky PSC Order included as Exhibit EKPC-04, the revised depreciation rates have been approved by the Kentucky PSC.

**F. Statement Showing Expenses or Costs Included in Cost-of-Service Statements – Section 35.13(b)(7)**

None of the costs related to this filing has been alleged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory practices.

**G. Rate Comparison – Section 35.13(c)(1)**

Section V above and Exhibit EKPC-05 discuss the impact of the revised depreciation rates on EKPC’s ATRR and transmission rates under PJM Tariff Attachment H-24A.

**H. Comparison with Other Rates – Section 35.13(c)(2)**

Section 35.13(c)(2) requires “[a] comparison of the rate change and the utility’s other rates for similar wholesale for resale and transmission services.”<sup>36</sup> EKPC has no rates other than the rate in its Formula Rate for similar transmission services.

**I. Installed or Modified Facilities - Section 35.13(c)(3)**

No facilities were installed or modified in order to supply service pursuant to the revised Formula Rate.

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<sup>36</sup> 18 C.F.R. § 35.13(c)(2) (2021).

**J. Cost-of-Service Information, Testimony, and Statements**

EKPC believes that it has provided sufficient information for the Commission to evaluate and accept the revised depreciation rates. To the extent that this filing does not contain information otherwise required for technical compliance with the Commission's regulations, EKPC respectfully requests that compliance with such regulation be waived.<sup>37</sup> As noted, the Commission generally permits limited-scope and single-issue Section 205 filings for revisions to depreciation rates.<sup>38</sup>

**VII. Conclusion**

**Wherefore**, East Kentucky Power Cooperative, Inc. respectfully requests that the Commission accept the revised depreciation rates effective June 1, 2022. Please contact the undersigned should there be any questions regarding this filing. Thank you for your attention to this matter.

Respectfully submitted,

/s/ Daniel E. Frank

Daniel E. Frank

Allison E. Speaker

*Counsel for*

*East Kentucky Power Cooperative, Inc.*

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<sup>37</sup> See *Westar Energy Inc.*, 131 FERC ¶ 61,183 (2010) (finding proposed depreciation rates to be reasonably and adequately supported by the depreciation study and granting waiver of the requirements of Section 35.13 of the Commission's regulations). See also *Kansas City Power & Light Co.*, 130 FERC ¶ 61,009, at PP 22 & 36 (2010) (granting waivers of Section 35.13).

<sup>38</sup> See, e.g., *Duke Energy Ohio, Inc.*, 163 FERC ¶ 61,173, at P 25 (2018); *Ameren Illinois Co.*, 141 FERC ¶ 61,264, at P 32 n.81 (2012).

**Exhibit EKPC-01**

**Revised EKPC Depreciation Rates  
(Clean and Redlined Versions)**

**Exhibit EKPC-01**  
**Revised Depreciation Rates**

Attachment H-24A

Appendix D

East Kentucky Power Cooperative, Inc.  
Depreciation Rates  
Rates effective for year ending December 31, 2021

Line No.	FERC Account Number (A)	Company Account Number (B)	Description (C)	Actual Accrual Rates (D) %
Transmission Plant (1)				
1	350	350010	Rights of Way (No depr on land)	-
2	353	353000	Station Equipment	2.180
3	353	353010	Station Equipment - ECS	6.310
4	354	354000	Towers and Fixtures - Trans Plant	1.660
5	355	355000	Poles and Fixtures	2.820
6	356	356000	Overhead Conductors & Devices	2.900
7	359	359000	Roads and Trails - Trans Plant	1.920
8	303	303000	Miscellaneous Intangible Plant	11.420
9	390	390000	Structures and Improvements - General Plant	0.990
10	391	391000	Office Furn & Equip - Gen Plant	5.000
11	391	391001	Office Furn & Equip - PeopleSoft	6.670
12	392	392000	Transportation Equipment	5.840
13	393	393000	Stores Equipment	4.000
14	394	394000	Tools, Shop & Garage Equipment	5.000
15	395	395000	Lab Equipment - General Plant	5.000
16	396	396000	Power Operated Equip - General Plant	2.020
17	397	397000	Communication Equipment - General Plant	6.670
18	397	397000	Communication Bldgs. & Towers	6.670
19	397	397001	Communication EQ - ECS - General Plant	6.670
20	398	398000	Misc. Equip - General Plant	5.000

NOTES:

(1) Depreciation Rates approved in KPSC Case No. 2021- 00103

**Exhibit EKPC-01**  
**Revised Depreciation Rates**

Attachment H-24A

Appendix D

East Kentucky Power Cooperative, Inc.  
Depreciation Rates  
Rates effective for year ending December 31, 2021

Line No.	FERC Account Number (A)	Company Account Number (B)	Description (C)	Actual Accrual Rates (D) %	
Transmission Plant (1)					
1	350	350010	Rights of Way (No depr on land)	-	-
2	353	353000	Station Equipment	<del>1.790</del>	2.180
3	353	353010	Station Equipment - ECS	<del>1.790</del>	6.310
4	354	354000	Towers and Fixtures - Trans Plant	<del>0.710</del>	1.660
5	355	355000	Poles and Fixtures	<del>1.560</del>	2.820
6	356	356000	Overhead Conductors & Devices	<del>1.490</del>	2.900
7	359	359000	Roads and Trails - Trans Plant	<del>2.778</del>	1.920
8	303	303000	Miscellaneous Intangible Plant	<del>2.857</del>	11.420
9	390	390000	Structures and Improvements - General Plant	<del>4.778</del>	0.990
10	391	391000	Office Furn & Equip - Gen Plant	<del>20.000</del>	5.000
11	391	391001	Office Furn & Equip - PeopleSoft	<del>20.000</del>	6.670
12	392	392000	Transportation Equipment	<del>16.667</del>	5.840
13	393	393000	Stores Equipment	<del>10.000</del>	4.000
14	394	394000	Tools, Shop & Garage Equipment	<del>10.000</del>	5.000
15	395	395000	Lab Equipment - General Plant	<del>10.000</del>	5.000
16	396	396000	Power Operated Equip - General Plant	<del>10.000</del>	2.020
17	397	397000	Communication Equipment - General Plant	<del>10.000</del>	6.670
18	397	397000	Communication Bldgs. & Towers	<del>3.030</del>	6.670
19	397	397001	Communication EQ - ECS - General Plant	<del>10.000</del>	6.670
20	398	398000	Misc. Equip - General Plant	<del>10.000</del>	5.000

NOTES:

(1) Depreciation Rates approved in KPSC Case No. ~~2006-00236~~ 2021-00103

**Exhibit EKPC-02**

**Prepared Direct Testimony of John J. Spanos  
Filed with Kentucky Public Service Commission**

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

In the Matter of:

THE ELECTRONIC APPLICATION OF EAST )  
KENTUCKY POWER COOPERATIVE, INC. )  
FOR A GENERAL ADJUSTMENT OF RATES, ) Case No. 2021-00103  
APPROVAL OF DEPRECIATION STUDY, )  
AMORTIZATION OF CERTAIN REGULATORY )  
ASSETS AND OTHER GENERAL RELIEF )

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**DIRECT TESTIMONY**

**OF**

**JOHN J. SPANOS**

**ON BEHALF OF**

**EAST KENTUCKY POWER COOPERATIVE**

---

April 1, 2021

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**Attachments**

Exhibit JJS-1 – 2019 Depreciation Study

Appendix A – Qualification Statement

**I. INTRODUCTION**

1 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

2 A. My name is John J. Spanos. My business address is 207 Senate Avenue, Camp  
3 Hill, Pennsylvania, 17011.

4 **Q. ARE YOU ASSOCIATED WITH ANY FIRM?**

5 A. Yes. I am associated with the firm of Gannett Fleming Valuation and Rate  
6 Consultants, LLC (Gannett Fleming).

7 **Q. HOW LONG HAVE YOU BEEN ASSOCIATED WITH GANNETT  
8 FLEMING?**

9 A. I have been associated with the firm since June 1986.

10 **Q. WHAT IS YOUR POSITION WITH THE FIRM?**

11 A. I am the President.

12 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS CASE?**

13 A. I am testifying on behalf of East Kentucky Power Cooperative. (“EKPC” or  
14 “Company”).

15 **Q. PLEASE STATE YOUR QUALIFICATIONS.**

16 A. I have over 34 years of depreciation experience which includes giving expert  
17 testimony in over 350 cases before 41 regulatory commissions in the United States  
18 and Canada, including this Commission. The cases include depreciation studies in  
19 the electric, gas, water, wastewater and pipeline industries. In addition to the cases  
20 where I have submitted testimony, I have supervised in over 700 other depreciation  
21 or valuation assignments. Please refer to Appendix A for additional information  
22 on my qualifications, which includes further information with respect to my work

1 history, case experience, and my leadership in the Society of Depreciation  
2 Professionals.

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
4 **PROCEEDING?**

5 A. My testimony will support and explain the depreciation study conducted under my  
6 direction and supervision for the electric utility plant of EKPC. The study  
7 represents all electric plant assets.

8 **Q. ARE YOU SPONSORING ANY FILING REQUIREMENTS?**

9 A. Yes, the depreciation study meets the filing requirements contained in 807 KAR  
10 5:001, Section 16(4)(n).

## II. DISCUSSION

11 **Q. PLEASE DEFINE THE CONCEPT OF DEPRECIATION.**

12 A. Depreciation refers to the loss in service value not restored by current maintenance,  
13 incurred in connection with the consumption or prospective retirement of utility  
14 plant in the course of service from causes which are known to be in current  
15 operation, against which the Company is not protected by insurance. Among the  
16 causes to be given consideration are wear and tear, decay, action of the elements,  
17 obsolescence, changes in the art, changes in demand and the requirements of public  
18 authorities.

19 **Q. PLEASE IDENTIFY EXHIBIT JJS-1.**

20 A. Exhibit JJS-1 is a report entitled, "2019 Depreciation Study - Calculated Annual  
21 Depreciation Accruals Related to Electric Plant as of December 31, 2019." This  
22 report sets forth the results of my depreciation study for EKPC.

1 **Q. IS EXHIBIT JJS-1 A TRUE AND ACCURATE COPY OF YOUR**  
2 **DEPRECIATION STUDY?**

3 A. Yes.

4 **Q. DOES EXHIBIT JJS-1 ACCURATELY PORTRAY THE RESULTS OF**  
5 **YOUR DEPRECIATION STUDY AS OF DECEMBER 31, 2019?**

6 A. Yes.

7 **Q. WHAT WAS THE PURPOSE OF YOUR DEPRECIATION STUDY?**

8 A. The purpose of the depreciation study was to estimate the annual depreciation  
9 accruals related to electric plant in service for ratemaking purposes and determine  
10 appropriate average service lives and net salvage percents for each plant account.

11 **Q. PLEASE DESCRIBE THE CONTENTS OF YOUR REPORT.**

12 A. The Depreciation Study is presented in nine parts. Part I, Introduction, presents the  
13 scope and basis for the Depreciation Study. Part II, Estimation of Survivor Curves,  
14 includes descriptions of the methodology of estimating survivor curves. Parts III  
15 and IV set forth the analysis for determining service life and net salvage estimates.  
16 Part V, Calculation of Annual and Accrued Depreciation, includes the concepts of  
17 depreciation and amortization using the remaining life. Part VI, Results of Study,  
18 presents a description of the results of my analysis and a summary of the  
19 depreciation calculations. Parts VII, VIII and IX include graphs and tables that  
20 relate to the service life and net salvage analyses, and the detailed depreciation  
21 calculations by account.

22 The Depreciation Study also includes several tables and tabulations of data  
23 and calculations. Table 1 on pages VI-4 through VI-8 of the Depreciation Study

1 presents the estimated survivor curve, the net salvage percent, the original cost as  
2 of December 31, 2019, the book depreciation reserve, and the calculated annual  
3 depreciation accrual and rate for each account or subaccount. The section  
4 beginning on page VII-2 presents the results of the retirement rate analyses  
5 prepared as the historical bases for the service life estimates. The section beginning  
6 on page VIII-2 presents the results of the net salvage analysis. The section  
7 beginning on page IX-2 presents the depreciation calculations related to surviving  
8 original cost as of December 31, 2019.

9 **Q. PLEASE EXPLAIN HOW YOU PERFORMED YOUR DEPRECIATION**  
10 **STUDY.**

11 A. I used the straight line remaining life method of depreciation, with the average  
12 service life procedure for all plant assets except some general plant accounts. The  
13 annual depreciation is based on a method of depreciation accounting that seeks to  
14 distribute the unrecovered cost of fixed capital assets over the estimated remaining  
15 useful life of each unit, or group of assets, in a systematic and rational manner.

16 For General Plant Accounts 391.0, 391.1, 393.0, 394.0, 395.0, 397.0, 397.1  
17 and 398.0, I used the straight line remaining life method of amortization. The  
18 annual amortization is based on amortization accounting that distributes the  
19 unrecovered cost of fixed capital assets over the remaining amortization period  
20 selected for each account and vintage.

21 **Q. HOW DID YOU DETERMINE THE RECOMMENDED ANNUAL**  
22 **DEPRECIATION ACCRUAL RATES?**

1 A. I did this in two phases. In the first phase, I estimated the service life and net  
2 salvage characteristics for each depreciable group, that is, each plant account or  
3 subaccount identified as having similar characteristics. In the second phase, I  
4 calculated the composite remaining lives and annual depreciation accrual rates  
5 based on the service life and net salvage estimates determined in the first phase.

6 **Q. PLEASE DESCRIBE THE FIRST PHASE OF THE DEPRECIATION**  
7 **STUDY, IN WHICH YOU ESTIMATED THE SERVICE LIFE AND NET**  
8 **SALVAGE CHARACTERISTICS FOR EACH DEPRECIABLE GROUP.**

9 A. The service life and net salvage study consisted of compiling historic data from  
10 records related to EKPC's plant; analyzing these data to obtain historic trends of  
11 survivor and net salvage characteristics; obtaining supplementary information from  
12 EKPC's management, and operating personnel concerning practices and plans as  
13 they relate to plant operations; and interpreting the above data and the estimates  
14 used by other electric utilities to form judgments of average service life and net  
15 salvage characteristics.

16 **Q. WHAT HISTORIC DATA DID YOU ANALYZE FOR THE PURPOSE OF**  
17 **ESTIMATING SERVICE LIFE CHARACTERISTICS?**

18 A. I analyzed the EKPC's accounting entries that record plant transactions during the  
19 period 1984 through 2019. The transactions included additions, retirements,  
20 transfers and the related balances. EKPC records also included surviving dollar  
21 value by year installed for each plant account as of December 31, 2019.

22 **Q. WHAT METHOD DID YOU USE TO ANALYZE THIS SERVICE LIFE**  
23 **DATA?**

1 A. I used the retirement rate method. This is the most appropriate method when aged  
2 retirement data are available, because this method determines the average rates of  
3 retirement actually experienced by EKPC during the period of time covered by the  
4 study.

5 **Q. PLEASE DESCRIBE HOW YOU USED THE RETIREMENT RATE**  
6 **METHOD TO ANALYZE EKPC'S SERVICE LIFE DATA.**

7 A. I applied the retirement rate method to each different group of property in the study.  
8 For each property group, I used the retirement rate method to form a life table  
9 which, when plotted, shows an original survivor curve for that property group.  
10 Each original survivor curve represents the average survivor pattern experienced  
11 by the several vintage groups during the experience band studied. The survivor  
12 patterns do not necessarily describe the life characteristics of the property group;  
13 therefore, interpretation of the original survivor curves is required in order to use  
14 them as valid considerations in estimating service life. The Iowa-type survivor  
15 curves were used to perform these interpretations.

16 **Q. WHAT IS AN "IOWA-TYPE SURVIVOR CURVE" AND HOW DID YOU**  
17 **USE SUCH CURVES TO ESTIMATE THE SERVICE LIFE**  
18 **CHARACTERISTICS FOR EACH PROPERTY GROUP?**

19 A. Iowa type curves are a widely used group of generalized survivor curves that  
20 contain the range of survivor characteristics usually experienced by utilities and  
21 other industrial companies. The Iowa curves were developed at the Iowa State  
22 College Engineering Experiment Station through an extensive process of observing

1 and classifying the ages at which various types of property used by utilities and  
2 other industrial companies had been retired.

3 Iowa type curves are used to smooth and extrapolate original survivor  
4 curves determined by the retirement rate method. The Iowa curves and truncated  
5 Iowa curves were used in this study to describe the forecasted rates of retirement  
6 based on the observed rates of retirement and the outlook for future retirements.

7 The estimated survivor curve designations for each depreciable property  
8 group indicate the average service life, the family within the Iowa system to which  
9 the property group belongs, and the relative height of the mode. For example, the  
10 Iowa 60-R2 indicates an average service life of sixty years; a right-moded, or R,  
11 type curve (the mode occurs after average life for right-moded curves); and a  
12 moderate height, 2, for the mode (possible modes for R type curves range from 0.5  
13 to 5).

14 **Q. WHAT APPROACH DID YOU USE TO ESTIMATE THE LIVES OF**  
15 **SIGNIFICANT PRODUCTION FACILITIES?**

16 A. I used the life span technique to estimate the lives of significant facilities for which  
17 concurrent retirement of the entire facility is anticipated. In this technique, the  
18 survivor characteristics of such facilities are described by the use of interim  
19 survivor curves and estimated probable retirement dates. The interim survivor  
20 curve describes the rate of retirement related to the replacement of elements of the  
21 facility, such as, for a power plant, the retirement of assets such as pumps, motors  
22 and piping that occur during the life of the facility. The probable retirement date  
23 provides the rate of final retirement for each year of installation for the facility by

1 truncating the interim survivor curve for each installation year at its attained age at  
2 the date of probable retirement. The use of interim survivor curves truncated at the  
3 date of probable retirement provides a consistent method for estimating the lives of  
4 the several years of installation for a particular facility inasmuch as a single  
5 concurrent retirement for all years of installation will occur when it is retired.

6 **Q. IS THIS APPROACH WIDELY ACCEPTED FOR ESTIMATING THE**  
7 **SERVICE LIVES OF PRODUCTION FACILITIES?**

8 A. Yes. The life span has been used previously for EKPC. My firm has also used the  
9 life span technique in performing depreciation studies presented to many other  
10 public utility commissions across the United States and Canada as well as for other  
11 electric utilities in Kentucky.

12 **Q. HOW ARE THE LIFE SPANS ESTIMATED FOR EKPC'S PRODUCTION**  
13 **FACILITIES?**

14 A. The life span estimates are based on informed judgment that incorporates factors  
15 for each facility such as the technology of the facility, management plans and  
16 outlook for the facility, and the estimates for similar facilities for other utilities.

17 **Q. ARE THE FACTORS CONSIDERED IN YOUR ESTIMATES OF SERVICE**  
18 **LIFE AND NET SALVAGE PERCENTS PRESENTED IN EXHIBIT JJS-1?**

19 A. Yes. A discussion of the factors considered in the estimation of service lives and  
20 net salvage percents are presented in Part III and Part IV of Exhibit JJS-1.

21 **Q. HAVE YOU PHYSICALLY OBSERVED EKPC'S PLANT AND**  
22 **EQUIPMENT AS PART OF YOUR DEPRECIATION STUDIES?**

1 A. Yes. I made field reviews of EKPC's property during September 2018 to observe  
2 representative portions of plant. Due to travel restrictions and pandemic guidelines,  
3 only a virtual site visit of facilities were conducted for this study in November 2020.  
4 Field reviews are conducted to become familiar with Company operations and  
5 obtain an understanding of the function of the plant and information with respect to  
6 the reasons for past retirements and the expected future causes of retirements. This  
7 knowledge was incorporated in the interpretation and extrapolation of the statistical  
8 analyses.

9 **Q. WOULD YOU PLEASE EXPLAIN THE CONCEPT OF "NET SALVAGE"?**

10 A. Net salvage is a component of the service value of capital assets that is recovered  
11 through depreciation rates. The service value of an asset is its original cost less its  
12 net salvage. Net salvage is the salvage value received for the asset upon retirement  
13 less the cost to retire the asset. When the cost to retire exceeds the salvage value,  
14 the result is negative net salvage.

15 Inasmuch as depreciation expense is the loss in service value of an asset  
16 during a defined period, e.g. one year, it must include a ratable portion of both the  
17 original cost and the net salvage. That is, the net salvage related to an asset should  
18 be incorporated in the cost of service during the same period as its original cost so  
19 that customers receiving service from the asset pay rates that include a portion of  
20 both elements of the asset's service value, the original cost and the net salvage  
21 value.

22 For example, the full recovery of the service value of a \$5,000 circuit  
23 breaker will include not only the \$5,000 of original cost, but also, on average, \$550

1 to remove the circuit breaker at the end of its life and \$50 in salvage value. In this  
2 example, the net salvage component is negative \$500 ( $\$50 - \$550$ ), and the net  
3 salvage percent is negative 10% ( $(\$50 - \$550)/\$5,000$ ).

4 **Q. PLEASE DESCRIBE HOW YOU ESTIMATED NET SALVAGE**  
5 **PERCENTAGES.**

6 A. The net salvage percentages estimated in the Depreciation Study were based on  
7 informed judgment that incorporated factors such as the statistical analyses of  
8 historical net salvage data; information provided to me by EKPC's operating  
9 personnel, general knowledge and experience of the industry practices; and trends  
10 in the industry in general. The statistical net salvage analyses incorporates EKPC's  
11 actual historical data for the period 2005 through 2019, and considers the cost of  
12 removal and gross salvage ratios to the associated retirements during the 15-year  
13 period. Trends of these data are also measured based on three-year moving  
14 averages and the most recent five-year indications.

15 **Q. WERE THE NET SALVAGE PERCENTAGES FOR GENERATING**  
16 **FACILITIES BASED ON THE SAME ANALYSES?**

17 A. Yes, for the interim net salvage estimates. The net salvage percentages for  
18 generating facilities were based on two components, the interim net salvage  
19 percentage and the final net salvage percentage. The interim net salvage percentage  
20 is determined based on the historical indications from the period 2005 to 2019 of  
21 the cost of removal and gross salvage amounts as a percentage of the associated  
22 plant retired. The final net salvage or dismantlement component was determined

1 based on the retirement activities associated with the assets anticipated to be retired  
2 at the concurrent date of final retirement.

3 **Q. HAVE YOU INCLUDED A DISMANTLEMENT OR DECOMMISSIONING**  
4 **COMPONENT INTO THE OVERALL RECOVERY OF GENERATING**  
5 **FACILITIES?**

6 A. Yes. A dismantlement or decommissioning component has been included to the  
7 net salvage percentage for steam and other production facilities.

8 **Q. CAN YOU EXPLAIN HOW THE FINAL NET SALVAGE COMPONENT IS**  
9 **INCLUDED IN THE DEPRECIATION STUDY?**

10 A. Yes. The dismantlement component is part of the overall net salvage for each  
11 location within the production assets. Based on studies for other utilities, it was  
12 determined that the dismantlement or decommissioning costs for steam and other  
13 production facilities is best calculated by dividing the dismantlement cost by the  
14 surviving plant at final retirement. These amounts at a location basis are added to  
15 the interim net salvage percentage of the assets anticipated to be retired on an  
16 interim basis to produce the weighted net salvage percentage for each location. The  
17 calculation of terminal and interim retirements as a percentage of plant by location  
18 is set forth in Table 1, page VIII-2 of the Depreciation Study. The detailed  
19 calculations of the overall net salvage for each location is set forth on Table 2, page  
20 VIII-3 of the Depreciation Study.

21 **Q. WHAT IS THE BASIS OF THE DISMANTLEMENT OR**  
22 **DECOMMISSIONING COST ESTIMATES?**

1 A. The decommissioning cost estimates are based on decommissioning estimates of  
2 other similar generating sites across the United States. For most steam facilities a  
3 utility standard has been to expect costs to be comparable to \$40/kw. The costs for  
4 other production plant are \$10/kw for combustion turbines and landfill locations  
5 and \$5/kw for solar facilities. However, the costs to decommission power plants  
6 has tended to increase over time (as have construction costs in general). For this  
7 reason, in order to recover the full decommissioning costs for each site, these costs  
8 need to be escalated to the time of retirement. The calculations of the escalation of  
9 these costs have been provided in the table set forth on page VIII-4 of the  
10 Depreciation Study.

11 **Q. PLEASE DESCRIBE THE SECOND PHASE OF THE PROCESS THAT**  
12 **YOU USED IN THE DEPRECIATION STUDY IN WHICH YOU**  
13 **CALCULATED COMPOSITE REMAINING LIVES AND ANNUAL**  
14 **DEPRECIATION ACCRUAL RATES.**

15 A. After I estimated the service life and net salvage characteristics for each depreciable  
16 property group, I calculated the annual depreciation accrual rates for each  
17 depreciable group based on the straight line remaining life method, using remaining  
18 lives weighted consistent with the average service life procedure. The calculation  
19 of annual depreciation accrual rates were developed as of December 31, 2019.

20 **Q. PLEASE DESCRIBE THE STRAIGHT LINE REMAINING LIFE**  
21 **METHOD OF DEPRECIATION.**

1 A. The straight line remaining life method of depreciation allocates the original cost  
2 of the property, less accumulated depreciation, less future net salvage, in equal  
3 amounts to each year of remaining service life.

4 **Q. PLEASE DESCRIBE THE AVERAGE SERVICE LIFE PROCEDURE FOR**  
5 **CALCULATING REMAINING LIFE ACCRUAL RATES.**

6 A. The average service life procedure defines the group or account for which the  
7 remaining life annual accrual is determined. Under this procedure, the annual  
8 accrual rate is determined for the entire group or account based on its average  
9 remaining life and the rate is then applied to the surviving balance of the group's  
10 cost. The average remaining life of the group is calculated by first dividing the  
11 future book accruals (original cost less allocated book reserve less future net  
12 salvage) by the average remaining life for each vintage. The average remaining life  
13 for each vintage is derived from the area under the survivor curve between the  
14 attained age of the vintage and the maximum age. The sum of the future book  
15 accruals is then divided by the sum of the annual accruals to determine the average  
16 remaining life of the entire group for use in calculating the annual depreciation  
17 accrual rate.

18 **Q. PLEASE DESCRIBE AMORTIZATION ACCOUNTING.**

19 A. Amortization accounting is used for accounts with a large number of units, but  
20 small asset values. In amortization accounting, units of property are capitalized in  
21 the same manner as they are in depreciation accounting. However, depreciation  
22 accounting is difficult for these assets because periodic inventories are required to  
23 properly reflect plant in service. Consequently, retirements are recorded when a

1 vintage is fully amortized rather than as the units are removed from service. That  
2 is, there is no dispersion of retirement. All units are retired when the age of the  
3 vintage reaches the amortization period. Each plant account or group of assets is  
4 assigned a fixed period which represents an anticipated life during which the asset  
5 will render service. For example, in amortization accounting, assets that have a 20-  
6 year amortization period will be fully recovered after 20 years of service and taken  
7 off EKPC's books, but not necessarily removed from service. In contrast, assets  
8 that are taken out of service before 20 years remain on the books until the  
9 amortization period for that vintage has expired.

10 **Q. AMORTIZATION ACCOUNTING IS BEING IMPLEMENTED FOR**  
11 **WHICH PLANT ACCOUNTS?**

12 A. Amortization accounting is only appropriate for certain General Plant accounts.  
13 These accounts are 391.0, 391.1, 393.0, 394.0, 395.0, 397.0, 397.1 and 398.0 for  
14 General Plant which represents approximately two percent of depreciable plant.

15 **Q. PLEASE USE AN EXAMPLE TO ILLUSTRATE THE DEVELOPMENT**  
16 **OF THE ANNUAL DEPRECIATION ACCRUAL RATE FOR A**  
17 **PARTICULAR GROUP OF PROPERTY IN YOUR DEPRECIATION**  
18 **STUDY.**

19 A. I will use Account 353.0, Station Equipment, as an example because it is one of the  
20 largest depreciable groups.

21 The retirement rate method was used to analyze the survivor characteristics  
22 of this property group. Aged plant accounting data were compiled from 1984  
23 through 2019 and analyzed in periods that best represent the overall service life of

1 this property. The life tables for the 1984-2019 and 2005-2019 experience bands  
2 are presented in the depreciation study on pages VII-38 through VII-41. Each life  
3 table displays the retirement and surviving ratios of the aged plant data exposed to  
4 retirement by age interval. For example, page VII-38 of Exhibit JJS-1, shows  
5 \$261,637 retired during age interval 0.5-1.5 with \$241,177,991 exposed to  
6 retirement at the beginning of the interval. Consequently, the retirement ratio is  
7 0.0011 ( $\$261,637/\$241,177,991$ ) and the survivor ratio is 0.9989 ( $1-0.0011$ ). The  
8 life tables, or original survivor curves, are plotted along with the estimated smooth  
9 survivor curve, the 60-R2, on page VII-37 of Exhibit JJS-1.

10 The net salvage percent is presented on page VIII-15. The percentage is  
11 based on the result of annual gross salvage minus the cost to remove plant assets as  
12 compared to the original cost of plant retired during the period 2005 through 2019.  
13 The 15-year period experienced \$7,648,622 ( $\$460,576 - \$8,109,198$ ) in net salvage  
14 for \$13,595,581 plant retired. The result is negative net salvage of 56 percent  
15 ( $\$7,648,622/\$13,595,581$ ). Recent trends have shown indications of negative 27  
16 percent. The industry ranges are negative 5 to negative 25 percent. Therefore, it  
17 was determined that based on historical indications, industry ranges and EKPC  
18 expectations, that negative 25 percent was the most appropriate estimate.

19 My calculation of the annual depreciation related to original cost of electric  
20 utility plant at December 31, 2019 for Account 353.0 is presented on pages IX-53  
21 and IX-54 of Exhibit JJS-1. The calculation is based on the 60-R2 survivor curve,  
22 25% negative net salvage, the attained age, and the allocated book reserve. The  
23 tabulation sets forth the installation year, the original cost, calculated accrued

1 depreciation, allocated book reserve, future accruals, remaining life and annual  
2 accrual. These totals are brought forward to Table 1 on page VI-7.

3 **Q. ARE THERE OTHER SPECIAL RECOVERY AMOUNTS THAT WERE**  
4 **INCLUDED IN THE STUDY?**

5 A. Yes. There is a special recovery amount for the unrecovered reserve amortization  
6 established for certain general plant accounts. In order to achieve a more stable  
7 accrual for general and common plant accounts in the future, I have recommended  
8 a ten-year amortization to adjust unrecovered reserve. This approach will achieve  
9 consistent amortization rates for existing assets as well as future assets. The reserve  
10 for each of these accounts is segregated into two components. The first component  
11 is the amount required to achieve the proper rate for the amortization period. The  
12 remaining amount, which could be negative, is amortized over 10 years separately  
13 from the assets.

### III. CONCLUSION

14 **Q. WAS EXHIBIT JJS-1 PREPARED UNDER YOUR DIRECTION AND**  
15 **CONTROL?**

16 A. Yes.

17 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

18 A. Yes.

**Exhibit EKPC-03**

**Depreciation Study**

**Exhibit EKPC-03**

**Depreciation Study**



# 2019 DEPRECIATION STUDY

CALCULATED ANNUAL DEPRECIATION ACCRUALS  
RELATED TO ELECTRIC PLANT  
AS OF DECEMBER 31, 2019

Prepared by:



Excellence Delivered *As Promised*

EAST KENTUCKY POWER COOPERATIVE, INC.  
Winchester, Kentucky

2019 DEPRECIATION STUDY

CALCULATED ANNUAL DEPRECIATION ACCRUALS  
RELATED TO ELECTRIC PLANT  
AS OF DECEMBER 31, 2019

GANNETT FLEMING VALUATION AND RATE CONSULTANTS, LLC  
Harrisburg, Pennsylvania



*Excellence Delivered **As Promised***

March 8, 2021

East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
Winchester, KY 40392

Attention Ms. Michelle K. Carpenter, CPA  
Controller

Ladies and Gentlemen:

Pursuant to your request, we have conducted a depreciation study related to the electric plant of East Kentucky Power Cooperative, Inc. as of December 31, 2019. The attached report presents a description of the methods used in the estimation of depreciation, the summary of annual depreciation accrual rates, the statistical support for the life and net salvage estimates and the detailed tabulations of annual and accrued depreciation.

Respectfully submitted,

GANNETT FLEMING VALUATION  
AND RATE CONSULTANTS, LLC

A handwritten signature in black ink that reads "John J. Spanos".

JOHN J. SPANOS  
President

JJS:mle

067379

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## EAST KENTUCKY POWER COOPERATIVE, INC.

### DEPRECIATION STUDY

#### EXECUTIVE SUMMARY

Pursuant to East Kentucky Power Cooperative, Inc.'s ("EKPC" or "Company") request, Gannett Fleming Valuation and Rate Consultants, LLC ("Gannett Fleming") conducted a depreciation study related to the electric plant as of December 31, 2019. The purpose of this study was to determine the annual depreciation accrual rates and amounts for book and ratemaking purposes.

The depreciation rates are based on the straight line method using the average service life ("ASL") procedure and were applied on a remaining life basis. The calculations were based on attained ages and estimated average service life and forecasted net salvage characteristics for each depreciable group of assets.

EKPC's accounting policy has not changed since the last depreciation study was prepared. However, there have been changes in plans of some generating assets since the most recent study as well as additions of capital investment in all plant categories. Some service lives for transmission and distribution plant have become slightly longer, however, the primary change has been the utilization of appropriate net salvage percentages for many accounts including a component of terminal net salvage for generating facilities.

Gannett Fleming recommends the calculated annual depreciation accrual rates set forth herein apply specifically to electric plant in service as of December 31, 2019 as summarized by Table 1 of the study. Supporting analysis and calculations are provided within the study.

The study results set forth an annual depreciation expense of \$129.1 million when applied to depreciable plant balances as of December 31, 2019. The results are summarized at the functional level as follows:

**SUMMARY OF ORIGINAL COST, ACCRUAL RATES AND AMOUNTS**

<b>FUNCTION</b>	<b>ORIGINAL COST AS OF DECEMBER 31, 2019</b>	<b>PROPOSED RATE</b>	<b>PROPOSED EXPENSE</b>
Electric Plant			
Steam Production Plant	\$ 2,426,607,851.36	3.55	\$ 86,108,150
Other Production Plant	639,379,853.03	2.87	18,378,213
Transmission Plant	588,898,570.85	2.59	15,271,844
Distribution Plant	238,391,641.92	2.51	5,983,284
General Plant	141,393,195.68	3.53	4,986,678
General Plant Reserve Amortization	-	-	(1,910,304)
<b>Total</b>	<b><u>\$4,037,004,423.89</u></b>	<b>3.20</b>	<b><u>\$129,084,263</u></b>

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## **PART I. INTRODUCTION**

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**DEPRECIATION STUDY**

**PART I. INTRODUCTION**

**SCOPE**

This report sets forth the results of the depreciation study for East Kentucky Power Cooperative, Inc. ("Company"), to determine the annual depreciation accrual rates and amounts for book purposes applicable to the original cost of electric plant as of December 31, 2019. The rates and amounts are based on the straight line remaining life method of depreciation. This report also describes the concepts, methods and judgments which underlie the recommended annual depreciation accrual rates related to electric plant in service as of December 31, 2019.

The service life and net salvage estimates resulting from the study were based on informed judgment which incorporated analyses of historical plant retirement data as recorded through 2019, a review of Company practice and outlook as they relate to plant operation and retirement, and consideration of current practice in the electric industry, including knowledge of service lives and net salvage estimates used for other electric companies.

**PLAN OF REPORT**

Part I, Introduction, contains statements with respect to the plan of the report, and the basis of the study. Part II, Estimation of Survivor Curves, presents descriptions of the considerations and the methods used in the service life and net salvage studies. Part III, Service Life Considerations, presents the factors and judgment utilized in the average service life analysis. Part IV, Net Salvage Considerations, presents the judgment utilized for the net salvage study. Part V, Calculation of Annual and Accrued Depreciation, describes the procedures used in the calculation of group depreciation. Part VI, Results

of Study, presents summaries by depreciable group of annual depreciation accrual rates and amounts as well as composite remaining lives. Part VII, Service Life Statistics, presents the statistical analysis of service life estimates, Part VIII, Net Salvage Statistics, sets forth the statistical indications of net salvage percents, and Part IX, Detailed Depreciation Calculations, presents the detailed tabulations of annual depreciation.

## **BASIS OF THE STUDY**

### **Depreciation**

Depreciation, in public utility regulation, is the loss in service value not restored by current maintenance, incurred in connection with the consumption or prospective retirement of utility plant in the course of service from causes which are known to be in current operation and against which the utility is not protected by insurance. Among causes to be given consideration are wear and tear, deterioration, action of the elements, inadequacy, obsolescence, changes in the art, changes in demand, and the requirements of public authorities.

Depreciation, as used in accounting, is a method of distributing fixed capital costs, less net salvage, over a period of time by allocating annual amounts to expense. Each annual amount of such depreciation expense is part of that year's total cost of providing electric utility service. Normally, the period of time over which the fixed capital cost is allocated to the cost of service is equal to the period of time over which an item renders service, that is, the item's service life. The most prevalent method of allocation is to distribute an equal amount of cost to each year of service life. This method is known as the straight line method of depreciation.

For most accounts, the annual depreciation was calculated by the straight line method using the average service life procedure and the remaining life basis. For certain General Plant accounts, the annual depreciation is based on amortization accounting.

Both types of calculations were based on original cost, attained ages, and estimates of service lives and net salvage.

The straight line method, average service life procedure is a commonly used depreciation calculation procedure that has been accepted in Kentucky. Amortization accounting is used for certain General Plant accounts because of the disproportionate plant accounting effort required when compared to the minimal original cost of the large number of items in these accounts. An explanation of the calculation of annual and accrued amortization is presented beginning on page V-4 of the report.

### **Service Life and Net Salvage Estimates**

The service life and net salvage estimates used in the depreciation and amortization calculations were based on informed judgment which incorporated a review of management's plans, policies and outlook, a general knowledge of the electric utility industry, and comparisons of the service life and net salvage estimates from our studies of other electric utilities. The use of survivor curves to reflect the expected dispersion of retirement provides a consistent method of estimating depreciation for electric plant. Iowa type survivor curves were used to depict the estimated survivor curves for the plant accounts not subject to amortization accounting.

The procedure for estimating service lives consisted of compiling historical data for the plant accounts or depreciable groups, analyzing this history through the use of widely accepted techniques, and forecasting the survivor characteristics for each depreciable group on the basis of interpretations of the historical data analyses and the probable future. The combination of the historical experience and the estimated future yielded estimated survivor curves from which the average service lives were derived.

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**PART II. ESTIMATION OF  
SURVIVOR CURVES**

## **PART II. ESTIMATION OF SURVIVOR CURVES**

The calculation of annual depreciation based on the straight line method requires the estimation of survivor curves and the selection of group depreciation procedures. The estimation of survivor curves is discussed below and the development of net salvage is discussed in later sections of this report.

### **SURVIVOR CURVES**

The use of an average service life for a property group implies that the various units in the group have different lives. Thus, the average life may be obtained by determining the separate lives of each of the units or by constructing a survivor curve by plotting the number of units which survive at successive ages.

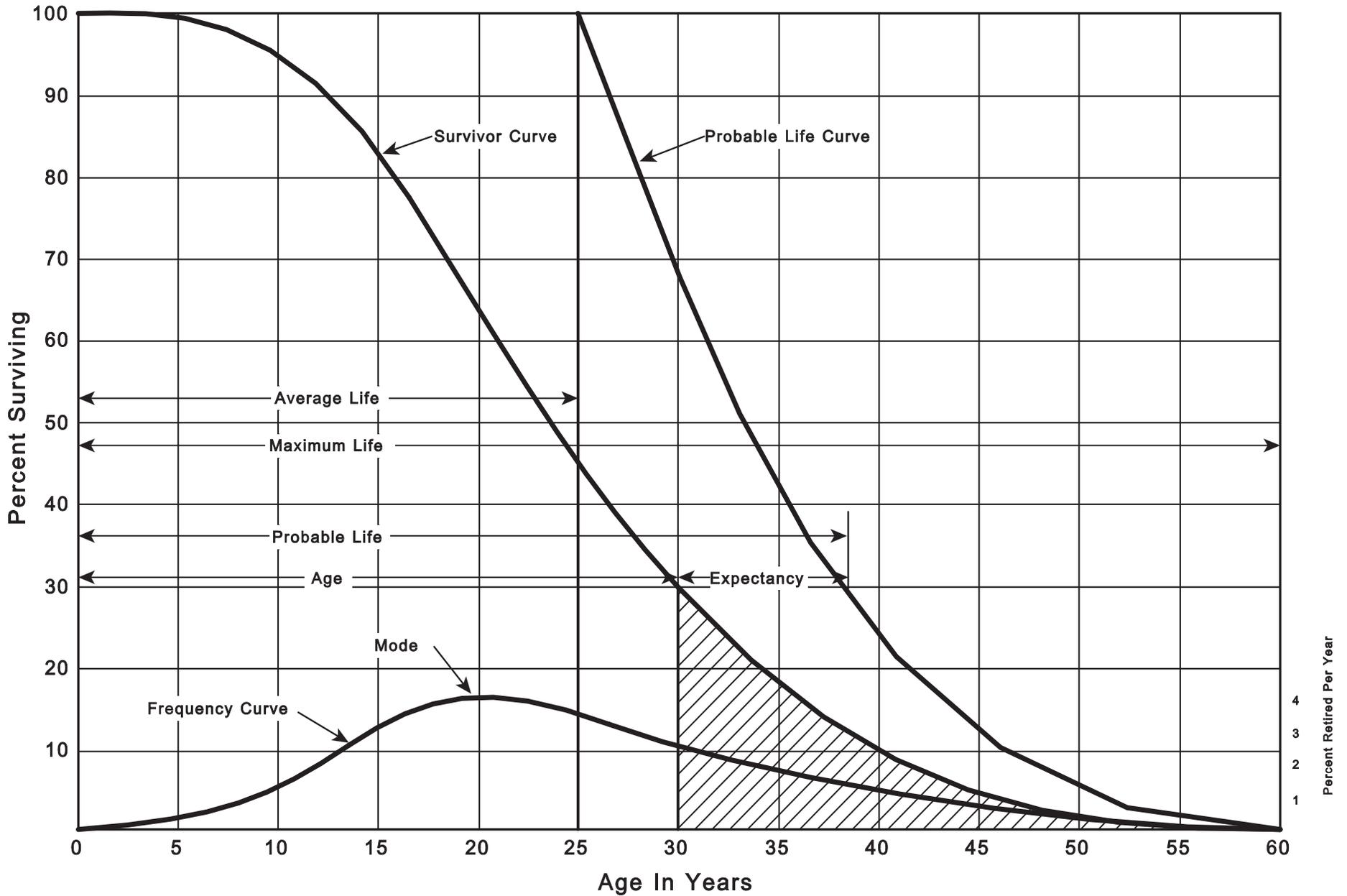
The survivor curve graphically depicts the amount of property existing at each age throughout the life of an original group. From the survivor curve, the average life of the group, the remaining life expectancy, the probable life, and the frequency curve can be calculated. In Figure 1, a typical smooth survivor curve and the derived curves are illustrated. The average life is obtained by calculating the area under the survivor curve, from age zero to the maximum age, and dividing this area by the ordinate at age zero. The remaining life expectancy at any age can be calculated by obtaining the area under the curve, from the observation age to the maximum age, and dividing this area by the percent surviving at the observation age. For example, in Figure 1, the remaining life at age 30 is equal to the crosshatched area under the survivor curve divided by 29.5 percent surviving at age 30. The probable life at any age is developed by adding the age and remaining life. If the probable life of the property is calculated for each year of age, the probable life curve shown in the chart can be developed. The frequency curve presents the number of units retired in each age interval. It is derived by obtaining the differences between the amount of property surviving at the beginning and at the end of each interval.

This study has incorporated the use of Iowa curves developed from a retirement rate analysis of historical retirement history. A discussion of the concepts of survivor curves and of the development of survivor curves using the retirement rate method is presented below.

### **Iowa Type Curves**

The range of survivor characteristics usually experienced by utility and industrial properties is encompassed by a system of generalized survivor curves known as the Iowa type curves. There are four families in the Iowa system, labeled in accordance with the location of the modes of the retirements in relationship to the average life and the relative height of the modes. The left moded curves, presented in Figure 2, are those in which the greatest frequency of retirement occurs to the left of, or prior to, average service life. The symmetrical moded curves, presented in Figure 3, are those in which the greatest frequency of retirement occurs at average service life. The right moded curves, presented in Figure 4, are those in which the greatest frequency occurs to the right of, or after, average service life. The origin moded curves, presented in Figure 5, are those in which the greatest frequency of retirement occurs at the origin, or immediately after age zero. The letter designation of each family of curves (L, S, R or O) represents the location of the mode of the associated frequency curve with respect to the average service life. The numbers represent the relative heights of the modes of the frequency curves within each family.

The Iowa curves were developed at the Iowa State College Engineering Experiment Station through an extensive process of observation and classification of the ages at which industrial property had been retired. A report of the study which resulted in the classification of property survivor characteristics into 18 type curves, which constitute three of the four families, was published in 1935 in the form of the Experiment Station's Bulletin 125.



Percent Retired Per Year

Figure 1. A Typical Survivor Curve and Derived Curves

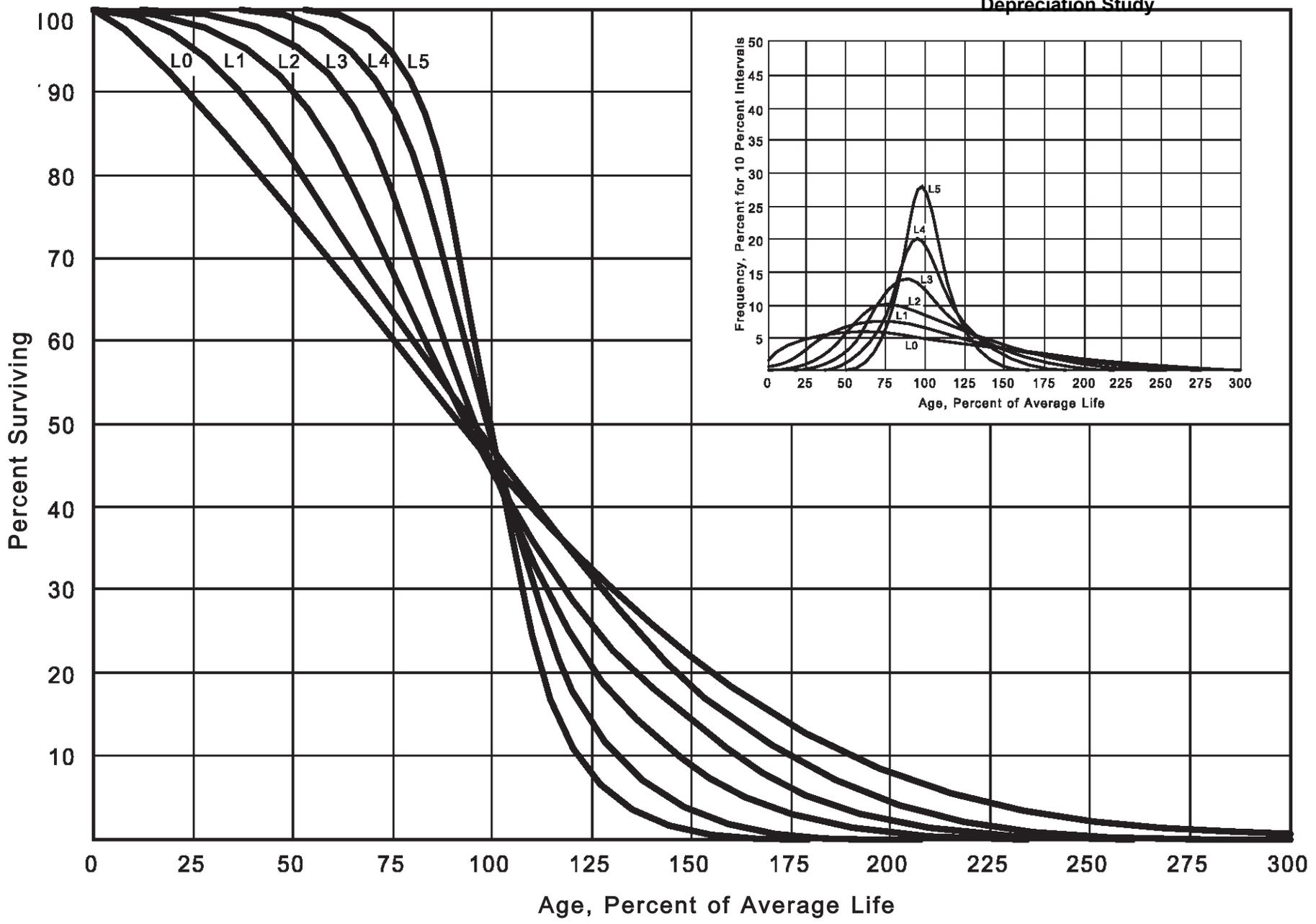


Figure 2. Left Modal or "L" Iowa Type Survivor Curves

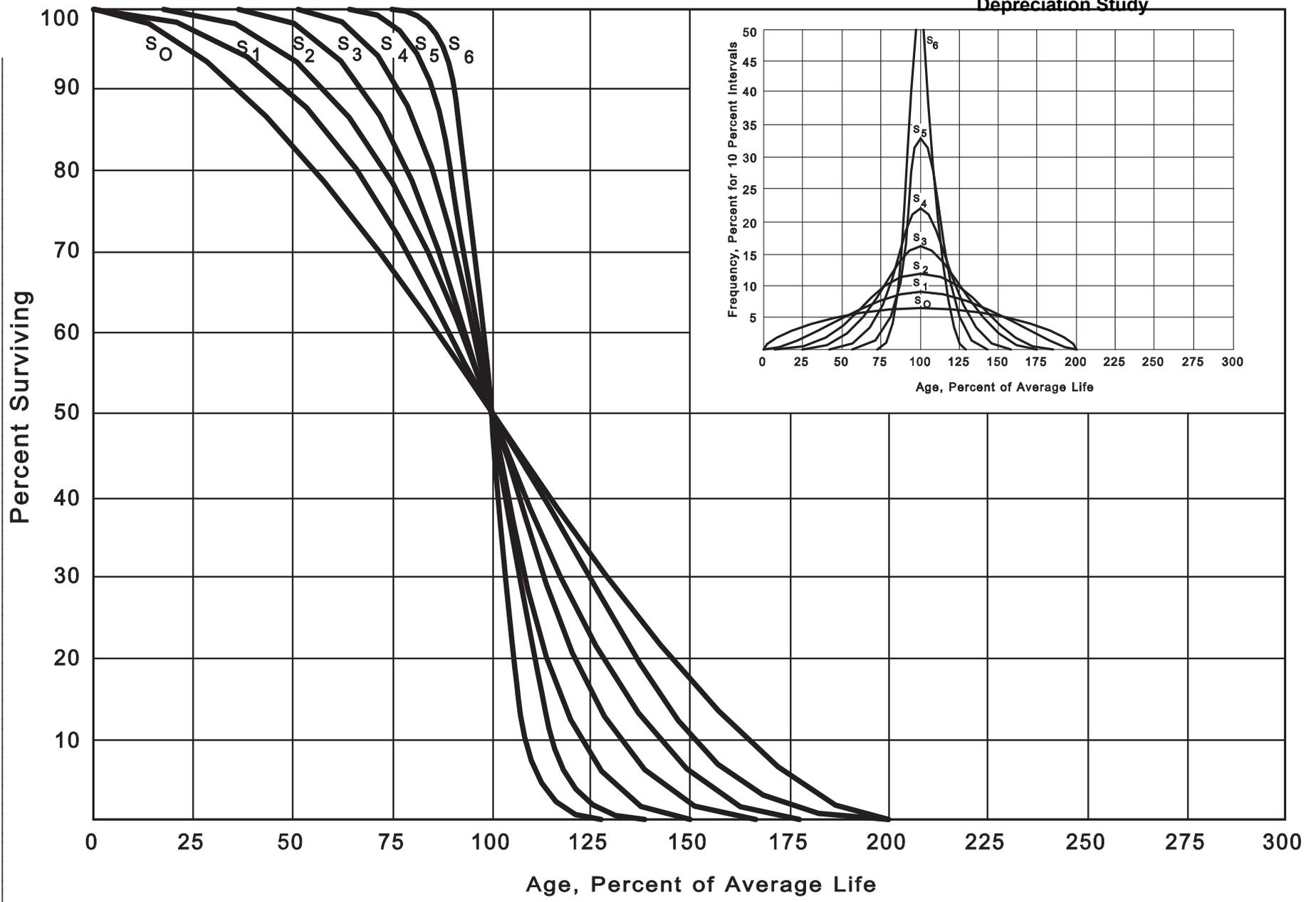


Figure 3. Symmetrical or "S" Iowa Type Survivor Curves

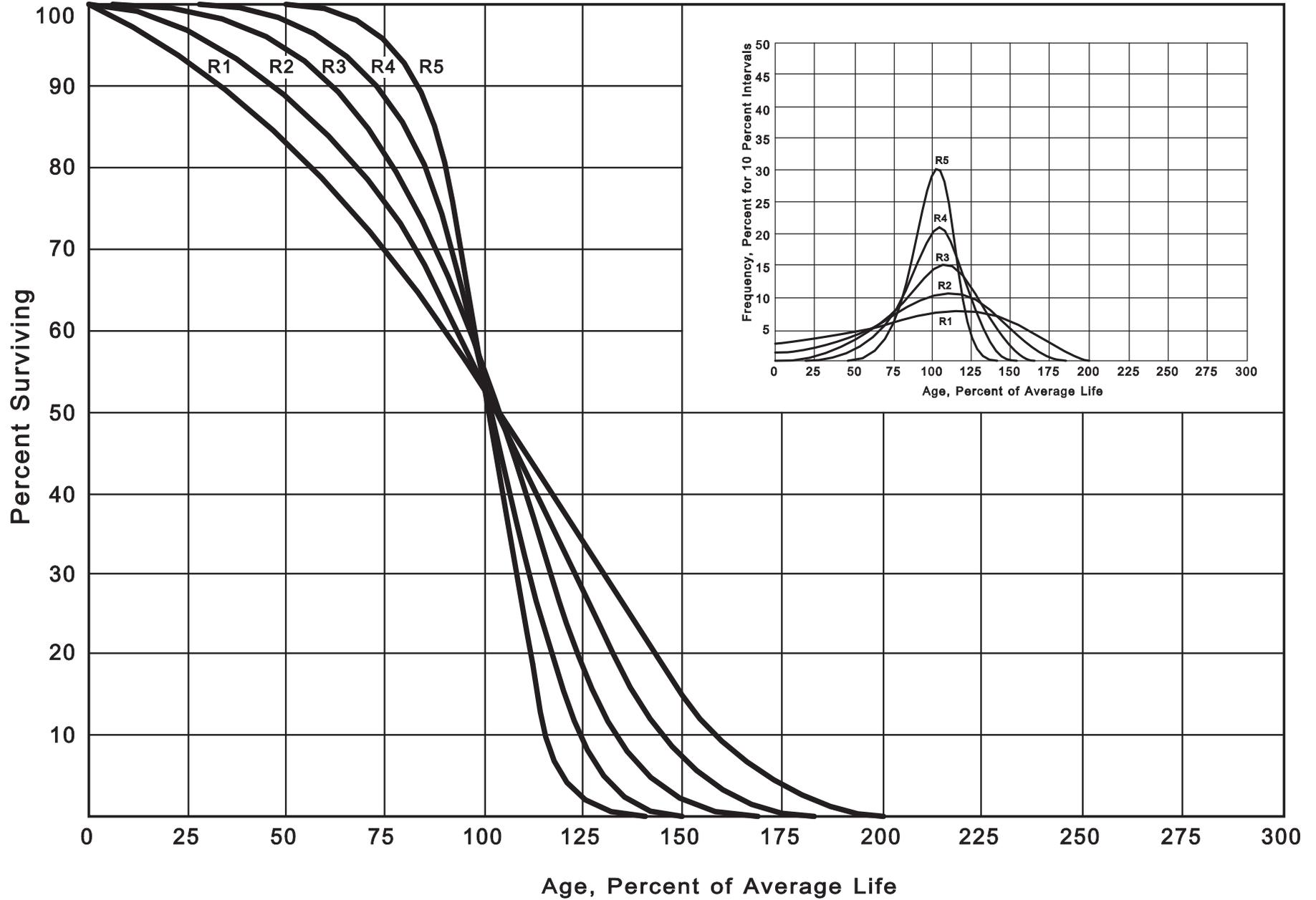


Figure 4. Right Modal or "R" Iowa Type Survivor Curves

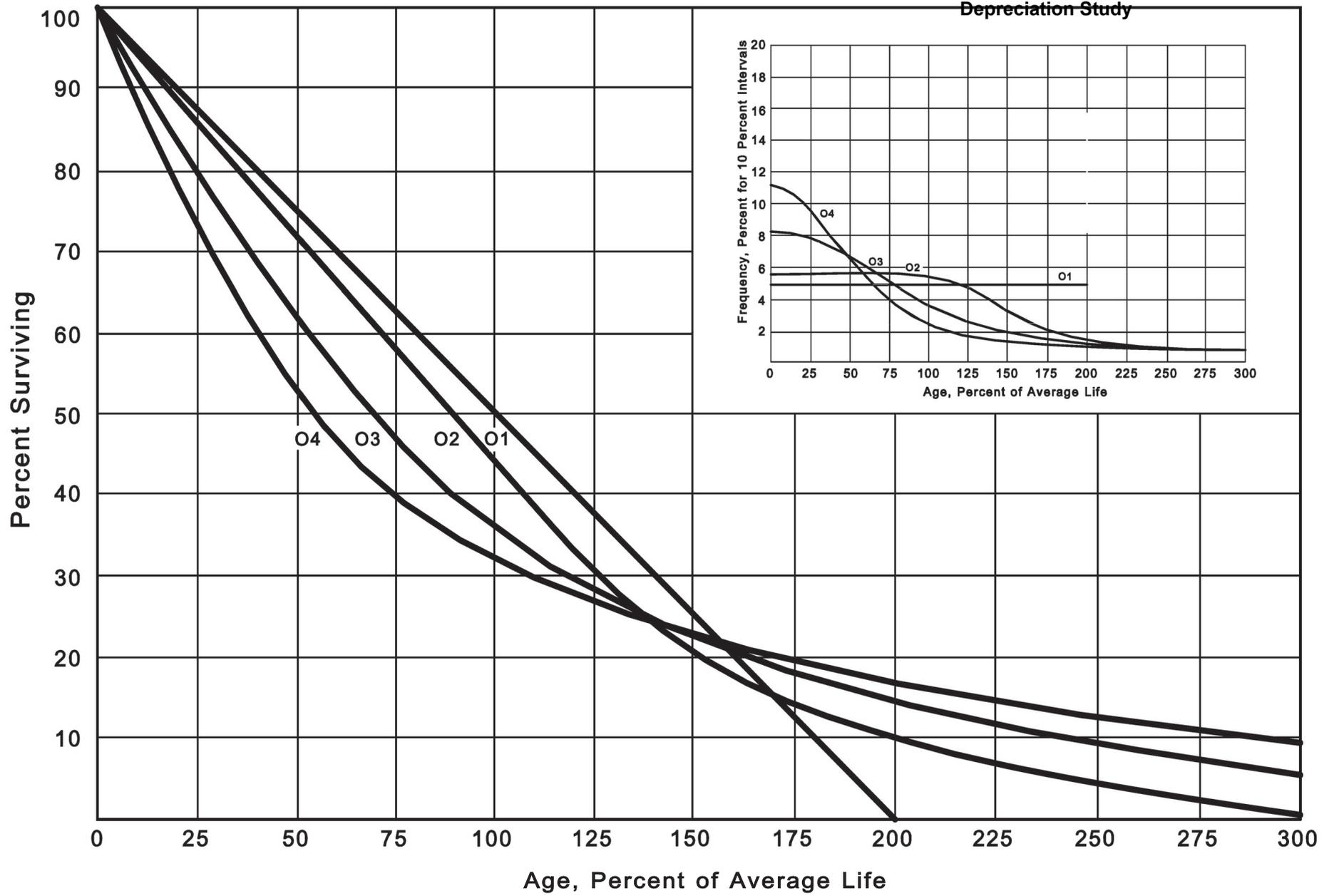


Figure 5. Origin Modal or "O" Iowa Type Survivor Curves

These curve types have also been presented in subsequent Experiment Station bulletins and in the text, "Engineering Valuation and Depreciation."<sup>1</sup> In 1957, Frank V. B. Couch, Jr., an Iowa State College graduate student submitted a thesis presenting his development of the fourth family consisting of the four O type survivor curves.

### **Retirement Rate Method of Analysis**

The retirement rate method is an actuarial method of deriving survivor curves using the average rates at which property of each age group is retired. The method relates to property groups for which aged accounting experience is available and is the method used to develop the original stub survivor curves in this study. The method (also known as the annual rate method) is illustrated through the use of an example in the following text and is also explained in several publications including "Statistical Analyses of Industrial Property Retirements,"<sup>2</sup> "Engineering Valuation and Depreciation,"<sup>3</sup> and "Depreciation Systems."<sup>4</sup>

The average rate of retirement used in the calculation of the percent surviving for the survivor curve (life table) requires two sets of data: first, the property retired during a period of observation, identified by the property's age at retirement; and second, the property exposed to retirement at the beginning of the age intervals during the same period. The period of observation is referred to as the experience band. The band of years which represent the installation dates of the property exposed to retirement during the experience band is referred to as the placement band. An example of the calculations used in the development of a life table follows. The example includes schedules of annual aged property transactions, a schedule of plant exposed to retirement, a life table and illustrations of smoothing the stub survivor curve.

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<sup>1</sup>Marston, Anson, Robley Winfrey and Jean C. Hempstead. Engineering Valuation and Depreciation, 2nd Edition. New York, McGraw-Hill Book Company. 1953.

<sup>2</sup>Winfrey, Robley, Supra Note 1.

<sup>3</sup>Marston, Anson, Robley Winfrey, and Jean C. Hempstead, Supra Note 2.

<sup>4</sup>Wolf, Frank K. and W. Chester Fitch. Depreciation Systems. Iowa State University Press. 1994.

### Schedules of Annual Transactions in Plant Records

The property group used to illustrate the retirement rate method is observed for the experience band 2010-2019 during which there were placements during the years 2005-2019. In order to illustrate the summation of the aged data by age interval, the data were compiled in the manner presented in Schedules 1 and 2 on pages II-11 and II-12. In Schedule 1, the year of installation (year placed) and the year of retirement are shown. The age interval during which a retirement occurred is determined from this information. In the example which follows, \$10,000 of the dollars invested in 2005 were retired in 2010. The \$10,000 retirement occurred during the age interval between 4½ and 5½ years on the basis that approximately one-half of the amount of property was installed prior to and subsequent to July 1 of each year. That is, on the average, property installed during a year is placed in service at the midpoint of the year for the purpose of the analysis. All retirements also are stated as occurring at the midpoint of a one-year age interval of time, except the first age interval which encompasses only one-half year.

The total retirements occurring in each age interval in a band are determined by summing the amounts for each transaction year-installation year combination for that age interval. For example, the total of \$143,000 retired for age interval 4½-5½ is the sum of the retirements entered on Schedule 1 immediately above the stair step line drawn on the table beginning with the 2010 retirements of 2005 installations and ending with the 2019 retirements of the 2014 installations. Thus, the total amount of 143 for age interval 4½-5½ equals the sum of:

$$10 + 12 + 13 + 11 + 13 + 13 + 15 + 17 + 19 + 20.$$

**Exhibit EKPC-03  
Depreciation Study**

**SCHEDULE 1. RETIREMENTS FOR EACH YEAR 2010-2019  
SUMMARIZED BY AGE INTERVAL**

Year Placed (1)	Retirements, Thousands of Dollars										Total During Age Interval (12)	Age Interval (13)
	2010 (2)	2011 (3)	2012 (4)	2013 (5)	2014 (6)	2015 (7)	2016 (8)	2017 (9)	2018 (10)	2019 (11)		
2005	10	11	12	13	14	16	23	24	25	26	26	13½-14½
2006	11	12	13	15	16	18	20	21	22	19	44	12½-13½
2007	11	12	13	14	16	17	19	21	22	18	64	11½-12½
2008	8	9	10	11	11	13	14	15	16	17	83	10½-11½
2009	9	10	11	12	13	14	16	17	19	20	93	9½-10½
2010	4	9	10	11	12	13	14	15	16	20	105	8½-9½
2011		5	11	12	13	14	15	16	18	20	113	7½-8½
2012			6	12	13	15	16	17	19	19	124	6½-7½
2013				6	13	15	16	17	19	19	131	5½-6½
2014					13	14	16	17	19	20	143	4½-5½
2015					7	8	18	20	22	23	146	3½-4½
2016						9	9	20	22	25	150	2½-3½
2017								11	23	25	151	1½-2½
2018									11	24	153	½-1½
2019										13	80	0-½
<b>Total</b>	<b>53</b>	<b>68</b>	<b>86</b>	<b>106</b>	<b>128</b>	<b>157</b>	<b>196</b>	<b>231</b>	<b>273</b>	<b>308</b>	<b>1,606</b>	

Experience Band 2010-2019

Placement Band 2005-2019

**Exhibit EKPC-03  
Depreciation Study**

**SCHEDULE 2. OTHER TRANSACTIONS FOR EACH YEAR 2010-2019  
SUMMARIZED BY AGE INTERVAL**

Year Placed	Acquisitions, Transfers and Sales, Thousands of Dollars										Total During Age Interval (12)	Age Interval (13)	
	During Year												
	2010 (2)	2011 (3)	2012 (4)	2013 (5)	2014 (6)	2015 (7)	2016 (8)	2017 (9)	2018 (10)	2019 (11)			
2005	-	-	-	-	-	-	60 <sup>a</sup>	-	-	-	-	-	13½-14½
2006	-	-	-	-	-	-	-	-	-	-	-	-	12½-13½
2007	-	-	-	-	-	-	-	-	-	-	-	-	11½-12½
2008	-	-	-	-	-	-	-	(5) <sup>b</sup>	-	-	60	-	10½-11½
2009	-	-	-	-	-	-	-	6 <sup>a</sup>	-	-	-	-	9½-10½
2010	-	-	-	-	-	-	-	-	-	-	(5)	-	8½-9½
2011	-	-	-	-	-	-	-	-	-	-	6	-	7½-8½
2012	-	-	-	-	-	-	-	-	-	-	-	-	6½-7½
2013	-	-	-	-	-	-	-	(12) <sup>b</sup>	-	-	-	-	5½-6½
2014	-	-	-	-	-	-	-	-	22 <sup>a</sup>	-	-	-	4½-5½
2015	-	-	-	-	-	-	-	(19) <sup>b</sup>	-	-	10	-	3½-4½
2016	-	-	-	-	-	-	-	-	-	-	-	-	2½-3½
2017	-	-	-	-	-	-	-	-	-	(102) <sup>c</sup>	(121)	-	1½-2½
2018	-	-	-	-	-	-	-	-	-	-	-	-	½-1½
2019	-	-	-	-	-	-	-	-	-	-	-	-	0-½
<b>Total</b>	-	-	-	-	-	-	60	(30)	22	(102)	(50)	-	

<sup>a</sup> Transfer Affecting Exposures at Beginning of Year

<sup>b</sup> Transfer Affecting Exposures at End of Year

<sup>c</sup> Sale with Continued Use

Parentheses Denote Credit Amount.

In Schedule 2, other transactions which affect the group are recorded in a similar manner. The entries illustrated include transfers and sales. The entries which are credits to the plant account are shown in parentheses. The items recorded on this schedule are not totaled with the retirements, but are used in developing the exposures at the beginning of each age interval.

**Schedule of Plant Exposed to Retirement**

The development of the amount of plant exposed to retirement at the beginning of each age interval is illustrated in Schedule 3 on page II-14. The surviving plant at the beginning of each year from 2010 through 2019 is recorded by year in the portion of the table headed "Annual Survivors at the Beginning of the Year." The last amount entered in each column is the amount of new plant added to the group during the year. The amounts entered in Schedule 3 for each successive year following the beginning balance or addition are obtained by adding or subtracting the net entries shown on Schedules 1 and 2. For the purpose of determining the plant exposed to retirement, transfers-in are considered as being exposed to retirement in this group at the beginning of the year in which they occurred, and the sales and transfers-out are considered to be removed from the plant exposed to retirement at the beginning of the following year. Thus, the amounts of plant shown at the beginning of each year are the amounts of plant from each placement year considered to be exposed to retirement at the beginning of each successive transaction year. For example, the exposures for the installation year 2015 are calculated in the following manner:

Exposures at age 0	= amount of addition	= \$750,000
Exposures at age ½	= \$750,000 - \$ 8,000	= \$742,000
Exposures at age 1½	= \$742,000 - \$18,000	= \$724,000
Exposures at age 2½	= \$724,000 - \$20,000 - \$19,000	= \$685,000
Exposures at age 3½	= \$685,000 - \$22,000	= \$663,000

**Exhibit EKPC-03  
Depreciation Study**

**SCHEDULE 3. PLANT EXPOSED TO RETIREMENT  
JANUARY 1 OF EACH YEAR 2010-2019  
SUMMARIZED BY AGE INTERVAL**

Year Placed	Exposures, Thousands of Dollars										Total at		Age Interval
	Annual Survivors at the Beginning of the Year										Beginning of		
	2010 (1)	2011 (2)	2012 (3)	2013 (4)	2014 (5)	2015 (6)	2016 (7)	2017 (8)	2018 (9)	2019 (10)	2019 (11)	Age Interval (12)	
2005	255	245	234	222	209	195	239	216	192	167	167	167	13½-14½
2006	279	268	256	243	228	212	194	174	153	131	131	323	12½-13½
2007	307	296	284	271	257	241	224	205	184	162	162	531	11½-12½
2008	338	330	321	311	300	289	276	262	242	226	226	823	10½-11½
2009	376	367	357	346	334	321	307	297	280	261	261	1,097	9½-10½
2010	420 <sup>a</sup>	416	407	397	386	374	361	347	332	316	316	1,503	8½-9½
2011		460 <sup>a</sup>	455	444	432	419	405	390	374	356	356	1,952	7½-8½
2012			510 <sup>a</sup>	504	492	479	464	448	431	412	412	2,463	6½-7½
2013				580 <sup>a</sup>	574	561	546	530	501	482	482	3,057	5½-6½
2014					660 <sup>a</sup>	653	639	623	628	609	609	3,789	4½-5½
2015						750 <sup>a</sup>	742	724	685	663	663	4,332	3½-4½
2016							850 <sup>a</sup>	841	821	799	799	4,955	2½-3½
2017								960 <sup>a</sup>	949	926	926	5,719	1½-2½
2018									1,080 <sup>a</sup>	1,069	1,069	6,579	½-1½
2019										1,220 <sup>a</sup>	7,490	7,490	0-½
<b>Total</b>	<b>1,975</b>	<b>2,382</b>	<b>2,824</b>	<b>3,318</b>	<b>3,872</b>	<b>4,494</b>	<b>5,247</b>	<b>6,017</b>	<b>6,852</b>	<b>7,799</b>	<b>44,780</b>		

<sup>a</sup>Additions during the year

For the entire experience band 2010-2019, the total exposures at the beginning of an age interval are obtained by summing diagonally in a manner similar to the summing of the retirements during an age interval (Schedule 1). For example, the figure of 3,789, shown as the total exposures at the beginning of age interval 4½-5½, is obtained by summing:

$$255 + 268 + 284 + 311 + 334 + 374 + 405 + 448 + 501 + 609.$$

### **Original Life Table**

The original life table, illustrated in Schedule 4 on page II-16, is developed from the totals shown on the schedules of retirements and exposures, Schedules 1 and 3, respectively. The exposures at the beginning of the age interval are obtained from the corresponding age interval of the exposure schedule, and the retirements during the age interval are obtained from the corresponding age interval of the retirement schedule. The retirement ratio is the result of dividing the retirements during the age interval by the exposures at the beginning of the age interval. The percent surviving at the beginning of each age interval is derived from survivor ratios, each of which equals one minus the retirement ratio. The percent surviving is developed by starting with 100% at age zero and successively multiplying the percent surviving at the beginning of each interval by the survivor ratio, i.e., one minus the retirement ratio for that age interval. The calculations necessary to determine the percent surviving at age 5½ are as follows:

Percent surviving at age 4½	=	88.15	
Exposures at age 4½	=	3,789,000	
Retirements from age 4½ to 5½	=	143,000	
Retirement Ratio	=	143,000 ÷ 3,789,000	= 0.0377
Survivor Ratio	=	1.000 - 0.0377	= 0.9623
Percent surviving at age 5½	=	(88.15) x (0.9623)	= 84.83

The totals of the exposures and retirements (columns 2 and 3) are shown for the purpose of checking with the respective totals in Schedules 1 and 3. The ratio of the total retirements to the total exposures, other than for each age interval, is meaningless.

SCHEDULE 4. ORIGINAL LIFE TABLE  
CALCULATED BY THE RETIREMENT RATE METHOD

Experience Band 2010-2019

Placement Band 2005-2019

(Exposure and Retirement Amounts are in Thousands of Dollars)

Age at Beginning of Interval	Exposures at Beginning of Age Interval	Retirements During Age Interval	Retirement Ratio	Survivor Ratio	Percent Surviving at Beginning of Age Interval
(1)	(2)	(3)	(4)	(5)	(6)
0.0	7,490	80	0.0107	0.9893	100.00
0.5	6,579	153	0.0233	0.9767	98.93
1.5	5,719	151	0.0264	0.9736	96.62
2.5	4,955	150	0.0303	0.9697	94.07
3.5	4,332	146	0.0337	0.9663	91.22
4.5	3,789	143	0.0377	0.9623	88.15
5.5	3,057	131	0.0429	0.9571	84.83
6.5	2,463	124	0.0503	0.9497	81.19
7.5	1,952	113	0.0579	0.9421	77.11
8.5	1,503	105	0.0699	0.9301	72.65
9.5	1,097	93	0.0848	0.9152	67.57
10.5	823	83	0.1009	0.8991	61.84
11.5	531	64	0.1205	0.8795	55.60
12.5	323	44	0.1362	0.8638	48.90
13.5	<u>167</u>	<u>26</u>	0.1557	0.8443	42.24
Total	<u>44,780</u>	<u>1,606</u>			35.66

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Column 2 from Schedule 3, Column 12, Plant Exposed to Retirement.  
 Column 3 from Schedule 1, Column 12, Retirements for Each Year.  
 Column 4 = Column 3 Divided by Column 2.  
 Column 5 = 1.0000 Minus Column 4.  
 Column 6 = Column 5 Multiplied by Column 6 as of the Preceding Age Interval.

The original survivor curve is plotted from the original life table (column 6, Schedule 4). When the curve terminates at a percent surviving greater than zero, it is called a stub survivor curve. Survivor curves developed from retirement rate studies generally are stub curves.

### **Smoothing the Original Survivor Curve**

The smoothing of the original survivor curve eliminates any irregularities and serves as the basis for the preliminary extrapolation to zero percent surviving of the original stub curve. Even if the original survivor curve is complete from 100% to zero percent, it is desirable to eliminate any irregularities, as there is still an extrapolation for the vintages which have not yet lived to the age at which the curve reaches zero percent. In this study, the smoothing of the original curve with established type curves was used to eliminate irregularities in the original curve.

The Iowa type curves are used in this study to smooth those original stub curves which are expressed as percents surviving at ages in years. Each original survivor curve was compared to the Iowa curves using visual and mathematical matching in order to determine the better fitting smooth curves. In Figures 6, 7, and 8, the original curve developed in Table 4 is compared with the L, S, and R Iowa type curves which most nearly fit the original survivor curve. In Figure 6, the L1 curve with an average life between 12 and 13 years appears to be the best fit. In Figure 7, the S0 type curve with a 12-year average life appears to be the best fit and appears to be better than the L1 fitting. In Figure 8, the R1 type curve with a 12-year average life appears to be the best fit and appears to be better than either the L1 or the S0.

In Figure 9, the three fittings, 12-L1, 12-S0 and 12-R1 are drawn for comparison purposes. It is probable that the 12-R1 Iowa curve would be selected as the most representative of the plotted survivor characteristics of the group.

FIGURE 6. ILLUSTRATION OF THE MATCHING OF AN ORIGINAL SURVIVOR CURVE WITH AN L1 IOWA TYPE CURVE  
 ORIGINAL AND SMOOTH SURVIVOR CURVES

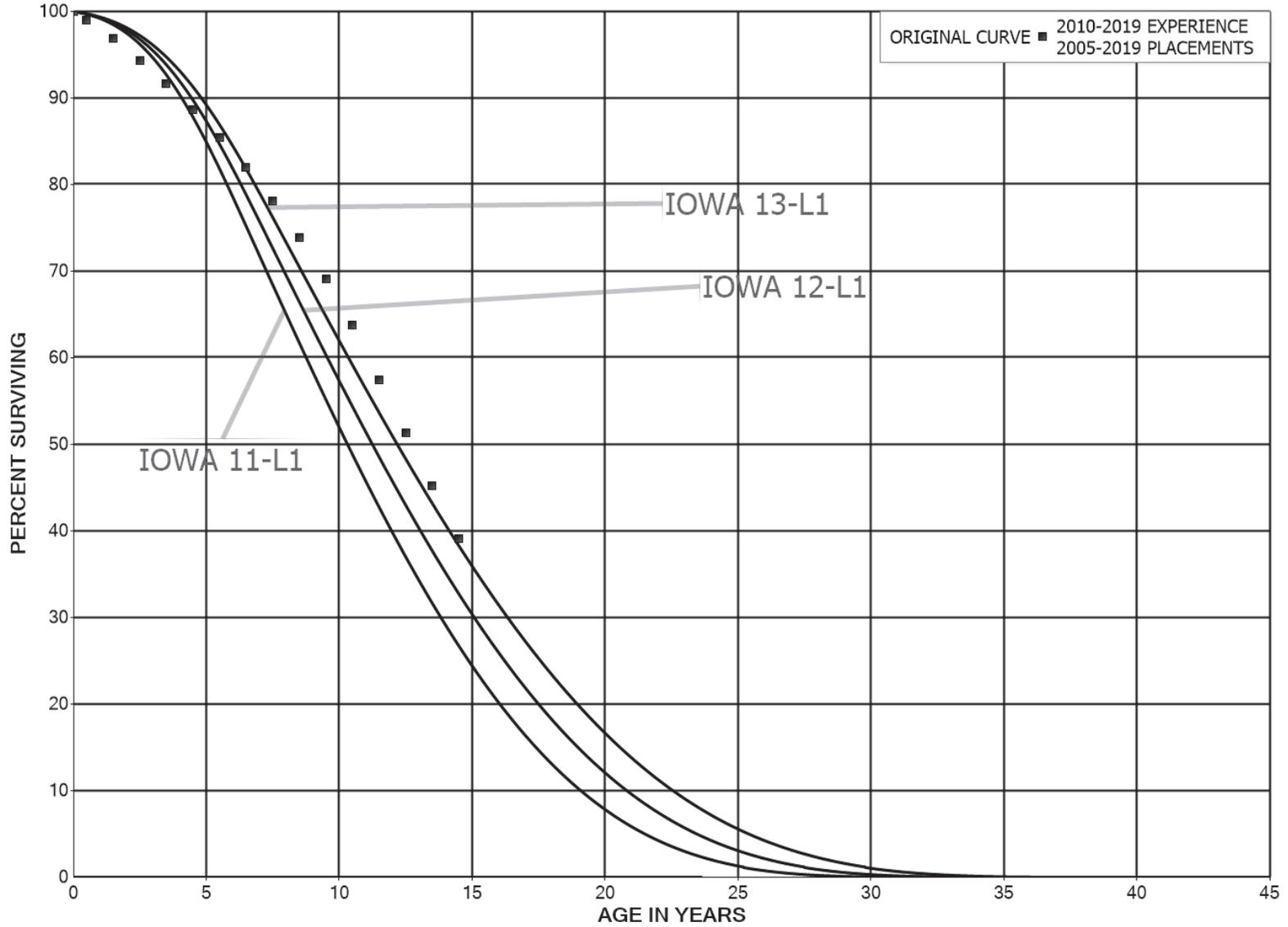


FIGURE 7. ILLUSTRATION OF THE MATCHING OF AN ORIGINAL SURVIVOR CURVE WITH AN S0 IOWA TYPE CURVE  
 ORIGINAL AND SMOOTH SURVIVOR CURVES

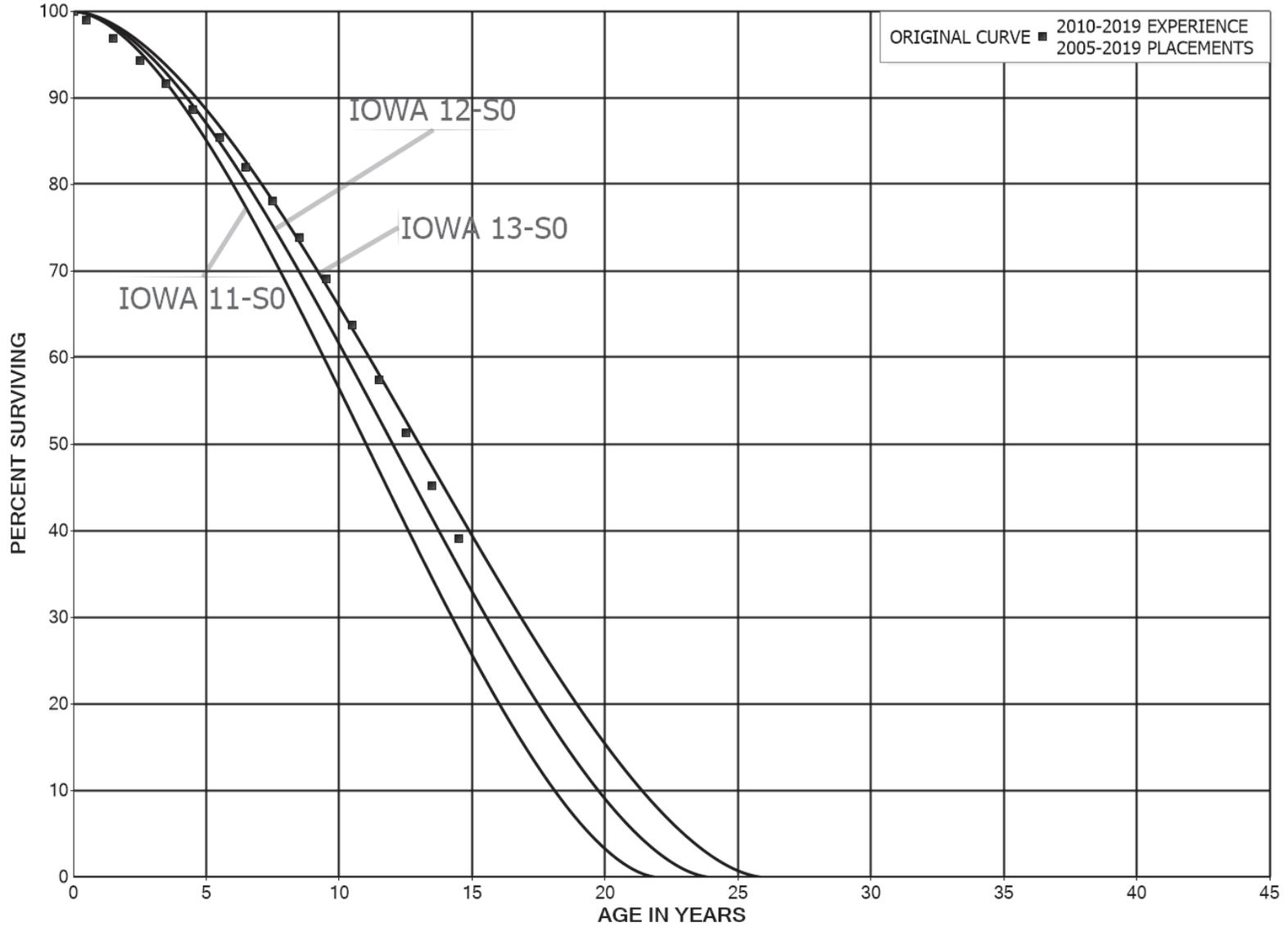


FIGURE 8. ILLUSTRATION OF THE MATCHING OF AN ORIGINAL SURVIVOR CURVE WITH AN R1 IOWA TYPE CURVE  
 ORIGINAL AND SMOOTH SURVIVOR CURVES

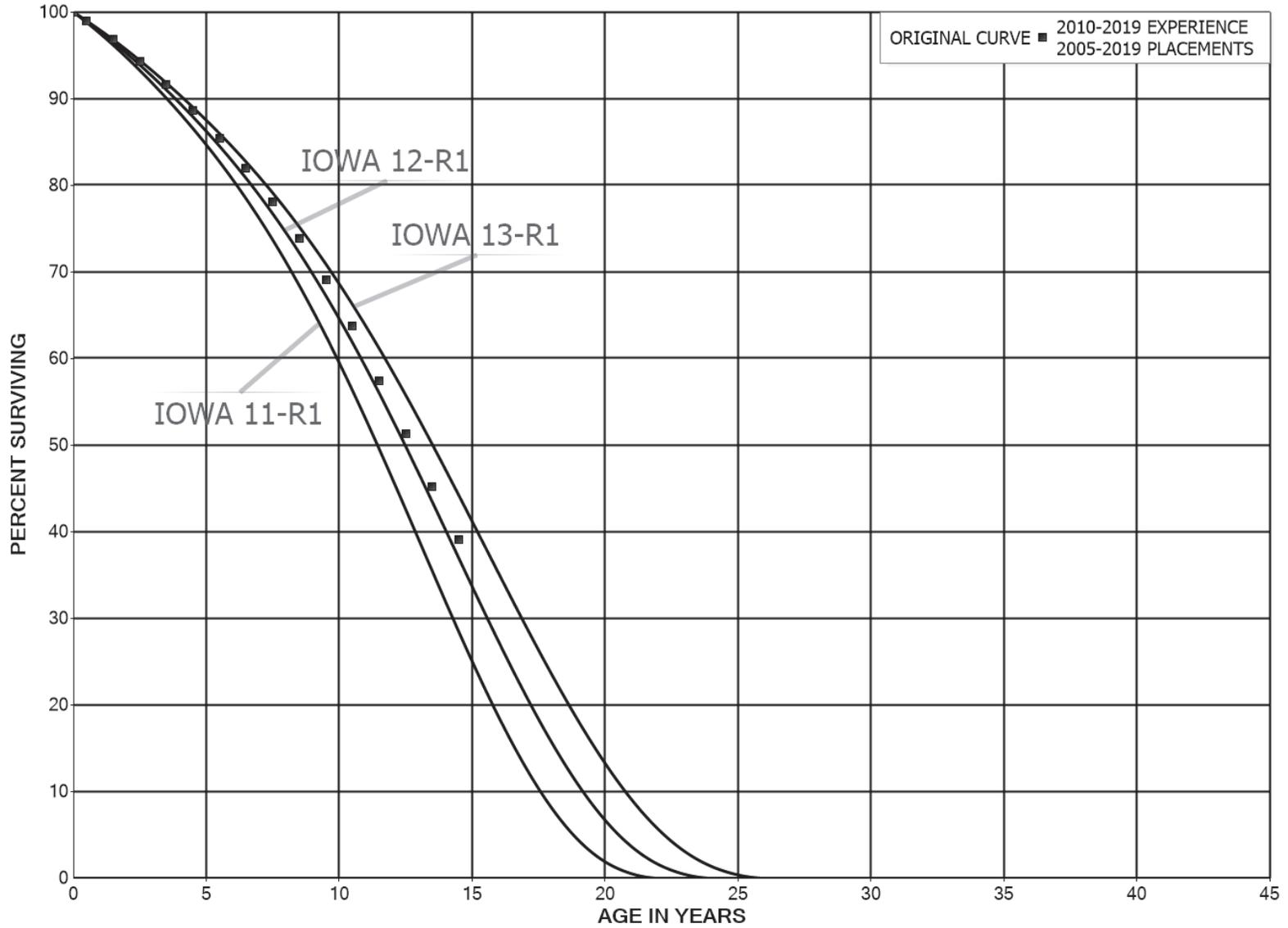
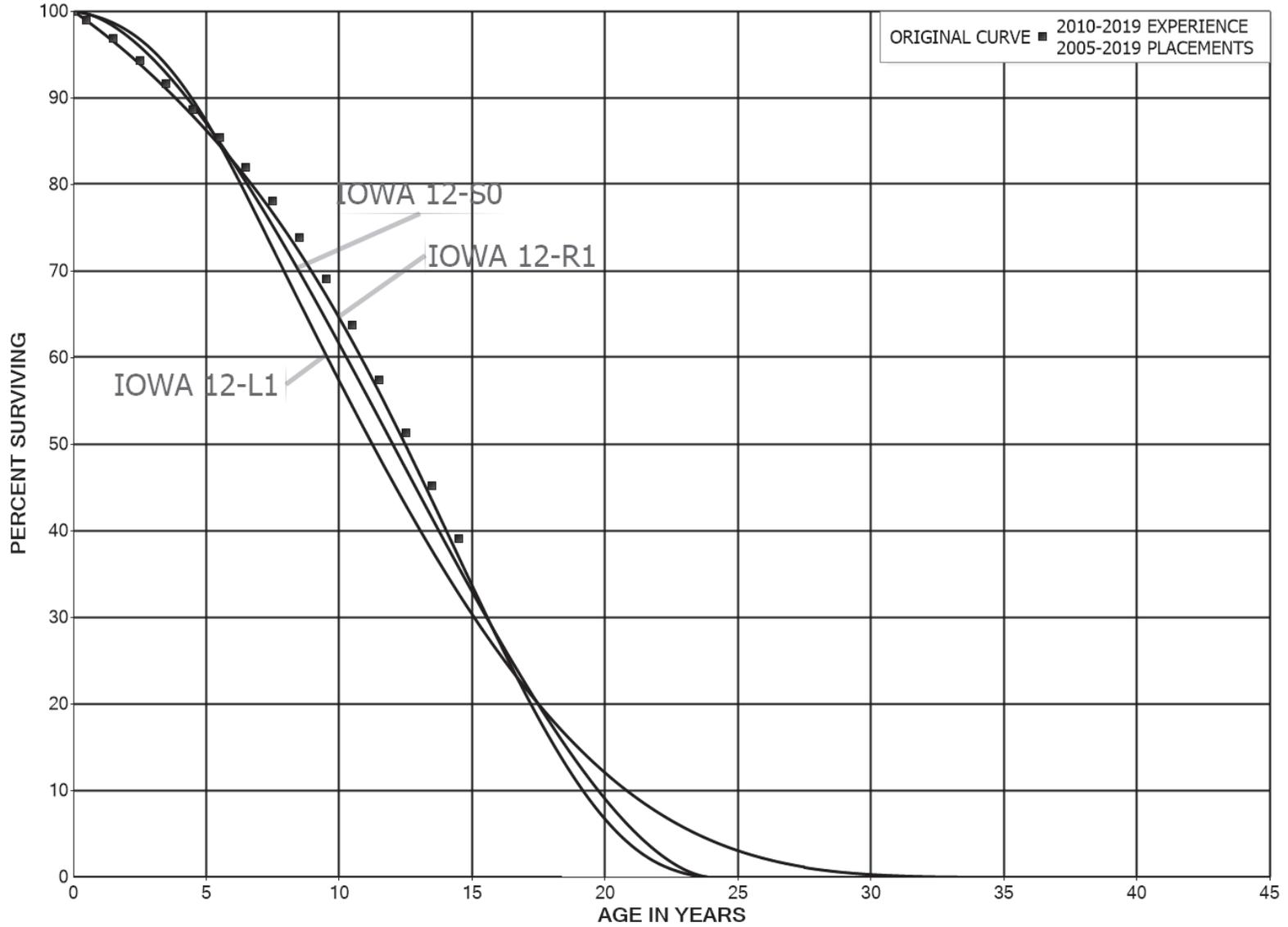


FIGURE 9. ILLUSTRATION OF THE MATCHING OF AN ORIGINAL SURVIVOR CURVE WITH AN L1, S0 AND R1 IOWA TYPE CURVE  
 ORIGINAL AND SMOOTH SURVIVOR CURVES



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## **PART III. SERVICE LIFE CONSIDERATIONS**

## **PART III. SERVICE LIFE CONSIDERATIONS**

### **FIELD TRIPS**

In order to be familiar with the operation of the Company and observe representative portions of the plant, field trips have been conducted in past studies with a virtual tour of some locations during this study. These field trips and meetings aid in the general understanding of the plant and provide information related the reasons for past retirements and expected future causes of retirement. This knowledge and information were incorporated in the interpretation and extrapolation of the statistical analyses.

The following is a list of the locations visited during the most recent field trips.

#### November 20-23, 2020

Smith Station – Irvine Road  
Smith Station – White Conkwright Road

#### November 17, 2020

Spurlock Station

#### September 5-6, 2018

Bluegrass Station  
Cooper Station  
Burnside Service Center  
Somerset Substation – Transmission  
Somerset Substation – Distribution  
Pulaski County Transmission Substation  
South Floyd Distribution Substation  
Cooperative Solar Farm One  
Headquarters  
Spurlock Station  
Bavarian Landfill

#### August 28-29, 2013

Spurlock Station  
Dale Station  
Dale Substation  
Smith Station  
Smith Substation  
North Clark Substation

Sideview Substation  
Winchester Office  
Cooper Station  
Burnside Service Center  
Avon Substation  
Winchester Operations Center

## **SERVICE LIFE ANALYSIS**

The service life estimates were based on informed judgment which considered a number of factors. The primary factors were the statistical analyses of data; current Company policies and outlook as determined during conversations with management; and the survivor curve estimates from previous studies of this company and other electric companies.

For many of the plant accounts and subaccounts for which survivor curves were estimated, the statistical analyses using the retirement rate method resulted in good to excellent indications of the survivor patterns experienced. These accounts represent 76 percent of depreciable plant. Generally, the information external to the statistics led to little or no significant departure from the indicated survivor curves for the accounts listed below. The statistical support for the service life estimates is presented in the section beginning on page VII-2.

### **STEAM PRODUCTION PLANT**

- 311 Structures and Improvements
- 312 Boiler Plant Equipment
- 315 Accessory Electric Equipment
- 316 Miscellaneous Power Plant Equipment

### **OTHER PRODUCTION PLANT**

- 344 Generators

### **TRANSMISSION PLANT**

- 353 Station Equipment
- 353.1 Station Equipment – Energy Control System
- 355 Poles and Fixtures
- 356 Overhead Conductors and Devices

**DISTRIBUTION PLANT**

- 362 Station Equipment
- 362.1 Station Equipment - SCADA

**GENERAL PLANT**

- 390 Structures and Improvements
- 392 Transportation Equipment
- 396 Power Operated Equipment

Account 353, Station Equipment, and Account 355, Poles and Fixtures are used to illustrate the manner in which the study was conducted for the groups in the preceding list. Account 353 represents 7 percent, and Account 355 represents 4 percent of the total depreciable plant. Aged plant accounting data have been compiled for the years 1984 through 2019. These data have been coded in the course of the Company's normal record keeping according to account or property group, type of transaction, year in which the transaction took place, and year in which the electric plant was placed in service. The retirements, other plant transactions, and plant additions were analyzed by the retirement rate method.

The survivor curve estimate for Account 353, Station Equipment, is the 60-R2 and is based on the statistical indication for the period 1984-2019 and 2005-2019. The 60-R2 is an excellent fit of the significant portion of the original survivor curve as set forth on page VII-37 consistent with management outlook for a continuation of historical experience, and at the upper end of the typical service life range of 40 to 60 years for transmission substation equipment.

The survivor curve estimate for Account 355, Poles and Fixtures, is based on the statistical indications for the period 1984-2019. The Iowa 60-S2 is an excellent fit of the original survivor curve. The 60-year service life is within the typical service life range of 45 to 65 years for transmission poles. The 60-year life reflects the Company's continued

practices for replacing transmission poles and reflects the industry trend towards a longer life.

### **Life Span Estimates**

The life span technique was used for the Company's Power Production accounts. The life span procedure is appropriate for these accounts since many of the assets within the plant will be retired concurrently. Probable retirement dates were estimated for each generating facility and structure. Life spans for each Steam and Other Production Plant were the result of considering experienced life spans of similar generating units, the age of surviving units, general operating characteristics of the units, major refurbishing, and discussions with management personnel concerning the probable long-term outlook for the units.

The depreciable life span estimates for steam, base-load units are 40 to 60 years. The typical range of life spans for such units in the past has been 50 to 65 years, however, in recent years the life spans have been 40 to 50 years. This life span represents the expected depreciable life of the facility under its current configuration. Future capital expenditures can extend a facility's depreciable life, however, such changes to depreciable life would not be prudent until the capital expenditures are actually put into plant in service. A life span of 35 to 40 years was estimated for the combustion turbines and landfill facilities. Life span estimates are typically 35 to 40 years for combustion turbines which are used primarily as peaking units and 30 to 35 years for landfill facilities. The life spans for solar facilities are typically 25 years.

The life span and probable retirement dates used for steam and other production plants are as follows:

**Exhibit EKPC-03  
Depreciation Study**

<u>Depreciable Group</u>	<u>Major Year in Service</u>	<u>Depreciable Life Date</u>	<u>Depreciable Life Span</u>
<b>Steam Production Plant</b>			
Central Lab	1978	2030	52
Cooper	1966,1970	2030	60,64
Spurlock Unit 1	1980	2040	60
Spurlock Unit 2	1982	2042	60
Spurlock Unit 3	2005	2045	40
Spurlock Unit 4	2009	2049	40
<b>Other Production Plant</b>			
Smith Unit 1	1999	2034	35
Smith Unit 2	1999	2034	35
Smith Unit 3	1999	2034	35
Smith Unit 4	2001	2041	40
Smith Unit 5	2001	2041	40
Smith Unit 6	2005	2045	40
Smith Unit 7	2005	2045	40
Smith Unit 9	2010	2050	40
Smith Unit 10	2010	2050	40
Cooperative Solar	2017	2042	25
Green Valley Landfill	2003	2038	35
Laurel Ridge Landfill	2003	2038	35
Bavarian Landfill	2003	2038	35
Pearl Hollow Landfill	2006	2041	35
Pendleton County Landfill	2007	2042	35
Bluegrass Oldham Unit 1	2002*	2042	40
Bluegrass Oldham Unit 2	2002*	2042	40
Bluegrass Oldham Unit 3	2002*	2042	40

\*All units were acquired in 2015.

Similar studies were performed for the remaining plant accounts. Each of the judgments represented a consideration of statistical analyses of aged plant activity, management's outlook for the future, and the typical range of lives used by other electric companies.

The selected amortization periods for other General Plant accounts are described in the section "Calculated Annual and Accrued Amortization."

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**PART IV. NET SALVAGE CONSIDERATIONS**

## **PART IV. NET SALVAGE CONSIDERATIONS**

### **SALVAGE ANALYSIS**

The estimates of net salvage by account were based in part on historical data compiled for the years 2005 through 2019. Cost of removal and salvage were expressed as percents of the original cost of plant retired, both on annual and three-year moving average bases. The most recent five-year average also was calculated for consideration. The net salvage estimates by account are expressed as a percent of the original cost of plant retired.

#### **Net Salvage Considerations**

The estimates of future net salvage are expressed as percentages of surviving plant in service, i.e., all future retirements. In cases in which removal costs are expected to exceed salvage receipts, a negative net salvage percentage is estimated. The net salvage estimates were based on judgment which incorporated analyses of historical cost of removal and salvage data, expectations with respect to future removal requirements and markets for retired equipment and materials.

The analyses of historical cost of removal and salvage data are presented in the section titled "Net Salvage Statistics" for the plant accounts for which the net salvage estimate relied partially on those analyses.

Statistical analyses of historical data for the period 2005 through 2019 contributed toward the net salvage estimates for 17 plant accounts, representing 93 percent of the depreciable plant, as follows:

#### **STEAM PRODUCTION PLANT**

311	Structures and Improvements
312	Boiler Plant Equipment
314	Turbogenerator Units
315	Accessory Electric Equipment
316	Miscellaneous Power Plant Equipment

OTHER PRODUCTION PLANT

- 341 Structures and Improvements
- 343 Prime Movers
- 345 Accessory Electric Equipment
- 346 Miscellaneous Power Plant Equipment

TRANSMISSION PLANT

- 353 Station Equipment
- 353.1 Station Equipment – Energy Control System
- 355 Poles and Fixtures
- 356 Overhead Conductors and Devices

DISTRIBUTION PLANT

- 362 Station Equipment
- 362.1 Station Equipment - SCADA

GENERAL PLANT

- 392 Transportation Equipment
- 396 Power Operated Equipment

Account 353, Station Equipment, is used to illustrate the manner in which the study was conducted for the groups in the preceding list. Net salvage data for the period 2005 through 2019 were analyzed for this account. The data include cost of removal, gross salvage and net salvage amounts and each of these amounts is expressed as a percent of the original cost of regular retirements. Three-year moving averages for the 2005-2007 through 2017-2019 periods were computed to smooth the annual amounts.

Cost of removal was high during the entire period, however, particularly high in the early years as compared to retirements. The high removal cost in the early years related to practices during that time and the type of assets primarily being replaced. Since 2011, cost of removal as a percentage of retirements has been at a more common level. Cost of removal for the most recent five years averaged 31 percent.

Gross salvage has been recorded consistently since 2012. The most recent five-year average of 4 percent gross salvage reflects recent trends of salvage value for some equipment.

The net salvage percent based on the overall period 2005 through 2019 is 56 percent negative net salvage. The range of estimates made by other electric companies for station equipment is negative 10 to negative 25 percent. The net salvage estimate for station equipment is negative 25 percent, is at the upper end of the range of estimates for other electric companies, reflects the trend to lower cost of removal and reflects the overall experience for negative net salvage for the future.

The overall net salvage estimates for the Company's production facilities, for which the life span method is used, is based on estimates of both final net salvage and interim net salvage. Final (terminal) net salvage is the net salvage experienced at the end of a production plant's life span. Interim net salvage is the net salvage experienced for interim retirements that occur prior to the final retirement of the plant. The final net salvage estimates in the study were based on industry decommissioning analyses performed by various engineering organizations. The interim net salvage estimates were based in part on analysis of historical interim retirement and net salvage data. Based on informed judgment that incorporated these interim net salvage analyses for each plant account, an interim net salvage estimate of zero to negative 10 percent was used for each steam plant account, and zero to negative 51 percent estimate was used for all other production plant accounts.

The interim survivor curve estimates for each account and production facility were used to calculate the percentage of plant expected to be retired as interim retirements and final retirements. These are shown on Table 1 in the Net Salvage Statistics section on page VIII-2. These percentages were used to determine the weighted net salvage

estimate for each account and production facility based on the interim and final net salvage estimates. These calculations, as well as the estimated final net salvage amounts and interim net salvage percents, are shown on Table 2 of the Net Salvage Statistics. Table 3 sets forth the determination of the terminal net salvage amount for each location.

The net salvage percents for the remaining accounts were based on judgment incorporating estimates of previous studies of this and other electric utilities.

Generally, the net salvage estimates for the general plant accounts were zero percent, consistent with amortization accounting.

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**PART V. CALCULATION OF ANNUAL AND  
ACCRUED DEPRECIATION**

## **PART V. CALCULATION OF ANNUAL AND ACCRUED DEPRECIATION**

### **GROUP DEPRECIATION PROCEDURES**

A group procedure for depreciation is appropriate when considering more than a single item of property. Normally the items within a group do not have identical service lives, but have lives that are dispersed over a range of time. There are two primary group procedures, namely, average service life and equal life group. In the average service life procedure, the rate of annual depreciation is based on the average life or average remaining life of the group, and this rate is applied to the surviving balances of the group's cost. A characteristic of this procedure is that the cost of plant retired prior to average life is not fully recouped at the time of retirement, whereas the cost of plant retired subsequent to average life is more than fully recouped. Over the entire life cycle, the portion of cost not recouped prior to average life is balanced by the cost recouped subsequent to average life.

#### **Single Unit of Property**

The calculation of straight line depreciation for a single unit of property is straightforward. For example, if a \$1,000 unit of property attains an age of four years and has a life expectancy of six years, the annual accrual over the total life is:

$$\frac{\$1,000}{(4 + 6)} = \$100 \text{ per year.}$$

The accrued depreciation is:

$$\$1,000 \left( 1 - \frac{6}{10} \right) = \$400.$$

### **Remaining Life Annual Accruals**

For the purpose of calculating remaining life accruals as of December 31, 2019, the depreciation reserve for each plant account is allocated among vintages in proportion to the calculated accrued depreciation for the account. Explanations of remaining life accruals and calculated accrued depreciation follow. The detailed calculations as of December 31, 2019, are set forth in the Results of Study section of the report.

### **Average Service Life Procedure**

In the average service life procedure, the remaining life annual accrual for each vintage is determined by dividing future book accruals (original cost less book reserve) by the average remaining life of the vintage. The average remaining life is a directly weighted average derived from the estimated future survivor curve in accordance with the average service life procedure.

The calculated accrued depreciation for each depreciable property group represents that portion of the depreciable cost of the group which would not be allocated to expense through future depreciation accruals, if current forecasts of life characteristics are used as the basis for such accruals. The accrued depreciation calculation consists of applying an appropriate ratio to the surviving original cost of each vintage of each account, based upon the attained age and service life. The straight line accrued depreciation ratios are calculated as follows for the average service life procedure:

$$Ratio = 1 - \frac{Average\ Remaining\ Life}{Average\ Service\ Life}$$

## CALCULATION OF ANNUAL AND ACCRUED AMORTIZATION

Amortization is the gradual extinguishment of an amount in an account by distributing such amount over a fixed period, over the life of the asset or liability to which it applies, or over the period during which it is anticipated the benefit will be realized. Normally, the distribution of the amount is in equal amounts to each year of the amortization period.

The calculation of annual and accrued amortization requires the selection of an amortization period. The amortization periods used in this report were based on judgment which incorporated a consideration of the period during which the assets will render most of their service, the amortization period and service lives used by other utilities, and the service life estimates previously used for the asset under depreciation accounting.

Amortization accounting is proposed for a number of accounts that represent numerous units of property, but a very small portion of depreciable electric plant in service. The accounts and their amortization periods are as follows:

<u>Account</u>	<u>Amortization Period, Years</u>
391 Office Furniture and Equipment	20
391.1 Office Furniture and Equipment - Peoplesoft	15
393 Stores Equipment	25
394 Tools, Shop and Garage Equipment	20
395 Laboratory Equipment	20
397 Communication Equipment	15
397.1 Communication Equipment – Energy Control System	10
398 Miscellaneous Equipment	20

For the purpose of calculating annual amortization amounts as of December 31, 2019, the book depreciation reserve for each plant account or subaccount is assigned or allocated to vintages. The book reserve assigned to vintages with an age greater than the amortization period is equal to the vintage's original cost. The remaining book reserve

is allocated among vintages with an age less than the amortization period in proportion to the calculated accrued amortization. The calculated accrued amortization is equal to the original cost multiplied by the ratio of the vintage's age to its amortization period. The annual amortization amount is determined by dividing the future amortizations (original cost less allocated book reserve) by the remaining period of amortization for the vintage.

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**PART VI. RESULTS OF STUDY**

## **PART VI. RESULTS OF STUDY**

### **QUALIFICATION OF RESULTS**

The calculated annual and accrued depreciation are the principal results of the study. Continued surveillance and periodic revisions are normally required to maintain continued use of appropriate annual depreciation accrual rates. An assumption that accrual rates can remain unchanged over a long period of time implies a disregard for the inherent variability in service lives and net salvage and for the change of the composition of property in service. The annual accrual rates were calculated in accordance with the straight line remaining life method of depreciation, using the average service life procedure based on estimates which reflect considerations of current historical evidence and expected future conditions.

The annual depreciation accrual rates are applicable specifically to the electric plant in service as of December 31, 2019. For most plant accounts, the application of such rates to future balances that reflect additions subsequent to December 31, 2019, is reasonable for a period of three to five years.

### **DESCRIPTION OF DETAILED TABULATIONS**

Table 1 sets forth a summary of the results of the study as applied to the original cost of electric plant at December 31, 2019. These results are presented on pages VI-4 through VI-8 of this report. The schedule sets forth the original cost, the book depreciation reserve, future accruals, the calculated annual depreciation rate and amount, and the composite remaining life related to electric plant.

The service life estimates were based on judgment that incorporated statistical analysis of retirement data, discussions with management and consideration of estimates made for other electric utilities. The results of the statistical analysis of service life are

presented in the section beginning on page VII-2, within the supporting documents of this report.

For each depreciable group analyzed by the retirement rate method, a chart is provided depicting the original and estimated survivor curves followed by a tabular presentation of the original life table(s) plotted on the chart. The survivor curves estimated for the depreciable groups are shown as dark smooth curves on the charts. Each smooth survivor curve is denoted by a numeral followed by the curve type designation. The numeral used is the average life derived from the entire curve from 100 percent to zero percent surviving. The titles of the chart indicate the group, the symbol used to plot the points of the original life table, and the experience and placement bands of the life tables which were plotted. The experience band indicates the range of years for which retirements were used to develop the stub survivor curve. The placements indicate, for the related experience band, the range of years of installations which appear in the experience.

The analyses of salvage data are presented in the section titled, "Net Salvage Statistics." The tabulations present annual cost of removal and salvage data, three-year moving averages and the most recent five-year average. Data are shown in dollars and as percentages of original costs retired.

The tables of the calculated annual depreciation applicable to depreciable assets as of December 31, 2019 are presented in account sequence starting on page IX-2 of the supporting documents. The tables indicate the estimated survivor curve and net salvage percent for the account and set forth, for each installation year, the original cost, the calculated accrued depreciation, the allocated book reserve, future accruals, the remaining life, and the calculated annual accrual amount.

**Exhibit EKPC-03  
Depreciation Study**

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2019**

ACCOUNT (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2019 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL AMOUNT (8)	RATE (9)=(8)/(5)	COMPOSITE REMAINING LIFE (10)=(7)/(8)
<b>ELECTRIC PLANT</b>									
<b>INTANGIBLE PLANT</b>									
303.00		10-SQ	0	2,333,311.05	1,134,520	1,198,791	266,388	11.42	4.5
				<b>2,333,311.05</b>	<b>1,134,520</b>	<b>1,198,791</b>	<b>266,388</b>	<b>11.42</b>	
<b>STEAM PRODUCTION PLANT</b>									
310.10		SQUARE	*	5,325,571.66	0	5,325,572	507,197	9.52	10.5
		SQUARE	*	480,134.08	0	480,134	45,727	9.52	10.5
		SQUARE	*	20,170,029.31	0	20,170,029	683,730	3.39	29.5
		SQUARE	*	1,050,779.86	0	1,050,780	35,620	3.39	29.5
		SQUARE	*	6,050,424.87	1,462,186	4,588,239	705,883	11.67	6.5
				33,076,939.68	1,462,186	31,614,754	1,978,157	5.98	
<b>TOTAL LAND AND LAND RIGHTS</b>									
311.00		85-S1.5	*	619,445.66	501,279	118,167	11,477	1.85	10.3
		85-S1.5	*	11,599,889.13	8,333,766	3,846,118	372,847	3.21	10.3
		85-S1.5	*	16,839,214.86	7,532,370	10,148,806	969,322	5.76	10.5
		85-S1.5	*	29,801,164.96	4,504,371	27,489,876	945,554	3.16	29.1
		85-S1.5	*	17,909,967	17,909,967	11,880,961	614,994	2.21	19.3
		85-S1.5	*	34,657,321.80	23,943,936	13,139,388	627,228	1.81	20.9
		85-S1.5	*	135,424,737.29	43,162,292	101,142,177	4,087,225	3.02	24.9
		85-S1.5	*	91,915,975.08	9,800,259	88,949,727	3,069,934	3.34	28.8
		85-S1.5	*	23,289,573.36	9,077,580	18,652,253	890,382	3.52	20.3
		85-S1.5	*	22,341,947.21	8,045,353	15,800,551	714,436	3.20	22.2
				396,431,158.27	132,741,143	290,828,054	12,303,611	3.10	
<b>TOTAL STRUCTURES AND IMPROVEMENTS</b>									
312.00		55-S0.5	*	102,794,003.59	66,700,151	41,233,553	4,110,747	4.00	10.0
		55-S0.5	*	4,819,574	4,819,574	10,887,507	1,053,970	7.05	10.3
		55-S0.5	*	14,959,125.04	320,975	1,228,886	118,541	8.03	10.4
		55-S0.5	*	1,476,057.99	86,850,257	117,008,691	11,404,356	5.87	10.3
		55-S0.5	*	194,151,378.75	47,303,061.50	39,381,544	1,487,587	3.14	26.6
		55-S0.5	*	207,072,332.59	100,727,355	120,840,041	6,574,732	3.18	18.4
		55-S0.5	*	284,954,492.52	148,127,712	135,373,595	6,886,909	2.64	19.4
		55-S0.5	*	182,163,077.56	55,645,311	139,269,182	6,110,529	3.35	22.8
		55-S0.5	*	102,930,250.29	33,139,434	299,529,356	11,408,395	3.72	19.9
		55-S0.5	*	36,988,548	36,988,548	73,146,820	3,629,676	3.40	20.2
		55-S0.5	*	157,596,866.53	57,451,408	111,179,379	5,355,461	3.40	20.0
				1,586,308,057.02	601,803,456	1,088,278,554	58,442,903	3.68	
<b>TOTAL BOILER PLANT EQUIPMENT</b>									
314.00		50-R2	*	23,714,956.78	17,101,082	7,799,623	812,009	3.42	9.9
		50-R2	*	33,699,815.29	21,499,392	14,559,410	884,400	2.62	16.6
		50-R2	*	60,137,136.60	34,021,115	30,325,621	1,606,261	2.67	18.1
		50-R2	*	80,408,959.55	25,108,153	60,929,434	2,646,915	3.29	23.6
		50-R2	*	80,239,064.25	6,017,115	79,838,684	2,860,611	3.69	27.7
				278,199,932.47	103,746,857	193,452,772	8,910,196	3.20	
<b>TOTAL TURBOGENERATOR UNITS</b>									

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2019

ACCOUNT (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2019 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL AMOUNT (8)	RATE (9)=(8)/(5)	COMPOSITE REMAINING LIFE (10)=(7)/(8)
315.00									
ACCESSORY ELECTRIC EQUIPMENT									
COOPER COMMON	2030	60-R4	*	3,362,383.45	2,657,793	872,710	86,288	2.63	9.9
COOPER UNIT 1	2030	60-R4	*	106,139.10	17,587	96,959	9,139	8.45	10.5
COOPER UNIT 2 SCRUBBER	2030	60-R4	*	106,269.09	17,606	96,077	9,150	8.45	10.5
COOPER UNIT 3 SCRUBBER	2030	60-R4	*	12,000,000.00	5,300,000	7,000,000	683,000	5.68	3.3
SPURLOCK COMMON	2040	60-R4	*	857,912.36	78,878	749,000	23,693	2.76	29.3
SPURLOCK UNIT 1	2040	60-R4	*	10,870,855.65	6,683,401	4,754,415	255,913	2.40	18.6
SPURLOCK UNIT 2	2042	60-R4	*	21,783,326.51	15,081,564	8,226,595	421,018	1.93	19.5
SPURLOCK UNIT 3	2045	60-R4	*	23,764,302.84	7,521,598	17,906,206	715,699	3.01	25.0
SPURLOCK UNIT 4	2049	60-R4	*	12,751,242.41	1,382,162	12,261,667	422,962	3.32	29.0
SPURLOCK UNIT 1 SCRUBBER	2040	60-R4	*	12,520,715.15	4,450,680	8,946,485	439,199	3.51	20.4
SPURLOCK UNIT 2 SCRUBBER	2042	60-R4	*	17,731,988.49	6,374,337	12,998,891	564,466	3.18	22.3
TOTAL ACCESSORY ELECTRIC EQUIPMENT				115,619,762.90	49,563,507	73,729,851	3,643,001	3.15	
316.00									
MISCELLANEOUS POWER PLANT EQUIPMENT									
CENTRAL LAB	2030	30-L1	*	1,111,554.26	695,769	415,785	46,409	4.18	9.0
COOPER COMMON	2030	30-L1	*	2,706,566.34	1,294,786	1,597,109	165,029	6.10	9.4
COOPER UNIT 2 SCRUBBER	2030	30-L1	*	2,139,985.18	969,395	1,277,569	134,767	6.30	9.5
SPURLOCK COMMON	2040	30-L1	*	4,774,642.05	1,942,513	3,166,354	160,210	3.77	6.30
SPURLOCK UNIT 1	2046	30-L1	*	162,562.76	127,731	3,671,611	16,978	3.82	9.7
SPURLOCK UNIT 2	2046	30-L1	*	2,149,493.65	20,469	2,129,024	16,939	0.79	20.4
SPURLOCK UNIT 3	2048	30-L1	*	3,964,220.82	272,786	3,866,930	191,731	4.84	20.7
TOTAL MISCELLANEOUS POWER PLANT EQUIPMENT				17,072,001.02	5,551,006	12,541,295	830,282	4.86	
TOTAL STEAM PRODUCTION PLANT				2,426,607,851.36	894,868,156	1,691,445,280	86,108,150	3.55	
341.00									
OTHER PRODUCTION PLANT									
STRUCTURES AND IMPROVEMENTS									
SMITH CT COMMON	2050	55-S1	*	19,634,021.23	8,079,954	12,040,088	461,876	2.36	26.1
SMITH CT UNIT 1	2034	55-S1	*	2,666,719.81	1,526,577	1,246,812	91,600	3.43	13.6
SMITH CT UNIT 2	2034	55-S1	*	2,666,719.81	1,547,030	1,226,359	90,097	3.38	13.6
SMITH CT UNIT 3	2034	55-S1	*	2,666,719.81	1,537,134	1,236,255	90,824	3.41	13.6
SMITH CT UNIT 4	2041	55-S1	*	1,937,757.41	910,073	1,051,995	56,828	2.93	19.4
SMITH CT UNIT 5	2041	55-S1	*	1,599,135.43	744,544	918,557	47,190	2.95	19.5
SMITH CT UNIT 6	2045	55-S1	*	303,524.78	111,370	204,296	8,862	2.93	23.0
SMITH CT UNIT 7	2045	55-S1	*	303,524.78	111,368	204,288	8,862	2.93	23.0
SMITH CT UNIT 9	2060	55-S1	*	4,500,637.37	883,169	3,797,464	157,706	3.08	27.6
SMITH CT UNIT 10	2038	55-S1	*	1,189,860.90	635,659	1,104,804	57,693	3.37	17.2
GREEN VALLEY LANDFILL	2038	55-S1	*	1,110,800.00	485,454	646,804	37,693	3.37	17.2
LAUREL RIDGE LANDFILL	2038	55-S1	*	1,200,486.53	531,124	683,372	40,406	3.37	17.2
BAVARIAN LANDFILL	2038	55-S1	*	1,135,966.24	502,579	656,107	38,235	3.29	17.2
PEARL HOLLOW LANDFILL	2041	55-S1	*	1,465,228.09	534,890	959,643	48,151	3.29	19.9
PENDLETON COUNTY LANDFILL	2042	55-S1	*	2,033,652.36	141,041	1,933,284	88,263	4.34	21.9
BLUEGRASS OLDHAM COMMON	2042	55-S1	*	7,229,721.64	3,246,262	4,344,946	200,136	2.77	21.9
BLUEGRASS OLDHAM UNIT 1	2042	55-S1	*	933,680.40	448,838	531,526	24,483	2.62	21.9
BLUEGRASS OLDHAM UNIT 2	2042	55-S1	*	933,680.40	444,133	536,231	24,700	2.62	21.9
BLUEGRASS OLDHAM UNIT 3	2042	55-S1	*	933,680.40	448,802	531,562	24,485	2.62	21.9
COOPERATIVE SOLAR	2042	55-S1	*	625,892.00	55,403	576,738	26,347	4.21	21.9
TOTAL STRUCTURES AND IMPROVEMENTS				53,879,446.86	22,321,752	33,459,960	1,549,325	2.88	
342.00									
FUEL HOLDERS, PRODUCERS AND ACCESSORIES									
SMITH CT COMMON	2050	50-S2.5	*	13,766,120.51	6,102,453	8,076,671	307,631	2.23	26.7
SMITH CT UNIT 9	2046	50-S2.5	*	70,051.65	28,326	46,529	1,970	2.81	26.7
SMITH CT UNIT 10	2046	50-S2.5	*	2,384,532.85	464,445	2,015,459	70,594	2.96	26.7
SMITH CT UNIT 1	2050	50-S2.5	*	2,116,650.59	551,382	1,649,935	57,791	2.73	26.7
SMITH CT UNIT 2	2050	50-S2.5	*	1,062,294.19	47,199	61,221	3,475	3.27	26.7
LAUREL RIDGE LANDFILL	2038	50-S2.5	*	357,670.24	158,822	206,002	11,691	3.27	17.6
BAVARIAN LANDFILL	2038	50-S2.5	*	1,162,203.57	513,184	707,130	31,781	3.27	17.6
BLUEGRASS OLDHAM COMMON	2042	50-S2.5	*	20,033,575.25	7,890,120	12,809,481	486,903	2.43	22.3
TOTAL FUEL HOLDERS, PRODUCERS AND ACCESSORIES									



**Exhibit EKPC-03  
Depreciation Study**

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2019**

ACCOUNT (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2019 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE ACCRUALS (7)	ANNUAL ACCRUAL AMOUNT (8)	RATE (9)=(8)/(5)	COMPOSITE REMAINING LIFE (10)=(7)/(8)
346.00	MISCELLANEOUS POWER PLANT EQUIPMENT								
	SMITH CT COMMON								
	2038	40-S2.5	(3)	15,528,635.62	4,517,088	11,177,407	439,927	2.83	26.1
	2038	40-S2.5	(2)	91,233.04	39,894	51,124	3,194	3.50	16.6
	2038	40-S2.5	(2)	169,465.00	109,465	60,000	4,500	2.66	16.0
	2041	40-S2.5	(2)	60,998.54	34,294	26,704	2,092	3.43	16.4
	2042	40-S2.5	(2)	63,886.20	24,158	41,016	2,135	3.34	19.2
	2042	40-S2.5	(2)	141,983.37	29,284	115,549	5,398	3.80	21.4
	TOTAL MISCELLANEOUS POWER PLANT EQUIPMENT			15,990,208.41	4,662,043	11,803,256	457,301	2.86	
	<b>TOTAL OTHER PRODUCTION PLANT</b>			<b>639,379,853.03</b>	<b>251,804,012</b>	<b>413,035,433</b>	<b>18,376,213</b>	<b>2.87</b>	
	<b>TRANSMISSION PLANT</b>								
353.00	STATION EQUIPMENT								
353.10	STATION EQUIPMENT - ENERGY CONTROL SYSTEM								
354.00	TOWERS AND FIXTURES								
355.00	POLES AND FIXTURES								
356.00	OVERHEAD CONDUCTORS AND DEVICES								
359.00	ROADS AND TRAILS								
	<b>TOTAL TRANSMISSION PLANT</b>			<b>588,896,570.85</b>	<b>196,616,761</b>	<b>644,136,134</b>	<b>15,271,844</b>	<b>2.59</b>	
	<b>DISTRIBUTION PLANT</b>								
362.00	STATION EQUIPMENT								
362.10	STATION EQUIPMENT - SCADA								
366.00	LINE TRANSFORMERS								
	<b>TOTAL DISTRIBUTION PLANT</b>			<b>238,391,641.92</b>	<b>90,309,866</b>	<b>170,954,334</b>	<b>5,983,284</b>	<b>2.51</b>	
	<b>GENERAL PLANT</b>								
390.00	STRUCTURES AND IMPROVEMENTS								
391.00	OFFICE FURNITURE AND EQUIPMENT								
	FULLY ACCRUED								
	AMORTIZED								
	<b>TOTAL OFFICE FURNITURE AND EQUIPMENT</b>			<b>11,317,709.69</b>	<b>4,737,665</b>	<b>6,580,045</b>	<b>465,074</b>	<b>4.11</b>	
391.10	OFFICE FURNITURE AND EQUIPMENT - PEOPLESOF								
	FULLY ACCRUED								
	AMORTIZED								
	<b>TOTAL OFFICE FURNITURE AND EQUIPMENT - PEOPLESOF</b>			<b>2,771,805.14</b>	<b>2,771,805</b>	<b>7,077,637</b>	<b>0</b>	<b>-</b>	<b>7</b>
392.00	TRANSPORTATION EQUIPMENT								
393.00	STORES EQUIPMENT								
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT								
	FULLY ACCRUED								
	AMORTIZED								
	<b>TOTAL TOOLS, SHOP AND GARAGE EQUIPMENT</b>			<b>2,313,149.79</b>	<b>1,374,673</b>	<b>938,476</b>	<b>77,077</b>	<b>3.33</b>	
395.00	LABORATORY EQUIPMENT								
	FULLY ACCRUED								
	AMORTIZED								
	<b>TOTAL LABORATORY EQUIPMENT</b>			<b>1,251,278.95</b>	<b>1,251,279</b>	<b>2,486,038</b>	<b>0</b>	<b>-</b>	<b>12.3</b>
396.00	POWER OPERATED EQUIPMENT								
	<b>TOTAL LABORATORY EQUIPMENT</b>			<b>5,311,175.70</b>	<b>2,815,138</b>	<b>2,486,038</b>	<b>203,000</b>	<b>3.82</b>	
	<b>POWER OPERATED EQUIPMENT</b>			<b>20,685,598.48</b>	<b>13,562,128</b>	<b>7,123,470</b>	<b>416,907</b>	<b>2.02</b>	

**Exhibit EKPC-03  
Depreciation Study**

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2019**

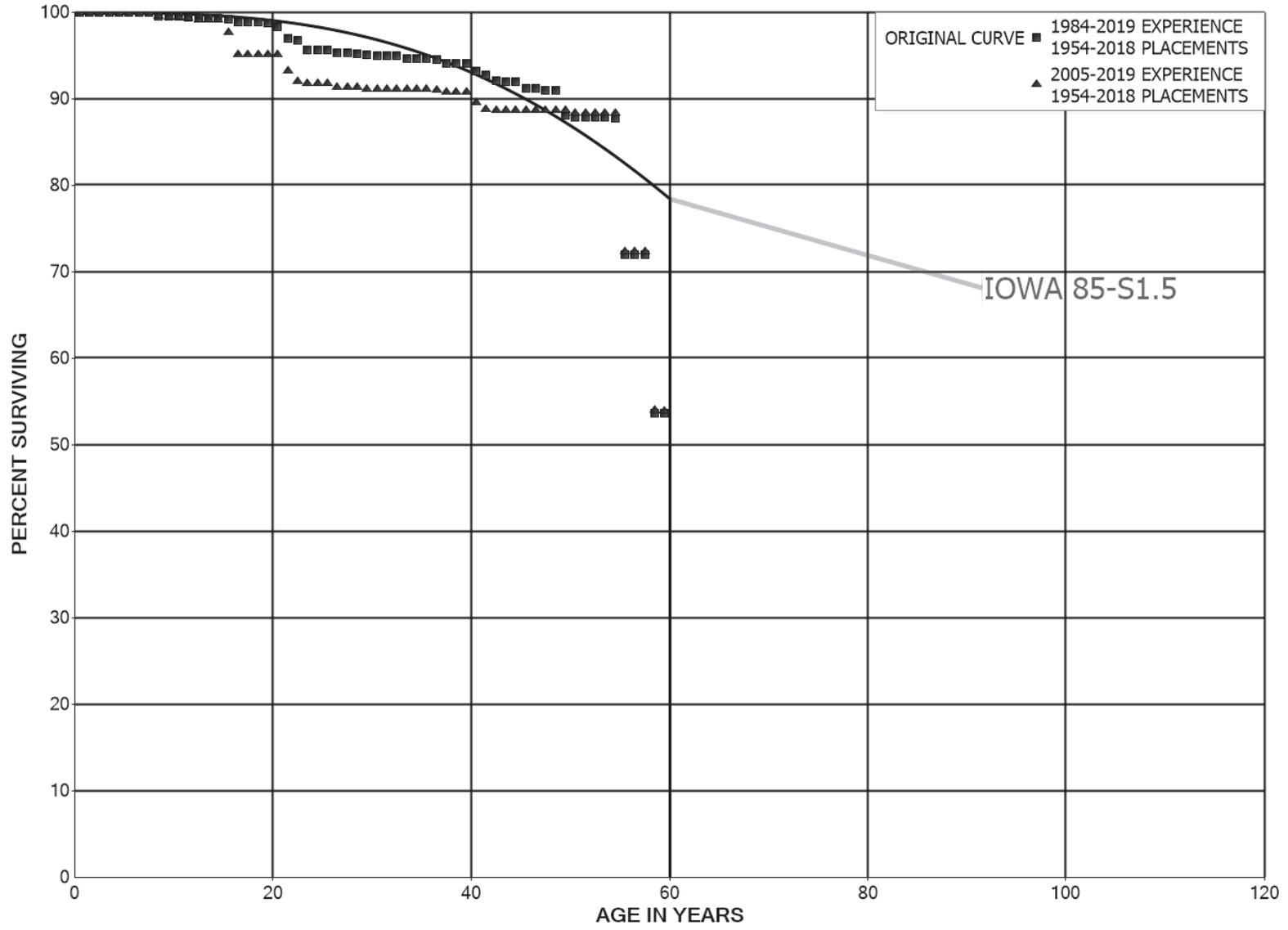
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)=(8)/(5)	(10)=(7)/(8)
	ACCOUNT	PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	ORIGINAL COST AS OF DECEMBER 31, 2019	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)=(8)/(5)	(10)=(7)/(8)
397.00	COMMUNICATION EQUIPMENT FULLY ACCRUED AMORTIZED		15-SQ	0	23,276,736.88 23,514,697.87	23,276,737 8,867,518	0 14,847,180	0 1,569,449	- 6.67	- 9.5
	TOTAL COMMUNICATION EQUIPMENT				46,791,434.75	31,944,255	14,847,180	1,569,449	3.35	
397.10	COMMUNICATION EQUIPMENT - ENERGY CONTROL SYSTEM		FULLY ACCRUED		642,538.48	642,538	0	0	-	**
398.00	MISCELLANEOUS EQUIPMENT FULLY ACCRUED		20-SQ	0	413,882.29 2,014,590.63	413,882 918,854	0 1,095,737	0 100,721	- 5.00	- 10.9
	TOTAL MISCELLANEOUS EQUIPMENT				2,428,472.92	1,332,736	1,095,737	100,721	4.15	
	<b>TOTAL GENERAL PLANT</b>				<b>141,393,195.88</b>	<b>85,489,035</b>	<b>55,894,160</b>	<b>4,896,678</b>	<b>3.63</b>	
	<b>RESERVE ADJUSTMENT FOR AMORTIZATION</b>									
391.00	OFFICE FURNITURE AND EQUIPMENT					1,216,907		(121,691) ***		
391.10	OFFICE FURNITURE AND EQUIPMENT - PEOPLESOF					6,179,000		(617,900) ***		
393.00	STORES EQUIPMENT					31,577		(3,158) ***		
394.00	TOOLS, SHOP, AND GARAGE EQUIPMENT					424,910		(42,491) ***		
395.00	LABORATORY EQUIPMENT					735,653		(73,565) ***		
397.00	COMMUNICATION EQUIPMENT					9,419,253		(941,925) ***		
398.00	MISCELLANEOUS EQUIPMENT					1,095,737		(109,574) ***		
	<b>TOTAL RESERVE ADJUSTMENT FOR AMORTIZATION</b>					<b>19,103,037</b>		<b>(1,910,304)</b>		
	<b>TOTAL DEPRECIABLE PLANT</b>				<b>4,037,004,423.89</b>	<b>1,539,337,387</b>	<b>2,976,664,132</b>	<b>129,064,263</b>	<b>3.20</b>	
	<b>NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED</b>									
301.00	ORGANIZATION				5,040.43					
310.00	LAND				6,916,766.14					
340.00	LAND				5,964,033.69					
350.00	LAND				5,771,327.60					
360.00	LAND AND LAND RIGHTS				55,184,463.42					
370.00	LAND				10,145,231.82					
380.00	LAND				1,381,311.82					
388.10	LAND AND LAND RIGHTS				454,290.86					
	<b>TOTAL NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED</b>				<b>86,227,372.19</b>					
	<b>TOTAL ELECTRIC PLANT</b>				<b>4,123,331,796.08</b>					

\* LIFE SPAN PROCEDURE USED. CURVE SHOWN IS INTERIM SURVIVOR CURVE.  
 \*\* NEW ADDITIONS WILL UTILIZE A 10% DEPRECIATION RATE BASED ON A 10-SQ SURVIVOR CURVE AND 0% NET SALVAGE.  
 \*\*\* 10-YEAR AMORTIZATION OF RESERVE ADJUSTMENT RELATED TO IMPLEMENTATION OF AMORTIZATION ACCOUNTING.

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## **PART VII. SERVICE LIFE STATISTICS**

EAST KENTUCKY POWER COOPERATIVE, INC.  
 ACCOUNT 311.00 STRUCTURES AND IMPROVEMENTS  
 ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 311.00 STRUCTURES AND IMPROVEMENTS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1954-2018

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	331,373,309	34	0.0000	1.0000	100.00
0.5	342,482,753	623	0.0000	1.0000	100.00
1.5	375,244,976	6,656	0.0000	1.0000	100.00
2.5	373,641,188	1,535	0.0000	1.0000	100.00
3.5	383,744,543	16,551	0.0000	1.0000	100.00
4.5	383,922,796	130,646	0.0003	0.9997	99.99
5.5	383,963,877	192,024	0.0005	0.9995	99.96
6.5	383,224,335	11,376	0.0000	1.0000	99.91
7.5	361,380,659	1,255,946	0.0035	0.9965	99.91
8.5	347,940,338	282,805	0.0008	0.9992	99.56
9.5	345,878,654	12,175	0.0000	1.0000	99.48
10.5	217,663,751	101,005	0.0005	0.9995	99.47
11.5	217,128,926	299,585	0.0014	0.9986	99.43
12.5	216,732,247	2,656	0.0000	1.0000	99.29
13.5	216,158,464	40,592	0.0002	0.9998	99.29
14.5	81,557,431	110,690	0.0014	0.9986	99.27
15.5	81,325,086	215,808	0.0027	0.9973	99.14
16.5	80,155,827	10,453	0.0001	0.9999	98.87
17.5	81,875,099	63,023	0.0008	0.9992	98.86
18.5	81,755,856	86,910	0.0011	0.9989	98.78
19.5	80,735,228	287,733	0.0036	0.9964	98.68
20.5	80,183,379	1,097,978	0.0137	0.9863	98.33
21.5	79,089,227	219,998	0.0028	0.9972	96.98
22.5	79,472,343	870,090	0.0109	0.9891	96.71
23.5	78,360,236	21,506	0.0003	0.9997	95.65
24.5	78,016,489	8,497	0.0001	0.9999	95.63
25.5	68,155,174	253,147	0.0037	0.9963	95.62
26.5	66,621,366	7,539	0.0001	0.9999	95.26
27.5	66,412,260	32,784	0.0005	0.9995	95.25
28.5	66,379,824	132,702	0.0020	0.9980	95.20
29.5	68,854,111	38,806	0.0006	0.9994	95.01
30.5	68,662,427	21,311	0.0003	0.9997	94.96
31.5	68,586,123	11,450	0.0002	0.9998	94.93
32.5	67,231,863	181,125	0.0027	0.9973	94.91
33.5	66,822,719	4,729	0.0001	0.9999	94.66
34.5	66,358,966	39,289	0.0006	0.9994	94.65
35.5	66,079,238	62,571	0.0009	0.9991	94.60
36.5	65,997,741	336,332	0.0051	0.9949	94.51
37.5	33,489,260	18	0.0000	1.0000	94.02
38.5	33,412,148	2,579	0.0001	0.9999	94.02

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 311.00 STRUCTURES AND IMPROVEMENTS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1954-2018			EXPERIENCE BAND 1984-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	11,209,632	103,161	0.0092	0.9908	94.02
40.5	11,012,979	55,512	0.0050	0.9950	93.15
41.5	10,759,325	71,870	0.0067	0.9933	92.68
42.5	10,687,455	7,096	0.0007	0.9993	92.06
43.5	10,622,576	31	0.0000	1.0000	92.00
44.5	10,619,932	90,736	0.0085	0.9915	92.00
45.5	10,529,196	2,427	0.0002	0.9998	91.22
46.5	10,526,454	23,796	0.0023	0.9977	91.19
47.5	10,502,658	40	0.0000	1.0000	90.99
48.5	10,502,618	343,599	0.0327	0.9673	90.99
49.5	7,273,179	14,552	0.0020	0.9980	88.01
50.5	7,258,627		0.0000	1.0000	87.84
51.5	7,258,627		0.0000	1.0000	87.84
52.5	7,256,479	2,485	0.0003	0.9997	87.84
53.5	3,896,985	3,440	0.0009	0.9991	87.81
54.5	3,893,545	701,846	0.1803	0.8197	87.73
55.5	3,191,699		0.0000	1.0000	71.91
56.5	3,191,699		0.0000	1.0000	71.91
57.5	3,191,699	810,646	0.2540	0.7460	71.91
58.5	2,381,053	3,405	0.0014	0.9986	53.65
59.5	2,377,648	737	0.0003	0.9997	53.57
60.5	2,376,911	298	0.0001	0.9999	53.56
61.5	2,376,612	2,376,612	1.0000		53.55
62.5					

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 311.00 STRUCTURES AND IMPROVEMENTS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1954-2018			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	320,659,326		0.0000	1.0000	100.00
0.5	321,172,993		0.0000	1.0000	100.00
1.5	321,702,815		0.0000	1.0000	100.00
2.5	321,977,055		0.0000	1.0000	100.00
3.5	308,809,720		0.0000	1.0000	100.00
4.5	309,934,143	121,316	0.0004	0.9996	100.00
5.5	310,044,833	188,915	0.0006	0.9994	99.96
6.5	309,305,730		0.0000	1.0000	99.90
7.5	287,492,550	1,250,483	0.0043	0.9957	99.90
8.5	274,348,382	280,049	0.0010	0.9990	99.47
9.5	272,705,035		0.0000	1.0000	99.36
10.5	144,817,288	98,836	0.0007	0.9993	99.36
11.5	145,695,696	299,440	0.0021	0.9979	99.30
12.5	145,515,841		0.0000	1.0000	99.09
13.5	141,850,705	24,674	0.0002	0.9998	99.09
14.5	7,460,598	107,883	0.0145	0.9855	99.07
15.5	7,390,113	196,879	0.0266	0.9734	97.64
16.5	6,307,550		0.0000	1.0000	95.04
17.5	5,834,609		0.0000	1.0000	95.04
18.5	6,006,408		0.0000	1.0000	95.04
19.5	5,535,481		0.0000	1.0000	95.04
20.5	5,525,155	106,782	0.0193	0.9807	95.04
21.5	16,214,623	216,478	0.0134	0.9866	93.20
22.5	47,993,077	126,493	0.0026	0.9974	91.96
23.5	47,719,174	14,258	0.0003	0.9997	91.72
24.5	69,898,868		0.0000	1.0000	91.69
25.5	59,308,923	239,480	0.0040	0.9960	91.69
26.5	57,983,012		0.0000	1.0000	91.32
27.5	57,783,144	29,457	0.0005	0.9995	91.32
28.5	57,908,903	128,771	0.0022	0.9978	91.27
29.5	57,642,941		0.0000	1.0000	91.07
30.5	57,495,827	2,170	0.0000	1.0000	91.07
31.5	57,438,980	8,743	0.0002	0.9998	91.07
32.5	56,087,426		0.0000	1.0000	91.05
33.5	55,859,406	4,716	0.0001	0.9999	91.05
34.5	58,283,527	17,512	0.0003	0.9997	91.05
35.5	58,025,576	62,425	0.0011	0.9989	91.02
36.5	57,944,226	93,888	0.0016	0.9984	90.92
37.5	25,680,337		0.0000	1.0000	90.77
38.5	28,974,804	2,553	0.0001	0.9999	90.77

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

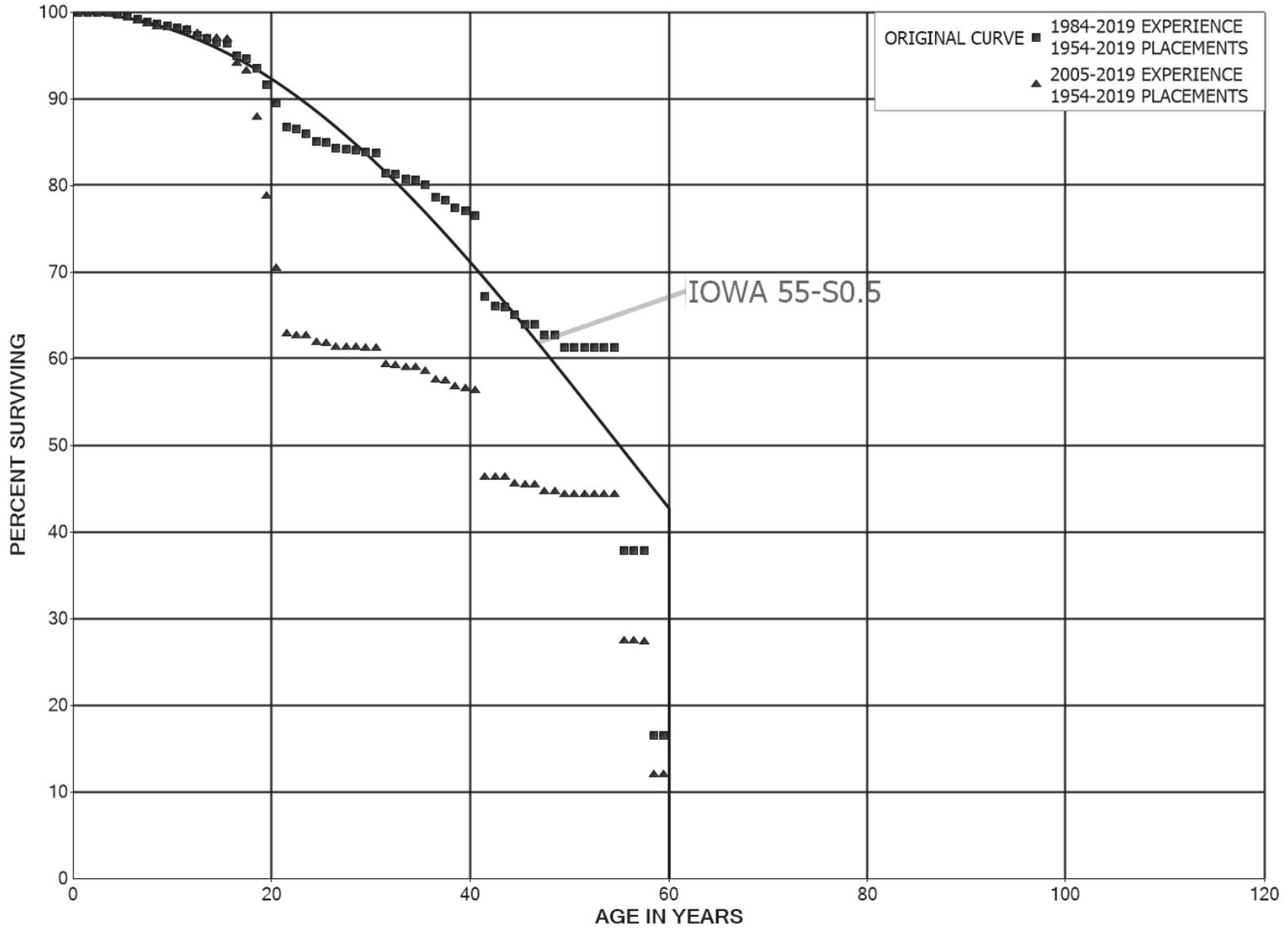
ACCOUNT 311.00 STRUCTURES AND IMPROVEMENTS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1954-2018			EXPERIENCE BAND 2005-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	6,772,314	97,433	0.0144	0.9856	90.76	
40.5	6,581,389	55,205	0.0084	0.9916	89.46	
41.5	6,330,527	5,763	0.0009	0.9991	88.71	
42.5	6,328,204		0.0000	1.0000	88.63	
43.5	6,972,268		0.0000	1.0000	88.63	
44.5	6,969,655		0.0000	1.0000	88.63	
45.5	6,969,655	2,019	0.0003	0.9997	88.63	
46.5	7,777,967		0.0000	1.0000	88.60	
47.5	7,781,371		0.0000	1.0000	88.60	
48.5	7,782,108		0.0000	1.0000	88.60	
49.5	4,896,566	14,552	0.0030	0.9970	88.60	
50.5	7,258,627		0.0000	1.0000	88.34	
51.5	7,258,627		0.0000	1.0000	88.34	
52.5	7,256,479	2,485	0.0003	0.9997	88.34	
53.5	3,896,985	3,440	0.0009	0.9991	88.31	
54.5	3,893,545	701,846	0.1803	0.8197	88.23	
55.5	3,191,699		0.0000	1.0000	72.33	
56.5	3,191,699		0.0000	1.0000	72.33	
57.5	3,191,699	810,646	0.2540	0.7460	72.33	
58.5	2,381,053	3,405	0.0014	0.9986	53.96	
59.5	2,377,648	737	0.0003	0.9997	53.88	
60.5	2,376,911	298	0.0001	0.9999	53.86	
61.5	2,376,612	2,376,612	1.0000		53.86	
62.5						

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 312.00 BOILER PLANT EQUIPMENT  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 312.00 BOILER PLANT EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1954-2019

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	1,446,692,235	128,130	0.0001	0.9999	100.00
0.5	1,523,685,588	179,328	0.0001	0.9999	99.99
1.5	1,679,290,799	263,231	0.0002	0.9998	99.98
2.5	1,659,788,495	944,140	0.0006	0.9994	99.96
3.5	1,704,041,466	3,244,938	0.0019	0.9981	99.91
4.5	1,670,648,623	3,537,997	0.0021	0.9979	99.72
5.5	1,644,846,648	6,085,168	0.0037	0.9963	99.51
6.5	1,618,364,162	5,283,582	0.0033	0.9967	99.14
7.5	1,392,169,916	2,952,549	0.0021	0.9979	98.81
8.5	1,375,746,755	3,307,254	0.0024	0.9976	98.60
9.5	1,368,299,207	2,632,715	0.0019	0.9981	98.37
10.5	806,443,846	1,724,394	0.0021	0.9979	98.18
11.5	773,622,361	5,139,997	0.0066	0.9934	97.97
12.5	763,717,074	3,201,979	0.0042	0.9958	97.32
13.5	756,247,979	2,782,176	0.0037	0.9963	96.91
14.5	589,046,296	741,327	0.0013	0.9987	96.55
15.5	585,535,485	8,638,236	0.0148	0.9852	96.43
16.5	449,866,073	1,867,276	0.0042	0.9958	95.01
17.5	388,290,086	4,605,234	0.0119	0.9881	94.61
18.5	379,204,711	7,801,738	0.0206	0.9794	93.49
19.5	365,917,755	8,148,953	0.0223	0.9777	91.57
20.5	357,396,381	11,010,913	0.0308	0.9692	89.53
21.5	346,386,798	1,068,396	0.0031	0.9969	86.77
22.5	349,208,535	2,223,056	0.0064	0.9936	86.50
23.5	342,418,043	3,723,841	0.0109	0.9891	85.95
24.5	338,175,089	138,058	0.0004	0.9996	85.02
25.5	239,085,646	2,079,352	0.0087	0.9913	84.98
26.5	236,933,928	169,705	0.0007	0.9993	84.24
27.5	236,556,865	423,561	0.0018	0.9982	84.18
28.5	235,159,488	507,973	0.0022	0.9978	84.03
29.5	237,316,248	331,618	0.0014	0.9986	83.85
30.5	235,437,263	6,576,549	0.0279	0.9721	83.73
31.5	228,491,377	269,139	0.0012	0.9988	81.40
32.5	226,862,607	1,568,877	0.0069	0.9931	81.30
33.5	224,637,965	332,338	0.0015	0.9985	80.74
34.5	224,211,935	1,563,805	0.0070	0.9930	80.62
35.5	222,509,169	3,857,593	0.0173	0.9827	80.06
36.5	218,297,734	942,131	0.0043	0.9957	78.67
37.5	79,914,794	952,690	0.0119	0.9881	78.33
38.5	78,617,929	282,022	0.0036	0.9964	77.39

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 312.00 BOILER PLANT EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1954-2019			EXPERIENCE BAND 1984-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	35,008,803	290,143	0.0083	0.9917	77.12
40.5	34,095,154	4,168,734	0.1223	0.8777	76.48
41.5	29,926,421	474,704	0.0159	0.9841	67.13
42.5	29,451,717	72,990	0.0025	0.9975	66.06
43.5	29,222,626	386,073	0.0132	0.9868	65.90
44.5	28,803,636	467,622	0.0162	0.9838	65.03
45.5	28,241,153	10,368	0.0004	0.9996	63.97
46.5	27,317,745	500,152	0.0183	0.9817	63.95
47.5	26,802,029	4,456	0.0002	0.9998	62.78
48.5	26,797,574	620,223	0.0231	0.9769	62.77
49.5	15,784,786	12,515	0.0008	0.9992	61.31
50.5	15,738,431		0.0000	1.0000	61.27
51.5	15,737,114		0.0000	1.0000	61.27
52.5	15,701,722	3,561	0.0002	0.9998	61.27
53.5	9,162,943	1,056	0.0001	0.9999	61.25
54.5	9,161,887	3,496,616	0.3816	0.6184	61.24
55.5	5,665,272	645	0.0001	0.9999	37.87
56.5	5,664,627	4,947	0.0009	0.9991	37.87
57.5	5,659,680	3,184,374	0.5626	0.4374	37.83
58.5	2,475,305	2,384	0.0010	0.9990	16.55
59.5	2,452,534	1,159	0.0005	0.9995	16.53
60.5	2,451,375	2,984	0.0012	0.9988	16.52
61.5	2,448,392	2,448,392	1.0000		16.50
62.5					

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 312.00 BOILER PLANT EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1954-2019

EXPERIENCE BAND 2005-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	1,160,261,059	75,210	0.0001	0.9999	100.00
0.5	1,159,148,932	8,066	0.0000	1.0000	99.99
1.5	1,286,316,709	27,805	0.0000	1.0000	99.99
2.5	1,338,605,386	751,086	0.0006	0.9994	99.99
3.5	1,334,703,270	3,046,176	0.0023	0.9977	99.93
4.5	1,307,040,475	3,213,073	0.0025	0.9975	99.71
5.5	1,282,658,750	5,951,643	0.0046	0.9954	99.46
6.5	1,259,874,048	4,999,141	0.0040	0.9960	99.00
7.5	1,041,201,846	2,899,954	0.0028	0.9972	98.61
8.5	1,029,136,658	2,012,723	0.0020	0.9980	98.33
9.5	1,028,156,167	675,265	0.0007	0.9993	98.14
10.5	496,044,653	514,093	0.0010	0.9990	98.08
11.5	464,825,937	2,463,040	0.0053	0.9947	97.97
12.5	457,779,960	2,309,000	0.0050	0.9950	97.45
13.5	439,206,271	293,775	0.0007	0.9993	96.96
14.5	275,556,928	71,842	0.0003	0.9997	96.90
15.5	274,488,456	7,954,958	0.0290	0.9710	96.87
16.5	139,881,473	1,385,448	0.0099	0.9901	94.07
17.5	72,377,345	4,118,533	0.0569	0.9431	93.13
18.5	64,434,437	6,710,827	0.1041	0.8959	87.83
19.5	52,608,833	5,508,525	0.1047	0.8953	78.69
20.5	47,226,814	5,069,076	0.1073	0.8927	70.45
21.5	117,369,760	491,019	0.0042	0.9958	62.89
22.5	264,168,674	147,273	0.0006	0.9994	62.62
23.5	261,165,535	3,305,166	0.0127	0.9873	62.59
24.5	305,321,118	80,114	0.0003	0.9997	61.80
25.5	203,076,888	1,529,893	0.0075	0.9925	61.78
26.5	202,135,520	60,727	0.0003	0.9997	61.31
27.5	202,120,155	52,441	0.0003	0.9997	61.30
28.5	201,365,419	448,840	0.0022	0.9978	61.28
29.5	202,550,294	4,970	0.0000	1.0000	61.14
30.5	201,092,819	6,213,902	0.0309	0.9691	61.14
31.5	197,173,775	265,966	0.0013	0.9987	59.25
32.5	195,633,983	642,642	0.0033	0.9967	59.17
33.5	194,358,328	115,901	0.0006	0.9994	58.98
34.5	205,243,978	1,394,458	0.0068	0.9932	58.94
35.5	203,744,399	3,666,453	0.0180	0.9820	58.54
36.5	199,729,346	361,700	0.0018	0.9982	57.49
37.5	61,962,229	664,077	0.0107	0.9893	57.38
38.5	67,721,204	254,293	0.0038	0.9962	56.77

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

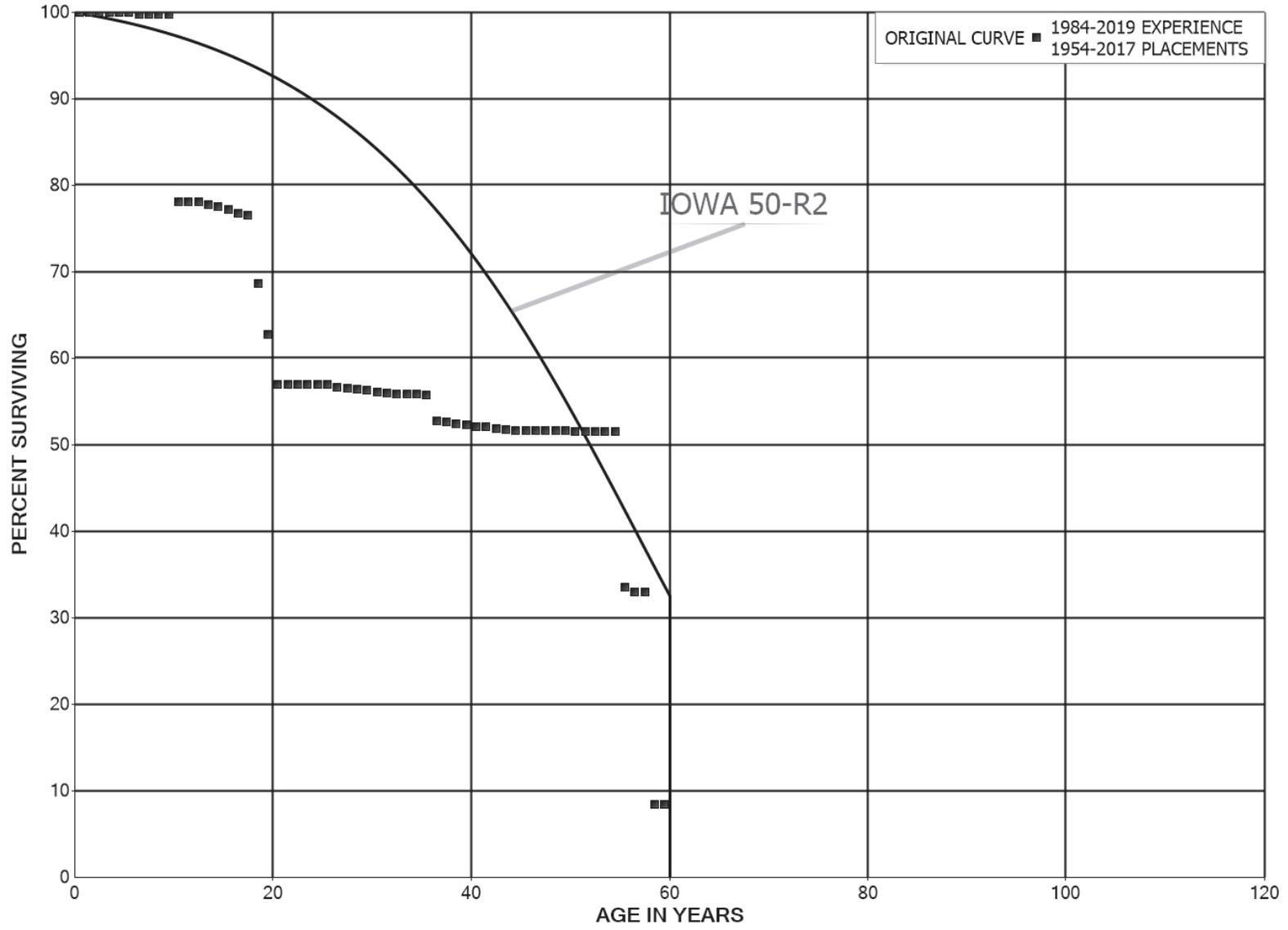
ACCOUNT 312.00 BOILER PLANT EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1954-2019			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	24,139,808	119,538	0.0050	0.9950	56.56
40.5	23,396,764	4,154,343	0.1776	0.8224	56.28
41.5	19,245,982		0.0000	1.0000	46.28
42.5	19,247,038	1,732	0.0001	0.9999	46.28
43.5	22,585,821	385,372	0.0171	0.9829	46.28
44.5	22,188,565	22,752	0.0010	0.9990	45.49
45.5	22,075,898		0.0000	1.0000	45.44
46.5	24,347,232	466,082	0.0191	0.9809	45.44
47.5	23,867,971	3,925	0.0002	0.9998	44.57
48.5	23,865,205	142,330	0.0060	0.9940	44.57
49.5	13,333,294	9,414	0.0007	0.9993	44.30
50.5	15,738,431		0.0000	1.0000	44.27
51.5	15,737,114		0.0000	1.0000	44.27
52.5	15,701,722	3,561	0.0002	0.9998	44.27
53.5	9,162,943	1,056	0.0001	0.9999	44.26
54.5	9,161,887	3,496,616	0.3816	0.6184	44.25
55.5	5,665,272	645	0.0001	0.9999	27.36
56.5	5,664,627	4,947	0.0009	0.9991	27.36
57.5	5,659,680	3,184,374	0.5626	0.4374	27.34
58.5	2,475,305	2,384	0.0010	0.9990	11.96
59.5	2,452,534	1,159	0.0005	0.9995	11.94
60.5	2,451,375	2,984	0.0012	0.9988	11.94
61.5	2,448,392	2,448,392	1.0000		11.92
62.5					

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 314.00 TURBOGENERATOR UNITS  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 314.00 TURBOGENERATOR UNITS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1954-2017

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	287,574,152	491	0.0000	1.0000	100.00
0.5	287,594,850	2,899	0.0000	1.0000	100.00
1.5	326,100,552	6,517	0.0000	1.0000	100.00
2.5	323,840,149	10	0.0000	1.0000	100.00
3.5	345,443,928	1,677	0.0000	1.0000	100.00
4.5	343,078,498	3,005	0.0000	1.0000	100.00
5.5	343,075,493	1,033,445	0.0030	0.9970	100.00
6.5	342,009,448	14,718	0.0000	1.0000	99.69
7.5	340,822,489	4,312	0.0000	1.0000	99.69
8.5	340,818,177	13,968	0.0000	1.0000	99.69
9.5	340,551,650	73,776,163	0.2166	0.7834	99.68
10.5	206,988,730	3,040	0.0000	1.0000	78.09
11.5	202,166,091	422	0.0000	1.0000	78.09
12.5	201,498,740	868,016	0.0043	0.9957	78.09
13.5	209,007,958	739,553	0.0035	0.9965	77.75
14.5	134,216,021	438,075	0.0033	0.9967	77.48
15.5	133,779,126	929,575	0.0069	0.9931	77.22
16.5	129,662,070	295,305	0.0023	0.9977	76.69
17.5	134,863,199	13,997,118	0.1038	0.8962	76.51
18.5	120,866,081	10,253,532	0.0848	0.9152	68.57
19.5	105,353,578	9,666,363	0.0918	0.9082	62.75
20.5	95,687,215	6,647	0.0001	0.9999	57.00
21.5	81,965,625	491	0.0000	1.0000	56.99
22.5	83,324,705	11,375	0.0001	0.9999	56.99
23.5	76,631,601	604	0.0000	1.0000	56.98
24.5	76,630,996	77,415	0.0010	0.9990	56.98
25.5	78,456,923	375,805	0.0048	0.9952	56.93
26.5	78,082,483	203,114	0.0026	0.9974	56.65
27.5	77,879,369	191,886	0.0025	0.9975	56.51
28.5	77,046,108	46,539	0.0006	0.9994	56.37
29.5	77,585,131	305,499	0.0039	0.9961	56.33
30.5	77,183,801	162,534	0.0021	0.9979	56.11
31.5	77,021,267	213,017	0.0028	0.9972	55.99
32.5	76,555,803	40,860	0.0005	0.9995	55.84
33.5	76,514,943	9,041	0.0001	0.9999	55.81
34.5	76,505,902	166,202	0.0022	0.9978	55.80
35.5	76,324,743	3,996,880	0.0524	0.9476	55.68
36.5	72,327,863	132,964	0.0018	0.9982	52.76
37.5	37,697,887	160,938	0.0043	0.9957	52.67
38.5	37,486,521	96,145	0.0026	0.9974	52.44

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

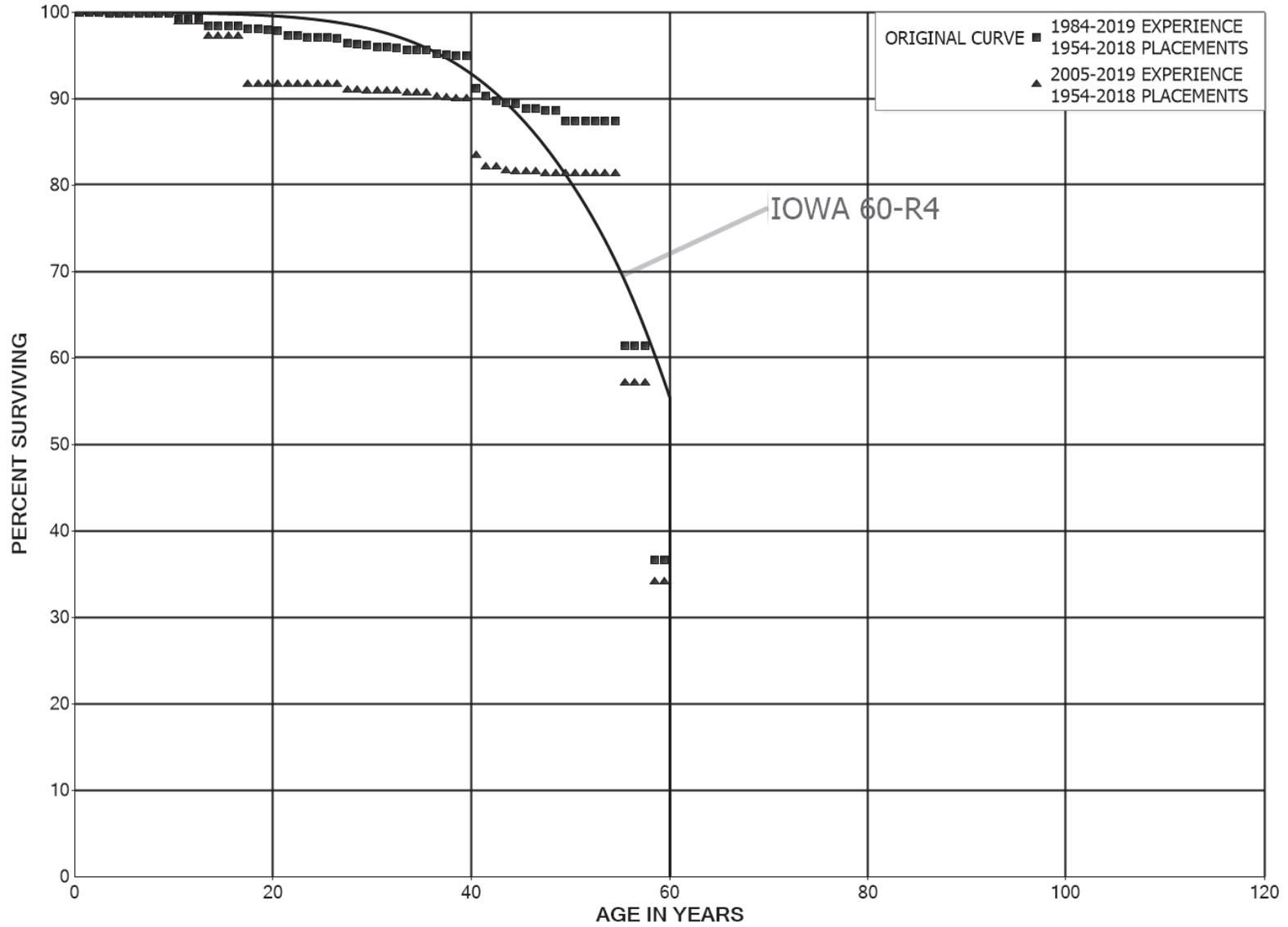
ACCOUNT 314.00 TURBOGENERATOR UNITS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1954-2017			EXPERIENCE BAND 1984-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	16,151,985	83,841	0.0052	0.9948	52.31	
40.5	15,977,961	50	0.0000	1.0000	52.04	
41.5	15,977,911	71,423	0.0045	0.9955	52.04	
42.5	15,906,488	29,875	0.0019	0.9981	51.80	
43.5	15,868,390	31,740	0.0020	0.9980	51.71	
44.5	15,836,650	777	0.0000	1.0000	51.60	
45.5	15,835,873	1	0.0000	1.0000	51.60	
46.5	15,835,873		0.0000	1.0000	51.60	
47.5	15,829,511		0.0000	1.0000	51.60	
48.5	15,829,511	281	0.0000	1.0000	51.60	
49.5	8,231,794	13,192	0.0016	0.9984	51.60	
50.5	8,218,602		0.0000	1.0000	51.52	
51.5	8,217,544		0.0000	1.0000	51.52	
52.5	8,213,001		0.0000	1.0000	51.52	
53.5	3,352,823	3,177	0.0009	0.9991	51.52	
54.5	3,349,646	1,166,951	0.3484	0.6516	51.47	
55.5	2,182,695	37,601	0.0172	0.9828	33.54	
56.5	2,145,094		0.0000	1.0000	32.96	
57.5	2,145,094	1,596,979	0.7445	0.2555	32.96	
58.5	548,114	1,136	0.0021	0.9979	8.42	
59.5	546,979		0.0000	1.0000	8.40	
60.5	546,979		0.0000	1.0000	8.40	
61.5	546,979	546,979	1.0000		8.40	
62.5						

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 315.00 ACCESSORY ELECTRIC EQUIPMENT  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 315.00 ACCESSORY ELECTRIC EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1954-2018

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	87,933,405		0.0000	1.0000	100.00
0.5	94,843,056	24	0.0000	1.0000	100.00
1.5	114,155,198	618	0.0000	1.0000	100.00
2.5	114,107,296	142,903	0.0013	0.9987	100.00
3.5	121,137,301	3,122	0.0000	1.0000	99.87
4.5	121,149,688	14	0.0000	1.0000	99.87
5.5	121,149,673	1,162	0.0000	1.0000	99.87
6.5	121,148,511	262	0.0000	1.0000	99.87
7.5	108,586,182	1,533	0.0000	1.0000	99.87
8.5	108,613,650	174	0.0000	1.0000	99.87
9.5	108,613,476	756,981	0.0070	0.9930	99.87
10.5	64,852,549	65	0.0000	1.0000	99.17
11.5	64,856,155	37	0.0000	1.0000	99.17
12.5	64,856,118	491,160	0.0076	0.9924	99.17
13.5	65,481,270	17,219	0.0003	0.9997	98.42
14.5	42,335,886	14	0.0000	1.0000	98.40
15.5	41,513,700	3,996	0.0001	0.9999	98.40
16.5	37,799,594	122,101	0.0032	0.9968	98.39
17.5	36,667,176	17,759	0.0005	0.9995	98.07
18.5	36,649,417	4,520	0.0001	0.9999	98.02
19.5	36,567,803	63,174	0.0017	0.9983	98.01
20.5	36,504,629	186,856	0.0051	0.9949	97.84
21.5	36,317,774	417	0.0000	1.0000	97.34
22.5	36,784,160	109,549	0.0030	0.9970	97.34
23.5	36,674,612	1,414	0.0000	1.0000	97.05
24.5	36,673,197	5,206	0.0001	0.9999	97.04
25.5	30,409,419	32,362	0.0011	0.9989	97.03
26.5	30,377,057	181,717	0.0060	0.9940	96.93
27.5	30,174,207	7,036	0.0002	0.9998	96.35
28.5	30,167,172	62,559	0.0021	0.9979	96.32
29.5	30,781,979	58,944	0.0019	0.9981	96.12
30.5	30,723,035	90	0.0000	1.0000	95.94
31.5	30,722,945	21,451	0.0007	0.9993	95.94
32.5	30,701,494	88,058	0.0029	0.9971	95.87
33.5	30,561,182	4,298	0.0001	0.9999	95.60
34.5	30,556,883		0.0000	1.0000	95.59
35.5	29,961,936	136,349	0.0046	0.9954	95.59
36.5	29,629,971	32,800	0.0011	0.9989	95.15
37.5	10,218,847	9,923	0.0010	0.9990	95.04
38.5	10,170,697	0	0.0000	1.0000	94.95

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 315.00 ACCESSORY ELECTRIC EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1954-2018			EXPERIENCE BAND 1984-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	3,288,547	131,683	0.0400	0.9600	94.95
40.5	3,156,864	28,257	0.0090	0.9910	91.15
41.5	3,128,607	20,348	0.0065	0.9935	90.33
42.5	3,108,259	8,828	0.0028	0.9972	89.75
43.5	3,099,431	1,762	0.0006	0.9994	89.49
44.5	3,097,669	22,189	0.0072	0.9928	89.44
45.5	3,075,480		0.0000	1.0000	88.80
46.5	3,075,480	8,200	0.0027	0.9973	88.80
47.5	3,065,511		0.0000	1.0000	88.56
48.5	3,065,511	39,118	0.0128	0.9872	88.56
49.5	1,972,532		0.0000	1.0000	87.43
50.5	1,972,532		0.0000	1.0000	87.43
51.5	1,972,532		0.0000	1.0000	87.43
52.5	1,972,532		0.0000	1.0000	87.43
53.5	1,400,947		0.0000	1.0000	87.43
54.5	1,400,947	416,997	0.2977	0.7023	87.43
55.5	983,950		0.0000	1.0000	61.41
56.5	983,950		0.0000	1.0000	61.41
57.5	983,950	396,441	0.4029	0.5971	61.41
58.5	587,509		0.0000	1.0000	36.67
59.5	587,509		0.0000	1.0000	36.67
60.5	587,509		0.0000	1.0000	36.67
61.5	587,509	587,509	1.0000		36.67
62.5					

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 315.00 ACCESSORY ELECTRIC EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1954-2018			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	80,560,186		0.0000	1.0000	100.00
0.5	81,382,358		0.0000	1.0000	100.00
1.5	84,836,964		0.0000	1.0000	100.00
2.5	86,385,981	142,797	0.0017	0.9983	100.00
3.5	86,243,184		0.0000	1.0000	99.83
4.5	86,320,278		0.0000	1.0000	99.83
5.5	86,442,191		0.0000	1.0000	99.83
6.5	86,442,191		0.0000	1.0000	99.83
7.5	73,745,426		0.0000	1.0000	99.83
8.5	73,745,426		0.0000	1.0000	99.83
9.5	73,745,426	755,972	0.0103	0.9897	99.83
10.5	30,043,759		0.0000	1.0000	98.81
11.5	30,043,759		0.0000	1.0000	98.81
12.5	30,064,892	491,096	0.0163	0.9837	98.81
13.5	29,573,796		0.0000	1.0000	97.20
14.5	6,474,009		0.0000	1.0000	97.20
15.5	5,831,129		0.0000	1.0000	97.20
16.5	2,121,018	121,913	0.0575	0.9425	97.20
17.5	374,543		0.0000	1.0000	91.61
18.5	426,796		0.0000	1.0000	91.61
19.5	349,703		0.0000	1.0000	91.61
20.5	1,002,108		0.0000	1.0000	91.61
21.5	7,853,556		0.0000	1.0000	91.61
22.5	27,231,880		0.0000	1.0000	91.61
23.5	27,270,108		0.0000	1.0000	91.61
24.5	34,351,866		0.0000	1.0000	91.61
25.5	27,653,064	3,730	0.0001	0.9999	91.61
26.5	27,649,334	179,292	0.0065	0.9935	91.60
27.5	27,448,910		0.0000	1.0000	91.00
28.5	27,580,593	61,099	0.0022	0.9978	91.00
29.5	27,523,102		0.0000	1.0000	90.80
30.5	27,523,102		0.0000	1.0000	90.80
31.5	27,523,102	6,753	0.0002	0.9998	90.80
32.5	27,519,880	56,864	0.0021	0.9979	90.78
33.5	27,410,763	4,298	0.0002	0.9998	90.59
34.5	28,469,154		0.0000	1.0000	90.58
35.5	27,874,207	132,822	0.0048	0.9952	90.58
36.5	27,545,769	10,984	0.0004	0.9996	90.15
37.5	8,156,461	9,923	0.0012	0.9988	90.11
38.5	8,688,096		0.0000	1.0000	90.00

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

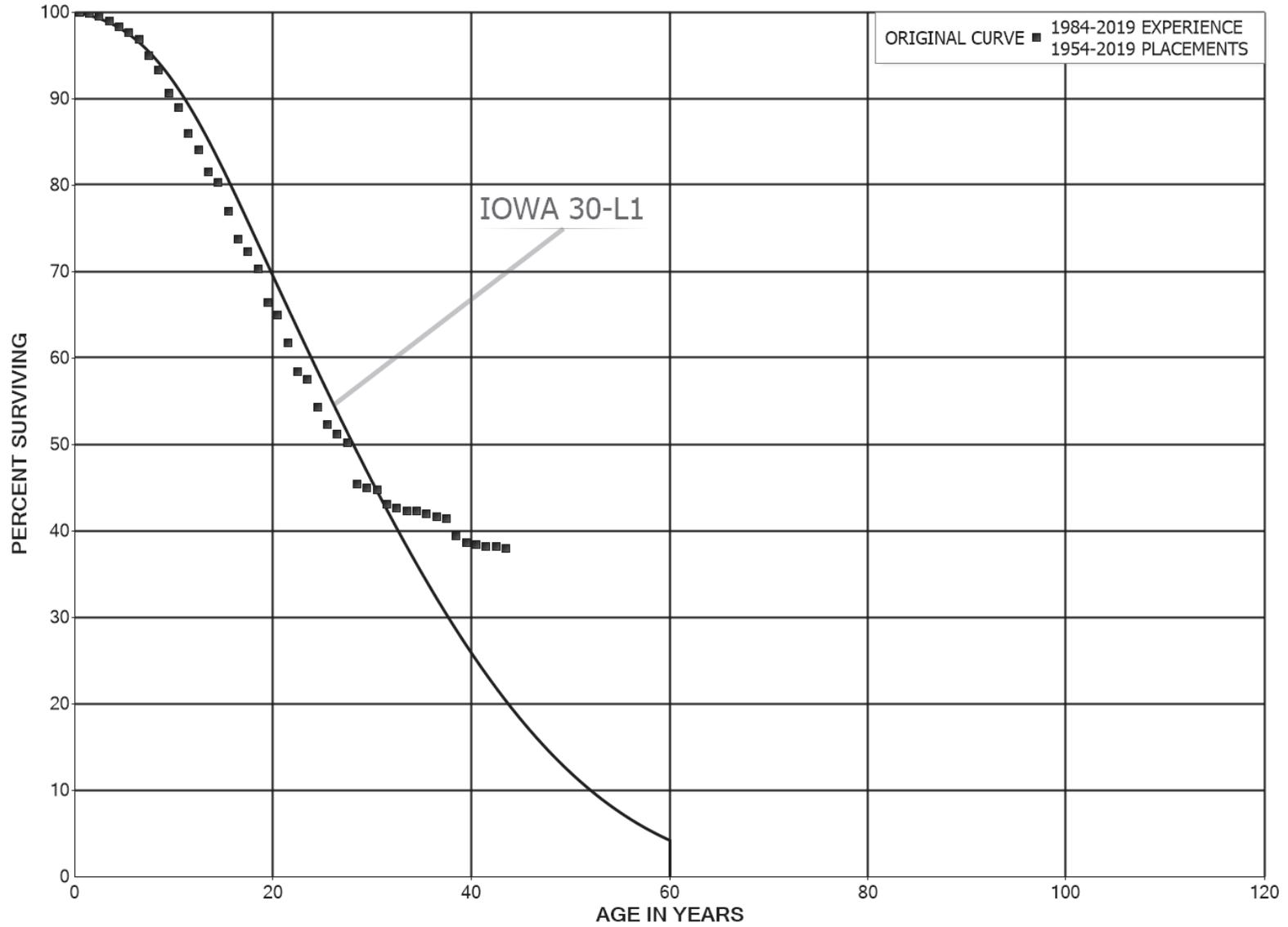
ACCOUNT 315.00 ACCESSORY ELECTRIC EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1954-2018			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	1,805,946	131,683	0.0729	0.9271	90.00
40.5	1,674,262	28,257	0.0169	0.9831	83.44
41.5	1,646,006		0.0000	1.0000	82.03
42.5	1,646,006	8,828	0.0054	0.9946	82.03
43.5	2,054,174	1,762	0.0009	0.9991	81.59
44.5	2,052,412		0.0000	1.0000	81.52
45.5	2,052,412		0.0000	1.0000	81.52
46.5	2,448,853	8,200	0.0033	0.9967	81.52
47.5	2,438,884		0.0000	1.0000	81.25
48.5	2,438,884		0.0000	1.0000	81.25
49.5	1,385,023		0.0000	1.0000	81.25
50.5	1,972,532		0.0000	1.0000	81.25
51.5	1,972,532		0.0000	1.0000	81.25
52.5	1,972,532		0.0000	1.0000	81.25
53.5	1,400,947		0.0000	1.0000	81.25
54.5	1,400,947	416,997	0.2977	0.7023	81.25
55.5	983,950		0.0000	1.0000	57.06
56.5	983,950		0.0000	1.0000	57.06
57.5	983,950	396,441	0.4029	0.5971	57.06
58.5	587,509		0.0000	1.0000	34.07
59.5	587,509		0.0000	1.0000	34.07
60.5	587,509		0.0000	1.0000	34.07
61.5	587,509	587,509	1.0000		34.07
62.5					

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 316.00 MISCELLANEOUS POWER PLANT EQUIPMENT  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 316.00 MISCELLANEOUS POWER PLANT EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1954-2019

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	17,026,285	8,193	0.0005	0.9995	100.00
0.5	17,176,109	26,216	0.0015	0.9985	99.95
1.5	16,701,731	50,438	0.0030	0.9970	99.80
2.5	16,366,816	87,379	0.0053	0.9947	99.50
3.5	14,471,108	94,211	0.0065	0.9935	98.97
4.5	14,246,988	99,547	0.0070	0.9930	98.32
5.5	13,635,838	109,598	0.0080	0.9920	97.64
6.5	13,630,456	262,525	0.0193	0.9807	96.85
7.5	11,669,287	203,380	0.0174	0.9826	94.99
8.5	11,357,125	327,806	0.0289	0.9711	93.33
9.5	10,147,204	193,567	0.0191	0.9809	90.64
10.5	8,141,643	268,312	0.0330	0.9670	88.91
11.5	7,707,057	170,779	0.0222	0.9778	85.98
12.5	7,492,209	228,356	0.0305	0.9695	84.07
13.5	7,062,545	104,314	0.0148	0.9852	81.51
14.5	6,183,616	256,927	0.0415	0.9585	80.31
15.5	5,864,118	248,204	0.0423	0.9577	76.97
16.5	5,400,129	101,992	0.0189	0.9811	73.71
17.5	5,277,474	146,134	0.0277	0.9723	72.32
18.5	5,088,593	281,444	0.0553	0.9447	70.32
19.5	4,702,960	106,526	0.0227	0.9773	66.43
20.5	4,345,454	211,367	0.0486	0.9514	64.92
21.5	3,994,420	217,606	0.0545	0.9455	61.76
22.5	3,571,387	57,696	0.0162	0.9838	58.40
23.5	3,219,749	178,461	0.0554	0.9446	57.46
24.5	2,834,561	102,208	0.0361	0.9639	54.27
25.5	2,307,235	50,801	0.0220	0.9780	52.32
26.5	2,047,081	39,842	0.0195	0.9805	51.16
27.5	1,856,215	175,122	0.0943	0.9057	50.17
28.5	1,601,775	17,100	0.0107	0.9893	45.43
29.5	1,444,253	5,859	0.0041	0.9959	44.95
30.5	1,338,817	52,233	0.0390	0.9610	44.77
31.5	1,181,048	11,379	0.0096	0.9904	43.02
32.5	1,020,759	7,042	0.0069	0.9931	42.61
33.5	966,406	1,256	0.0013	0.9987	42.31
34.5	829,067	7,042	0.0085	0.9915	42.26
35.5	737,896	5,687	0.0077	0.9923	41.90
36.5	683,438	2,397	0.0035	0.9965	41.58
37.5	534,452	26,703	0.0500	0.9500	41.43
38.5	451,788	8,528	0.0189	0.9811	39.36

**Exhibit EKPC-03  
Depreciation Study**

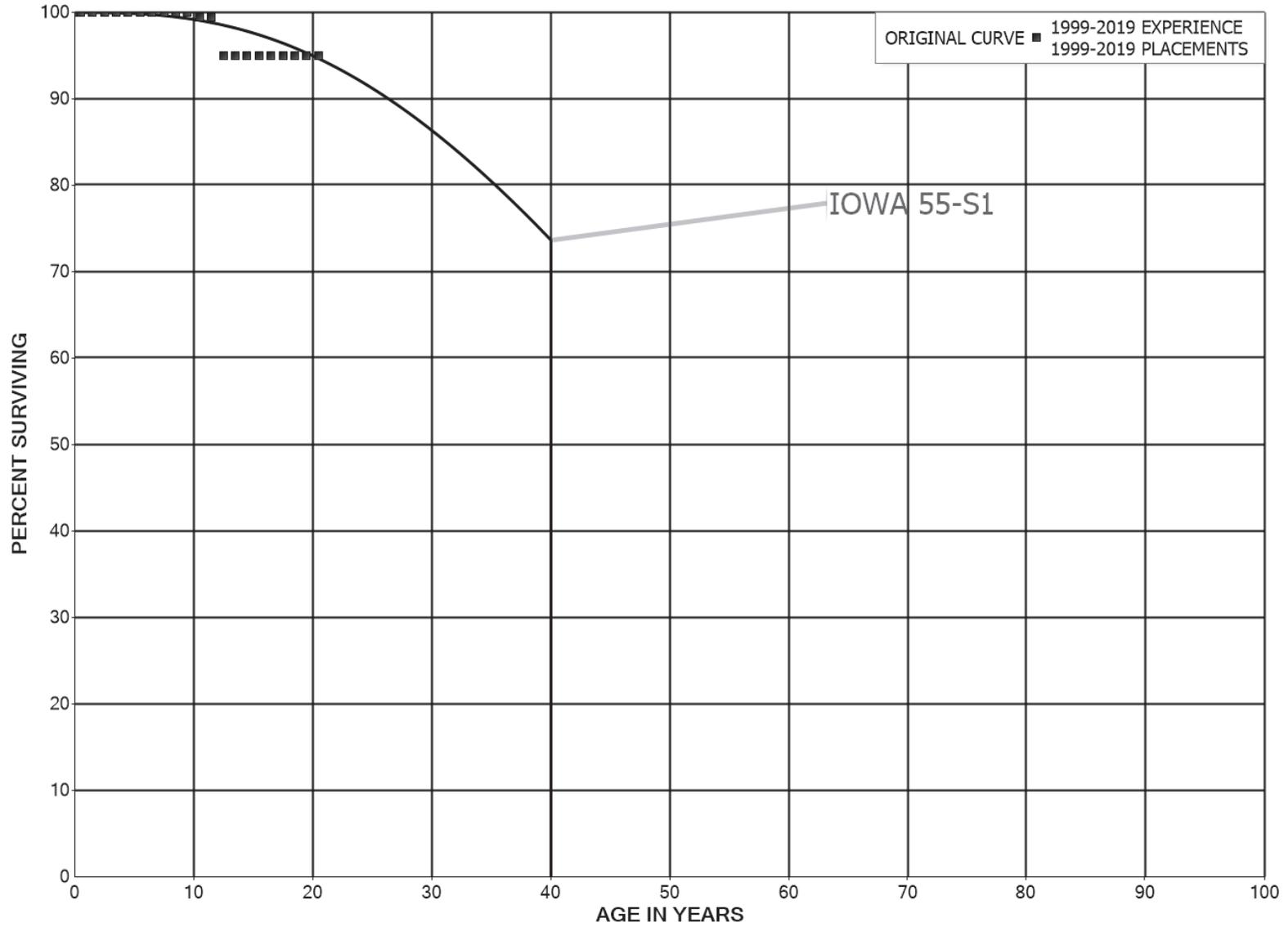
EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 316.00 MISCELLANEOUS POWER PLANT EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1954-2019			EXPERIENCE BAND 1984-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	380,555	2,692	0.0071	0.9929	38.62	
40.5	353,579	1,598	0.0045	0.9955	38.34	
41.5	215,414		0.0000	1.0000	38.17	
42.5	166,859	1,091	0.0065	0.9935	38.17	
43.5	57,495		0.0000	1.0000	37.92	
44.5	48,533		0.0000	1.0000	37.92	
45.5	38,621		0.0000	1.0000	37.92	
46.5	38,621		0.0000	1.0000	37.92	
47.5	37,076		0.0000	1.0000	37.92	
48.5	37,076		0.0000	1.0000	37.92	
49.5	37,076		0.0000	1.0000	37.92	
50.5	37,076		0.0000	1.0000	37.92	
51.5	37,076	7,531	0.2031	0.7969	37.92	
52.5	27,168		0.0000	1.0000	30.22	
53.5	27,168	4,594	0.1691	0.8309	30.22	
54.5	22,574		0.0000	1.0000	25.11	
55.5					25.11	

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 341.00 STRUCTURES AND IMPROVEMENTS  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

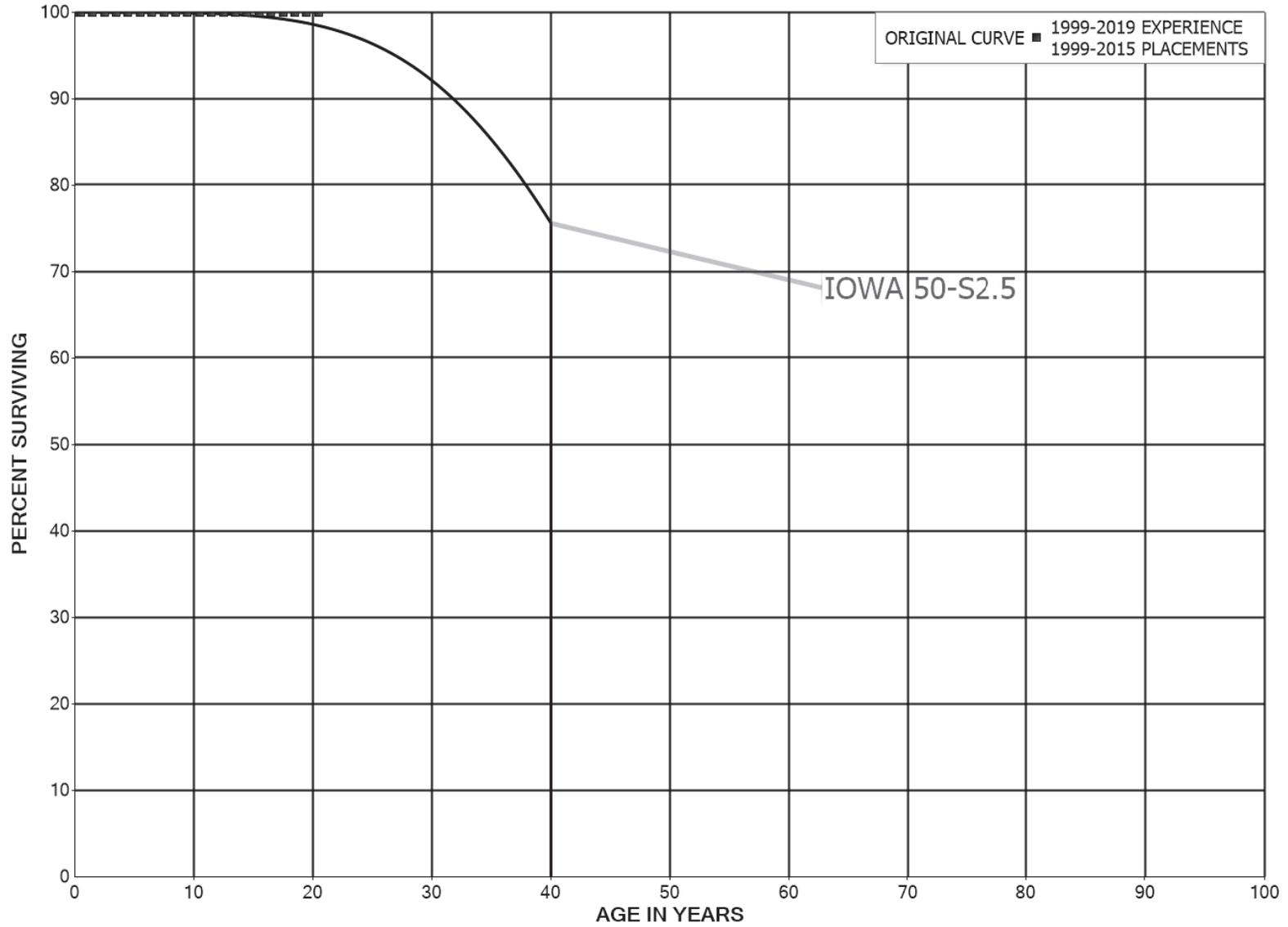
ACCOUNT 341.00 STRUCTURES AND IMPROVEMENTS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1999-2019			EXPERIENCE BAND 1999-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	54,993,881		0.0000	1.0000	100.00
0.5	57,375,248		0.0000	1.0000	100.00
1.5	52,921,230		0.0000	1.0000	100.00
2.5	51,969,902		0.0000	1.0000	100.00
3.5	51,914,247		0.0000	1.0000	100.00
4.5	41,883,484		0.0000	1.0000	100.00
5.5	41,817,903		0.0000	1.0000	100.00
6.5	41,817,903		0.0000	1.0000	100.00
7.5	41,817,903		0.0000	1.0000	100.00
8.5	41,292,669		0.0000	1.0000	100.00
9.5	34,086,915	200,883	0.0059	0.9941	100.00
10.5	33,845,791		0.0000	1.0000	99.41
11.5	33,316,789	1,504,460	0.0452	0.9548	99.41
12.5	31,500,168		0.0000	1.0000	94.92
13.5	30,034,940		0.0000	1.0000	94.92
14.5	29,025,638		0.0000	1.0000	94.92
15.5	28,750,661		0.0000	1.0000	94.92
16.5	25,223,525		0.0000	1.0000	94.92
17.5	22,747,965		0.0000	1.0000	94.92
18.5	13,970,825		0.0000	1.0000	94.92
19.5	13,970,825		0.0000	1.0000	94.92
20.5					94.92

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 342.00 FUEL HOLDERS, PRODUCERS AND ACCESSORIES  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

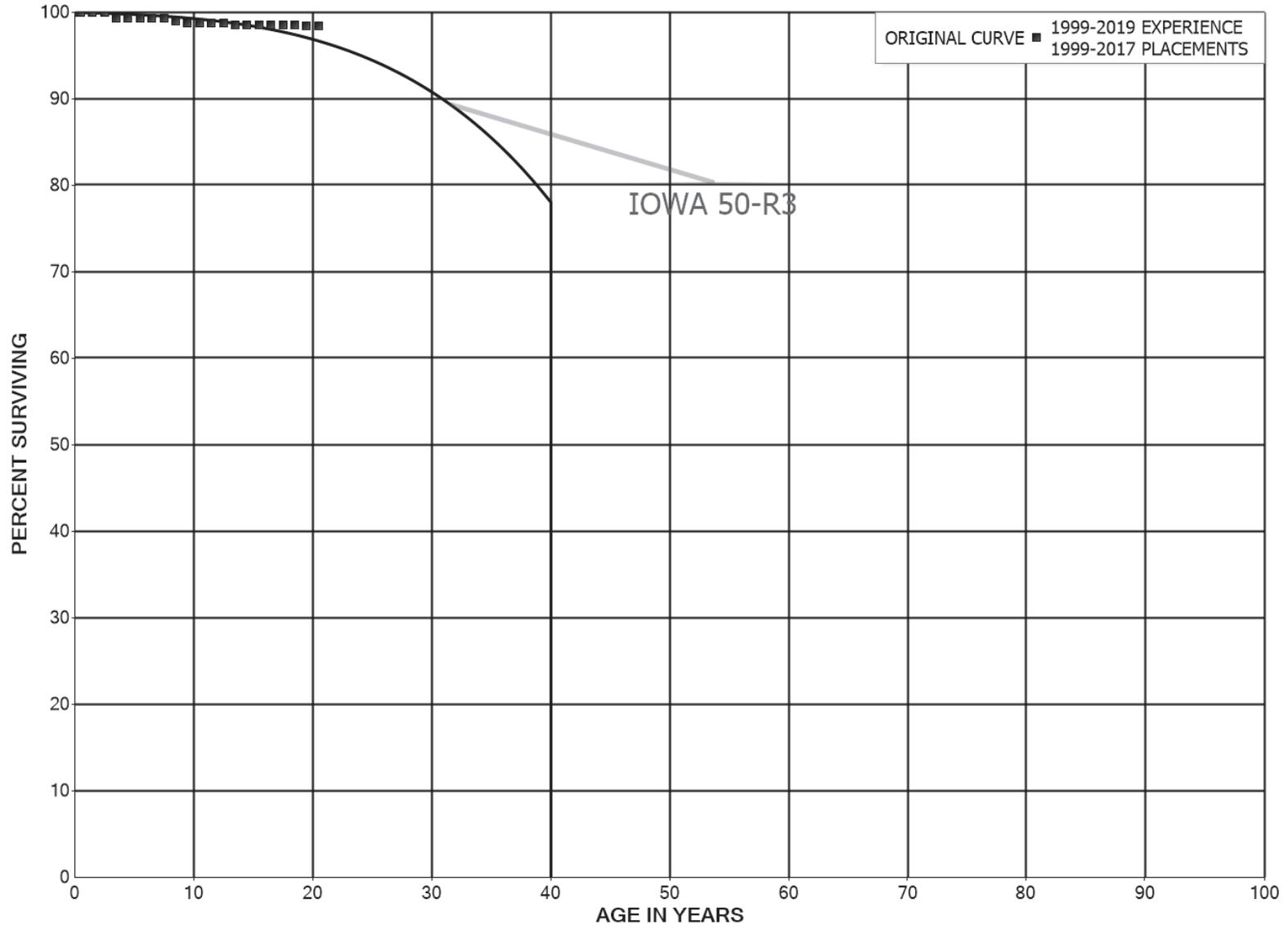
ACCOUNT 342.00 FUEL HOLDERS, PRODUCERS AND ACCESSORIES

ORIGINAL LIFE TABLE

PLACEMENT BAND 1999-2015			EXPERIENCE BAND 1999-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	20,058,007		0.0000	1.0000	100.00
0.5	20,058,007		0.0000	1.0000	100.00
1.5	20,033,575		0.0000	1.0000	100.00
2.5	20,033,575		0.0000	1.0000	100.00
3.5	20,033,575		0.0000	1.0000	100.00
4.5	18,871,372		0.0000	1.0000	100.00
5.5	18,871,372		0.0000	1.0000	100.00
6.5	18,871,372		0.0000	1.0000	100.00
7.5	18,871,372		0.0000	1.0000	100.00
8.5	18,871,372		0.0000	1.0000	100.00
9.5	14,370,188		0.0000	1.0000	100.00
10.5	14,370,188		0.0000	1.0000	100.00
11.5	14,370,188		0.0000	1.0000	100.00
12.5	14,370,188		0.0000	1.0000	100.00
13.5	14,370,188		0.0000	1.0000	100.00
14.5	12,077,951		0.0000	1.0000	100.00
15.5	5,125,937		0.0000	1.0000	100.00
16.5	4,661,972		0.0000	1.0000	100.00
17.5	4,661,972		0.0000	1.0000	100.00
18.5	3,702,255		0.0000	1.0000	100.00
19.5	3,702,255		0.0000	1.0000	100.00
20.5					100.00

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 343.00 PRIME MOVERS  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

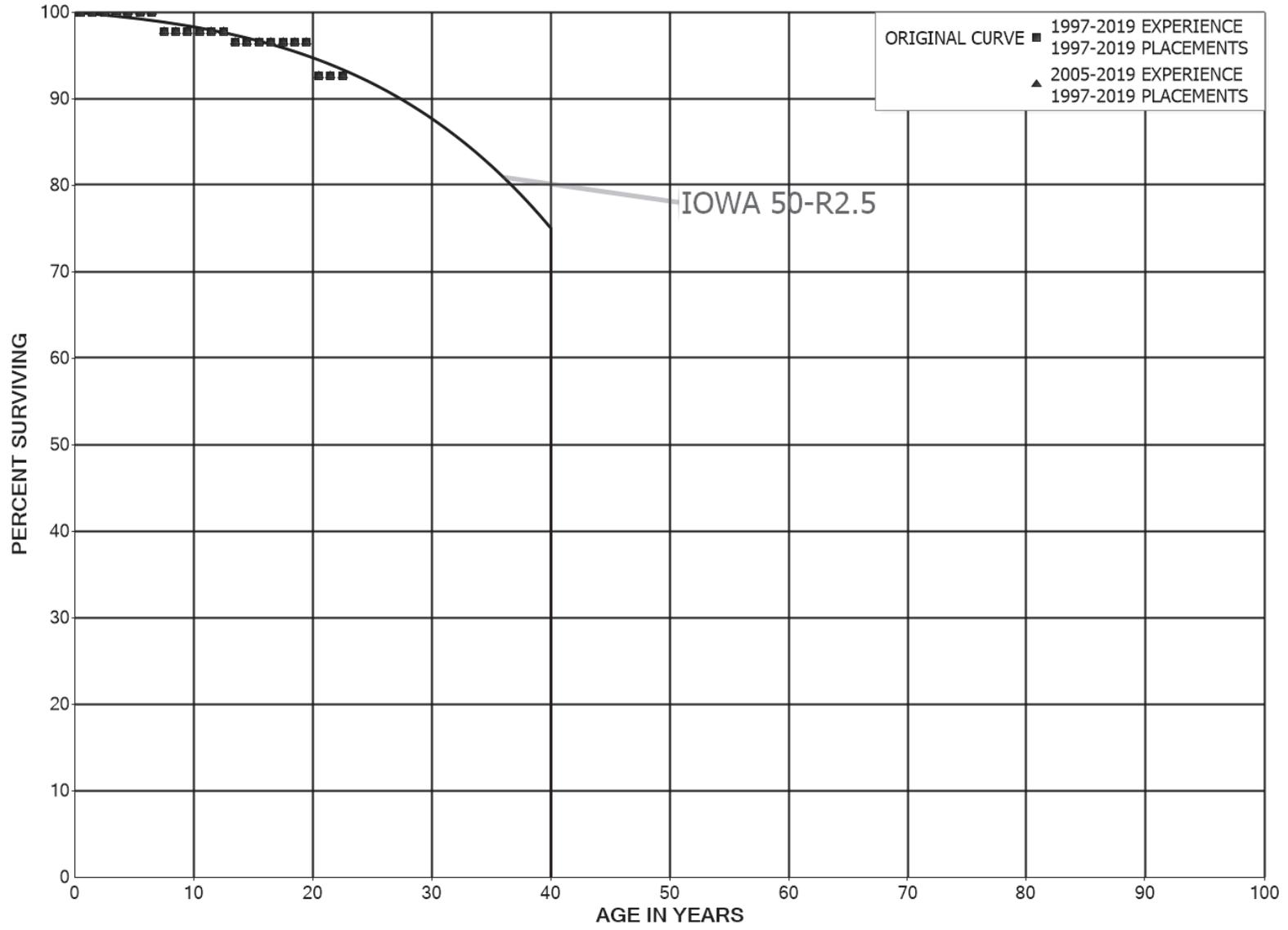
ACCOUNT 343.00 PRIME MOVERS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1999-2017			EXPERIENCE BAND 1999-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	458,345,056		0.0000	1.0000	100.00
0.5	357,903,861		0.0000	1.0000	100.00
1.5	302,622,195		0.0000	1.0000	100.00
2.5	405,621,153	2,695,268	0.0066	0.9934	100.00
3.5	402,925,886		0.0000	1.0000	99.34
4.5	268,408,467		0.0000	1.0000	99.34
5.5	267,863,584		0.0000	1.0000	99.34
6.5	267,623,352		0.0000	1.0000	99.34
7.5	267,549,536	931,747	0.0035	0.9965	99.34
8.5	266,617,789	852,688	0.0032	0.9968	98.99
9.5	155,318,256		0.0000	1.0000	98.67
10.5	154,715,439		0.0000	1.0000	98.67
11.5	154,715,439		0.0000	1.0000	98.67
12.5	153,416,076	290,419	0.0019	0.9981	98.67
13.5	149,861,754		0.0000	1.0000	98.49
14.5	116,465,764		0.0000	1.0000	98.49
15.5	116,465,764		0.0000	1.0000	98.49
16.5	110,949,159		0.0000	1.0000	98.49
17.5	110,949,159		0.0000	1.0000	98.49
18.5	56,618,643	59,612	0.0011	0.9989	98.49
19.5	56,559,032		0.0000	1.0000	98.38
20.5					98.38

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 344.00 GENERATORS  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 344.00 GENERATORS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1997-2019

EXPERIENCE BAND 1997-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	116,693,593		0.0000	1.0000	100.00
0.5	112,164,212		0.0000	1.0000	100.00
1.5	104,697,577		0.0000	1.0000	100.00
2.5	88,887,271		0.0000	1.0000	100.00
3.5	85,778,793		0.0000	1.0000	100.00
4.5	60,841,869		0.0000	1.0000	100.00
5.5	60,841,869		0.0000	1.0000	100.00
6.5	60,841,869	1,364,371	0.0224	0.9776	100.00
7.5	59,477,497		0.0000	1.0000	97.76
8.5	57,885,031		0.0000	1.0000	97.76
9.5	49,000,644		0.0000	1.0000	97.76
10.5	49,000,644		0.0000	1.0000	97.76
11.5	49,000,644		0.0000	1.0000	97.76
12.5	47,320,064	599,987	0.0127	0.9873	97.76
13.5	44,947,811		0.0000	1.0000	96.52
14.5	35,277,147		0.0000	1.0000	96.52
15.5	35,277,147		0.0000	1.0000	96.52
16.5	30,495,388		0.0000	1.0000	96.52
17.5	30,495,388		0.0000	1.0000	96.52
18.5	15,677,270		0.0000	1.0000	96.52
19.5	14,994,494	603,570	0.0403	0.9597	96.52
20.5	449,511		0.0000	1.0000	92.63
21.5	449,511		0.0000	1.0000	92.63
22.5					92.63

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

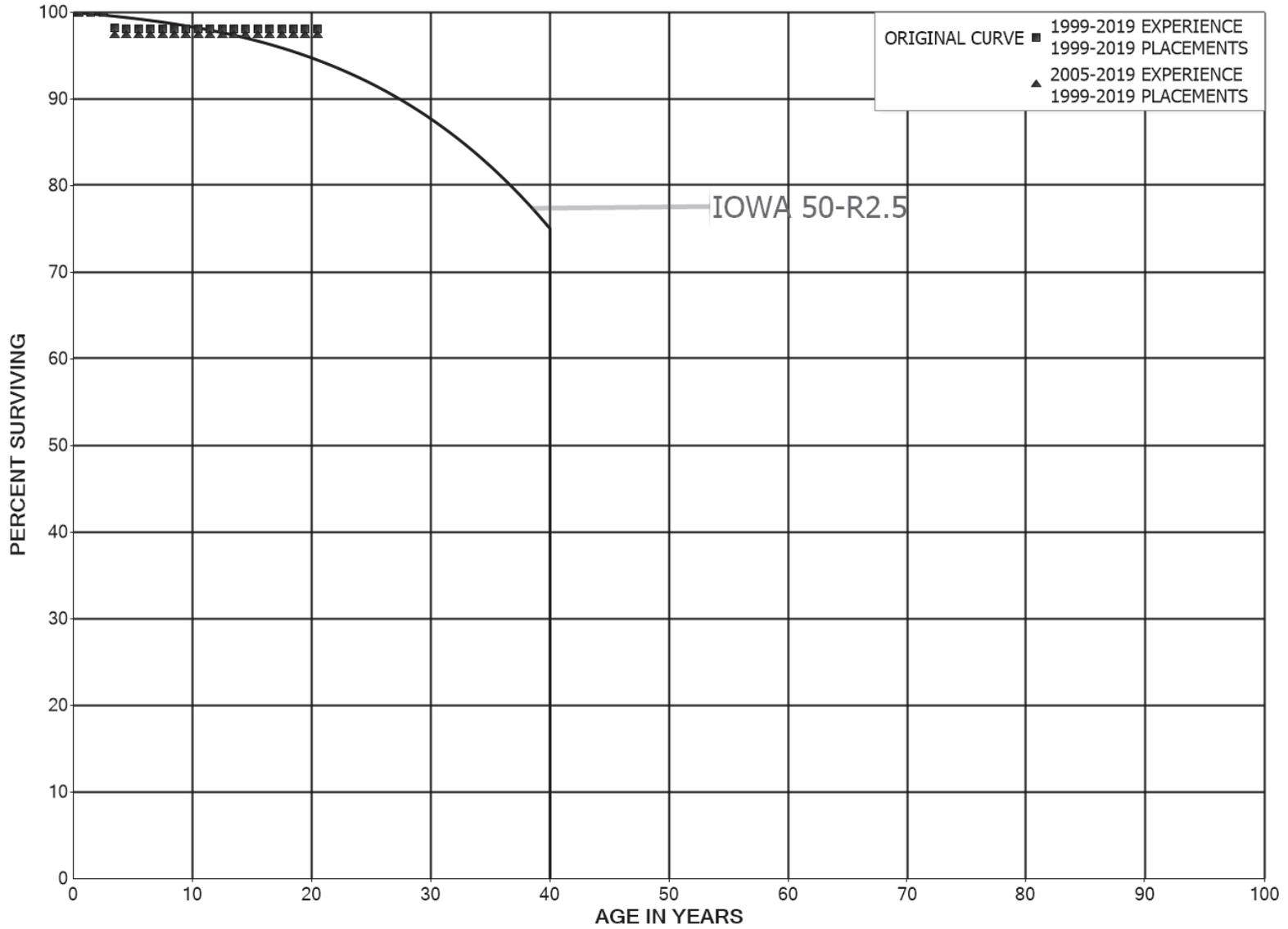
ACCOUNT 344.00 GENERATORS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1997-2019			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	72,162,830		0.0000	1.0000	100.00
0.5	70,441,338		0.0000	1.0000	100.00
1.5	74,202,189		0.0000	1.0000	100.00
2.5	58,391,883		0.0000	1.0000	100.00
3.5	70,101,523		0.0000	1.0000	100.00
4.5	45,847,374		0.0000	1.0000	100.00
5.5	60,392,358		0.0000	1.0000	100.00
6.5	60,392,358	1,364,371	0.0226	0.9774	100.00
7.5	59,477,497		0.0000	1.0000	97.74
8.5	57,885,031		0.0000	1.0000	97.74
9.5	49,000,644		0.0000	1.0000	97.74
10.5	49,000,644		0.0000	1.0000	97.74
11.5	49,000,644		0.0000	1.0000	97.74
12.5	47,320,064	599,987	0.0127	0.9873	97.74
13.5	44,947,811		0.0000	1.0000	96.50
14.5	35,277,147		0.0000	1.0000	96.50
15.5	35,277,147		0.0000	1.0000	96.50
16.5	30,495,388		0.0000	1.0000	96.50
17.5	30,495,388		0.0000	1.0000	96.50
18.5	15,677,270		0.0000	1.0000	96.50
19.5	14,994,494	603,570	0.0403	0.9597	96.50
20.5	449,511		0.0000	1.0000	92.62
21.5	449,511		0.0000	1.0000	92.62
22.5					92.62

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 345.00 ACCESSORY ELECTRIC EQUIPMENT  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 345.00 ACCESSORY ELECTRIC EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1999-2019			EXPERIENCE BAND 1999-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	39,003,660		0.0000	1.0000	100.00
0.5	38,989,721		0.0000	1.0000	100.00
1.5	38,989,721		0.0000	1.0000	100.00
2.5	37,581,003	697,322	0.0186	0.9814	100.00
3.5	36,883,681	18,282	0.0005	0.9995	98.14
4.5	32,692,972		0.0000	1.0000	98.10
5.5	32,692,972		0.0000	1.0000	98.10
6.5	32,692,972		0.0000	1.0000	98.10
7.5	32,692,972		0.0000	1.0000	98.10
8.5	32,692,972		0.0000	1.0000	98.10
9.5	18,773,076		0.0000	1.0000	98.10
10.5	18,773,076		0.0000	1.0000	98.10
11.5	18,773,076		0.0000	1.0000	98.10
12.5	18,366,291		0.0000	1.0000	98.10
13.5	17,913,614		0.0000	1.0000	98.10
14.5	12,607,118		0.0000	1.0000	98.10
15.5	12,607,118		0.0000	1.0000	98.10
16.5	11,502,353		0.0000	1.0000	98.10
17.5	11,502,353		0.0000	1.0000	98.10
18.5	7,130,844		0.0000	1.0000	98.10
19.5	7,130,844		0.0000	1.0000	98.10
20.5					98.10

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

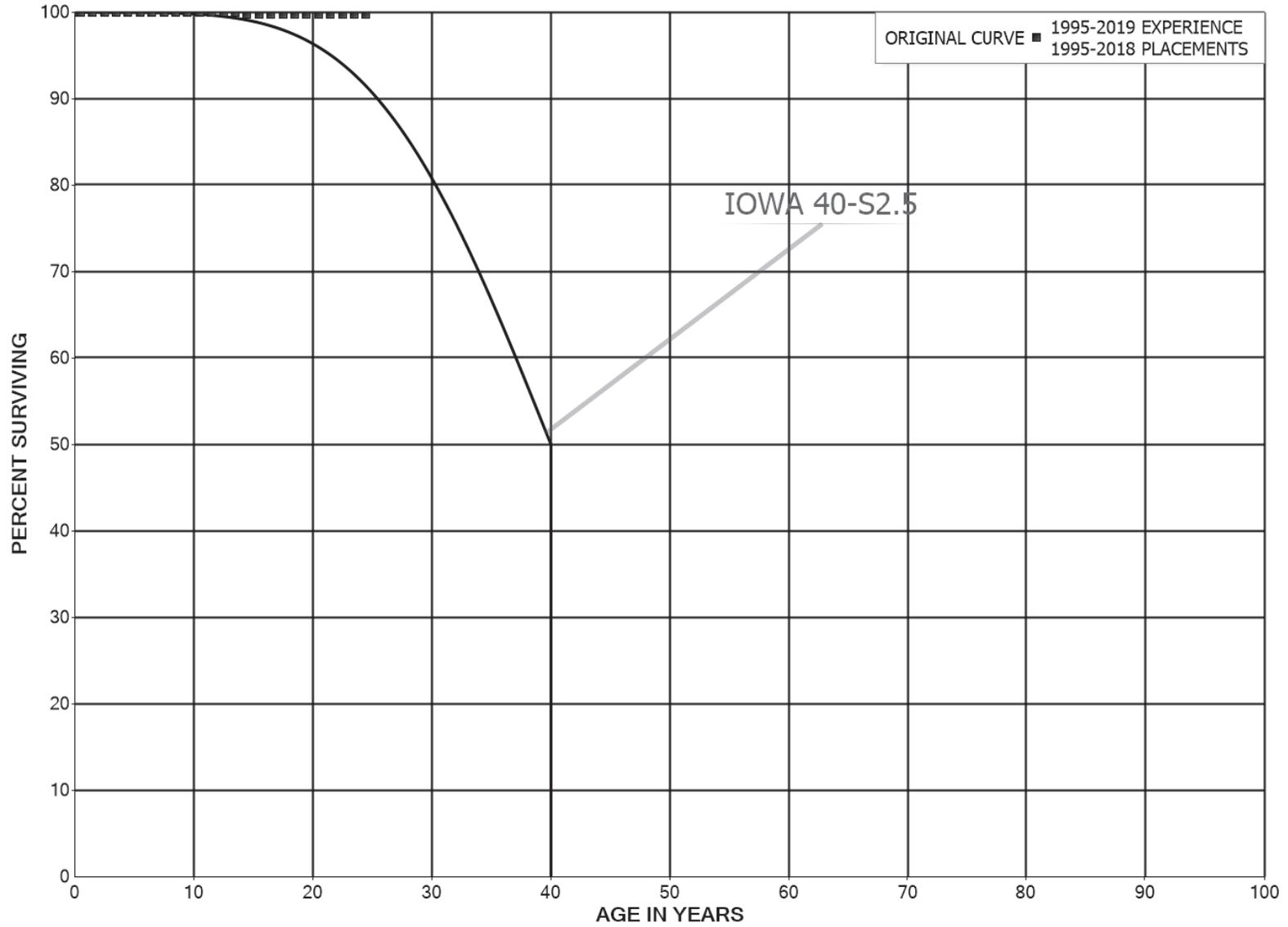
ACCOUNT 345.00 ACCESSORY ELECTRIC EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1999-2019			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	26,396,542		0.0000	1.0000	100.00
0.5	26,382,603		0.0000	1.0000	100.00
1.5	27,487,369		0.0000	1.0000	100.00
2.5	26,078,650	697,322	0.0267	0.9733	100.00
3.5	29,752,837	18,282	0.0006	0.9994	97.33
4.5	25,562,128		0.0000	1.0000	97.27
5.5	32,692,972		0.0000	1.0000	97.27
6.5	32,692,972		0.0000	1.0000	97.27
7.5	32,692,972		0.0000	1.0000	97.27
8.5	32,692,972		0.0000	1.0000	97.27
9.5	18,773,076		0.0000	1.0000	97.27
10.5	18,773,076		0.0000	1.0000	97.27
11.5	18,773,076		0.0000	1.0000	97.27
12.5	18,366,291		0.0000	1.0000	97.27
13.5	17,913,614		0.0000	1.0000	97.27
14.5	12,607,118		0.0000	1.0000	97.27
15.5	12,607,118		0.0000	1.0000	97.27
16.5	11,502,353		0.0000	1.0000	97.27
17.5	11,502,353		0.0000	1.0000	97.27
18.5	7,130,844		0.0000	1.0000	97.27
19.5	7,130,844		0.0000	1.0000	97.27
20.5					97.27

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 346.00 MISCELLANEOUS POWER PLANT EQUIPMENT  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

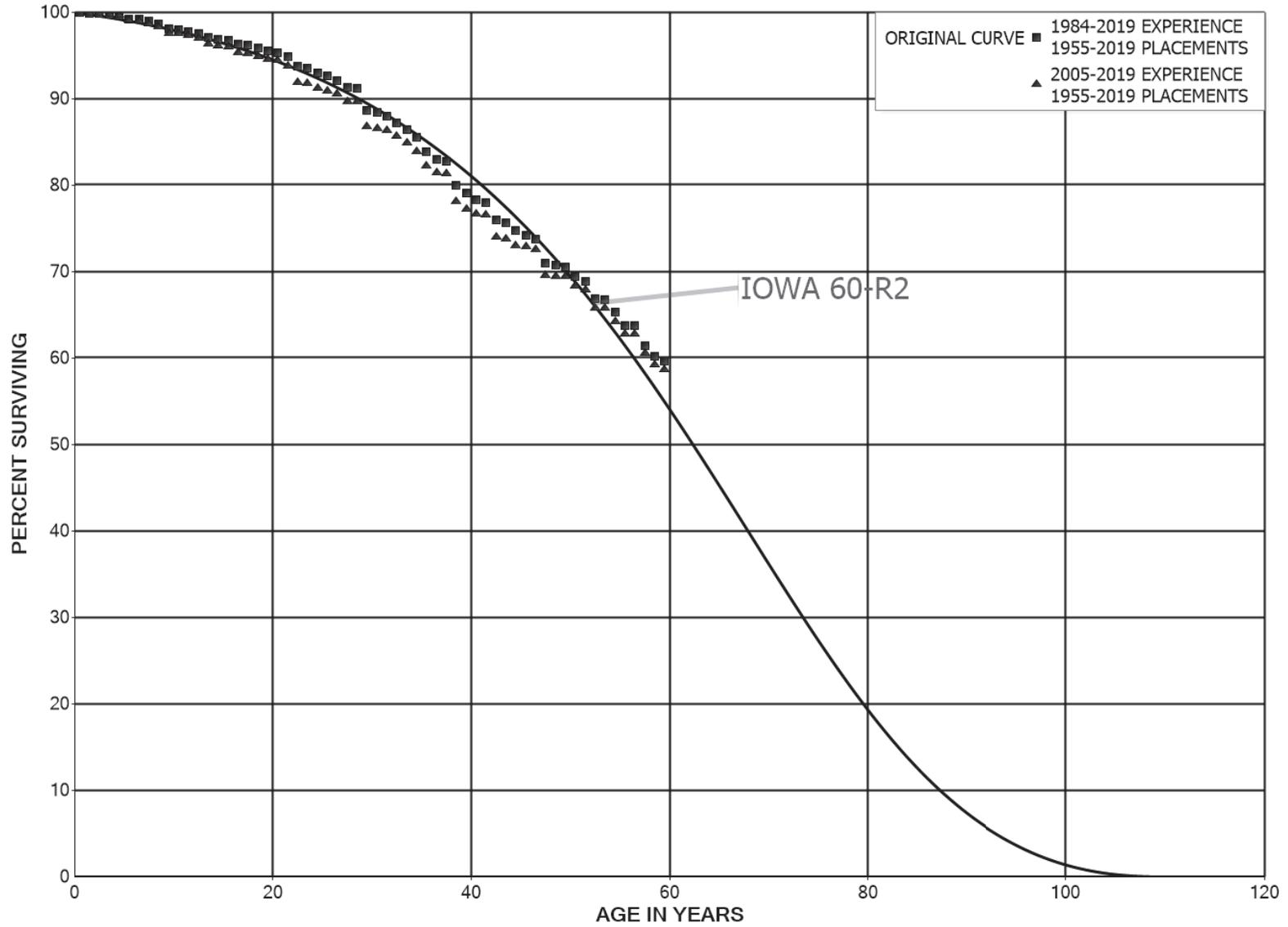
ACCOUNT 346.00 MISCELLANEOUS POWER PLANT EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1995-2018			EXPERIENCE BAND 1995-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	18,433,064		0.0000	1.0000	100.00
0.5	15,994,133		0.0000	1.0000	100.00
1.5	15,987,627		0.0000	1.0000	100.00
2.5	15,987,627		0.0000	1.0000	100.00
3.5	15,861,174		0.0000	1.0000	100.00
4.5	12,120,906		0.0000	1.0000	100.00
5.5	11,605,154		0.0000	1.0000	100.00
6.5	11,500,667		0.0000	1.0000	100.00
7.5	6,213,087		0.0000	1.0000	100.00
8.5	5,928,515		0.0000	1.0000	100.00
9.5	5,910,707		0.0000	1.0000	100.00
10.5	5,910,707		0.0000	1.0000	100.00
11.5	5,904,772		0.0000	1.0000	100.00
12.5	3,687,342		0.0000	1.0000	100.00
13.5	1,483,799	3,924	0.0026	0.9974	100.00
14.5	1,059,591		0.0000	1.0000	99.74
15.5	1,059,591		0.0000	1.0000	99.74
16.5	874,357		0.0000	1.0000	99.74
17.5	841,541		0.0000	1.0000	99.74
18.5	780,953		0.0000	1.0000	99.74
19.5	780,953		0.0000	1.0000	99.74
20.5	293,791		0.0000	1.0000	99.74
21.5	154,469		0.0000	1.0000	99.74
22.5	137,940		0.0000	1.0000	99.74
23.5	85,357		0.0000	1.0000	99.74
24.5					99.74

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 353.00 STATION EQUIPMENT  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 353.00 STATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1955-2019

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	230,326,146	6,206	0.0000	1.0000	100.00
0.5	241,177,991	261,637	0.0011	0.9989	100.00
1.5	247,734,880	81,247	0.0003	0.9997	99.89
2.5	253,036,676	347,345	0.0014	0.9986	99.86
3.5	252,597,932	134,108	0.0005	0.9995	99.72
4.5	237,140,793	1,102,177	0.0046	0.9954	99.67
5.5	236,511,452	71,938	0.0003	0.9997	99.20
6.5	231,309,608	656,167	0.0028	0.9972	99.17
7.5	228,796,313	718,273	0.0031	0.9969	98.89
8.5	198,745,101	1,081,875	0.0054	0.9946	98.58
9.5	180,834,472	100,476	0.0006	0.9994	98.04
10.5	140,221,029	303,025	0.0022	0.9978	97.99
11.5	131,950,693	358,432	0.0027	0.9973	97.78
12.5	107,627,455	476,917	0.0044	0.9956	97.51
13.5	106,190,027	280,778	0.0026	0.9974	97.08
14.5	89,518,785	137,344	0.0015	0.9985	96.82
15.5	84,689,921	334,681	0.0040	0.9960	96.68
16.5	80,171,766	127,180	0.0016	0.9984	96.29
17.5	79,001,467	258,889	0.0033	0.9967	96.14
18.5	77,341,253	214,485	0.0028	0.9972	95.83
19.5	71,080,471	197,954	0.0028	0.9972	95.56
20.5	69,968,679	361,115	0.0052	0.9948	95.29
21.5	69,261,282	775,950	0.0112	0.9888	94.80
22.5	66,711,377	154,109	0.0023	0.9977	93.74
23.5	67,098,868	398,491	0.0059	0.9941	93.52
24.5	62,411,507	261,768	0.0042	0.9958	92.97
25.5	55,625,995	280,641	0.0050	0.9950	92.58
26.5	51,049,491	480,403	0.0094	0.9906	92.11
27.5	49,174,101	41,333	0.0008	0.9992	91.24
28.5	49,839,234	1,367,955	0.0274	0.9726	91.17
29.5	47,839,419	163,952	0.0034	0.9966	88.66
30.5	46,806,265	244,753	0.0052	0.9948	88.36
31.5	46,430,298	369,976	0.0080	0.9920	87.90
32.5	45,808,627	408,450	0.0089	0.9911	87.20
33.5	44,002,670	478,437	0.0109	0.9891	86.42
34.5	42,570,520	794,816	0.0187	0.9813	85.48
35.5	40,381,547	454,891	0.0113	0.9887	83.89
36.5	37,062,289	80,442	0.0022	0.9978	82.94
37.5	27,364,861	945,750	0.0346	0.9654	82.76
38.5	18,485,780	186,488	0.0101	0.9899	79.90

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 353.00 STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1955-2019			EXPERIENCE BAND 1984-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	14,178,875	141,375	0.0100	0.9900	79.09
40.5	11,976,438	52,315	0.0044	0.9956	78.31
41.5	7,776,512	199,320	0.0256	0.9744	77.96
42.5	7,509,512	39,638	0.0053	0.9947	75.96
43.5	7,369,349	83,536	0.0113	0.9887	75.56
44.5	7,260,393	49,238	0.0068	0.9932	74.71
45.5	7,176,646	43,167	0.0060	0.9940	74.20
46.5	7,114,436	271,730	0.0382	0.9618	73.75
47.5	6,602,150	20,150	0.0031	0.9969	70.94
48.5	6,565,842	19,889	0.0030	0.9970	70.72
49.5	4,940,209	81,080	0.0164	0.9836	70.51
50.5	4,483,391	31,545	0.0070	0.9930	69.35
51.5	4,163,131	123,521	0.0297	0.9703	68.86
52.5	4,026,422	6,510	0.0016	0.9984	66.82
53.5	2,478,349	54,668	0.0221	0.9779	66.71
54.5	2,031,740	48,357	0.0238	0.9762	65.24
55.5	1,888,442		0.0000	1.0000	63.69
56.5	1,881,884	67,239	0.0357	0.9643	63.69
57.5	1,776,272	36,192	0.0204	0.9796	61.41
58.5	1,658,946	15,975	0.0096	0.9904	60.16
59.5	832,739		0.0000	1.0000	59.58
60.5	656,144		0.0000	1.0000	59.58
61.5	655,504	27,717	0.0423	0.9577	59.58
62.5	627,787		0.0000	1.0000	57.06
63.5	627,731		0.0000	1.0000	57.06
64.5					57.06

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 353.00 STATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1955-2019			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	178,813,732		0.0000	1.0000	100.00
0.5	191,905,698	243,792	0.0013	0.9987	100.00
1.5	190,389,151	57,100	0.0003	0.9997	99.87
2.5	189,408,136	314,282	0.0017	0.9983	99.84
3.5	186,735,516	94,422	0.0005	0.9995	99.68
4.5	175,267,662	1,061,767	0.0061	0.9939	99.63
5.5	169,915,482	25,891	0.0002	0.9998	99.02
6.5	165,215,531	616,488	0.0037	0.9963	99.01
7.5	164,653,556	655,335	0.0040	0.9960	98.64
8.5	135,651,896	1,008,661	0.0074	0.9926	98.25
9.5	123,001,359	14,969	0.0001	0.9999	97.52
10.5	89,475,557	231,961	0.0026	0.9974	97.50
11.5	85,635,169	295,384	0.0034	0.9966	97.25
12.5	62,663,769	379,560	0.0061	0.9939	96.92
13.5	60,553,622	183,367	0.0030	0.9970	96.33
14.5	44,148,935	48,764	0.0011	0.9989	96.04
15.5	39,919,610	263,328	0.0066	0.9934	95.93
16.5	35,710,523	40,732	0.0011	0.9989	95.30
17.5	33,119,828	134,098	0.0040	0.9960	95.19
18.5	32,553,272	93,439	0.0029	0.9971	94.80
19.5	27,406,117	45,857	0.0017	0.9983	94.53
20.5	28,102,172	184,384	0.0066	0.9934	94.37
21.5	30,423,676	614,234	0.0202	0.9798	93.75
22.5	39,800,497	43,738	0.0011	0.9989	91.86
23.5	47,731,879	325,649	0.0068	0.9932	91.76
24.5	47,146,042	152,797	0.0032	0.9968	91.13
25.5	42,762,527	148,254	0.0035	0.9965	90.84
26.5	43,124,460	426,647	0.0099	0.9901	90.52
27.5	41,372,959	21,018	0.0005	0.9995	89.63
28.5	40,972,283	1,330,800	0.0325	0.9675	89.58
29.5	39,037,748	96,117	0.0025	0.9975	86.67
30.5	38,117,937	58,850	0.0015	0.9985	86.46
31.5	37,948,601	313,267	0.0083	0.9917	86.33
32.5	37,696,397	361,426	0.0096	0.9904	85.61
33.5	36,150,761	409,116	0.0113	0.9887	84.79
34.5	36,610,791	743,177	0.0203	0.9797	83.83
35.5	34,900,144	319,656	0.0092	0.9908	82.13
36.5	32,106,739	39,788	0.0012	0.9988	81.38
37.5	22,463,086	895,524	0.0399	0.9601	81.28
38.5	15,243,271	174,209	0.0114	0.9886	78.04

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

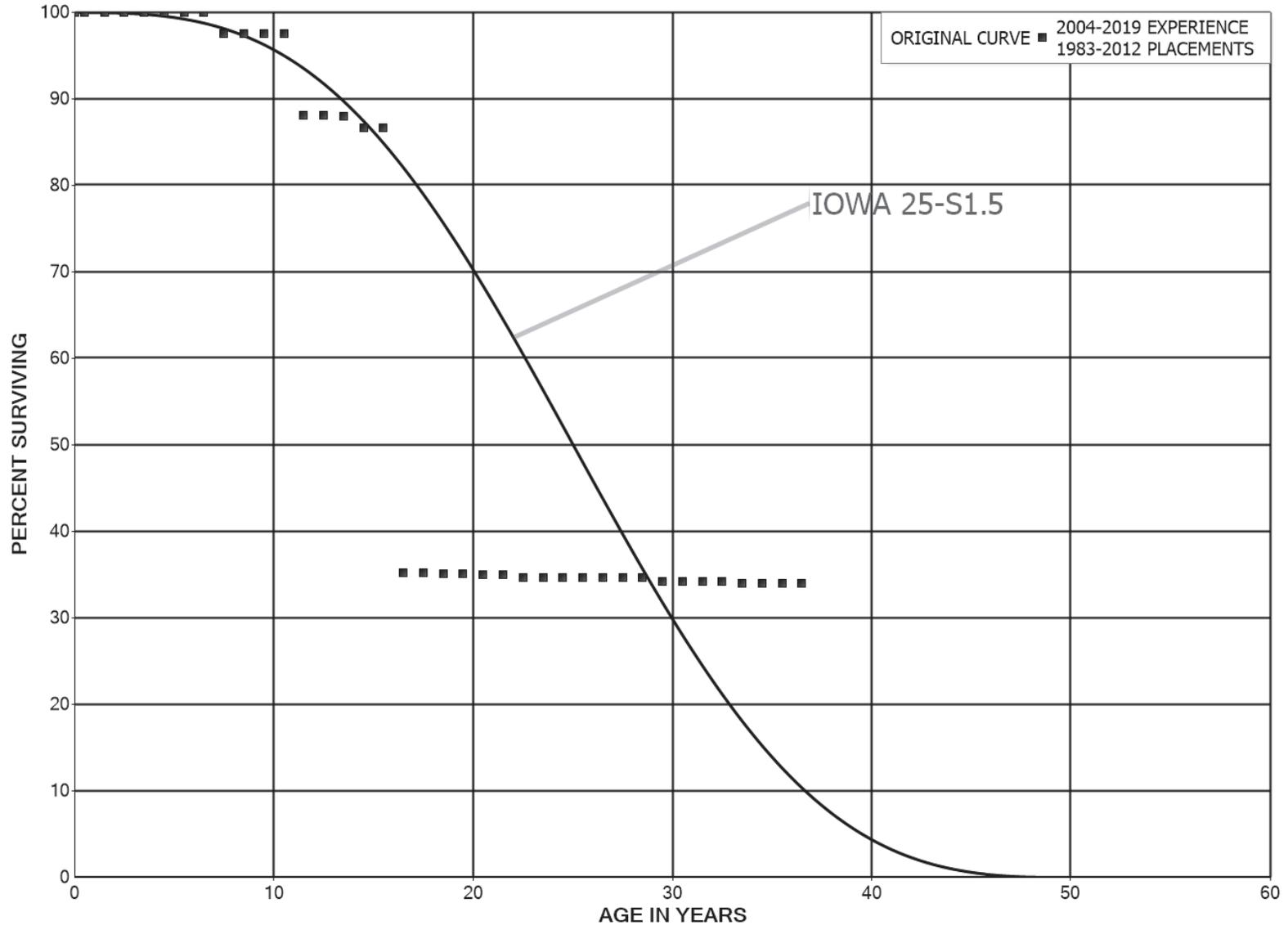
ACCOUNT 353.00 STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1955-2019			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	11,399,545	80,716	0.0071	0.9929	77.15
40.5	9,353,682	5,556	0.0006	0.9994	76.60
41.5	5,207,462	173,449	0.0333	0.9667	76.55
42.5	5,019,891	15,892	0.0032	0.9968	74.00
43.5	5,029,858	57,809	0.0115	0.9885	73.77
44.5	6,116,515	5,352	0.0009	0.9991	72.92
45.5	6,275,692	34,673	0.0055	0.9945	72.86
46.5	6,222,615	257,910	0.0414	0.9586	72.46
47.5	5,724,150	3,572	0.0006	0.9994	69.45
48.5	5,704,475		0.0000	1.0000	69.41
49.5	4,940,209	81,080	0.0164	0.9836	69.41
50.5	4,483,391	31,545	0.0070	0.9930	68.27
51.5	4,163,131	123,521	0.0297	0.9703	67.79
52.5	4,026,422	6,510	0.0016	0.9984	65.78
53.5	2,478,349	54,668	0.0221	0.9779	65.67
54.5	2,031,740	48,357	0.0238	0.9762	64.22
55.5	1,888,442		0.0000	1.0000	62.70
56.5	1,881,884	67,239	0.0357	0.9643	62.70
57.5	1,776,272	36,192	0.0204	0.9796	60.46
58.5	1,658,946	15,975	0.0096	0.9904	59.22
59.5	832,739		0.0000	1.0000	58.65
60.5	656,144		0.0000	1.0000	58.65
61.5	655,504	27,717	0.0423	0.9577	58.65
62.5	627,787		0.0000	1.0000	56.17
63.5	627,731		0.0000	1.0000	56.17
64.5					56.17

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 353.10 STATION EQUIPMENT - ENERGY CONTROL SYSTEM  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

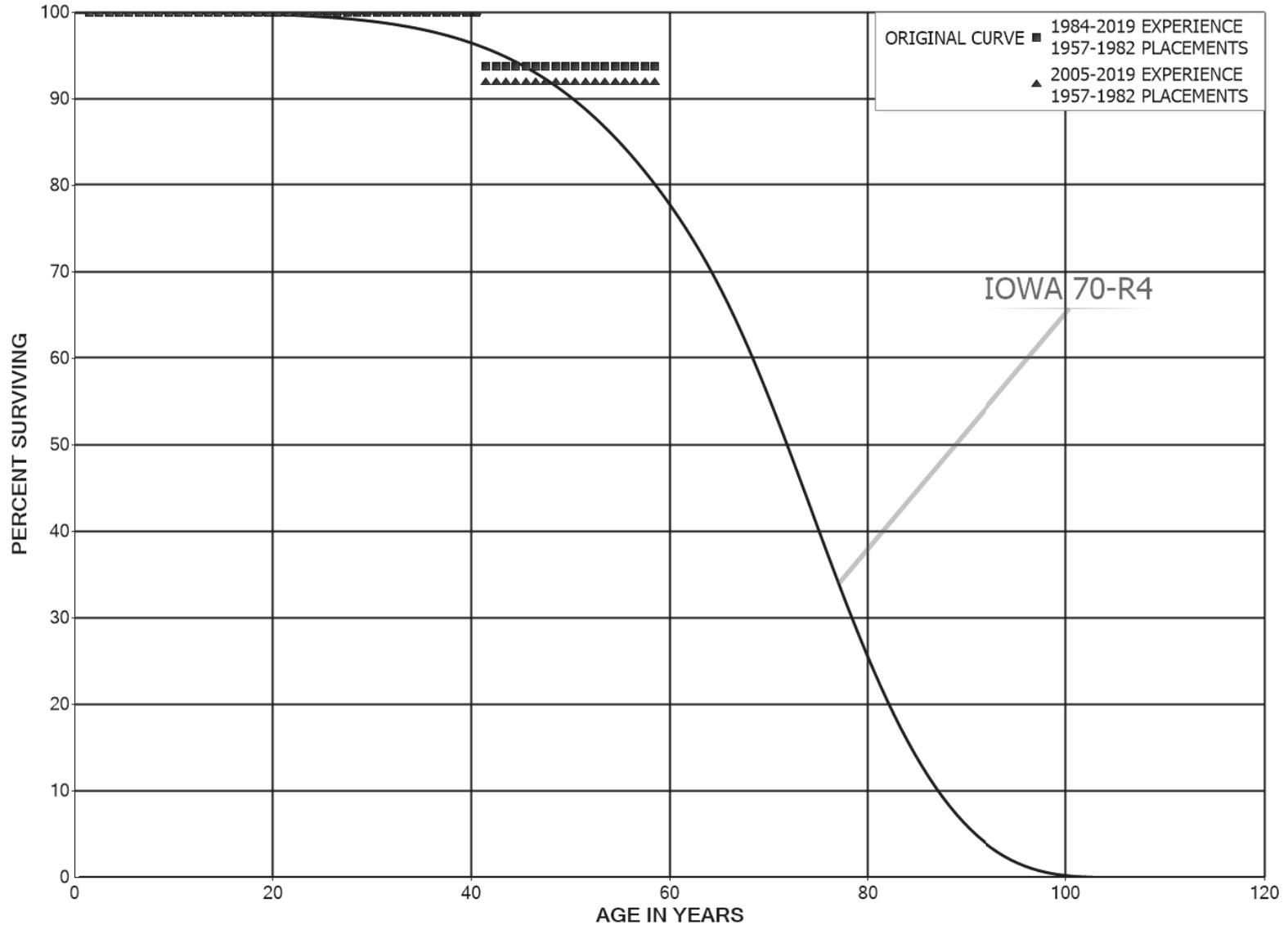
ACCOUNT 353.10 STATION EQUIPMENT - ENERGY CONTROL SYSTEM

ORIGINAL LIFE TABLE

PLACEMENT BAND 1983-2012			EXPERIENCE BAND 2004-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	478,304		0.0000	1.0000	100.00
0.5	534,140		0.0000	1.0000	100.00
1.5	774,404		0.0000	1.0000	100.00
2.5	813,915		0.0000	1.0000	100.00
3.5	4,321,264		0.0000	1.0000	100.00
4.5	4,387,018		0.0000	1.0000	100.00
5.5	7,254,751		0.0000	1.0000	100.00
6.5	7,332,716	179,124	0.0244	0.9756	100.00
7.5	4,505,324		0.0000	1.0000	97.56
8.5	4,588,828		0.0000	1.0000	97.56
9.5	4,627,583		0.0000	1.0000	97.56
10.5	4,699,644	457,262	0.0973	0.9027	97.56
11.5	4,397,637		0.0000	1.0000	88.07
12.5	4,408,436	4,925	0.0011	0.9989	88.07
13.5	4,411,306	68,370	0.0155	0.9845	87.97
14.5	4,351,300		0.0000	1.0000	86.60
15.5	4,429,345	2,629,841	0.5937	0.4063	86.60
16.5	1,767,752		0.0000	1.0000	35.18
17.5	1,791,013	4,983	0.0028	0.9972	35.18
18.5	1,784,095		0.0000	1.0000	35.09
19.5	950,152	3,960	0.0042	0.9958	35.09
20.5	5,710,602	5,000	0.0009	0.9991	34.94
21.5	5,705,602	46,933	0.0082	0.9918	34.91
22.5	5,580,703		0.0000	1.0000	34.62
23.5	5,549,323	424	0.0001	0.9999	34.62
24.5	5,512,328		0.0000	1.0000	34.62
25.5	5,473,572		0.0000	1.0000	34.62
26.5	5,406,495		0.0000	1.0000	34.62
27.5	5,234,316		0.0000	1.0000	34.62
28.5	5,223,518	62,134	0.0119	0.9881	34.62
29.5	5,153,589	7,302	0.0014	0.9986	34.21
30.5	5,137,922		0.0000	1.0000	34.16
31.5	5,056,182		0.0000	1.0000	34.16
32.5	5,039,401	27,426	0.0054	0.9946	34.16
33.5	4,813,673		0.0000	1.0000	33.97
34.5	4,776,097		0.0000	1.0000	33.97
35.5	4,732,532		0.0000	1.0000	33.97
36.5					33.97

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 354.00 TOWERS AND FIXTURES  
ORIGINAL AND SMOOTH SURVIVOR CURVES



EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 354.00 TOWERS AND FIXTURES

ORIGINAL LIFE TABLE

PLACEMENT BAND 1957-1982			EXPERIENCE BAND 1984-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0					
0.5					
1.5	1,385		0.0000	1.0000	100.00
2.5	2,171,385		0.0000	1.0000	100.00
3.5	2,171,385		0.0000	1.0000	100.00
4.5	3,078,289		0.0000	1.0000	100.00
5.5	3,078,289		0.0000	1.0000	100.00
6.5	3,452,671		0.0000	1.0000	100.00
7.5	3,504,170		0.0000	1.0000	100.00
8.5	3,504,170		0.0000	1.0000	100.00
9.5	3,504,170		0.0000	1.0000	100.00
10.5	3,504,170		0.0000	1.0000	100.00
11.5	3,504,170		0.0000	1.0000	100.00
12.5	3,504,170		0.0000	1.0000	100.00
13.5	3,504,170		0.0000	1.0000	100.00
14.5	3,504,170		0.0000	1.0000	100.00
15.5	3,506,849		0.0000	1.0000	100.00
16.5	3,713,169		0.0000	1.0000	100.00
17.5	3,713,169		0.0000	1.0000	100.00
18.5	3,713,169		0.0000	1.0000	100.00
19.5	3,713,169		0.0000	1.0000	100.00
20.5	3,713,169		0.0000	1.0000	100.00
21.5	3,713,169		0.0000	1.0000	100.00
22.5	3,878,461		0.0000	1.0000	100.00
23.5	3,878,461		0.0000	1.0000	100.00
24.5	3,888,227		0.0000	1.0000	100.00
25.5	3,888,227		0.0000	1.0000	100.00
26.5	3,905,020		0.0000	1.0000	100.00
27.5	3,905,020		0.0000	1.0000	100.00
28.5	3,905,020		0.0000	1.0000	100.00
29.5	3,905,020		0.0000	1.0000	100.00
30.5	3,905,020		0.0000	1.0000	100.00
31.5	3,905,020		0.0000	1.0000	100.00
32.5	3,905,020		0.0000	1.0000	100.00
33.5	3,905,020		0.0000	1.0000	100.00
34.5	3,905,020		0.0000	1.0000	100.00
35.5	3,905,020		0.0000	1.0000	100.00
36.5	3,905,020		0.0000	1.0000	100.00
37.5	3,903,635		0.0000	1.0000	100.00
38.5	1,733,635		0.0000	1.0000	100.00

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 354.00 TOWERS AND FIXTURES

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1957-1982			EXPERIENCE BAND 1984-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	1,733,635		0.0000	1.0000	100.00	
40.5	826,731	51,499	0.0623	0.9377	100.00	
41.5	775,231		0.0000	1.0000	93.77	
42.5	400,850		0.0000	1.0000	93.77	
43.5	400,850		0.0000	1.0000	93.77	
44.5	400,850		0.0000	1.0000	93.77	
45.5	400,850		0.0000	1.0000	93.77	
46.5	400,850		0.0000	1.0000	93.77	
47.5	400,850		0.0000	1.0000	93.77	
48.5	400,850		0.0000	1.0000	93.77	
49.5	400,850		0.0000	1.0000	93.77	
50.5	400,850		0.0000	1.0000	93.77	
51.5	398,171		0.0000	1.0000	93.77	
52.5	191,851		0.0000	1.0000	93.77	
53.5	191,851		0.0000	1.0000	93.77	
54.5	191,851		0.0000	1.0000	93.77	
55.5	191,851		0.0000	1.0000	93.77	
56.5	191,851		0.0000	1.0000	93.77	
57.5	191,851		0.0000	1.0000	93.77	
58.5	26,559		0.0000	1.0000	93.77	
59.5	26,559		0.0000	1.0000	93.77	
60.5	16,793		0.0000	1.0000	93.77	
61.5	16,793		0.0000	1.0000	93.77	
62.5					93.77	

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 354.00 TOWERS AND FIXTURES

ORIGINAL LIFE TABLE

PLACEMENT BAND 1957-1982			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0					
0.5					
1.5					
2.5					
3.5					
4.5					
5.5					
6.5					
7.5					
8.5					
9.5					
10.5					
11.5					
12.5					
13.5					
14.5					
15.5					
16.5					
17.5					
18.5					
19.5					
20.5					
21.5					
22.5	1,385		0.0000	1.0000	100.00
23.5	2,171,385		0.0000	1.0000	100.00
24.5	2,171,385		0.0000	1.0000	100.00
25.5	3,078,289		0.0000	1.0000	100.00
26.5	3,078,289		0.0000	1.0000	100.00
27.5	3,452,671		0.0000	1.0000	100.00
28.5	3,504,170		0.0000	1.0000	100.00
29.5	3,504,170		0.0000	1.0000	100.00
30.5	3,504,170		0.0000	1.0000	100.00
31.5	3,504,170		0.0000	1.0000	100.00
32.5	3,504,170		0.0000	1.0000	100.00
33.5	3,504,170		0.0000	1.0000	100.00
34.5	3,504,170		0.0000	1.0000	100.00
35.5	3,504,170		0.0000	1.0000	100.00
36.5	3,506,849		0.0000	1.0000	100.00
37.5	3,711,784		0.0000	1.0000	100.00
38.5	1,541,784		0.0000	1.0000	100.00

EAST KENTUCKY POWER COOPERATIVE, INC.

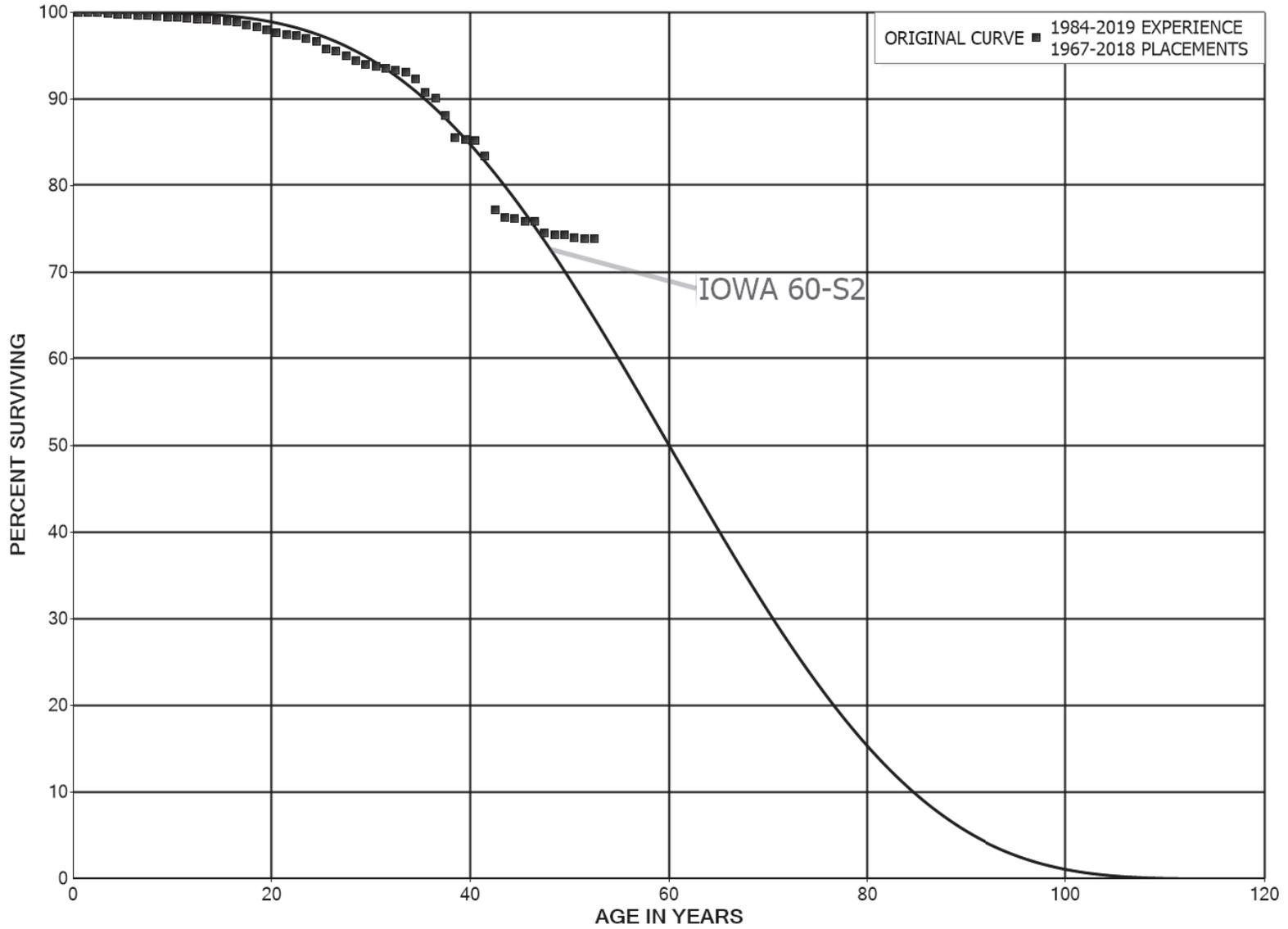
ACCOUNT 354.00 TOWERS AND FIXTURES

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1957-1982			EXPERIENCE BAND 2005-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	1,541,784		0.0000	1.0000	100.00	
40.5	634,879	51,499	0.0811	0.9189	100.00	
41.5	583,380		0.0000	1.0000	91.89	
42.5	208,999		0.0000	1.0000	91.89	
43.5	374,291		0.0000	1.0000	91.89	
44.5	374,291		0.0000	1.0000	91.89	
45.5	384,057		0.0000	1.0000	91.89	
46.5	384,057		0.0000	1.0000	91.89	
47.5	400,850		0.0000	1.0000	91.89	
48.5	400,850		0.0000	1.0000	91.89	
49.5	400,850		0.0000	1.0000	91.89	
50.5	400,850		0.0000	1.0000	91.89	
51.5	398,171		0.0000	1.0000	91.89	
52.5	191,851		0.0000	1.0000	91.89	
53.5	191,851		0.0000	1.0000	91.89	
54.5	191,851		0.0000	1.0000	91.89	
55.5	191,851		0.0000	1.0000	91.89	
56.5	191,851		0.0000	1.0000	91.89	
57.5	191,851		0.0000	1.0000	91.89	
58.5	26,559		0.0000	1.0000	91.89	
59.5	26,559		0.0000	1.0000	91.89	
60.5	16,793		0.0000	1.0000	91.89	
61.5	16,793		0.0000	1.0000	91.89	
62.5					91.89	

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 355.00 POLES AND FIXTURES  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 355.00 POLES AND FIXTURES

ORIGINAL LIFE TABLE

PLACEMENT BAND 1967-2018

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	125,919,525	17,261	0.0001	0.9999	100.00
0.5	128,636,796	49,126	0.0004	0.9996	99.99
1.5	132,582,158	31,011	0.0002	0.9998	99.95
2.5	135,164,017	126,995	0.0009	0.9991	99.92
3.5	126,440,885	132,184	0.0010	0.9990	99.83
4.5	124,683,321	63,146	0.0005	0.9995	99.73
5.5	118,252,144	40,643	0.0003	0.9997	99.68
6.5	117,610,974	85,536	0.0007	0.9993	99.64
7.5	116,054,025	84,135	0.0007	0.9993	99.57
8.5	106,472,618	52,229	0.0005	0.9995	99.50
9.5	94,935,600	94,057	0.0010	0.9990	99.45
10.5	88,977,214	49,542	0.0006	0.9994	99.35
11.5	82,488,890	53,572	0.0006	0.9994	99.29
12.5	70,860,134	56,116	0.0008	0.9992	99.23
13.5	69,553,731	41,867	0.0006	0.9994	99.15
14.5	66,215,812	87,516	0.0013	0.9987	99.09
15.5	58,262,034	85,483	0.0015	0.9985	98.96
16.5	59,338,505	172,508	0.0029	0.9971	98.82
17.5	56,010,517	162,687	0.0029	0.9971	98.53
18.5	53,302,799	132,528	0.0025	0.9975	98.24
19.5	51,000,414	203,980	0.0040	0.9960	98.00
20.5	50,578,617	109,779	0.0022	0.9978	97.61
21.5	49,601,618	75,217	0.0015	0.9985	97.39
22.5	48,242,742	169,027	0.0035	0.9965	97.25
23.5	46,879,553	146,565	0.0031	0.9969	96.91
24.5	43,310,218	388,308	0.0090	0.9910	96.60
25.5	42,386,984	125,939	0.0030	0.9970	95.74
26.5	39,819,322	210,846	0.0053	0.9947	95.45
27.5	38,446,073	240,881	0.0063	0.9937	94.95
28.5	36,965,488	134,253	0.0036	0.9964	94.35
29.5	35,835,196	127,532	0.0036	0.9964	94.01
30.5	35,027,299	74,344	0.0021	0.9979	93.67
31.5	32,776,078	73,820	0.0023	0.9977	93.48
32.5	31,922,541	51,928	0.0016	0.9984	93.27
33.5	28,866,314	246,946	0.0086	0.9914	93.11
34.5	27,872,901	466,933	0.0168	0.9832	92.32
35.5	25,723,231	189,908	0.0074	0.9926	90.77
36.5	24,209,541	551,602	0.0228	0.9772	90.10
37.5	23,087,060	659,804	0.0286	0.9714	88.05
38.5	19,496,963	50,540	0.0026	0.9974	85.53

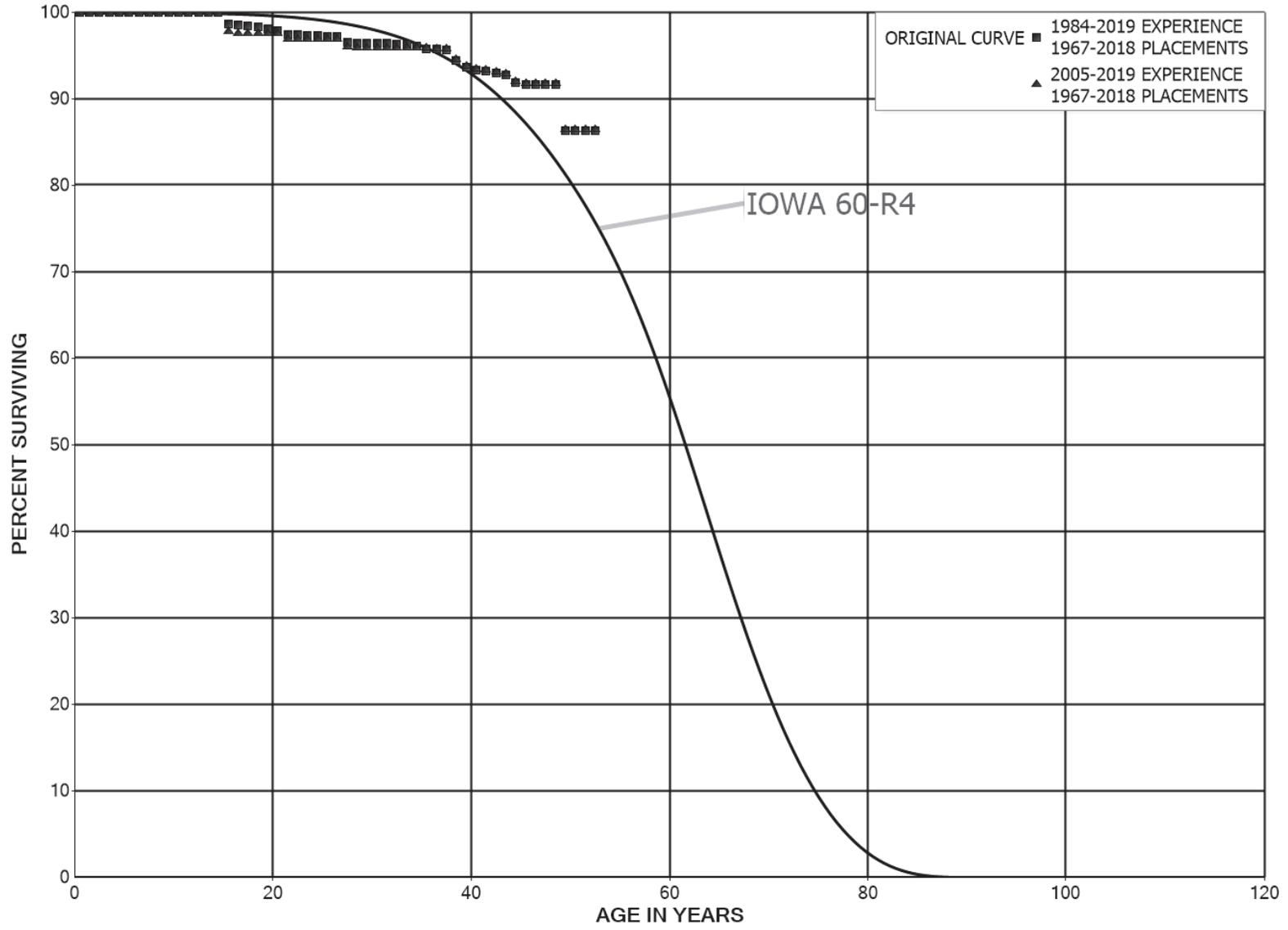
EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 355.00 POLES AND FIXTURES

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1967-2018			EXPERIENCE BAND 1984-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	18,970,852	31,182	0.0016	0.9984	85.31	
40.5	12,082,060	244,062	0.0202	0.9798	85.17	
41.5	10,891,420	821,090	0.0754	0.9246	83.45	
42.5	7,894,564	90,136	0.0114	0.9886	77.16	
43.5	7,458,958	15,275	0.0020	0.9980	76.28	
44.5	6,977,565	21,407	0.0031	0.9969	76.12	
45.5	6,496,697	6,287	0.0010	0.9990	75.89	
46.5	6,427,048	114,101	0.0178	0.9822	75.81	
47.5	6,243,300	16,985	0.0027	0.9973	74.47	
48.5	6,095,885	2,069	0.0003	0.9997	74.26	
49.5	5,356,571	25,113	0.0047	0.9953	74.24	
50.5	3,306,264	460	0.0001	0.9999	73.89	
51.5	3,304,824	460	0.0001	0.9999	73.88	
52.5					73.87	

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 356.00 OVERHEAD CONDUCTORS AND DEVICES  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 356.00 OVERHEAD CONDUCTORS AND DEVICES

ORIGINAL LIFE TABLE

PLACEMENT BAND 1967-2018

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	106,706,279		0.0000	1.0000	100.00
0.5	108,497,179	4	0.0000	1.0000	100.00
1.5	108,003,997	43	0.0000	1.0000	100.00
2.5	112,336,043	296	0.0000	1.0000	100.00
3.5	110,302,208	403	0.0000	1.0000	100.00
4.5	115,790,851	3,150	0.0000	1.0000	100.00
5.5	116,156,361	2,380	0.0000	1.0000	100.00
6.5	115,354,978	9,054	0.0001	0.9999	99.99
7.5	115,047,722	5,534	0.0000	1.0000	99.99
8.5	114,065,797	10,102	0.0001	0.9999	99.98
9.5	111,519,908	4,929	0.0000	1.0000	99.97
10.5	84,348,621	7,432	0.0001	0.9999	99.97
11.5	80,178,143	6,281	0.0001	0.9999	99.96
12.5	67,722,998	17,047	0.0003	0.9997	99.95
13.5	67,753,804	8,139	0.0001	0.9999	99.93
14.5	63,922,509	850,878	0.0133	0.9867	99.91
15.5	60,500,834	60,851	0.0010	0.9990	98.58
16.5	64,068,814	94,000	0.0015	0.9985	98.49
17.5	59,118,017	26,836	0.0005	0.9995	98.34
18.5	56,279,834	157,669	0.0028	0.9972	98.30
19.5	51,922,114	73,989	0.0014	0.9986	98.02
20.5	51,591,659	227,547	0.0044	0.9956	97.88
21.5	50,037,946	19,449	0.0004	0.9996	97.45
22.5	48,830,422	76,044	0.0016	0.9984	97.41
23.5	46,946,636	14,050	0.0003	0.9997	97.26
24.5	42,919,997	14,858	0.0003	0.9997	97.23
25.5	42,499,559	2,428	0.0001	0.9999	97.20
26.5	39,568,014	266,660	0.0067	0.9933	97.19
27.5	37,845,048	43,879	0.0012	0.9988	96.54
28.5	36,341,355	1,359	0.0000	1.0000	96.42
29.5	34,279,236	3,369	0.0001	0.9999	96.42
30.5	33,778,686	9,517	0.0003	0.9997	96.41
31.5	33,184,631	15,865	0.0005	0.9995	96.38
32.5	32,588,708	24,811	0.0008	0.9992	96.34
33.5	29,269,700	57,477	0.0020	0.9980	96.27
34.5	28,808,325	106,179	0.0037	0.9963	96.08
35.5	27,061,541	13,174	0.0005	0.9995	95.72
36.5	25,786,762	8,474	0.0003	0.9997	95.68
37.5	25,166,495	325,545	0.0129	0.9871	95.64
38.5	19,904,251	162,902	0.0082	0.9918	94.41

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 356.00 OVERHEAD CONDUCTORS AND DEVICES

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1967-2018			EXPERIENCE BAND 1984-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	19,137,136	69,397	0.0036	0.9964	93.63	
40.5	12,694,986	17,700	0.0014	0.9986	93.29	
41.5	11,548,944	23,743	0.0021	0.9979	93.16	
42.5	9,589,635	27,151	0.0028	0.9972	92.97	
43.5	9,531,984	87,299	0.0092	0.9908	92.71	
44.5	9,334,278	27,250	0.0029	0.9971	91.86	
45.5	8,602,622		0.0000	1.0000	91.59	
46.5	8,567,844		0.0000	1.0000	91.59	
47.5	8,486,417		0.0000	1.0000	91.59	
48.5	8,320,276	484,367	0.0582	0.9418	91.59	
49.5	6,971,399		0.0000	1.0000	86.26	
50.5	6,142,672		0.0000	1.0000	86.26	
51.5	6,114,015		0.0000	1.0000	86.26	
52.5					86.26	

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 356.00 OVERHEAD CONDUCTORS AND DEVICES

ORIGINAL LIFE TABLE

PLACEMENT BAND 1967-2018

EXPERIENCE BAND 2005-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	62,973,253		0.0000	1.0000	100.00
0.5	66,988,738		0.0000	1.0000	100.00
1.5	69,832,213		0.0000	1.0000	100.00
2.5	74,023,644		0.0000	1.0000	100.00
3.5	74,189,009		0.0000	1.0000	100.00
4.5	77,462,258		0.0000	1.0000	100.00
5.5	76,942,257		0.0000	1.0000	100.00
6.5	75,500,878		0.0000	1.0000	100.00
7.5	76,359,652		0.0000	1.0000	100.00
8.5	77,077,985		0.0000	1.0000	100.00
9.5	77,830,598		0.0000	1.0000	100.00
10.5	51,033,887		0.0000	1.0000	100.00
11.5	49,715,377		0.0000	1.0000	100.00
12.5	38,549,210	11,800	0.0003	0.9997	100.00
13.5	39,172,051		0.0000	1.0000	99.97
14.5	36,532,018	839,505	0.0230	0.9770	99.97
15.5	33,536,794	42,335	0.0013	0.9987	97.67
16.5	29,867,773		0.0000	1.0000	97.55
17.5	25,591,033		0.0000	1.0000	97.55
18.5	26,227,987	15,244	0.0006	0.9994	97.55
19.5	22,416,590		0.0000	1.0000	97.49
20.5	23,800,729	154,104	0.0065	0.9935	97.49
21.5	23,582,064		0.0000	1.0000	96.86
22.5	23,263,356		0.0000	1.0000	96.86
23.5	26,429,974		0.0000	1.0000	96.86
24.5	23,024,387		0.0000	1.0000	96.86
25.5	28,991,560		0.0000	1.0000	96.86
26.5	27,192,420	262,000	0.0096	0.9904	96.86
27.5	27,410,976	37,660	0.0014	0.9986	95.93
28.5	25,944,002		0.0000	1.0000	95.80
29.5	23,993,649		0.0000	1.0000	95.80
30.5	24,200,874	1,234	0.0001	0.9999	95.80
31.5	23,649,881		0.0000	1.0000	95.79
32.5	23,151,250	62	0.0000	1.0000	95.79
33.5	20,023,133		0.0000	1.0000	95.79
34.5	20,489,631		0.0000	1.0000	95.79
35.5	19,677,753	5,887	0.0003	0.9997	95.79
36.5	18,487,214		0.0000	1.0000	95.76
37.5	25,166,495	325,545	0.0129	0.9871	95.76
38.5	19,904,251	162,902	0.0082	0.9918	94.52

EAST KENTUCKY POWER COOPERATIVE, INC.

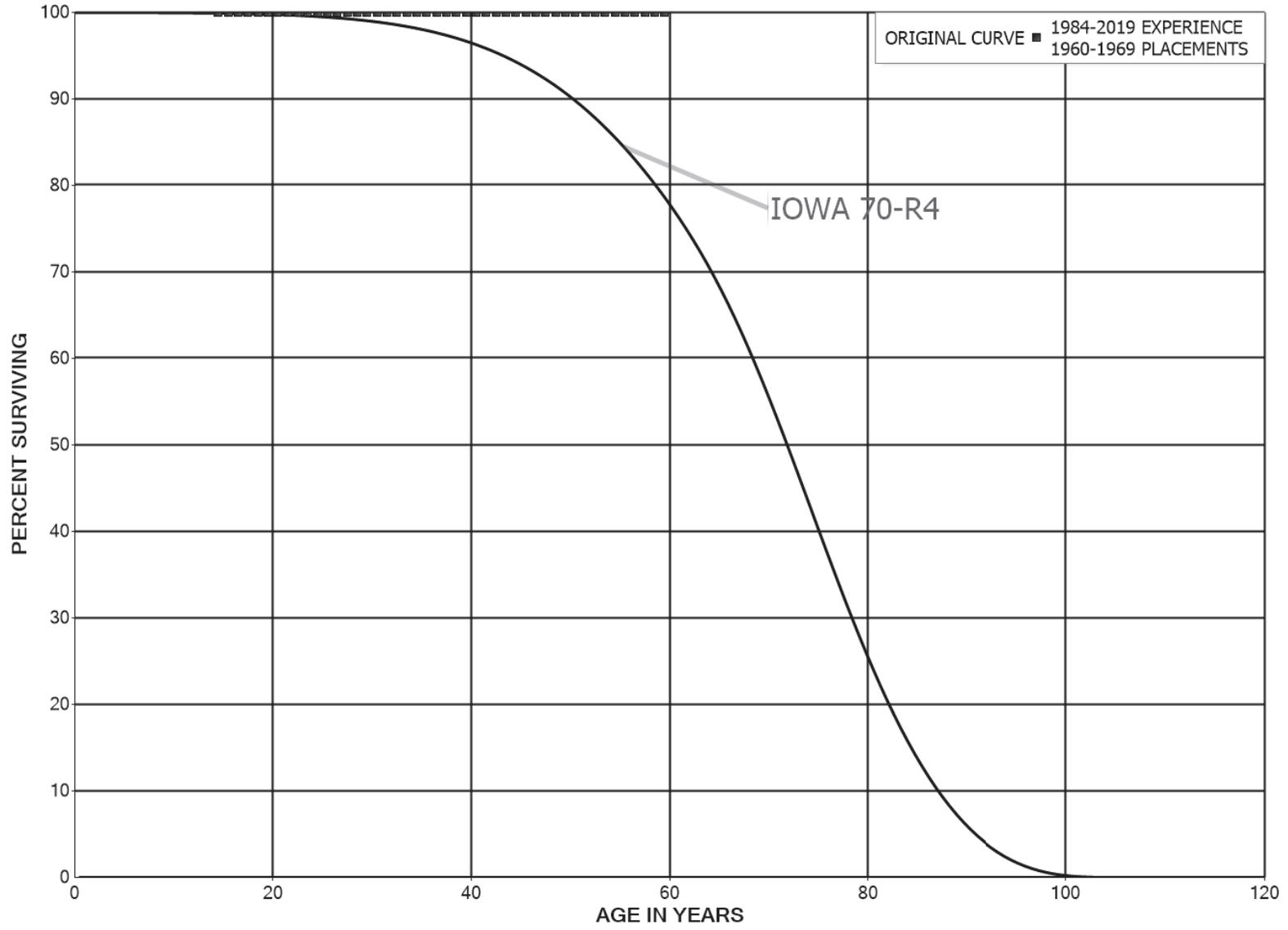
ACCOUNT 356.00 OVERHEAD CONDUCTORS AND DEVICES

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1967-2018			EXPERIENCE BAND 2005-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	19,137,136	69,397	0.0036	0.9964	93.75	
40.5	12,694,986	17,700	0.0014	0.9986	93.41	
41.5	11,548,944	23,743	0.0021	0.9979	93.28	
42.5	9,589,635	27,151	0.0028	0.9972	93.09	
43.5	9,531,984	87,299	0.0092	0.9908	92.82	
44.5	9,334,278	27,250	0.0029	0.9971	91.97	
45.5	8,602,622		0.0000	1.0000	91.71	
46.5	8,567,844		0.0000	1.0000	91.71	
47.5	8,486,417		0.0000	1.0000	91.71	
48.5	8,320,276	484,367	0.0582	0.9418	91.71	
49.5	6,971,399		0.0000	1.0000	86.37	
50.5	6,142,672		0.0000	1.0000	86.37	
51.5	6,114,015		0.0000	1.0000	86.37	
52.5					86.37	

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 359.00 ROADS AND TRAILS  
ORIGINAL AND SMOOTH SURVIVOR CURVES



EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 359.00 ROADS AND TRAILS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1960-1969			EXPERIENCE BAND 1984-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0					
0.5					
1.5					
2.5					
3.5					
4.5					
5.5					
6.5					
7.5					
8.5					
9.5					
10.5					
11.5					
12.5					
13.5					
14.5	7,116		0.0000	1.0000	100.00
15.5	7,116		0.0000	1.0000	100.00
16.5	7,116		0.0000	1.0000	100.00
17.5	7,116		0.0000	1.0000	100.00
18.5	7,116		0.0000	1.0000	100.00
19.5	7,116		0.0000	1.0000	100.00
20.5	7,116		0.0000	1.0000	100.00
21.5	7,116		0.0000	1.0000	100.00
22.5	7,116		0.0000	1.0000	100.00
23.5	23,288		0.0000	1.0000	100.00
24.5	23,288		0.0000	1.0000	100.00
25.5	23,288		0.0000	1.0000	100.00
26.5	23,288		0.0000	1.0000	100.00
27.5	23,288		0.0000	1.0000	100.00
28.5	23,288		0.0000	1.0000	100.00
29.5	23,288		0.0000	1.0000	100.00
30.5	23,288		0.0000	1.0000	100.00
31.5	23,288		0.0000	1.0000	100.00
32.5	23,288		0.0000	1.0000	100.00
33.5	23,288		0.0000	1.0000	100.00
34.5	23,288		0.0000	1.0000	100.00
35.5	23,288		0.0000	1.0000	100.00
36.5	23,288		0.0000	1.0000	100.00
37.5	23,288		0.0000	1.0000	100.00
38.5	23,288		0.0000	1.0000	100.00

EAST KENTUCKY POWER COOPERATIVE, INC.

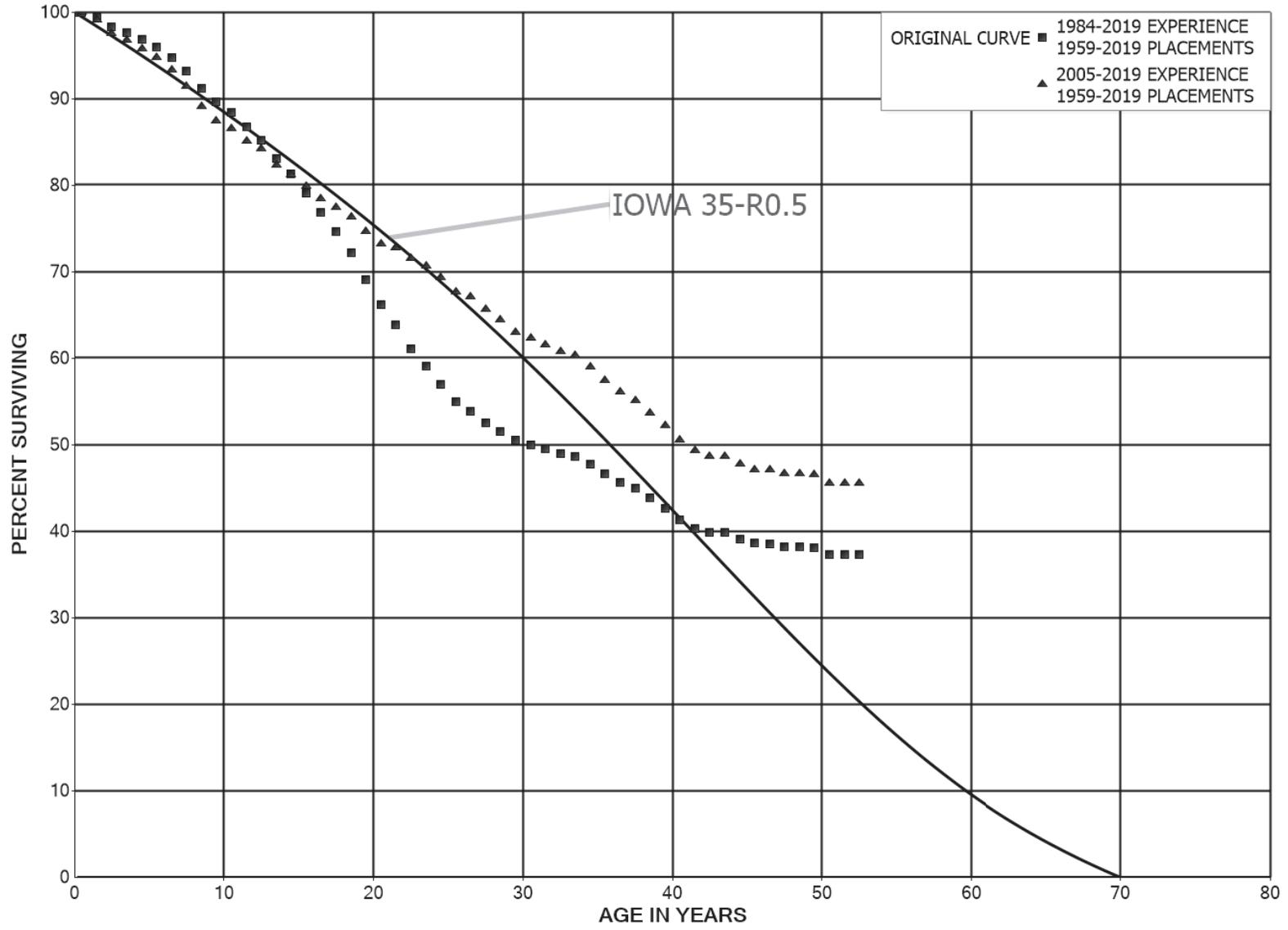
ACCOUNT 359.00 ROADS AND TRAILS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1960-1969			EXPERIENCE BAND 1984-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	23,288		0.0000	1.0000	100.00
40.5	23,288		0.0000	1.0000	100.00
41.5	23,288		0.0000	1.0000	100.00
42.5	23,288		0.0000	1.0000	100.00
43.5	23,288		0.0000	1.0000	100.00
44.5	23,288		0.0000	1.0000	100.00
45.5	23,288		0.0000	1.0000	100.00
46.5	23,288		0.0000	1.0000	100.00
47.5	23,288		0.0000	1.0000	100.00
48.5	23,288		0.0000	1.0000	100.00
49.5	23,288		0.0000	1.0000	100.00
50.5	16,172		0.0000	1.0000	100.00
51.5	16,172		0.0000	1.0000	100.00
52.5	16,172		0.0000	1.0000	100.00
53.5	16,172		0.0000	1.0000	100.00
54.5	16,172		0.0000	1.0000	100.00
55.5	16,172		0.0000	1.0000	100.00
56.5	16,172		0.0000	1.0000	100.00
57.5	16,172		0.0000	1.0000	100.00
58.5	16,172		0.0000	1.0000	100.00
59.5					100.00

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 362.00 STATION EQUIPMENT  
ORIGINAL AND SMOOTH SURVIVOR CURVES



EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 362.00 STATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1959-2019

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	239,443,047	162,347	0.0007	0.9993	100.00
0.5	239,476,524	1,340,117	0.0056	0.9944	99.93
1.5	239,326,828	2,552,659	0.0107	0.9893	99.37
2.5	235,871,878	1,582,224	0.0067	0.9933	98.31
3.5	227,207,840	1,879,903	0.0083	0.9917	97.65
4.5	214,742,743	1,948,577	0.0091	0.9909	96.85
5.5	202,674,394	2,582,873	0.0127	0.9873	95.97
6.5	195,869,932	3,209,970	0.0164	0.9836	94.74
7.5	181,332,694	3,996,356	0.0220	0.9780	93.19
8.5	170,704,690	2,908,536	0.0170	0.9830	91.14
9.5	158,149,317	2,044,435	0.0129	0.9871	89.58
10.5	145,992,453	2,867,825	0.0196	0.9804	88.43
11.5	134,375,890	2,300,321	0.0171	0.9829	86.69
12.5	123,129,857	3,114,263	0.0253	0.9747	85.21
13.5	112,564,308	2,441,481	0.0217	0.9783	83.05
14.5	105,010,641	2,757,675	0.0263	0.9737	81.25
15.5	96,867,872	2,827,904	0.0292	0.9708	79.12
16.5	91,058,889	2,611,427	0.0287	0.9713	76.81
17.5	83,283,672	2,691,827	0.0323	0.9677	74.60
18.5	75,775,562	3,282,681	0.0433	0.9567	72.19
19.5	59,746,903	2,522,662	0.0422	0.9578	69.06
20.5	57,650,601	2,003,996	0.0348	0.9652	66.15
21.5	50,037,274	2,152,180	0.0430	0.9570	63.85
22.5	42,087,699	1,416,181	0.0336	0.9664	61.10
23.5	37,773,963	1,311,514	0.0347	0.9653	59.05
24.5	33,877,126	1,200,776	0.0354	0.9646	57.00
25.5	31,554,863	682,058	0.0216	0.9784	54.98
26.5	28,784,802	700,059	0.0243	0.9757	53.79
27.5	23,925,660	439,218	0.0184	0.9816	52.48
28.5	21,217,228	421,284	0.0199	0.9801	51.52
29.5	19,665,650	192,164	0.0098	0.9902	50.49
30.5	17,838,394	177,364	0.0099	0.9901	50.00
31.5	16,481,966	194,808	0.0118	0.9882	49.50
32.5	15,724,699	91,760	0.0058	0.9942	48.92
33.5	14,847,349	281,419	0.0190	0.9810	48.63
34.5	13,713,523	313,271	0.0228	0.9772	47.71
35.5	12,675,253	261,328	0.0206	0.9794	46.62
36.5	10,750,766	171,768	0.0160	0.9840	45.66
37.5	9,669,001	233,649	0.0242	0.9758	44.93
38.5	8,341,448	223,767	0.0268	0.9732	43.84

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 362.00 STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1959-2019			EXPERIENCE BAND 1984-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	7,276,174	226,641	0.0311	0.9689	42.67	
40.5	6,072,196	150,559	0.0248	0.9752	41.34	
41.5	4,558,998	55,310	0.0121	0.9879	40.31	
42.5	3,818,679	2,225	0.0006	0.9994	39.83	
43.5	3,150,312	54,852	0.0174	0.9826	39.80	
44.5	2,854,962	37,301	0.0131	0.9869	39.11	
45.5	2,459,776	4,875	0.0020	0.9980	38.60	
46.5	2,158,325	20,203	0.0094	0.9906	38.52	
47.5	2,008,812	84	0.0000	1.0000	38.16	
48.5	1,851,939	3,273	0.0018	0.9982	38.16	
49.5	1,683,577	35,624	0.0212	0.9788	38.09	
50.5	1,518,223		0.0000	1.0000	37.29	
51.5	1,423,434	1,732	0.0012	0.9988	37.29	
52.5	259,677		0.0000	1.0000	37.24	
53.5	132,988	92	0.0007	0.9993	37.24	
54.5	123,894		0.0000	1.0000	37.21	
55.5	123,646		0.0000	1.0000	37.21	
56.5	123,258		0.0000	1.0000	37.21	
57.5	123,258		0.0000	1.0000	37.21	
58.5	123,083		0.0000	1.0000	37.21	
59.5	964		0.0000	1.0000	37.21	
60.5					37.21	

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 362.00 STATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1959-2019

EXPERIENCE BAND 2005-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	141,843,112	113,168	0.0008	0.9992	100.00
0.5	146,537,769	1,210,151	0.0083	0.9917	99.92
1.5	151,944,763	2,373,897	0.0156	0.9844	99.10
2.5	152,893,878	1,340,048	0.0088	0.9912	97.55
3.5	147,879,966	1,543,678	0.0104	0.9896	96.69
4.5	148,623,128	1,509,371	0.0102	0.9898	95.68
5.5	132,408,521	2,046,775	0.0155	0.9845	94.71
6.5	130,197,631	2,548,273	0.0196	0.9804	93.25
7.5	121,518,826	3,187,393	0.0262	0.9738	91.42
8.5	114,893,845	2,049,132	0.0178	0.9822	89.02
9.5	105,287,722	1,083,797	0.0103	0.9897	87.44
10.5	94,932,910	1,598,371	0.0168	0.9832	86.54
11.5	86,910,018	977,461	0.0112	0.9888	85.08
12.5	81,850,554	1,782,000	0.0218	0.9782	84.12
13.5	74,008,182	1,018,019	0.0138	0.9862	82.29
14.5	69,299,209	1,149,794	0.0166	0.9834	81.16
15.5	64,352,712	1,134,887	0.0176	0.9824	79.81
16.5	58,436,200	753,303	0.0129	0.9871	78.40
17.5	52,827,913	726,545	0.0138	0.9862	77.39
18.5	48,694,924	1,107,122	0.0227	0.9773	76.33
19.5	36,337,824	695,167	0.0191	0.9809	74.59
20.5	36,984,253	212,399	0.0057	0.9943	73.17
21.5	33,047,805	584,419	0.0177	0.9823	72.75
22.5	27,746,894	348,524	0.0126	0.9874	71.46
23.5	25,604,407	467,636	0.0183	0.9817	70.56
24.5	23,743,573	573,975	0.0242	0.9758	69.27
25.5	23,449,378	174,913	0.0075	0.9925	67.60
26.5	23,498,839	502,993	0.0214	0.9786	67.10
27.5	19,701,595	366,569	0.0186	0.9814	65.66
28.5	17,848,115	401,272	0.0225	0.9775	64.44
29.5	16,667,526	190,708	0.0114	0.9886	62.99
30.5	15,268,106	177,364	0.0116	0.9884	62.27
31.5	14,217,364	194,808	0.0137	0.9863	61.54
32.5	13,609,723	91,760	0.0067	0.9933	60.70
33.5	12,895,864	281,419	0.0218	0.9782	60.29
34.5	11,932,767	313,271	0.0263	0.9737	58.98
35.5	11,026,694	261,328	0.0237	0.9763	57.43
36.5	9,204,220	171,768	0.0187	0.9813	56.07
37.5	9,411,436	233,649	0.0248	0.9752	55.02
38.5	8,215,840	223,767	0.0272	0.9728	53.65

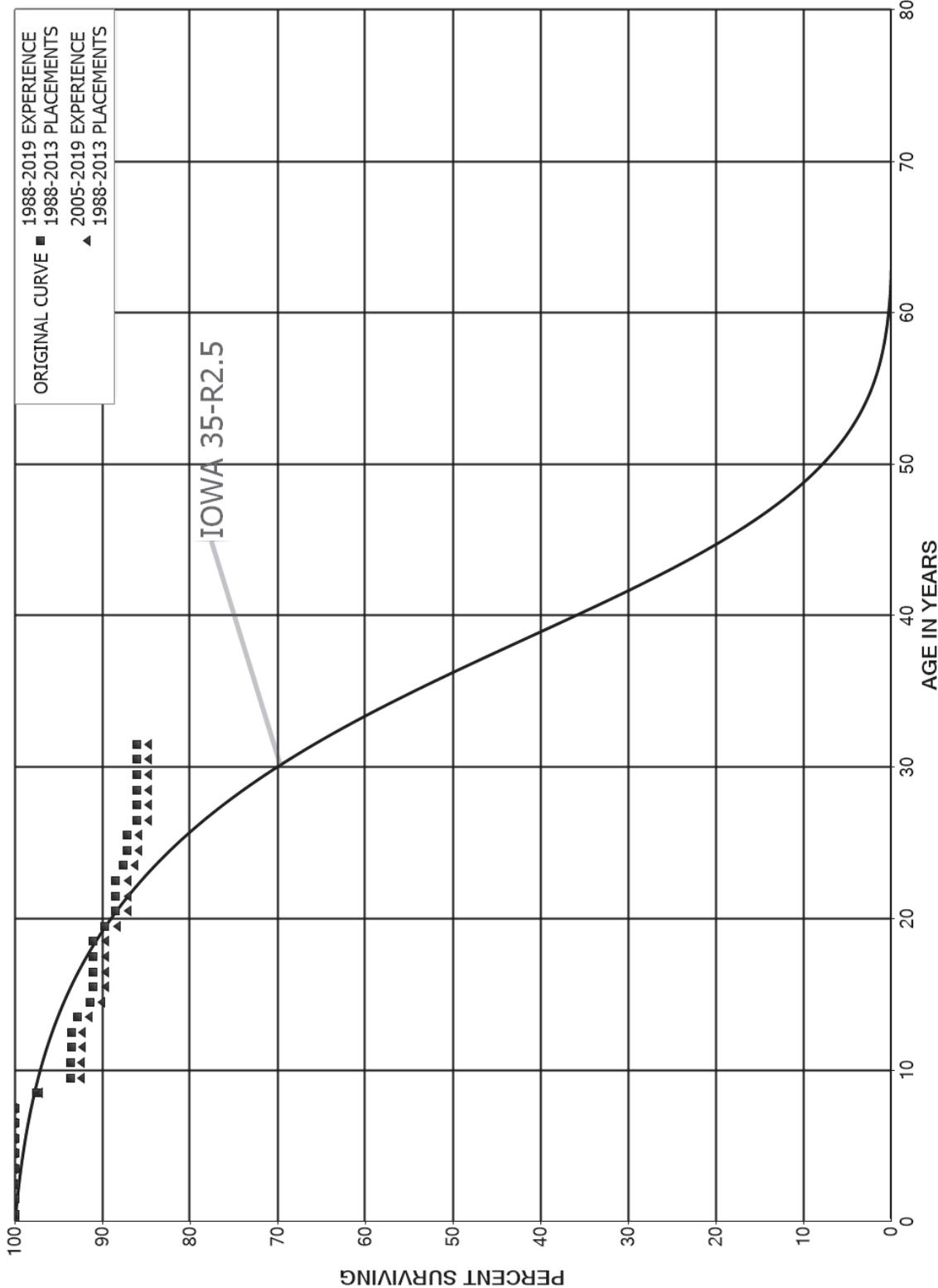
EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 362.00 STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1959-2019			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	7,159,289	226,641	0.0317	0.9683	52.19
40.5	5,955,311	150,559	0.0253	0.9747	50.54
41.5	4,442,112	55,310	0.0125	0.9875	49.26
42.5	3,701,794	2,225	0.0006	0.9994	48.65
43.5	3,033,427	54,852	0.0181	0.9819	48.62
44.5	2,854,962	37,301	0.0131	0.9869	47.74
45.5	2,459,776	4,875	0.0020	0.9980	47.12
46.5	2,158,325	20,203	0.0094	0.9906	47.02
47.5	2,008,812	84	0.0000	1.0000	46.58
48.5	1,851,939	3,273	0.0018	0.9982	46.58
49.5	1,683,577	35,624	0.0212	0.9788	46.50
50.5	1,518,223		0.0000	1.0000	45.52
51.5	1,423,434	1,732	0.0012	0.9988	45.52
52.5	259,677		0.0000	1.0000	45.46
53.5	132,988	92	0.0007	0.9993	45.46
54.5	123,894		0.0000	1.0000	45.43
55.5	123,646		0.0000	1.0000	45.43
56.5	123,258		0.0000	1.0000	45.43
57.5	123,258		0.0000	1.0000	45.43
58.5	123,083		0.0000	1.0000	45.43
59.5	964		0.0000	1.0000	45.43
60.5					45.43

EAST KENTUCKY POWER COOPERATIVE, INC.  
 ACCOUNT 362.10 STATION EQUIPMENT - SCADA  
 ORIGINAL AND SMOOTH SURVIVOR CURVES



EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 362.10 STATION EQUIPMENT - SCADA

ORIGINAL LIFE TABLE

PLACEMENT BAND 1988-2013			EXPERIENCE BAND 1988-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	13,056,475		0.0000	1.0000	100.00
0.5	12,923,251		0.0000	1.0000	100.00
1.5	9,537,590		0.0000	1.0000	100.00
2.5	6,569,202		0.0000	1.0000	100.00
3.5	6,569,202		0.0000	1.0000	100.00
4.5	6,569,202		0.0000	1.0000	100.00
5.5	6,569,202		0.0000	1.0000	100.00
6.5	6,542,453		0.0000	1.0000	100.00
7.5	6,424,719	159,146	0.0248	0.9752	100.00
8.5	5,734,171	227,015	0.0396	0.9604	97.52
9.5	5,449,824		0.0000	1.0000	93.66
10.5	5,049,338	7,562	0.0015	0.9985	93.66
11.5	4,962,829		0.0000	1.0000	93.52
12.5	4,962,829	34,780	0.0070	0.9930	93.52
13.5	3,274,973	51,034	0.0156	0.9844	92.87
14.5	2,958,880	11,638	0.0039	0.9961	91.42
15.5	1,947,940		0.0000	1.0000	91.06
16.5	1,922,278		0.0000	1.0000	91.06
17.5	1,922,278		0.0000	1.0000	91.06
18.5	1,922,278	27,513	0.0143	0.9857	91.06
19.5	1,706,981	23,555	0.0138	0.9862	89.76
20.5	1,683,427		0.0000	1.0000	88.52
21.5	1,648,610		0.0000	1.0000	88.52
22.5	1,044,787	10,096	0.0097	0.9903	88.52
23.5	1,034,692	5,522	0.0053	0.9947	87.66
24.5	777,796		0.0000	1.0000	87.19
25.5	635,935	8,461	0.0133	0.9867	87.19
26.5	398,801		0.0000	1.0000	86.03
27.5	383,451		0.0000	1.0000	86.03
28.5	256,338		0.0000	1.0000	86.03
29.5	256,338		0.0000	1.0000	86.03
30.5	256,338		0.0000	1.0000	86.03
31.5					86.03

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

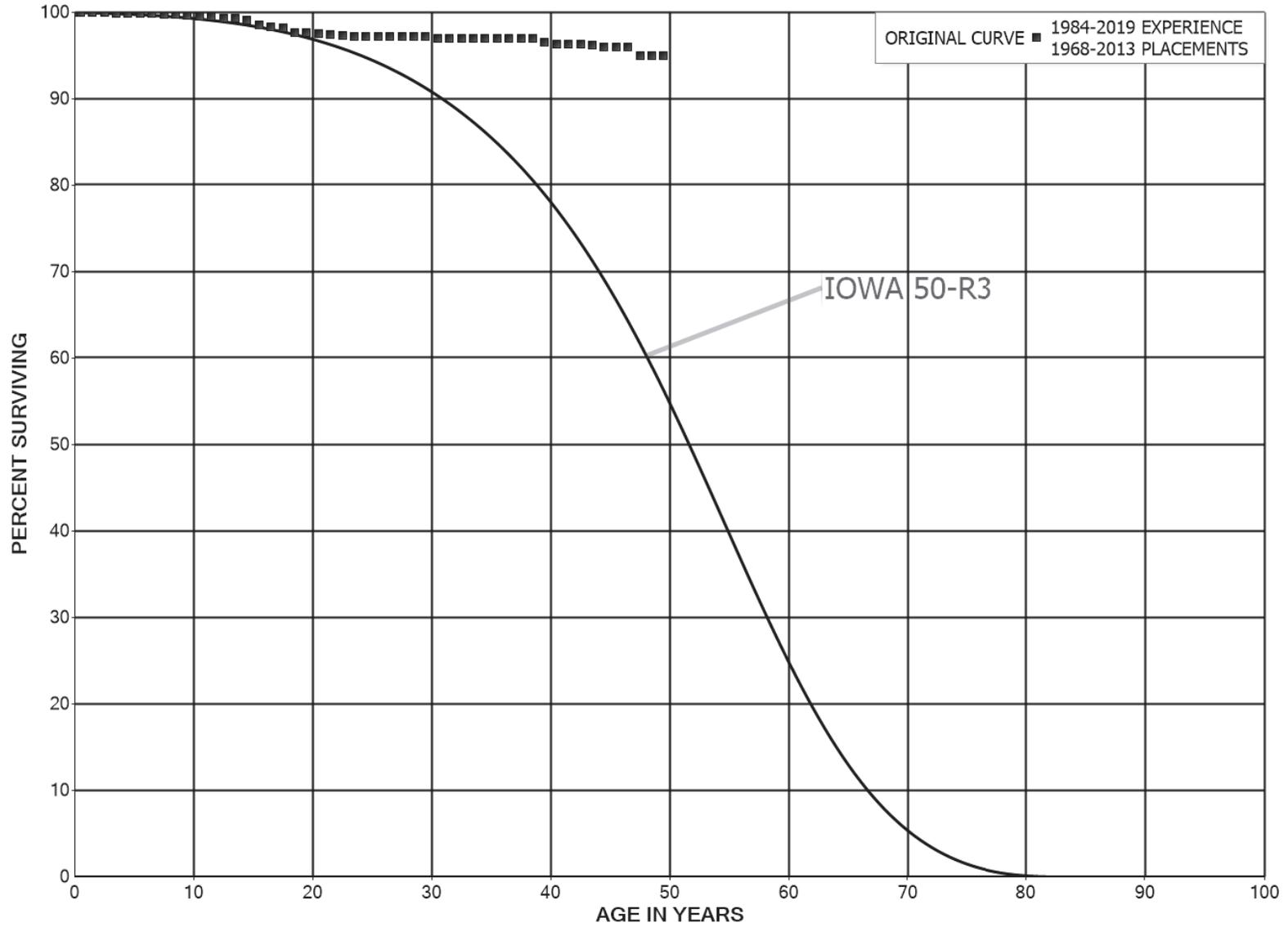
ACCOUNT 362.10 STATION EQUIPMENT - SCADA

ORIGINAL LIFE TABLE

PLACEMENT BAND 1988-2013			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	9,633,183		0.0000	1.0000	100.00
0.5	10,963,673		0.0000	1.0000	100.00
1.5	7,603,674		0.0000	1.0000	100.00
2.5	4,635,285		0.0000	1.0000	100.00
3.5	4,635,285		0.0000	1.0000	100.00
4.5	4,823,069		0.0000	1.0000	100.00
5.5	4,823,069		0.0000	1.0000	100.00
6.5	4,831,136		0.0000	1.0000	100.00
7.5	5,352,418	159,146	0.0297	0.9703	100.00
8.5	4,661,870	227,015	0.0487	0.9513	97.03
9.5	4,628,896		0.0000	1.0000	92.30
10.5	4,370,272	7,562	0.0017	0.9983	92.30
11.5	4,558,506		0.0000	1.0000	92.14
12.5	4,573,856	34,780	0.0076	0.9924	92.14
13.5	3,013,113	51,034	0.0169	0.9831	91.44
14.5	2,697,020	11,638	0.0043	0.9957	89.89
15.5	1,686,080		0.0000	1.0000	89.50
16.5	1,922,278		0.0000	1.0000	89.50
17.5	1,922,278		0.0000	1.0000	89.50
18.5	1,922,278	27,513	0.0143	0.9857	89.50
19.5	1,706,981	23,555	0.0138	0.9862	88.22
20.5	1,683,427		0.0000	1.0000	87.01
21.5	1,648,610		0.0000	1.0000	87.01
22.5	1,044,787	10,096	0.0097	0.9903	87.01
23.5	1,034,692	5,522	0.0053	0.9947	86.17
24.5	777,796		0.0000	1.0000	85.71
25.5	635,935	8,461	0.0133	0.9867	85.71
26.5	398,801		0.0000	1.0000	84.57
27.5	383,451		0.0000	1.0000	84.57
28.5	256,338		0.0000	1.0000	84.57
29.5	256,338		0.0000	1.0000	84.57
30.5	256,338		0.0000	1.0000	84.57
31.5					84.57

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 368.00 LINE TRANSFORMERS  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 368.00 LINE TRANSFORMERS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1968-2013

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	1,423,532	220	0.0002	0.9998	100.00
0.5	1,446,330	348	0.0002	0.9998	99.98
1.5	1,480,423	440	0.0003	0.9997	99.96
2.5	1,520,122	661	0.0004	0.9996	99.93
3.5	1,522,251	559	0.0004	0.9996	99.89
4.5	1,534,868	431	0.0003	0.9997	99.85
5.5	1,554,109	388	0.0002	0.9998	99.82
6.5	1,419,251	663	0.0005	0.9995	99.80
7.5	962,564	399	0.0004	0.9996	99.75
8.5	975,637	938	0.0010	0.9990	99.71
9.5	1,017,486	689	0.0007	0.9993	99.61
10.5	1,053,640	916	0.0009	0.9991	99.55
11.5	1,032,489	1,539	0.0015	0.9985	99.46
12.5	1,071,374	544	0.0005	0.9995	99.31
13.5	1,315,451	1,937	0.0015	0.9985	99.26
14.5	1,313,514	8,228	0.0063	0.9937	99.11
15.5	1,293,434	2,109	0.0016	0.9984	98.49
16.5	1,248,429	2,123	0.0017	0.9983	98.33
17.5	1,126,424	5,774	0.0051	0.9949	98.17
18.5	1,041,293	767	0.0007	0.9993	97.66
19.5	855,042	1,103	0.0013	0.9987	97.59
20.5	853,939	1,063	0.0012	0.9988	97.47
21.5	852,876	192	0.0002	0.9998	97.34
22.5	852,684	832	0.0010	0.9990	97.32
23.5	851,852	212	0.0002	0.9998	97.23
24.5	851,640	128	0.0002	0.9998	97.20
25.5	851,512	184	0.0002	0.9998	97.19
26.5	851,328	167	0.0002	0.9998	97.17
27.5	851,161		0.0000	1.0000	97.15
28.5	851,161	202	0.0002	0.9998	97.15
29.5	850,959	1,274	0.0015	0.9985	97.13
30.5	849,685		0.0000	1.0000	96.98
31.5	849,685	138	0.0002	0.9998	96.98
32.5	621,978		0.0000	1.0000	96.96
33.5	621,978		0.0000	1.0000	96.96
34.5	601,174		0.0000	1.0000	96.96
35.5	572,256		0.0000	1.0000	96.96
36.5	549,568		0.0000	1.0000	96.96
37.5	515,687		0.0000	1.0000	96.96
38.5	476,287	2,158	0.0045	0.9955	96.96

EAST KENTUCKY POWER COOPERATIVE, INC.

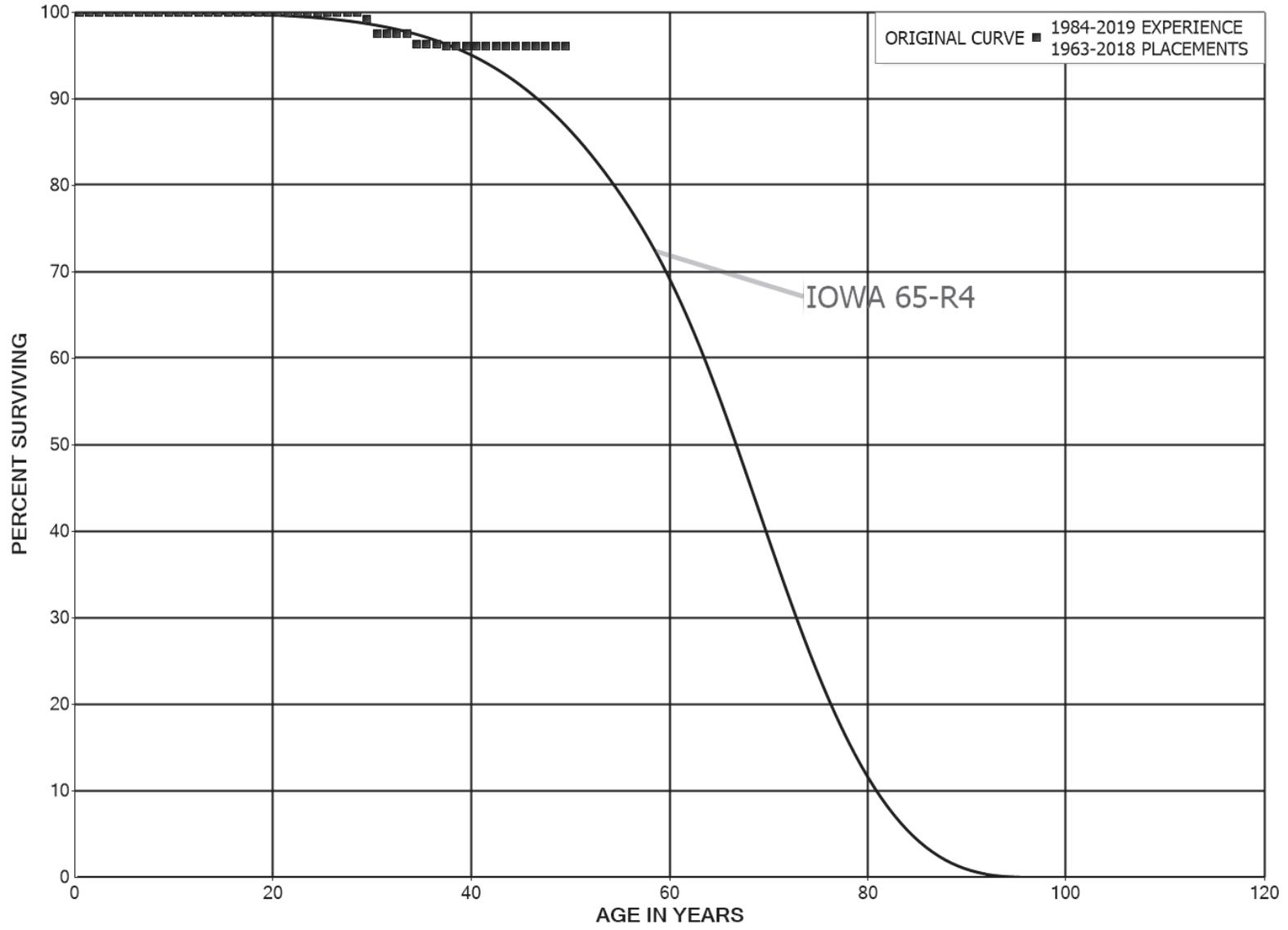
ACCOUNT 368.00 LINE TRANSFORMERS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1968-2013			EXPERIENCE BAND 1984-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	471,398	922	0.0020	0.9980	96.52	
40.5	457,612		0.0000	1.0000	96.34	
41.5	438,469		0.0000	1.0000	96.34	
42.5	426,023	475	0.0011	0.9989	96.34	
43.5	372,285	891	0.0024	0.9976	96.23	
44.5	358,822		0.0000	1.0000	96.00	
45.5	319,329		0.0000	1.0000	96.00	
46.5	284,335	3,050	0.0107	0.9893	96.00	
47.5	281,285		0.0000	1.0000	94.97	
48.5	243,460		0.0000	1.0000	94.97	
49.5	22,398		0.0000	1.0000	94.97	
50.5	22,398		0.0000	1.0000	94.97	
51.5					94.97	

Exhibit EKPC-03  
Depreciation Study

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 390.00 STRUCTURES AND IMPROVEMENTS  
ORIGINAL AND SMOOTH SURVIVOR CURVES



EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 390.00 STRUCTURES AND IMPROVEMENTS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1963-2018			EXPERIENCE BAND 1984-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	12,580,620		0.0000	1.0000	100.00
0.5	12,594,298		0.0000	1.0000	100.00
1.5	13,255,233		0.0000	1.0000	100.00
2.5	14,330,688		0.0000	1.0000	100.00
3.5	14,211,436		0.0000	1.0000	100.00
4.5	14,235,726		0.0000	1.0000	100.00
5.5	14,047,989		0.0000	1.0000	100.00
6.5	13,591,273	7,738	0.0006	0.9994	100.00
7.5	12,898,432		0.0000	1.0000	99.94
8.5	12,770,758		0.0000	1.0000	99.94
9.5	12,779,321		0.0000	1.0000	99.94
10.5	12,701,446		0.0000	1.0000	99.94
11.5	12,630,782		0.0000	1.0000	99.94
12.5	12,592,304		0.0000	1.0000	99.94
13.5	14,465,319		0.0000	1.0000	99.94
14.5	14,432,315		0.0000	1.0000	99.94
15.5	14,432,315		0.0000	1.0000	99.94
16.5	14,433,766		0.0000	1.0000	99.94
17.5	14,331,586		0.0000	1.0000	99.94
18.5	14,064,435		0.0000	1.0000	99.94
19.5	11,924,830		0.0000	1.0000	99.94
20.5	11,956,267	2,307	0.0002	0.9998	99.94
21.5	11,953,961		0.0000	1.0000	99.92
22.5	11,820,649		0.0000	1.0000	99.92
23.5	11,820,649		0.0000	1.0000	99.92
24.5	11,820,649	1,839	0.0002	0.9998	99.92
25.5	7,276,613		0.0000	1.0000	99.91
26.5	7,257,074		0.0000	1.0000	99.91
27.5	5,924,387		0.0000	1.0000	99.91
28.5	4,703,075	33,214	0.0071	0.9929	99.91
29.5	4,596,514	78,424	0.0171	0.9829	99.20
30.5	4,516,289	1,755	0.0004	0.9996	97.51
31.5	4,494,326		0.0000	1.0000	97.47
32.5	4,488,684	739	0.0002	0.9998	97.47
33.5	4,477,900	52,357	0.0117	0.9883	97.46
34.5	4,375,271		0.0000	1.0000	96.32
35.5	4,354,236		0.0000	1.0000	96.32
36.5	4,340,559	12,307	0.0028	0.9972	96.32
37.5	3,481,737		0.0000	1.0000	96.04
38.5	2,406,283		0.0000	1.0000	96.04

EAST KENTUCKY POWER COOPERATIVE, INC.

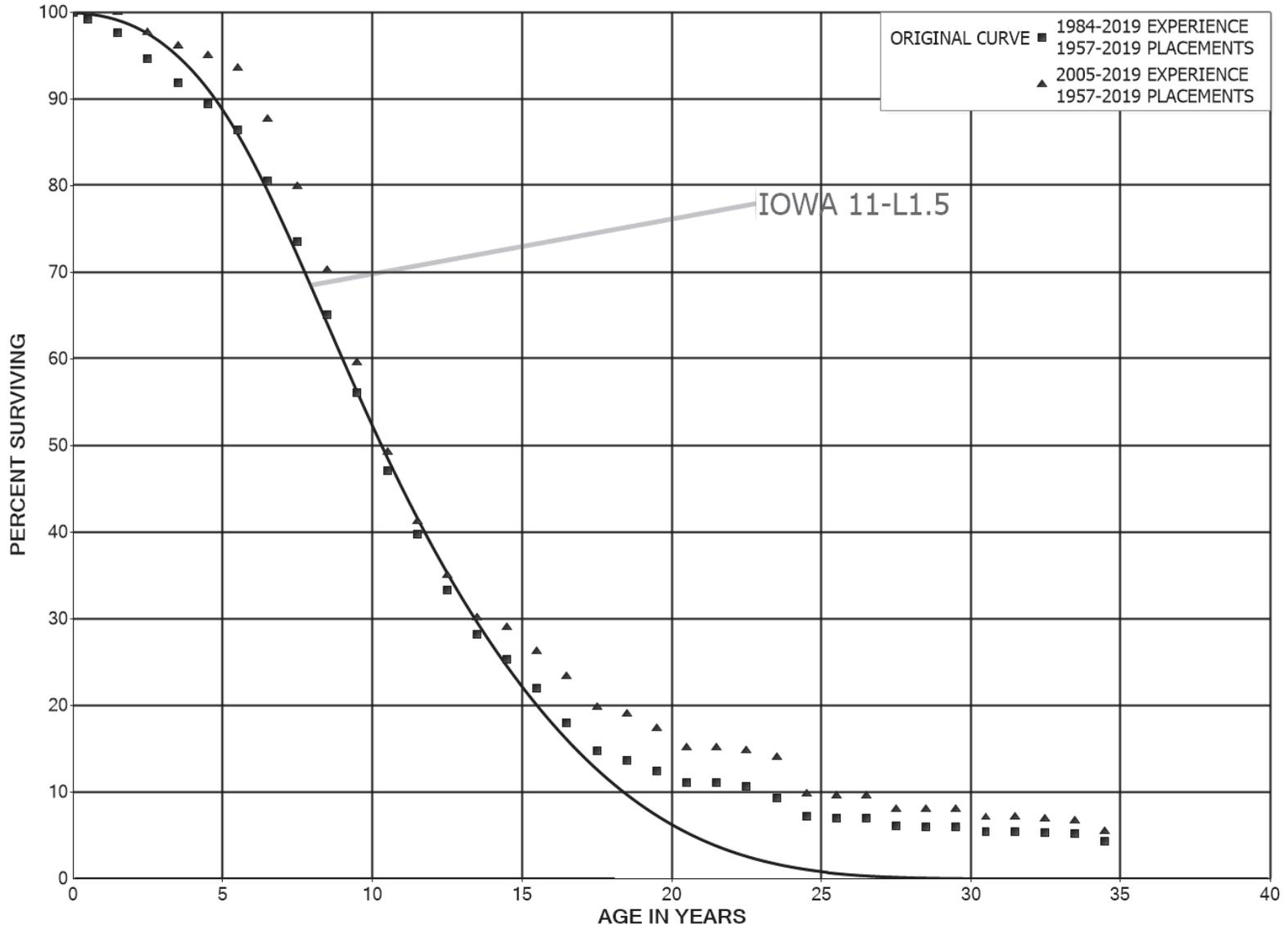
ACCOUNT 390.00 STRUCTURES AND IMPROVEMENTS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1963-2018			EXPERIENCE BAND 1984-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	2,360,958		0.0000	1.0000	96.04
40.5	2,316,667		0.0000	1.0000	96.04
41.5	2,306,778		0.0000	1.0000	96.04
42.5	2,123,583		0.0000	1.0000	96.04
43.5	2,099,937		0.0000	1.0000	96.04
44.5	1,954,389		0.0000	1.0000	96.04
45.5	1,945,826		0.0000	1.0000	96.04
46.5	1,938,214		0.0000	1.0000	96.04
47.5	1,930,372		0.0000	1.0000	96.04
48.5	1,908,569		0.0000	1.0000	96.04
49.5	101,690		0.0000	1.0000	96.04
50.5	100,000		0.0000	1.0000	96.04
51.5	100,000		0.0000	1.0000	96.04
52.5	99,288		0.0000	1.0000	96.04
53.5	48,866		0.0000	1.0000	96.04
54.5	48,866		0.0000	1.0000	96.04
55.5	48,866		0.0000	1.0000	96.04
56.5					96.04

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 392.00 TRANSPORTATION EQUIPMENT  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 392.00 TRANSPORTATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1957-2019

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	31,627,937	260,605	0.0082	0.9918	100.00
0.5	29,654,085	452,560	0.0153	0.9847	99.18
1.5	27,918,418	865,903	0.0310	0.9690	97.66
2.5	24,637,131	723,452	0.0294	0.9706	94.63
3.5	22,564,140	606,546	0.0269	0.9731	91.85
4.5	20,179,611	669,878	0.0332	0.9668	89.39
5.5	17,951,723	1,217,142	0.0678	0.9322	86.42
6.5	15,625,592	1,369,919	0.0877	0.9123	80.56
7.5	13,518,519	1,557,501	0.1152	0.8848	73.50
8.5	11,312,998	1,567,180	0.1385	0.8615	65.03
9.5	8,764,340	1,407,399	0.1606	0.8394	56.02
10.5	6,593,459	1,022,511	0.1551	0.8449	47.02
11.5	5,507,065	891,609	0.1619	0.8381	39.73
12.5	4,552,822	704,077	0.1546	0.8454	33.30
13.5	3,530,409	354,713	0.1005	0.8995	28.15
14.5	3,012,765	407,951	0.1354	0.8646	25.32
15.5	2,176,132	390,203	0.1793	0.8207	21.89
16.5	1,704,085	311,792	0.1830	0.8170	17.97
17.5	1,333,573	101,160	0.0759	0.9241	14.68
18.5	1,117,157	93,937	0.0841	0.9159	13.57
19.5	978,556	106,396	0.1087	0.8913	12.43
20.5	775,886	2,951	0.0038	0.9962	11.07
21.5	650,665	26,136	0.0402	0.9598	11.03
22.5	586,692	74,282	0.1266	0.8734	10.59
23.5	454,216	103,270	0.2274	0.7726	9.25
24.5	308,744	6,499	0.0210	0.9790	7.15
25.5	299,993		0.0000	1.0000	7.00
26.5	274,723	36,462	0.1327	0.8673	7.00
27.5	189,828	2,241	0.0118	0.9882	6.07
28.5	124,895		0.0000	1.0000	6.00
29.5	124,895	12,301	0.0985	0.9015	6.00
30.5	112,594		0.0000	1.0000	5.40
31.5	112,594	2,739	0.0243	0.9757	5.40
32.5	109,855	2,913	0.0265	0.9735	5.27
33.5	106,942	16,900	0.1580	0.8420	5.13
34.5	90,042	1,473	0.0164	0.9836	4.32
35.5	87,283		0.0000	1.0000	4.25
36.5	87,283		0.0000	1.0000	4.25
37.5	59,345		0.0000	1.0000	4.25
38.5	57,718		0.0000	1.0000	4.25

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 392.00 TRANSPORTATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1957-2019			EXPERIENCE BAND 1984-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	57,718	17,971	0.3114	0.6886	4.25	
40.5	39,746		0.0000	1.0000	2.93	
41.5	24,961		0.0000	1.0000	2.93	
42.5	24,961	1,143	0.0458	0.9542	2.93	
43.5	21,112	3,382	0.1602	0.8398	2.79	
44.5	17,730	995	0.0561	0.9439	2.35	
45.5	10,955		0.0000	1.0000	2.21	
46.5	10,955		0.0000	1.0000	2.21	
47.5	10,955		0.0000	1.0000	2.21	
48.5	9,352	317	0.0339	0.9661	2.21	
49.5	9,035		0.0000	1.0000	2.14	
50.5	3,775		0.0000	1.0000	2.14	
51.5	3,775		0.0000	1.0000	2.14	
52.5	3,775		0.0000	1.0000	2.14	
53.5	3,775		0.0000	1.0000	2.14	
54.5	3,775		0.0000	1.0000	2.14	
55.5	3,775		0.0000	1.0000	2.14	
56.5	3,775		0.0000	1.0000	2.14	
57.5	340		0.0000	1.0000	2.14	
58.5	340		0.0000	1.0000	2.14	
59.5	340		0.0000	1.0000	2.14	
60.5	340		0.0000	1.0000	2.14	
61.5	340		0.0000	1.0000	2.14	
62.5					2.14	

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 392.00 TRANSPORTATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1957-2019			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	19,873,195	20,935	0.0011	0.9989	100.00
0.5	19,144,148		0.0000	1.0000	99.89
1.5	18,047,527	412,438	0.0229	0.9771	99.89
2.5	15,552,026	253,001	0.0163	0.9837	97.61
3.5	14,314,377	156,581	0.0109	0.9891	96.02
4.5	13,100,026	201,835	0.0154	0.9846	94.97
5.5	11,837,125	741,027	0.0626	0.9374	93.51
6.5	10,489,897	930,295	0.0887	0.9113	87.66
7.5	9,250,187	1,118,917	0.1210	0.8790	79.88
8.5	7,726,553	1,183,170	0.1531	0.8469	70.22
9.5	5,695,510	987,669	0.1734	0.8266	59.47
10.5	4,123,160	668,260	0.1621	0.8379	49.15
11.5	3,503,805	531,158	0.1516	0.8484	41.19
12.5	2,965,463	414,381	0.1397	0.8603	34.94
13.5	2,479,314	92,307	0.0372	0.9628	30.06
14.5	2,210,166	213,530	0.0966	0.9034	28.94
15.5	1,568,544	170,674	0.1088	0.8912	26.15
16.5	1,343,273	207,327	0.1543	0.8457	23.30
17.5	1,077,227	42,842	0.0398	0.9602	19.70
18.5	925,639	80,922	0.0874	0.9126	18.92
19.5	814,096	106,171	0.1304	0.8696	17.27
20.5	589,165		0.0000	1.0000	15.01
21.5	416,633	9,531	0.0229	0.9771	15.01
22.5	417,947	20,483	0.0490	0.9510	14.67
23.5	342,371	102,526	0.2995	0.7005	13.95
24.5	233,620	6,499	0.0278	0.9722	9.77
25.5	224,869		0.0000	1.0000	9.50
26.5	223,618	35,977	0.1609	0.8391	9.50
27.5	148,967		0.0000	1.0000	7.97
28.5	91,689		0.0000	1.0000	7.97
29.5	102,640	12,301	0.1198	0.8802	7.97
30.5	96,120		0.0000	1.0000	7.02
31.5	96,120	2,739	0.0285	0.9715	7.02
32.5	93,381	2,913	0.0312	0.9688	6.82
33.5	92,071	16,900	0.1836	0.8164	6.61
34.5	75,171	1,473	0.0196	0.9804	5.39
35.5	77,671		0.0000	1.0000	5.29
36.5	77,671		0.0000	1.0000	5.29
37.5	49,734		0.0000	1.0000	5.29
38.5	48,106		0.0000	1.0000	5.29

EAST KENTUCKY POWER COOPERATIVE, INC.

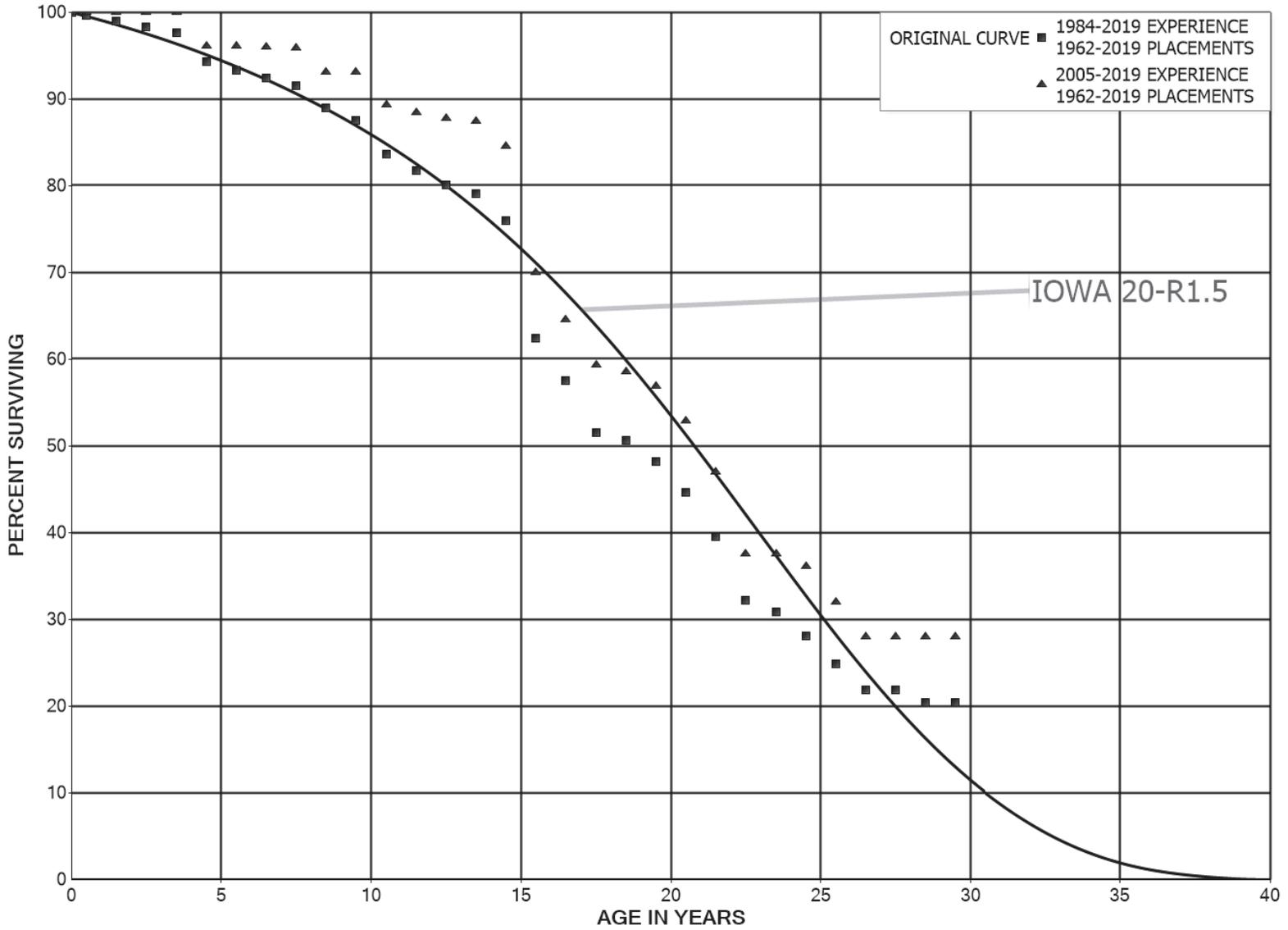
ACCOUNT 392.00 TRANSPORTATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1957-2019			EXPERIENCE BAND 2005-2019			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
39.5	48,106	17,971	0.3736	0.6264	5.29	
40.5	30,452		0.0000	1.0000	3.31	
41.5	18,326		0.0000	1.0000	3.31	
42.5	24,621	1,143	0.0464	0.9536	3.31	
43.5	20,772	3,382	0.1628	0.8372	3.16	
44.5	17,390	995	0.0572	0.9428	2.64	
45.5	10,615		0.0000	1.0000	2.49	
46.5	10,615		0.0000	1.0000	2.49	
47.5	10,955		0.0000	1.0000	2.49	
48.5	9,352	317	0.0339	0.9661	2.49	
49.5	9,035		0.0000	1.0000	2.41	
50.5	3,775		0.0000	1.0000	2.41	
51.5	3,775		0.0000	1.0000	2.41	
52.5	3,775		0.0000	1.0000	2.41	
53.5	3,775		0.0000	1.0000	2.41	
54.5	3,775		0.0000	1.0000	2.41	
55.5	3,775		0.0000	1.0000	2.41	
56.5	3,775		0.0000	1.0000	2.41	
57.5	340		0.0000	1.0000	2.41	
58.5	340		0.0000	1.0000	2.41	
59.5	340		0.0000	1.0000	2.41	
60.5	340		0.0000	1.0000	2.41	
61.5	340		0.0000	1.0000	2.41	
62.5					2.41	

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.  
ACCOUNT 396.00 POWER OPERATED EQUIPMENT  
ORIGINAL AND SMOOTH SURVIVOR CURVES



**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 396.00 POWER OPERATED EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1962-2019

EXPERIENCE BAND 1984-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	24,731,756	97,227	0.0039	0.9961	100.00
0.5	25,838,095	171,705	0.0066	0.9934	99.61
1.5	23,225,217	153,741	0.0066	0.9934	98.94
2.5	21,709,152	141,419	0.0065	0.9935	98.29
3.5	21,393,253	735,536	0.0344	0.9656	97.65
4.5	19,787,448	200,583	0.0101	0.9899	94.29
5.5	16,793,973	167,148	0.0100	0.9900	93.34
6.5	15,362,767	147,501	0.0096	0.9904	92.41
7.5	13,876,401	397,330	0.0286	0.9714	91.52
8.5	10,506,968	166,990	0.0159	0.9841	88.90
9.5	9,856,443	431,757	0.0438	0.9562	87.49
10.5	9,198,775	213,839	0.0232	0.9768	83.65
11.5	8,096,544	164,725	0.0203	0.9797	81.71
12.5	7,167,226	89,520	0.0125	0.9875	80.05
13.5	7,058,041	278,635	0.0395	0.9605	79.05
14.5	6,659,977	1,189,704	0.1786	0.8214	75.93
15.5	4,880,725	380,678	0.0780	0.9220	62.36
16.5	4,500,046	465,155	0.1034	0.8966	57.50
17.5	3,968,219	70,669	0.0178	0.9822	51.56
18.5	3,871,367	190,700	0.0493	0.9507	50.64
19.5	3,195,481	233,172	0.0730	0.9270	48.14
20.5	2,527,205	292,068	0.1156	0.8844	44.63
21.5	1,791,144	329,092	0.1837	0.8163	39.47
22.5	1,270,467	56,582	0.0445	0.9555	32.22
23.5	766,369	68,365	0.0892	0.9108	30.79
24.5	670,774	76,231	0.1136	0.8864	28.04
25.5	594,544	71,033	0.1195	0.8805	24.85
26.5	502,983	354	0.0007	0.9993	21.88
27.5	309,386	20,626	0.0667	0.9333	21.87
28.5	178,880		0.0000	1.0000	20.41
29.5	87,127		0.0000	1.0000	20.41
30.5	77,806	41,958	0.5393	0.4607	20.41
31.5	23,458	8,795	0.3749	0.6251	9.40
32.5	14,663		0.0000	1.0000	5.88
33.5	4,320		0.0000	1.0000	5.88
34.5	4,320		0.0000	1.0000	5.88
35.5	4,320		0.0000	1.0000	5.88
36.5	4,320		0.0000	1.0000	5.88
37.5	4,320		0.0000	1.0000	5.88
38.5	4,320		0.0000	1.0000	5.88

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 396.00 POWER OPERATED EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1962-2019			EXPERIENCE BAND 1984-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	4,320		0.0000	1.0000	5.88
40.5	4,320		0.0000	1.0000	5.88
41.5	4,320		0.0000	1.0000	5.88
42.5	4,320		0.0000	1.0000	5.88
43.5	4,320		0.0000	1.0000	5.88
44.5	4,320		0.0000	1.0000	5.88
45.5	4,320		0.0000	1.0000	5.88
46.5	4,320		0.0000	1.0000	5.88
47.5	4,320		0.0000	1.0000	5.88
48.5	4,320		0.0000	1.0000	5.88
49.5	4,320		0.0000	1.0000	5.88
50.5	4,320		0.0000	1.0000	5.88
51.5	4,320		0.0000	1.0000	5.88
52.5	4,320		0.0000	1.0000	5.88
53.5	4,320		0.0000	1.0000	5.88
54.5	4,320	4,320	1.0000		5.88
55.5					

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 396.00 POWER OPERATED EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1962-2019

EXPERIENCE BAND 2005-2019

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	16,327,449		0.0000	1.0000	100.00
0.5	18,116,950		0.0000	1.0000	100.00
1.5	15,696,976		0.0000	1.0000	100.00
2.5	13,616,879		0.0000	1.0000	100.00
3.5	13,771,069	544,867	0.0396	0.9604	100.00
4.5	13,080,693		0.0000	1.0000	96.04
5.5	10,802,547	13,340	0.0012	0.9988	96.04
6.5	10,432,705	13,637	0.0013	0.9987	95.92
7.5	9,719,380	279,083	0.0287	0.9713	95.80
8.5	6,915,709		0.0000	1.0000	93.05
9.5	6,937,391	281,083	0.0405	0.9595	93.05
10.5	6,669,625	68,304	0.0102	0.9898	89.28
11.5	5,733,456	41,116	0.0072	0.9928	88.36
12.5	5,455,927	18,000	0.0033	0.9967	87.73
13.5	6,022,464	202,953	0.0337	0.9663	87.44
14.5	6,024,294	1,035,555	0.1719	0.8281	84.49
15.5	4,423,853	344,779	0.0779	0.9221	69.97
16.5	4,091,464	331,090	0.0809	0.9191	64.52
17.5	3,693,703	52,251	0.0141	0.9859	59.30
18.5	3,625,611	101,932	0.0281	0.9719	58.46
19.5	3,070,885	216,550	0.0705	0.9295	56.81
20.5	2,419,231	267,160	0.1104	0.8896	52.81
21.5	1,607,060	324,492	0.2019	0.7981	46.98
22.5	1,090,983		0.0000	1.0000	37.49
23.5	685,425	25,065	0.0366	0.9634	37.49
24.5	633,130	72,681	0.1148	0.8852	36.12
25.5	569,244	71,033	0.1248	0.8752	31.97
26.5	477,684		0.0000	1.0000	27.98
27.5	284,439		0.0000	1.0000	27.98
28.5	174,560		0.0000	1.0000	27.98
29.5	82,807		0.0000	1.0000	27.98
30.5	73,485	41,958	0.5710	0.4290	27.98
31.5	19,137	8,795	0.4596	0.5404	12.01
32.5	10,343		0.0000	1.0000	6.49
33.5					6.49
34.5					
35.5					
36.5					
37.5					
38.5					

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 396.00 POWER OPERATED EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1962-2019			EXPERIENCE BAND 2005-2019		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5					
40.5					
41.5					
42.5	4,320		0.0000		
43.5	4,320		0.0000		
44.5	4,320		0.0000		
45.5	4,320		0.0000		
46.5	4,320		0.0000		
47.5	4,320		0.0000		
48.5	4,320		0.0000		
49.5	4,320		0.0000		
50.5	4,320		0.0000		
51.5	4,320		0.0000		
52.5	4,320		0.0000		
53.5	4,320		0.0000		
54.5	4,320	4,320	1.0000		
55.5					

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## PART VIII. NET SALVAGE STATISTICS

EAST KENTUCKY POWER COOPERATIVE, INC.

TABLE 1. CALCULATION OF TERMINAL AND INTERIM RETIREMENTS AS A PERCENT OF TOTAL RETIREMENTS

UNIT (1)	PROJECTED RETIREMENTS TERMINAL (2)	INTERIM (3)	TOTAL RETIREMENTS (4)=(2)+(3)	TERMINAL RETIREMENT % (5)=(2)/(4)	INTERIM RETIREMENT % (6)=(3)/(4)
<b>STEAM PRODUCTION PLANT</b>					
CENTRAL LAB	(1,346,538.16)	(384,461.68)	(1,730,999.84)	77.79	22.21
COOPER COMMON	(124,377,280.53)	(19,800,518.76)	(144,177,799.29)	86.27	13.73
COOPER UNIT 1	(14,515,248.21)	(552,015.93)	(15,067,264.14)	96.34	3.66
COOPER UNIT 2	(1,539,705.70)	(44,621.38)	(1,584,327.08)	97.18	2.82
COOPER UNIT 2 SCRUBBER	(215,261,096.15)	(9,930,110.49)	(225,191,206.64)	95.59	4.41
SPURLOCK COMMON	(66,017,993.86)	(16,618,787.03)	(82,636,780.89)	79.89	20.11
SPURLOCK UNIT 1	(209,832,911.56)	(69,634,643.67)	(279,467,555.23)	75.08	24.92
SPURLOCK UNIT 2	(260,040,425.44)	(121,491,851.99)	(381,532,277.43)	68.16	31.84
SPURLOCK UNIT 3	(349,834,391.09)	(74,119,155.80)	(423,953,546.89)	82.52	17.48
SPURLOCK UNIT 4	(391,964,904.67)	(107,810,908.75)	(499,775,813.42)	78.43	21.57
SPURLOCK UNIT 1 SCRUBBER	(123,747,202.08)	(16,993,336.72)	(140,740,538.80)	87.93	12.07
SPURLOCK UNIT 2 SCRUBBER	(168,323,263.33)	(29,349,538.33)	(197,672,802.03)	85.15	14.85
<b>TOTAL STEAM PRODUCTION PLANT</b>	<b>(1,926,800,961)</b>	<b>(466,729,951)</b>	<b>(2,393,530,912)</b>		
<b>OTHER PRODUCTION PLANT</b>					
SMITH CT COMMON	(49,229,192.26)	(31,523,753.46)	(80,752,945.72)	60.96	39.04
SMITH CT UNIT 1	(24,941,223.87)	(3,113,466.13)	(28,054,690.00)	88.90	11.10
SMITH CT UNIT 2	(23,080,684.67)	(2,962,966.57)	(26,043,651.24)	88.62	11.38
SMITH CT UNIT 3	(23,958,740.66)	(3,066,288.88)	(27,025,029.54)	88.65	11.35
SMITH CT UNIT 4	(29,994,874.55)	(7,007,706.54)	(37,002,581.09)	81.06	18.94
SMITH CT UNIT 5	(25,842,264.24)	(6,202,325.18)	(32,044,589.42)	80.64	19.36
SMITH CT UNIT 6	(18,717,581.23)	(4,740,761.57)	(23,458,342.80)	79.79	20.21
SMITH CT UNIT 7	(18,496,577.85)	(4,690,396.06)	(23,186,973.91)	79.77	20.23
SMITH CT UNIT 9	(64,698,498.28)	(17,382,263.67)	(82,090,761.95)	78.81	21.19
SMITH CT UNIT 10	(50,701,250.52)	(13,282,775.88)	(63,984,026.40)	79.24	20.76
GREEN VALLEY LANDFILL	(2,559,915.20)	(448,366.06)	(3,008,281.26)	85.10	14.90
LAUREL RIDGE LANDFILL	(3,487,291.15)	(573,382.48)	(4,060,673.63)	85.88	14.12
BAVARIAN LANDFILL	(6,078,540.00)	(746,704.93)	(6,825,244.93)	89.06	10.94
PEARL HOLLOW LANDFILL	(2,909,219.03)	(560,043.28)	(3,469,262.31)	83.86	16.14
PENDLETON COUNTY LANDFILL	(3,989,492.00)	(548,616.67)	(4,538,108.67)	87.91	12.09
GLASGOW LANDFILL	(2,611,084.43)	(382,669.44)	(2,993,753.87)	87.22	12.78
BLUEGRASS OLDHAM COMMON	(12,674,990.41)	(1,170,235.34)	(13,845,225.75)	91.55	8.45
BLUEGRASS OLDHAM UNIT 1	(51,776,975.16)	(3,725,387.00)	(55,502,362.16)	93.29	6.71
BLUEGRASS OLDHAM UNIT 2	(50,654,324.66)	(3,631,727.07)	(54,286,051.73)	93.31	6.69
BLUEGRASS OLDHAM UNIT 3	(46,613,287.13)	(3,378,021.97)	(49,991,309.10)	93.24	6.76
COOPERATIVE SOLAR	(15,905,538.41)	(1,310,449.14)	(17,215,987.55)	92.39	7.61
<b>TOTAL OTHER PRODUCTION PLANT</b>	<b>(528,921,546)</b>	<b>(110,458,307)</b>	<b>(639,379,853)</b>		

EAST KENTUCKY POWER COOPERATIVE, INC.

TABLE 2. CALCULATION OF WEIGHTED NET SALVAGE PERCENT

UNIT (1)	TERMINAL RETIREMENTS		INTERIM RETIREMENTS		WEIGHTED AVERAGE NET SALVAGE % (6)=(2)*(3)+(4)*(5)
	RETIREMENTS (%) (2)	NET SALVAGE (%) (3)	RETIREMENTS (%) (4)	NET SALVAGE (%) (5)	
<b>STEAM PRODUCTION PLANT</b>					
CENTRAL LAB	77.79	0	22.21	0	0 (5)
COOPER COMMON	86.27	(5)	13.73	(8)	(5)
COOPER UNIT 1	96.34	(5)	3.66	(10)	(5)
COOPER UNIT 2	97.18	(5)	2.82	(10)	(5)
COOPER UNIT 2 SCRUBBER	95.59	(5)	4.41	(9)	(5)
SPURLOCK COMMON	79.89	(7)	20.11	(7)	(7)
SPURLOCK UNIT 1	75.08	(7)	24.92	(8)	(7)
SPURLOCK UNIT 2	68.16	(7)	31.84	(8)	(7)
SPURLOCK UNIT 3	82.52	(7)	17.48	(8)	(7)
SPURLOCK UNIT 4	78.43	(7)	21.57	(9)	(7)
SPURLOCK UNIT 1 SCRUBBER	87.93	(7)	12.07	(10)	(7)
SPURLOCK UNIT 2 SCRUBBER	85.15	(7)	14.85	(10)	(7)
<b>OTHER PRODUCTION PLANT</b>					
SMITH CT COMMON	60.96	(4)	39.04	(2)	(3)
SMITH CT UNIT 1	88.90	(4)	11.10	(5)	(4)
SMITH CT UNIT 2	88.62	(4)	11.38	(5)	(4)
SMITH CT UNIT 3	88.65	(4)	11.35	(5)	(4)
SMITH CT UNIT 4	81.06	(4)	18.94	(5)	(4)
SMITH CT UNIT 5	80.64	(4)	19.36	(5)	(4)
SMITH CT UNIT 6	79.79	(4)	20.21	(5)	(4)
SMITH CT UNIT 7	79.77	(4)	20.23	(5)	(4)
SMITH CT UNIT 9	78.81	(4)	21.19	(4)	(4)
SMITH CT UNIT 10	79.24	(4)	20.76	(5)	(4)
GREEN VALLEY LANDFILL	85.10	(1)	14.90	(4)	(2)
LAUREL RIDGE LANDFILL	85.88	(1)	14.12	(4)	(2)
BAVARIAN LANDFILL	89.06	(1)	10.94	(4)	(2)
PEARL HOLLOW LANDFILL	83.86	(1)	16.14	(4)	(2)
PENDLETON COUNTY LANDFILL	87.91	(1)	12.09	(4)	(2)
GLASGOW LANDFILL	87.22	(1)	12.78	(5)	(1)
BLUEGRASS OLDHAM COMMON	91.55	(6)	8.45	(4)	(5)
BLUEGRASS OLDHAM UNIT 1	93.29	(6)	6.71	(5)	(5)
BLUEGRASS OLDHAM UNIT 2	93.31	(6)	6.69	(5)	(5)
BLUEGRASS OLDHAM UNIT 3	93.24	(6)	6.76	(5)	(5)
COOPERATIVE SOLAR	92.39	0	7.61	(5)	(1)

EAST KENTUCKY POWER COOPERATIVE, INC.

TABLE 3. CALCULATION OF TERMINAL NET SALVAGE PERCENT

LOCATION (1)	ESTIMATED RETIREMENT YEAR (2)	MW (3)	TOTAL DECOMMISSIONING COSTS (CURRENT \$) (4)	TOTAL DECOMMISSIONING COSTS (FUTURE \$) (5)	ESTIMATED TERMINAL RETIREMENTS (6)	TERMINAL NET SALVAGE (%) (7)=(5)/(6)
<b>STEAM PRODUCTION PLANT</b>						
CENTRAL LAB	2030	0	0	0	(1,346,538)	0
COOPER	2030	320.85	12,834,000	16,839,320	(355,693,331)	(5)
SPURLOCK	2049	1,518.1	60,723,800	111,564,885	(1,569,761,092)	(7)
<b>OTHER PRODUCTION PLANT</b>						
SMITH CT	2050	796	7,960,000	13,794,754	(329,660,888)	(4)
GREEN VALLEY LANDFILL	2038	2.4	24,000	38,368	(2,559,915)	(1)
LAUREL RIDGE LANDFILL	2038	3.2	32,000	51,157	(3,487,291)	(1)
BAVARIAN LANDFILL	2038	4.8	48,000	76,735	(6,078,540)	(1)
PEARL HOLLOW LANDFILL	2041	2.4	24,000	41,318	(2,909,219)	(1)
PENDLETON COUNTY LANDFILL	2042	3.2	32,000	56,468	(3,989,492)	(1)
GLASGOW LANDFILL	2046	1	10,000	19,478	(2,611,084)	(1)
BLUEGRASS OLDHAM	2042	507	5,070,000	8,946,576	(161,719,577)	(6)
COOPERATIVE SOLAR	2042	8.5	42,500	74,996	(15,905,538)	(0)

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 311.00 STRUCTURES AND IMPROVEMENTS

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2005	209,950		0		0		0
2006	239,480		0		0		0
2007							
2008	14,351		0		0		0
2009							
2010							
2011							
2012							
2013							
2014							
2015	188,915		0		0		0
2016	5,700,894	3,093	0		0	3,093-	0
2017	1,250,483	239	0		0	239-	0
2018							
2019	92,572		0		0		0
TOTAL	7,696,645	3,332	0		0	3,332-	0

THREE-YEAR MOVING AVERAGES

05-07	149,810		0		0		0
06-08	84,610		0		0		0
07-09	4,784		0		0		0
08-10	4,784		0		0		0
09-11							
10-12							
11-13							
12-14							
13-15	62,972		0		0		0
14-16	1,963,270	1,031	0		0	1,031-	0
15-17	2,380,097	1,111	0		0	1,111-	0
16-18	2,317,126	1,111	0		0	1,111-	0
17-19	447,685	80	0		0	80-	0

FIVE-YEAR AVERAGE

15-19	1,446,573	666	0		0	666-	0
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 312.00 BOILER PLANT EQUIPMENT

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2006	4,362,366	93,922	2		0	93,922-	2-
2007		26,183				26,183-	
2008	66,672	1,064,599			0	1,064,599-	
2009	104,852	461,938	441	105,000	100	356,938-	340-
2010	514,093	1,072,217	209		0	1,072,217-	209-
2011	269,154	661,934	246		0	661,934-	246-
2012		3,763,219				3,763,219-	
2013	11,815,718	11,804,550	100	5,400,410	46	6,404,140-	54-
2014	3,417,359	3,283,678	96	1,117,054	33	2,166,624-	63-
2015	6,077,105	1,534,324	25		0	1,534,324-	25-
2016	48,456,473	173	0	41	0	132-	0
2017	1,428,583	790,960	55	88,861	6	702,099-	49-
2018	13,105,672	769,172	6		0	769,172-	6-
2019	4,592,653	76,018	2		0	76,018-	2-
<b>TOTAL</b>	<b>94,210,699</b>	<b>25,402,888</b>	<b>27</b>	<b>6,711,366</b>	<b>7</b>	<b>18,691,522-</b>	<b>20-</b>

THREE-YEAR MOVING AVERAGES

06-08	1,476,346	394,901	27		0	394,901-	27-
07-09	57,174	517,573	905	35,000	61	482,573-	844-
08-10	228,539	866,251	379	35,000	15	831,251-	364-
09-11	296,033	732,030	247	35,000	12	697,030-	235-
10-12	261,082	1,832,457	702		0	1,832,457-	702-
11-13	4,028,291	5,409,901	134	1,800,137	45	3,609,765-	90-
12-14	5,077,692	6,283,816	124	2,172,488	43	4,111,328-	81-
13-15	7,103,394	5,540,851	78	2,172,488	31	3,368,363-	47-
14-16	19,316,979	1,606,059	8	372,365	2	1,233,694-	6-
15-17	18,654,054	775,152	4	29,634	0	745,518-	4-
16-18	20,996,909	520,101	2	29,634	0	490,467-	2-
17-19	6,375,636	545,383	9	29,620	0	515,763-	8-

FIVE-YEAR AVERAGE

15-19	14,732,097	634,129	4	17,780	0	616,349-	4-
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 314.00 TURBOGENERATOR UNITS

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2012		6,980		8		6,972-	
2013	23,288	68,544	294	14,042	60	54,503-	234-
2014							
2015							
2016	37,485,923		0		0		0
2017							
2018	5,732,296	955,317	17	5,857	0	949,460-	17-
2019	73,792,664	1,242,756	2	533,864	1	708,892-	1-
<b>TOTAL</b>	<b>117,034,171</b>	<b>2,273,597</b>	<b>2</b>	<b>553,771</b>	<b>0</b>	<b>1,719,826-</b>	<b>1-</b>

THREE-YEAR MOVING AVERAGES

12-14	7,763	25,175	324	4,683	60	20,492-	264-
13-15	7,763	22,848	294	4,681	60	18,168-	234-
14-16	12,495,308		0		0		0
15-17	12,495,308		0		0		0
16-18	14,406,073	318,439	2	1,952	0	316,487-	2-
17-19	26,508,320	732,691	3	179,907	1	552,784-	2-

FIVE-YEAR AVERAGE

15-19	23,402,177	439,615	2	107,944	0	331,670-	1-
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 315.00 ACCESSORY ELECTRIC EQUIPMENT

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2005			11			11-	
2006							
2007							
2008	142,797		0		0		0
2009							
2010							
2011							
2012							
2013	128,896	17,151	13	1,453	1	15,698-	12-
2014							
2015							
2016	2,028,537		0		0		0
2017							
2018	501,019	6,000	1		0	6,000-	1-
2019	755,972	8,588	1		0	8,588-	1-
TOTAL	3,557,220	31,750	1	1,453	0	30,297-	1-

THREE-YEAR MOVING AVERAGES

05-07			4			4-	
06-08	47,599		0		0		0
07-09	47,599		0		0		0
08-10	47,599		0		0		0
09-11							
10-12							
11-13	42,965	5,717	13	484	1	5,233-	12-
12-14	42,965	5,717	13	484	1	5,233-	12-
13-15	42,965	5,717	13	484	1	5,233-	12-
14-16	676,179		0		0		0
15-17	676,179		0		0		0
16-18	843,185	2,000	0		0	2,000-	0
17-19	418,997	4,863	1		0	4,863-	1-

FIVE-YEAR AVERAGE

15-19	657,106	2,918	0		0	2,918-	0
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 316.00 MISCELLANEOUS POWER PLANT EQUIPMENT

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2005	118,375		0		0		0
2006	749,427		0		0		0
2007							
2008							
2009							
2010							
2011	1,256		0		0		0
2012	6,996		0		0		0
2013	2,840	401	14		0	401-	14-
2014							
2015							
2016	760,144		0		0		0
2017	281,050		0		0		0
2018	28,145		0		0		0
2019	5,896		0		0		0
TOTAL	1,954,128	401	0		0	401-	0

THREE-YEAR MOVING AVERAGES

05-07	289,267		0		0		0
06-08	249,809		0		0		0
07-09							
08-10							
09-11	419		0		0		0
10-12	2,751		0		0		0
11-13	3,697	134	4		0	134-	4-
12-14	3,279	134	4		0	134-	4-
13-15	947	134	14		0	134-	14-
14-16	253,381		0		0		0
15-17	347,065		0		0		0
16-18	356,447		0		0		0
17-19	105,030		0		0		0

FIVE-YEAR AVERAGE

15-19	215,047		0		0		0
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 341.00 STRUCTURES AND IMPROVEMENTS

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2014	200,883		0		0		0
2015							
2016							
2017							
2018		244,532		163,480		81,052-	
2019	1,504,460		0		0		0
<b>TOTAL</b>	<b>1,705,344</b>	<b>244,532</b>	<b>14</b>	<b>163,480</b>	<b>10</b>	<b>81,052-</b>	<b>5-</b>
<b>THREE-YEAR MOVING AVERAGES</b>							
14-16	66,961		0		0		0
15-17							
16-18		81,511		54,494		27,017-	
17-19	501,487	81,511	16	54,494	11	27,017-	5-
<b>FIVE-YEAR AVERAGE</b>							
15-19	300,892	48,906	16	32,696	11	16,210-	5-

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 343.00 PRIME MOVERS

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2012		29,364				29,364-	
2013							
2014							
2015							
2016							
2017		31,160				31,160-	
2018	3,977,045	75,570	2	238,222	6	162,652	4
2019	852,688	146,174	17		0	146,174-	17-
<b>TOTAL</b>	<b>4,829,733</b>	<b>282,268</b>	<b>6</b>	<b>238,222</b>	<b>5</b>	<b>44,046-</b>	<b>1-</b>

THREE-YEAR MOVING AVERAGES

12-14		9,788				9,788-	
13-15							
14-16							
15-17		10,387				10,387-	
16-18	1,325,682	35,577	3	79,407	6	43,831	3
17-19	1,609,911	84,301	5	79,407	5	4,894-	0

FIVE-YEAR AVERAGE

15-19	965,947	50,581	5	47,644	5	2,936-	0
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 344.00 GENERATORS

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2008		1,175		45,140		43,965	
2009							
2010							
2011							
2012							
2013							
2014							
2015							
2016	1,364,371		0		0		0
2017							
2018	599,987		0		0		0
2019	603,570		0		0		0
TOTAL	2,567,928	1,175	0	45,140	2	43,965	2

THREE-YEAR MOVING AVERAGES

08-10		392		15,047		14,655	
09-11							
10-12							
11-13							
12-14							
13-15							
14-16	454,790		0		0		0
15-17	454,790		0		0		0
16-18	654,786		0		0		0
17-19	401,186		0		0		0

FIVE-YEAR AVERAGE

15-19	513,586		0		0		0
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 345.00 ACCESSORY ELECTRIC EQUIPMENT

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2018	697,322	1,566	0		0	1,566-	0
2019	18,282		0		0		0
TOTAL	715,604	1,566	0		0	1,566-	0

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 346.00 MISCELLANEOUS POWER PLANT EQUIPMENT

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2014		9,762				9,762-	
2015		1,877				1,877-	
2016							
2017	3,924		0		0		0
2018							
2019							
<b>TOTAL</b>	<b>3,924</b>	<b>11,639</b>	<b>297</b>		<b>0</b>	<b>11,639-</b>	<b>297-</b>

THREE-YEAR MOVING AVERAGES

14-16		3,880				3,880-	
15-17	1,308	626	48		0	626-	48-
16-18	1,308		0		0		0
17-19	1,308		0		0		0

FIVE-YEAR AVERAGE

15-19	785	375	48		0	375-	48-
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 353.00 STATION EQUIPMENT

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2005	630,204	143,537	23		0	143,537-	23-
2006	73,050	430,917	590		0	430,917-	590-
2007	242,769	739,950	305		0	739,950-	305-
2008	632,952	636,141	101		0	636,141-	101-
2009	589,792	866,556	147	162,102	27	704,454-	119-
2010	13,258	1,217,043			0	1,217,043-	
2011	1,495,167	498,493	33		0	498,493-	33-
2012	2,355,517	194,878	8	6,854	0	188,024-	8-
2013	964,208	1,023,254	106	53,553	6	969,701-	101-
2014	609,935	522,981	86	23,982	4	498,999-	82-
2015	514,521	535,799	104	90,480	18	445,319-	87-
2016	754,433	222,193	29	68,497	9	153,696-	20-
2017	1,514,131	404,034	27	50,595	3	353,439-	23-
2018	87,654	577,399	659	3,909	4	573,490-	654-
2019	3,117,990	96,021	3	603	0	95,418-	3-
TOTAL	13,595,581	8,109,198	60	460,576	3	7,648,622-	56-

THREE-YEAR MOVING AVERAGES

05-07	315,341	438,135	139		0	438,135-	139-
06-08	316,257	602,336	190		0	602,336-	190-
07-09	488,504	747,549	153	54,034	11	693,515-	142-
08-10	412,001	906,580	220	54,034	13	852,546-	207-
09-11	699,406	860,697	123	54,034	8	806,663-	115-
10-12	1,287,981	636,805	49	2,285	0	634,520-	49-
11-13	1,604,964	572,208	36	20,136	1	552,073-	34-
12-14	1,309,887	580,371	44	28,130	2	552,241-	42-
13-15	696,221	694,012	100	56,005	8	638,006-	92-
14-16	626,297	426,991	68	60,986	10	366,005-	58-
15-17	927,695	387,342	42	69,857	8	317,485-	34-
16-18	785,406	401,209	51	41,000	5	360,208-	46-
17-19	1,573,258	359,152	23	18,369	1	340,783-	22-

FIVE-YEAR AVERAGE

15-19	1,197,746	367,089	31	42,817	4	324,273-	27-
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 353.10 STATION EQUIPMENT - ENERGY CONTROL SYSTEM

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2010		1,002				1,002-	
2011	4,983		0		0		0
2012	67,059	2,551	4		0	2,551-	4-
2013	3,146	10	0		0	10-	0
2014		18,524				18,524-	
2015		167				167-	
2016	3,184,136	414,015	13	5,232	0	408,783-	13-
2017	59,235	34,849	59	179	0	34,670-	59-
2018							
2019	179,124		0		0		0
TOTAL	3,497,685	471,118	13	5,412	0	465,706-	13-

THREE-YEAR MOVING AVERAGES

10-12	24,014	1,184	5		0	1,184-	5-
11-13	25,063	853	3		0	853-	3-
12-14	23,402	7,028	30		0	7,028-	30-
13-15	1,049	6,233	594		0	6,233-	594-
14-16	1,061,379	144,235	14	1,744	0	142,491-	13-
15-17	1,081,124	149,677	14	1,804	0	147,873-	14-
16-18	1,081,124	149,622	14	1,804	0	147,818-	14-
17-19	79,453	11,616	15	60	0	11,557-	15-

FIVE-YEAR AVERAGE

15-19	684,499	89,806	13	1,082	0	88,724-	13-
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 354.00 TOWERS AND FIXTURES

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2017	51,499		0		0		0
2018							
2019							
TOTAL	51,499		0		0		0
THREE-YEAR MOVING AVERAGES							
17-19	17,166		0		0		0

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNTS 355.00 AND 356.00 POLES AND FIXTURES AND OVERHEAD CONDUCTORS AND  
DEVICES

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2005	740,458	91,569	12	4,560	1	87,009-	12-
2006	402,681	85,513	21		0	85,513-	21-
2007	568,911	30,837	5	53,965	9	23,128	4
2008	116,182	120,964	104	1,905-	2-	122,869-	106-
2009	530,165	68,921	13		0	68,921-	13-
2010	237,095	145,438	61		0	145,438-	61-
2011	1,171,646	100,211	9		0	100,211-	9-
2012	238,626	50,034	21		0	50,034-	21-
2013	83,078	316,050	380	18,358	22	297,692-	358-
2014	83,264	255,092	306	23,757	29	231,335-	278-
2015	5,287	546,789		4,406	83	542,382-	
2016	624,841	1,765,603	283	131,035	21	1,634,568-	262-
2017	95,555	404,184	423	14,752	15	389,431-	408-
2018	311,576	1,485,842	477	1,699,999	546	214,157	69
2019	1,108,019	11,926	1	11,896	1	30-	0
<b>TOTAL</b>	<b>6,317,384</b>	<b>5,478,971</b>	<b>87</b>	<b>1,960,822</b>	<b>31</b>	<b>3,518,149-</b>	<b>56-</b>

THREE-YEAR MOVING AVERAGES

05-07	570,683	69,306	12	19,508	3	49,798-	9-
06-08	362,591	79,105	22	17,353	5	61,751-	17-
07-09	405,086	73,574	18	17,353	4	56,221-	14-
08-10	294,481	111,774	38	635-	0	112,409-	38-
09-11	646,302	104,857	16		0	104,857-	16-
10-12	549,122	98,561	18		0	98,561-	18-
11-13	497,783	155,432	31	6,119	1	149,312-	30-
12-14	134,989	207,059	153	14,038	10	193,020-	143-
13-15	57,210	372,643	651	15,507	27	357,137-	624-
14-16	237,797	855,828	360	53,066	22	802,762-	338-
15-17	241,894	905,525	374	50,065	21	855,460-	354-
16-18	343,991	1,218,543	354	615,262	179	603,281-	175-
17-19	505,050	633,984	126	575,549	114	58,435-	12-

FIVE-YEAR AVERAGE

15-19	429,056	842,869	196	372,418	87	470,451-	110-
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 362.00 STATION EQUIPMENT

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2005	2,746,060	288,564	11	1,543,492	56	1,254,928	46
2006	1,525,990	401,122	26	1,294,217	85	893,096	59
2007	1,840,910	129,797	7	1,165,345	63	1,035,547	56
2008	2,425,029	470,570	19	1,651,188	68	1,180,618	49
2009	2,004,666	520,202	26	1,453,301	72	933,099	47
2010	851,434	645,337	76	514,891	60	130,445-	15-
2011	1,558,114	922,880	59	1,489,651	96	566,770	36
2012	3,985,023	279,778	7	1,715,305	43	1,435,527	36
2013	1,976,646	426,056	22	1,708,251	86	1,282,195	65
2014	2,963,973	1,329,193	45	2,305,640	78	976,447	33
2015	3,320,242	923,483	28	2,412,565	73	1,489,082	45
2016	3,228,544	1,159,004	36	2,354,619	73	1,195,615	37
2017	3,085,469	733,486	24	1,655,127	54	921,641	30
2018	950,946	435,121	46	913,890	96	478,769	50
2019	3,850,617	141,896	4	856,054	22	714,158	19
<b>TOTAL</b>	<b>36,313,664</b>	<b>8,806,490</b>	<b>24</b>	<b>23,033,536</b>	<b>63</b>	<b>14,227,046</b>	<b>39</b>

THREE-YEAR MOVING AVERAGES

05-07	2,037,653	273,161	13	1,334,351	65	1,061,190	52
06-08	1,930,643	333,830	17	1,370,250	71	1,036,420	54
07-09	2,090,202	373,523	18	1,423,278	68	1,049,755	50
08-10	1,760,377	545,370	31	1,206,460	69	661,091	38
09-11	1,471,405	696,140	47	1,152,614	78	456,475	31
10-12	2,131,524	615,998	29	1,239,949	58	623,951	29
11-13	2,506,595	542,905	22	1,637,736	65	1,094,831	44
12-14	2,975,214	678,342	23	1,909,732	64	1,231,390	41
13-15	2,753,620	892,911	32	2,142,152	78	1,249,241	45
14-16	3,170,920	1,137,227	36	2,357,608	74	1,220,381	38
15-17	3,211,418	938,658	29	2,140,770	67	1,202,112	37
16-18	2,421,653	775,870	32	1,641,212	68	865,342	36
17-19	2,629,011	436,834	17	1,141,690	43	704,856	27

FIVE-YEAR AVERAGE

15-19	2,887,164	678,598	24	1,638,451	57	959,853	33
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 362.10 STATION EQUIPMENT - SCADA

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2009		1,426				1,426-	
2010		1,426-				1,426	
2011							
2012	203,819		0		0		0
2013	227,015	497	0	40,035	18	39,538	17
2014							
2015							
2016	10,096		0		0		0
2017	58,335	6,087	10		0	6,087-	10-
2018	51,034	264	1		0	264-	1-
2019	16,023		0		0		0
TOTAL	566,321	6,847	1	40,035	7	33,188	6

THREE-YEAR MOVING AVERAGES

09-11							
10-12	67,940	475-	1-		0	475	1
11-13	143,611	166	0	13,345	9	13,179	9
12-14	143,611	166	0	13,345	9	13,179	9
13-15	75,672	166	0	13,345	18	13,179	17
14-16	3,365		0		0		0
15-17	22,810	2,029	9		0	2,029-	9-
16-18	39,821	2,117	5		0	2,117-	5-
17-19	41,797	2,117	5		0	2,117-	5-

FIVE-YEAR AVERAGE

15-19	27,097	1,270	5		0	1,270-	5-
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 368.00 LINE TRANSFORMERS

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2009	1,786		0		0		0
2010							
2011							
2012							
2013							
2014	2,185	97,412-		54,010-		43,402	
2015							
2016							
2017	3,525		0		0		0
2018							
2019							
<b>TOTAL</b>	<b>7,495</b>	<b>97,412-</b>		<b>54,010-</b>	<b>721-</b>	<b>43,402</b>	<b>579</b>
<b>THREE-YEAR MOVING AVERAGES</b>							
09-11	595		0		0		0
10-12							
11-13							
12-14	728	32,471-		18,003-		14,467	
13-15	728	32,471-		18,003-		14,467	
14-16	728	32,471-		18,003-		14,467	
15-17	1,175		0		0		0
16-18	1,175		0		0		0
17-19	1,175		0		0		0
<b>FIVE-YEAR AVERAGE</b>							
15-19	705		0		0		0

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 390.00 STRUCTURES AND IMPROVEMENTS

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2006		1,350				1,350-	
2007		1,350-				1,350	
2008							
2009							
2010		11,082				11,082-	
2011		1,532				1,532-	
2012							
2013							
2014							
2015							
2016							
2017	11,213	5,024	45		0	5,024-	45-
2018		238				238-	
2019	7,738		0		0		0
TOTAL	18,951	17,876	94		0	17,876-	94-

THREE-YEAR MOVING AVERAGES

06-08							
07-09		450-				450	
08-10		3,694				3,694-	
09-11		4,205				4,205-	
10-12		4,205				4,205-	
11-13		511				511-	
12-14							
13-15							
14-16							
15-17	3,738	1,675	45		0	1,675-	45-
16-18	3,738	1,754	47		0	1,754-	47-
17-19	6,317	1,754	28		0	1,754-	28-

FIVE-YEAR AVERAGE

15-19	3,790	1,052	28		0	1,052-	28-
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 392.00 TRANSPORTATION EQUIPMENT

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2005	515,761		0		0		0
2006	433,524		0		0		0
2007	606,071		0		0		0
2008	353,269		0		0		0
2009	739,122		0		0		0
2010	617,432		0		0		0
2011	433,848		0		0		0
2012	702,640		0		0		0
2013	382,385		0		0		0
2014	441,465		0		0		0
2015	866,577		0		0		0
2016	491,515		0		0		0
2017	1,059,944		0		0		0
2018	599,920		0		0		0
2019	525,117		0		0		0
TOTAL	8,768,591		0		0		0

THREE-YEAR MOVING AVERAGES

05-07	518,452		0		0		0
06-08	464,288		0		0		0
07-09	566,154		0		0		0
08-10	569,941		0		0		0
09-11	596,801		0		0		0
10-12	584,640		0		0		0
11-13	506,291		0		0		0
12-14	508,830		0		0		0
13-15	563,476		0		0		0
14-16	599,852		0		0		0
15-17	806,012		0		0		0
16-18	717,126		0		0		0
17-19	728,327		0		0		0

FIVE-YEAR AVERAGE

15-19	708,615		0		0		0
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EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 396.00 POWER OPERATED EQUIPMENT

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL		GROSS SALVAGE		NET SALVAGE	
		AMOUNT	PCT	AMOUNT	PCT	AMOUNT	PCT
2005	131,140		0		0		0
2006	165,727		0		0		0
2007	255,587		0		0		0
2008	288,458		0		0		0
2009	94,172		0		0		0
2010	182,642		0		0		0
2011	312,750		0		0		0
2012	359,337		0		0		0
2013	731,941		0		0		0
2014	188,036		0		0		0
2015	490,732		0		0		0
2016	427,194		0		0		0
2017	546,340		0		0		0
2018	185,988		0		0		0
2019							
TOTAL	4,360,043		0		0		0

THREE-YEAR MOVING AVERAGES

05-07	184,151		0		0		0
06-08	236,591		0		0		0
07-09	212,739		0		0		0
08-10	188,424		0		0		0
09-11	196,521		0		0		0
10-12	284,909		0		0		0
11-13	468,009		0		0		0
12-14	426,438		0		0		0
13-15	470,236		0		0		0
14-16	368,654		0		0		0
15-17	488,089		0		0		0
16-18	386,507		0		0		0
17-19	244,109		0		0		0

FIVE-YEAR AVERAGE

15-19	330,051		0		0		0
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**PART IX. DETAILED DEPRECIATION  
CALCULATIONS**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 303.00 MISCELLANEOUS INTANGIBLE PLANT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 10-SQUARE						
NET SALVAGE PERCENT.. 0						
1993	332,106.96	332,107	332,107			
2001	66,238.90	66,239	66,239			
2002	849,440.38	849,440	849,440			
2005	568,160.00	568,160	568,160			
2014	517,364.81	284,551	681,426-	1,198,791	4.50	266,398
	2,333,311.05	2,100,497	1,134,520	1,198,791		266,398
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						4.5 11.42

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 310.10 LAND AND LAND RIGHTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
COOPER COMMON - LANDFILL						
INTERIM SURVIVOR CURVE.. SQUARE						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. 0						
2015	5,325,571.56	1,597,671		5,325,572	10.50	507,197
	5,325,571.56	1,597,671		5,325,572		507,197
SPURLOCK COMMON - LANDFILL						
INTERIM SURVIVOR CURVE.. SQUARE						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. 0						
2010	2,727,019.77	664,275		2,727,020	29.50	92,441
2013	6,046,318.51	1,091,723		6,046,319	29.50	204,960
2014	3,382,670.46	531,553		3,382,670	29.50	114,667
2017	8,014,020.57	626,055		8,014,021	29.50	271,662
	20,170,029.31	2,913,606		20,170,029		683,730
SMITH COMMON - LANDFILL						
INTERIM SURVIVOR CURVE.. SQUARE						
PROBABLE RETIREMENT YEAR.. 6-2026						
NET SALVAGE PERCENT.. 0						
2016	6,050,424.87	2,117,649	1,462,186	4,588,239	6.50	705,883
	6,050,424.87	2,117,649	1,462,186	4,588,239		705,883
COOPER COMMON - ACCESS ROAD						
INTERIM SURVIVOR CURVE.. SQUARE						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. 0						
2009	480,134.08	240,067		480,134	10.50	45,727
	480,134.08	240,067		480,134		45,727

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 310.10 LAND AND LAND RIGHTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK COMMON - AMMONIA CONTAINMENT						
INTERIM SURVIVOR CURVE.. SQUARE						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. 0						
2018	1,050,779.86	50,847		1,050,780	29.50	35,620
	1,050,779.86	50,847		1,050,780		35,620
	33,076,939.68	6,919,840	1,462,186	31,614,754		1,978,157
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						16.0 5.98

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 311.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
CENTRAL LAB						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. 0						
1978	198,141.46	158,022	172,755	25,387	10.13	2,506
1980	4,012.00	3,168	3,463	549	10.16	54
1984	1,076.54	831	908	168	10.22	16
1987	80,111.38	60,564	66,211	13,901	10.26	1,355
1988	10,063.49	7,549	8,253	1,811	10.28	176
1993	5,331.79	3,822	4,178	1,153	10.33	112
1995	314,884.87	220,545	241,107	73,778	10.36	7,121
1996	5,824.03	4,028	4,404	1,420	10.37	137
	619,445.56	458,529	501,279	118,167		11,477

COOPER COMMON  
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5  
PROBABLE RETIREMENT YEAR.. 6-2030  
NET SALVAGE PERCENT.. -5

1966	3,357,009.21	2,938,676	2,999,587	525,273	9.92	52,951
1967	2,147.35	1,874	1,913	342	9.94	34
1970	2,885,840.39	2,495,223	2,546,942	483,190	9.99	48,367
1973	315.00	269	275	56	10.05	6
1975	2,613.26	2,218	2,264	480	10.08	48
1976	57,782.42	48,824	49,836	10,836	10.10	1,073
1979	85,525.55	71,264	72,741	17,061	10.15	1,681
1980	13,175.25	10,924	11,150	2,684	10.16	264
1981	4,896.33	4,038	4,122	1,019	10.18	100
1982	8,132.18	6,670	6,808	1,731	10.19	170
1983	18,925.52	15,428	15,748	4,124	10.21	404
1984	42,304.53	34,280	34,991	9,429	10.22	923
1985	148,502.82	119,531	122,009	33,919	10.24	3,312
1986	204,908.37	163,831	167,227	47,927	10.25	4,676
1987	179,371.99	142,385	145,336	43,004	10.26	4,191
1988	44,928.39	35,387	36,120	11,054	10.28	1,075
1990	32,719.26	25,349	25,874	8,481	10.30	823
1992	158,592.93	120,597	123,097	43,426	10.32	4,208
1993	153,013.23	115,156	117,543	43,121	10.33	4,174
1996	234,596.49	170,347	173,878	72,448	10.37	6,986
1999	244,644.00	170,052	173,577	83,299	10.39	8,017
2000	98,385.28	67,216	68,609	34,695	10.40	3,336
2001	56,220.76	37,694	38,475	20,557	10.41	1,975
2004	66,585.88	41,727	42,592	27,323	10.43	2,620

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 311.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
COOPER COMMON						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
2009	38,319.00	20,137	20,554	19,681	10.46	1,882
2010	1,784,963.80	890,607	909,067	965,145	10.47	92,182
2012	160,176.17	70,194	71,649	96,536	10.47	9,220
2013	147,883.33	59,384	60,615	94,663	10.48	9,033
2014	13,452.33	4,862	4,963	9,162	10.48	874
2016	111,902.64	29,396	30,005	87,492	10.49	8,341
2017	1,242,055.47	250,998	256,200	1,047,958	10.49	99,901
	11,599,889.13	8,164,538	8,333,766	3,846,118		372,847

COOPER UNIT 2 SCRUBBER						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
2012	16,839,214.86	7,379,415	7,532,370	10,148,806	10.47	969,322
	16,839,214.86	7,379,415	7,532,370	10,148,806		969,322

SPURLOCK COMMON						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. -7						
1986	719.59	419	419	351	26.87	13
1987	53,939.04	30,932	30,947	26,768	26.98	992
1989	134,049.81	74,492	74,528	68,905	27.20	2,533
1990	162,289.28	88,691	88,734	84,915	27.30	3,110
1992	43,827.82	23,098	23,109	23,787	27.50	865
1993	993,093.83	513,188	513,438	549,172	27.60	19,898
1997	181,931.72	85,836	85,878	108,789	27.97	3,889
1999	22,220.10	9,924	9,929	13,847	28.14	492
2000	829,157.78	359,333	359,508	527,691	28.22	18,699
2002	234,590.17	95,051	95,097	155,914	28.37	5,496
2003	55,265.61	21,556	21,567	37,568	28.45	1,320
2004	55,068.76	20,617	20,627	38,297	28.52	1,343
2007	97,093.42	31,364	31,379	72,511	28.72	2,525
2008	433,821.00	131,950	132,014	332,174	28.78	11,542
2009	338,754.52	96,500	96,547	265,920	28.83	9,224
2012	4,995,720.82	1,096,346	1,096,881	4,248,541	28.99	146,552

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 311.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK COMMON						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. -7						
2013	402,304.45	78,629	78,667	351,798	29.04	12,114
2014	21,405.00	3,643	3,645	19,259	29.08	662
2015	533,315.37	76,210	76,247	494,400	29.13	16,972
2016	13,126,963.92	1,505,153	1,505,887	12,539,965	29.16	430,040
2017	452,901.43	38,216	38,235	446,370	29.20	15,287
2019	6,732,731.54	121,028	121,087	7,082,936	29.27	241,986
	29,901,164.98	4,502,176	4,504,371	27,489,876		945,554

SPURLOCK UNIT 1						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2040						
NET SALVAGE PERCENT.. -7						
1979	7,965.99	5,704	5,524	2,999	18.98	158
1980	22,182,750.03	15,749,482	15,253,615	8,481,927	19.04	445,479
1981	72,197.84	50,809	49,209	28,042	19.10	1,468
1982	447,989.49	312,363	302,528	176,820	19.16	9,229
1984	156,008.87	106,668	103,310	63,620	19.27	3,302
1985	260,476.09	176,189	170,642	108,068	19.33	5,591
1986	22,391.68	14,981	14,509	9,450	19.38	488
1993	126,557.09	76,931	74,509	60,907	19.72	3,089
2003	900,516.03	432,500	418,883	544,669	20.10	27,098
2006	3,665,135.89	1,566,560	1,517,237	2,404,458	20.19	119,092
	27,841,989.00	18,492,187	17,909,967	11,880,961		614,994

SPURLOCK UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -7						
1982	31,713,670.22	21,431,122	22,317,143	11,616,484	20.85	557,146
1984	41,049.17	27,168	28,291	15,631	20.98	745
1985	50,044.43	32,747	34,101	19,447	21.05	924
1987	1,029,387.85	657,519	684,703	416,742	21.18	19,676
1989	18,828.35	11,712	12,196	7,950	21.30	373
1993	6,576.33	3,843	4,002	3,035	21.53	141

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 311.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -7						
2002	1,627,331.27	768,028	799,780	941,464	21.96	42,872
2005	85,476.56	36,113	37,606	53,854	22.07	2,440
2011	84,957.62	25,077	26,114	64,791	22.26	2,911
	34,657,321.80	22,993,329	23,943,936	13,139,398		627,228
SPURLOCK UNIT 3						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -7						
1982	2,356.74	1,524	1,243	1,279	23.30	55
2002	82,600.88	36,383	29,675	58,707	24.74	2,373
2005	134,474,964.67	52,736,469	43,013,999	100,874,213	24.89	4,052,801
2011	438,855.44	118,441	96,605	372,970	25.14	14,836
2018	425,959.56	25,464	20,769	435,007	25.35	17,160
	135,424,737.29	52,918,281	43,162,292	101,742,177		4,087,225
SPURLOCK UNIT 4						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. -7						
2009	80,194,467.49	22,844,685	8,715,865	77,092,215	28.83	2,674,028
2011	11,721,407.59	2,842,247	1,084,394	11,457,512	28.94	395,906
	91,915,875.08	25,686,932	9,800,259	88,549,727		3,069,934
SPURLOCK UNIT 1 SCRUBBER						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2040						
NET SALVAGE PERCENT.. -7						
2009	25,289,573.36	9,216,583	9,007,550	18,052,293	20.27	890,592
	25,289,573.36	9,216,583	9,007,550	18,052,293		890,592

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 311.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK UNIT 2 SCRUBBER						
INTERIM SURVIVOR CURVE.. IOWA 85-S1.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -7						
2009	22,341,947.21	7,656,337	8,045,353	15,860,531	22.20	714,438
	22,341,947.21	7,656,337	8,045,353	15,860,531		714,438
	396,431,158.27	157,468,307	132,741,143	290,828,054		12,303,611
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						23.6 3.10

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 312.00 BOILER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
COOPER COMMON						
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
1966	6,535,217.20	5,606,579	5,722,788	1,139,190	8.97	127,000
1967	35,392.35	30,280	30,908	6,254	9.01	694
1968	1,317.04	1,124	1,147	236	9.05	26
1969	33,840.06	28,791	29,388	6,144	9.08	677
1970	10,392,564.79	8,814,433	8,997,132	1,915,061	9.12	209,985
1972	15,563.20	13,115	13,387	2,955	9.19	322
1973	913,040.28	766,705	782,597	176,096	9.23	19,079
1974	94,861.59	79,382	81,027	18,577	9.26	2,006
1975	32,916.52	27,438	28,007	6,556	9.30	705
1976	156,100.40	129,625	132,312	31,594	9.33	3,386
1979	566,517.71	464,531	474,159	120,684	9.42	12,811
1980	7,589.87	6,193	6,321	1,648	9.46	174
1981	49,562.11	40,242	41,076	10,964	9.49	1,155
1982	194,559.58	157,152	160,409	43,878	9.52	4,609
1983	111,511.91	89,580	91,437	25,651	9.55	2,686
1984	48,748.87	38,949	39,756	11,430	9.57	1,194
1985	45,027.67	35,760	36,501	10,778	9.60	1,123
1986	632,293.02	498,874	509,214	154,693	9.63	16,064
1987	819,193.23	641,949	655,255	204,898	9.66	21,211
1989	1,275,004.67	984,641	1,005,050	333,705	9.71	34,367
1990	769,853.36	589,705	601,928	206,418	9.74	21,193
1991	211,474.63	160,574	163,902	58,146	9.77	5,951
1992	11,723.60	8,823	9,006	3,304	9.79	337
1993	17,247.35	12,850	13,116	4,993	9.82	508
1994	24,492,000.10	18,054,596	18,428,818	7,287,783	9.85	739,876
1996	686,604.84	494,424	504,672	216,263	9.90	21,845
1999	376,863.55	260,134	265,526	130,181	9.97	13,057
2000	801,466.74	544,157	555,436	286,104	9.99	28,639
2001	1,693,080.79	1,128,577	1,151,969	625,766	10.02	62,452
2002	546,144.29	356,922	364,320	209,132	10.04	20,830
2003	3,807,014.54	2,432,916	2,483,344	1,514,022	10.07	150,350
2004	1,837,110.98	1,146,057	1,169,812	759,155	10.09	75,238
2006	128,740.00	75,898	77,471	57,706	10.13	5,697
2007	141,338.25	80,517	82,186	66,219	10.16	6,518
2008	24,853,184.72	13,623,857	13,906,242	12,189,602	10.18	1,197,407
2009	2,093,125.39	1,098,341	1,121,107	1,076,675	10.20	105,556
2010	626,423.36	312,488	318,965	338,780	10.22	33,149
2011	1,234,900.67	580,871	592,911	703,735	10.24	68,724
2012	5,525,601.51	2,421,589	2,471,782	3,330,100	10.26	324,571
2013	4,005,131.86	1,609,486	1,642,846	2,562,542	10.29	249,032
2014	1,041,339.79	376,744	384,553	708,854	10.31	68,754

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 312.00 BOILER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
COOPER COMMON						
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
2015	2,389,195.24	754,127	769,758	1,738,897	10.33	168,335
2016	1,762,095.40	463,549	473,157	1,377,043	10.35	133,048
2017	966,205.08	195,801	199,859	814,656	10.37	78,559
2018	815,315.48	107,370	109,595	746,486	10.39	71,847
	102,794,003.59	65,345,716	66,700,151	41,233,553		4,110,747
COOPER UNIT 1						
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
2015	14,959,125.04	4,721,706	4,819,574	10,887,507	10.33	1,053,970
	14,959,125.04	4,721,706	4,819,574	10,887,507		1,053,970
COOPER UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
2015	135,710.76	42,836	43,724	98,772	10.33	9,562
2017	1,340,347.23	271,621	277,251	1,130,113	10.37	108,979
	1,476,057.99	314,457	320,975	1,228,886		118,541
COOPER UNIT 2 SCRUBBER						
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
2012	194,151,378.75	85,086,648	86,850,257	117,008,691	10.26	11,404,356
	194,151,378.75	85,086,648	86,850,257	117,008,691		11,404,356

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 312.00 BOILER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK COMMON						
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. -7						
1982	73,635.57	45,169	46,170	32,620	21.37	1,526
1987	6,893.04	3,963	4,051	3,325	22.33	149
1989	43,168.31	24,088	24,622	21,568	22.70	950
1990	25,902.38	14,223	14,538	13,177	22.88	576
1994	628,562.02	320,778	327,890	344,672	23.60	14,605
1995	211,951.67	105,897	108,245	118,544	23.78	4,985
1997	560,177.80	267,280	273,205	326,185	24.13	13,518
2000	2,089,569.63	919,221	939,600	1,296,240	24.65	52,586
2001	1,956,962.72	833,832	852,318	1,241,632	24.83	50,005
2004	938,636.24	358,399	366,345	637,996	25.34	25,177
2005	1,007,555.74	368,457	376,626	701,459	25.50	27,508
2007	2,060,339.32	681,408	696,515	1,508,049	25.84	58,361
2008	135,568.90	42,321	43,259	101,799	26.00	3,915
2009	4,890,589.93	1,429,951	1,461,652	3,771,279	26.17	144,107
2010	3,616,014.00	982,373	1,004,152	2,864,983	26.33	108,811
2011	1,871,987.75	467,146	477,502	1,525,524	26.50	57,567
2012	5,439,185.72	1,230,799	1,258,085	4,561,843	26.66	171,112
2013	2,628,218.66	530,802	542,570	2,269,624	26.82	84,624
2014	3,665,061.67	644,910	659,207	3,262,409	26.98	120,920
2015	6,731,457.10	998,937	1,021,083	6,181,576	27.14	227,766
2016	1,507,781.45	179,612	183,594	1,429,732	27.30	52,371
2017	2,091,267.60	183,286	187,349	2,050,307	27.46	74,665
2018	1,828,601.91	99,513	101,719	1,854,885	27.62	67,157
2019	3,293,972.37	61,080	62,434	3,462,116	27.78	124,626
	47,303,061.50	10,793,445	11,032,732	39,581,544		1,487,587

SPURLOCK UNIT 1  
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5  
PROBABLE RETIREMENT YEAR.. 6-2040  
NET SALVAGE PERCENT.. -7

1960	20,387.21	16,114	15,606	6,209	13.92	446
1979	56,988.07	40,197	38,929	22,049	16.31	1,352
1980	43,319,513.68	30,308,567	29,352,264	16,999,615	16.42	1,035,299
1981	294,613.06	204,367	197,919	117,317	16.53	7,097
1982	16,908.30	11,629	11,262	6,830	16.63	411
1983	242,330.25	165,172	159,960	99,333	16.73	5,937
1984	8,193.20	5,530	5,356	3,411	16.84	203
1985	33,499.92	22,387	21,681	14,164	16.94	836

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 312.00 BOILER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK UNIT 1						
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5						
PROBABLE RETIREMENT YEAR.. 6-2040						
NET SALVAGE PERCENT.. -7						
1986	23,472.40	15,522	15,032	10,083	17.04	592
1987	97,938.52	64,055	62,034	42,760	17.14	2,495
1988	148,635.22	96,117	93,084	65,955	17.23	3,828
1989	113,340.96	72,399	70,115	51,160	17.33	2,952
1990	6,634.87	4,184	4,052	3,047	17.43	175
1991	223,462.36	139,030	134,643	104,461	17.52	5,962
1992	197,206.56	120,949	117,133	93,878	17.61	5,331
1993	58,304.70	35,206	34,095	28,291	17.71	1,597
2000	264,715.70	138,989	134,604	148,642	18.34	8,105
2001	830,097.20	424,348	410,959	477,245	18.43	25,895
2003	122,941,488.67	59,179,226	57,311,990	74,235,403	18.60	3,991,151
2006	10,982,998.37	4,717,881	4,569,021	7,182,787	18.86	380,848
2007	1,181,538.34	484,788	469,492	794,754	18.94	41,962
2009	11,718,114.51	4,308,690	4,172,741	8,365,641	19.10	437,992
2011	1,495,874.74	476,558	461,522	1,139,064	19.27	59,111
2012	1,110,295.11	323,473	313,267	874,749	19.35	45,207
2013	8,626,358.93	2,260,015	2,188,706	7,041,498	19.43	362,403
2014	739,109.75	170,198	164,828	626,020	19.51	32,087
2016	91,818.12	14,631	14,169	84,076	19.66	4,277
2017	519,065.92	61,766	59,817	495,583	19.74	25,106
2018	1,709,427.95	127,085	123,075	1,706,013	19.82	86,075
	207,072,332.59	104,009,073	100,727,355	120,840,041		6,574,732

SPURLOCK UNIT 2  
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5  
PROBABLE RETIREMENT YEAR.. 6-2042  
NET SALVAGE PERCENT.. -7

1982	137,155,705.73	91,630,422	95,041,484	51,715,121	17.82	2,902,083
1984	82,018.59	53,712	55,711	32,048	18.06	1,775
1985	15,164.00	9,825	10,191	6,035	18.18	332
1987	435,607.02	275,819	286,087	180,013	18.42	9,773
1988	220,702.18	138,059	143,198	92,953	18.53	5,016
1989	115,852.28	71,526	74,189	49,773	18.65	2,669
1991	542,995.97	326,037	338,174	242,832	18.87	12,869
1994	5,243,007.88	2,998,106	3,109,714	2,500,304	19.21	130,156
1996	1,711,608.88	942,926	978,028	853,394	19.42	43,944
2000	2,329,466.89	1,169,620	1,213,161	1,279,369	19.85	64,452
2002	67,381,006.46	31,934,224	33,123,017	38,974,660	20.06	1,942,904

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 312.00 BOILER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -7						
2003	325,300.31	149,229	154,784	193,287	20.16	9,588
2005	4,578,249.51	1,948,763	2,021,308	2,877,419	20.36	141,327
2006	6,210,998.41	2,532,902	2,627,193	4,018,576	20.46	196,411
2008	5,622,106.07	2,071,430	2,148,542	3,867,112	20.66	187,179
2009	887,162.40	307,770	319,227	630,037	20.76	30,349
2010	8,346.55	2,702	2,803	6,128	20.86	294
2011	8,814,555.59	2,638,294	2,736,508	6,695,067	20.96	319,421
2012	153,990.13	42,080	43,646	121,123	21.05	5,754
2013	2,589,158.46	635,059	658,700	2,111,700	21.15	99,844
2014	5,188,392.67	1,116,978	1,158,559	4,393,021	21.24	206,828
2015	524,515.00	95,757	99,322	461,909	21.34	21,645
2016	4,477,930.26	661,067	685,676	4,105,709	21.43	191,587
2017	9,409,721.30	1,036,643	1,075,233	8,993,168	21.52	417,898
2019	930,929.98	22,422	23,257	972,838	21.71	44,811
	264,954,492.52	142,811,372	148,127,712	135,373,595		6,988,909

SPURLOCK UNIT 3  
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5  
PROBABLE RETIREMENT YEAR.. 6-2045  
NET SALVAGE PERCENT.. -7

2005	158,873,823.33	63,069,842	51,398,505	118,596,486	22.65	5,236,048
2009	3,968,914.66	1,273,002	1,037,428	3,209,311	23.15	138,631
2011	1,996,016.99	549,696	447,972	1,687,766	23.40	72,127
2012	2,808,692.32	703,391	573,226	2,432,075	23.53	103,361
2013	2,833,570.13	634,551	517,125	2,514,795	23.65	106,334
2014	8,495,716.71	1,665,001	1,356,886	7,733,531	23.77	325,348
2015	1,000,269.75	165,820	135,134	935,154	23.89	39,144
2016	94,291.34	12,611	10,277	90,614	24.01	3,774
2017	2,091,782.33	207,079	168,758	2,069,449	24.13	85,762
	182,163,077.56	68,280,993	55,645,311	139,269,182		6,110,529

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 312.00 BOILER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK UNIT 4						
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. -7						
2007	1,408,650.41	465,878	177,557	1,329,699	25.84	51,459
2008	585,742.89	182,853	69,690	557,055	26.00	21,425
2009	278,203,815.45	81,343,513	31,001,925	266,676,158	26.17	10,190,147
2010	246.36	67	26	238	26.33	9
2011	824,677.88	205,795	78,433	803,972	26.50	30,339
2012	12,032,597.35	2,722,779	1,037,715	11,837,164	26.66	444,005
2014	4,583,762.52	806,566	307,401	4,597,225	26.98	170,394
2015	7,065,155.09	1,048,457	399,592	7,160,124	27.14	263,822
2016	94,291.35	11,232	4,281	96,611	27.30	3,539
2018	1,437,733.46	78,242	29,820	1,508,555	27.62	54,618
2019	4,668,738.10	86,573	32,995	4,962,555	27.78	178,638
	310,905,410.86	86,951,955	33,139,434	299,529,356		11,408,395
SPURLOCK UNIT 1 SCRUBBER						
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5						
PROBABLE RETIREMENT YEAR.. 6-2040						
NET SALVAGE PERCENT.. -7						
2009	102,930,250.29	37,846,918	36,988,548	73,146,820	19.10	3,829,676
	102,930,250.29	37,846,918	36,988,548	73,146,820		3,829,676
SPURLOCK UNIT 2 SCRUBBER						
INTERIM SURVIVOR CURVE.. IOWA 55-S0.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -7						
2009	157,598,866.33	54,673,474	57,451,408	111,179,379	20.76	5,355,461
	157,598,866.33	54,673,474	57,451,408	111,179,379		5,355,461
	1,586,308,057.02	660,835,757	601,803,456	1,089,278,554		58,442,903
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						18.6 3.68

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 314.00 TURBOGENERATOR UNITS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
COOPER COMMON						
INTERIM SURVIVOR CURVE.. IOWA 50-R2						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
1966	4,860,178.43	4,259,018	4,347,296	755,892	7.94	95,201
1967	4,542.33	3,965	4,047	722	8.05	90
1968	1,058.71	921	940	172	8.16	21
1970	7,597,435.35	6,552,401	6,688,214	1,289,093	8.37	154,014
1972	6,362.15	5,440	5,553	1,128	8.57	132
1976	8,222.94	6,904	7,047	1,587	8.92	178
1982	146,098.34	118,803	121,265	32,138	9.34	3,441
1987	92,313.95	72,564	74,068	22,862	9.62	2,377
1989	7,635.92	5,907	6,029	1,988	9.71	205
1991	357,895.46	272,012	277,650	98,140	9.79	10,025
2000	581,325.17	393,196	401,346	209,046	10.07	20,759
2003	3,192,574.12	2,030,597	2,072,686	1,279,517	10.14	126,185
2009	3,791,952.99	1,974,132	2,015,050	1,966,500	10.25	191,854
2012	1,200,000.00	520,808	531,603	728,397	10.29	70,787
2015	1,069,909.60	334,730	341,668	781,737	10.32	75,750
2016	710,388.25	184,985	188,819	557,088	10.34	53,877
2017	87,063.07	17,439	17,800	73,616	10.35	7,113
	23,714,956.78	16,753,822	17,101,082	7,799,623		812,009

SPURLOCK UNIT 1  
INTERIM SURVIVOR CURVE.. IOWA 50-R2  
PROBABLE RETIREMENT YEAR.. 6-2040  
NET SALVAGE PERCENT.. -7

1979	90,183.19	65,980	63,903	32,593	14.92	2,185
1980	21,238,390.63	15,368,288	14,884,423	7,840,655	15.17	516,853
1981	50,427.89	36,088	34,952	19,006	15.41	1,233
1982	8,334.08	5,897	5,711	3,206	15.64	205
1984	4,038.88	2,792	2,704	1,618	16.07	101
1987	160,132.28	106,501	103,148	68,194	16.67	4,091
1989	88,195.62	57,025	55,230	39,140	17.04	2,297
1991	127,297.64	79,849	77,335	58,873	17.37	3,389
1996	6,725,856.46	3,852,519	3,731,224	3,465,443	18.09	191,567
2000	4,545,754.55	2,370,158	2,295,534	2,568,423	18.55	138,459
2007	341,932.27	138,078	133,731	232,137	19.17	12,109
2009	319,271.80	115,123	111,498	230,122	19.32	11,911
	33,699,815.29	22,198,298	21,499,392	14,559,410		884,400

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 314.00 TURBOGENERATOR UNITS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 50-R2						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -7						
1982	34,342,579.86	23,768,410	24,751,060	11,995,500	16.55	724,804
1984	10,917.52	7,363	7,667	4,014	17.07	235
1990	91,451.87	56,461	58,795	39,058	18.43	2,119
1991	156,182.28	94,813	98,733	68,382	18.63	3,671
1998	13,718,618.15	7,213,075	7,511,283	7,167,638	19.80	362,002
2000	131,890.57	65,775	68,494	72,629	20.07	3,619
2007	324,996.98	124,073	129,203	218,544	20.84	10,487
2009	300,913.39	102,273	106,501	215,476	21.01	10,256
2010	252,558.47	79,980	83,287	186,951	21.10	8,860
2013	56,336.50	13,462	14,019	46,261	21.32	2,170
2016	44,949.83	6,448	6,715	41,382	21.51	1,924
2017	10,705,741.18	1,138,298	1,185,358	10,269,785	21.57	476,114
	60,137,136.60	32,670,431	34,021,115	30,325,621		1,606,261

SPURLOCK UNIT 3  
INTERIM SURVIVOR CURVE.. IOWA 50-R2  
PROBABLE RETIREMENT YEAR.. 6-2045  
NET SALVAGE PERCENT.. -7

2005	74,052,384.09	28,930,667	23,597,023	55,639,028	22.97	2,422,248
2008	4,832,465.25	1,612,908	1,315,553	3,855,185	23.36	165,034
2015	1,454,156.42	233,112	190,136	1,365,812	24.06	56,767
2017	69,953.79	6,671	5,441	69,409	24.22	2,866
	80,408,959.55	30,783,358	25,108,153	60,929,434		2,646,915

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 314.00 TURBOGENERATOR UNITS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK UNIT 4						
INTERIM SURVIVOR CURVE.. IOWA 50-R2						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. -7						
2009	55,374,618.46	15,754,206	5,848,121	53,402,721	26.56	2,010,645
2017	201,780.13	16,929	6,284	209,621	27.62	7,589
2019	24,662,665.66	438,322	162,710	26,226,343	27.83	942,377
	80,239,064.25	16,209,457	6,017,115	79,838,684		2,960,611
	278,199,932.47	118,615,366	103,746,857	193,452,772		8,910,196
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						21.7 3.20

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 315.00 ACCESSORY ELECTRIC EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
COOPER COMMON						
INTERIM SURVIVOR CURVE.. IOWA 60-R4						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
1966	571,584.88	511,934	522,545	77,619	8.39	9,251
1970	1,053,861.18	925,345	944,525	162,029	9.03	17,943
1972	1,769.34	1,539	1,571	287	9.27	31
1981	27,393.32	22,743	23,214	5,549	9.92	559
1984	594,947.00	484,638	494,683	130,011	10.06	12,924
1986	52,253.74	41,961	42,831	12,036	10.14	1,187
1990	14,452.00	11,226	11,459	3,716	10.27	362
1992	21,132.64	16,099	16,433	5,757	10.32	558
1994	58,251.83	43,415	44,315	16,850	10.36	1,626
2000	19,529.62	13,341	13,618	6,889	10.44	660
2004	822,171.85	515,171	525,849	337,431	10.46	32,259
2018	125,036.05	16,411	16,751	114,537	10.50	10,908
	3,362,383.45	2,603,823	2,657,793	872,710		88,268

COOPER UNIT 1  
INTERIM SURVIVOR CURVE.. IOWA 60-R4  
PROBABLE RETIREMENT YEAR.. 6-2030  
NET SALVAGE PERCENT.. -5

2017	42,969.95	8,677	8,857	36,262	10.50	3,454
2018	65,169.15	8,553	8,730	59,697	10.50	5,685
	108,139.10	17,230	17,587	95,959		9,139

COOPER UNIT 2  
INTERIM SURVIVOR CURVE.. IOWA 60-R4  
PROBABLE RETIREMENT YEAR.. 6-2030  
NET SALVAGE PERCENT.. -5

2017	42,969.95	8,677	8,857	36,261	10.50	3,453
2018	65,299.14	8,571	8,749	59,815	10.50	5,697
	108,269.09	17,248	17,606	96,077		9,150

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 315.00 ACCESSORY ELECTRIC EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
COOPER UNIT 2 SCRUBBER						
INTERIM SURVIVOR CURVE.. IOWA 60-R4						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
2012	12,060,627.85	5,279,480	5,388,909	7,274,750	10.49	693,494
	12,060,627.85	5,279,480	5,388,909	7,274,750		693,494
SPURLOCK COMMON						
INTERIM SURVIVOR CURVE.. IOWA 60-R4						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. -7						
2019	657,912.36	11,777	7,870	696,096	29.38	23,693
	657,912.36	11,777	7,870	696,096		23,693
SPURLOCK UNIT 1						
INTERIM SURVIVOR CURVE.. IOWA 60-R4						
PROBABLE RETIREMENT YEAR.. 6-2040						
NET SALVAGE PERCENT.. -7						
1980	6,882,149.94	5,053,477	4,894,370	2,469,530	17.30	142,747
1981	10,833.94	7,864	7,616	3,976	17.55	227
1990	10,196.54	6,572	6,365	4,545	19.17	237
2000	57,564.24	30,290	29,336	32,257	20.06	1,608
2003	3,710,110.99	1,781,813	1,725,713	2,244,106	20.20	111,094
	10,670,855.65	6,880,016	6,663,401	4,754,415		255,913
SPURLOCK UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 60-R4						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -7						
1982	19,378,324.53	13,582,543	14,099,269	6,635,539	19.02	348,872
1983	195,615.84	135,283	140,430	68,879	19.30	3,569
2002	1,634,956.03	772,536	801,926	947,477	22.04	42,989
2018	574,430.11	38,476	39,940	574,700	22.46	25,588
	21,783,326.51	14,528,838	15,081,564	8,226,595		421,018

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 315.00 ACCESSORY ELECTRIC EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK UNIT 3						
INTERIM SURVIVOR CURVE.. IOWA 60-R4						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -7						
2005	23,128,165.31	9,066,114	7,394,689	17,352,448	25.01	693,820
2012	636,137.53	155,594	126,909	553,758	25.31	21,879
	23,764,302.84	9,221,708	7,521,598	17,906,206		715,699
SPURLOCK UNIT 4						
INTERIM SURVIVOR CURVE.. IOWA 60-R4						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. -7						
2009	12,751,242.41	3,622,710	1,382,162	12,261,667	28.99	422,962
	12,751,242.41	3,622,710	1,382,162	12,261,667		422,962
SPURLOCK UNIT 1 SCRUBBER						
INTERIM SURVIVOR CURVE.. IOWA 60-R4						
PROBABLE RETIREMENT YEAR.. 6-2040						
NET SALVAGE PERCENT.. -7						
2009	12,520,715.15	4,553,964	4,450,680	8,946,485	20.37	439,199
	12,520,715.15	4,553,964	4,450,680	8,946,485		439,199
SPURLOCK UNIT 2 SCRUBBER						
INTERIM SURVIVOR CURVE.. IOWA 60-R4						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -7						
2009	17,731,988.49	6,066,120	6,374,337	12,598,891	22.32	564,466
	17,731,988.49	6,066,120	6,374,337	12,598,891		564,466
	115,519,762.90	52,802,914	49,563,507	73,729,851		3,643,001
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						20.2 3.15

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 316.00 MISCELLANEOUS POWER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
CENTRAL LAB						
INTERIM SURVIVOR CURVE.. IOWA 30-L1						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. 0						
1978	1,684.51	1,267	1,385	299	7.24	41
1980	3,223.96	2,401	2,625	599	7.39	81
1984	7,531.81	5,500	6,013	1,519	7.66	198
1987	37,677.15	27,032	29,552	8,125	7.86	1,034
1988	25,865.18	18,443	20,162	5,703	7.92	720
1989	7,059.45	5,001	5,467	1,592	7.98	199
1990	40,800.84	28,690	31,365	9,436	8.05	1,172
1991	36,575.50	25,528	27,908	8,667	8.11	1,069
1992	16,788.77	11,633	12,718	4,071	8.16	499
1993	55,481.45	38,115	41,669	13,813	8.22	1,680
1994	14,729.95	10,028	10,963	3,767	8.28	455
1995	78,085.75	52,647	57,555	20,530	8.34	2,462
1996	11,459.20	7,650	8,363	3,096	8.39	369
1997	33,398.23	22,046	24,101	9,297	8.45	1,100
1998	45,514.89	29,698	32,467	13,048	8.50	1,535
1999	119,063.15	76,699	83,850	35,213	8.55	4,118
2000	178,343.24	113,250	123,809	54,535	8.61	6,334
2004	17,516.45	10,357	11,323	6,194	8.82	702
2005	37,280.89	21,532	23,539	13,741	8.88	1,547
2006	68,584.51	38,573	42,169	26,415	8.94	2,955
2007	13,977.68	7,620	8,330	5,647	9.02	626
2008	33,599.11	17,666	19,313	14,286	9.10	1,570
2010	71,207.35	34,187	37,374	33,833	9.28	3,646
2011	5,798.00	2,630	2,875	2,923	9.37	312
2012	23,129.40	9,776	10,687	12,442	9.48	1,312
2013	35,217.93	13,673	14,948	20,270	9.58	2,116
2018	6,843.70	867	948	5,896	10.06	586
2019	85,116.23	3,924	4,290	80,826	10.14	7,971
	1,111,554.28	636,433	695,769	415,785		46,409

COOPER COMMON  
INTERIM SURVIVOR CURVE.. IOWA 30-L1  
PROBABLE RETIREMENT YEAR.. 6-2030  
NET SALVAGE PERCENT.. -5

1964	22,574.33	18,931	19,243	4,460	6.02	741
1967	2,376.44	1,967	1,999	496	6.32	78
1972	1,545.02	1,252	1,273	350	6.76	52
1974	9,912.01	7,963	8,094	2,313	6.93	334

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 316.00 MISCELLANEOUS POWER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
COOPER COMMON						
INTERIM SURVIVOR CURVE.. IOWA 30-L1						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
1975	5,275.95	4,221	4,291	1,249	7.01	178
1976	2,426.00	1,932	1,964	583	7.09	82
1977	7,894.30	6,262	6,365	1,924	7.16	269
1978	5,395.95	4,260	4,330	1,336	7.24	185
1981	1,604.40	1,249	1,270	415	7.46	56
1982	5,012.12	3,882	3,946	1,317	7.53	175
1983	2,414.00	1,860	1,891	644	7.60	85
1984	29,319.75	22,479	22,849	7,937	7.66	1,036
1985	40,137.60	30,596	31,100	11,045	7.73	1,429
1986	14,546.34	11,027	11,209	4,065	7.79	522
1987	23,652.72	17,819	18,112	6,723	7.86	855
1988	40,328.77	30,194	30,691	11,654	7.92	1,471
1989	40,855.83	30,391	30,891	12,007	7.98	1,505
1990	49,869.26	36,820	37,426	14,936	8.05	1,855
1991	12,499.67	9,160	9,311	3,814	8.11	470
1992	50,003.22	36,379	36,978	15,525	8.16	1,903
1993	75,113.37	54,181	55,073	23,796	8.22	2,895
1994	130,817.83	93,514	95,054	42,305	8.28	5,109
1995	72,102.93	51,044	51,885	23,823	8.34	2,856
1996	52,853.47	37,049	37,659	17,837	8.39	2,126
1997	69,926.41	48,466	49,264	24,159	8.45	2,859
1998	56,917.68	38,995	39,637	20,126	8.50	2,368
1999	16,182.34	10,946	11,126	5,865	8.55	686
2000	8,834.22	5,890	5,987	3,289	8.61	382
2001	37,076.96	24,348	24,749	14,182	8.66	1,638
2002	15,135.30	9,775	9,936	5,956	8.71	684
2003	7,284.76	4,620	4,696	2,953	8.76	337
2004	6,784.00	4,212	4,281	2,842	8.82	322
2005	53,714.07	32,574	33,110	23,289	8.88	2,623
2010	798,066.81	402,318	408,943	429,027	9.28	46,231
2011	20,879.90	9,946	10,110	11,814	9.37	1,261
2013	61,490.00	25,067	25,480	39,085	9.58	4,080
2014	41,221.75	15,126	15,375	27,908	9.68	2,883
2015	61,723.31	19,760	20,085	44,724	9.78	4,573
2016	33,177.85	8,841	8,987	25,850	9.88	2,616
2017	406,303.15	83,327	84,699	341,919	9.97	34,295
2019	313,316.55	15,166	15,416	313,567	10.14	30,924
	2,706,566.34	1,273,809	1,294,786	1,547,109		165,029

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 316.00 MISCELLANEOUS POWER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
COOPER UNIT 2 SCRUBBER						
INTERIM SURVIVOR CURVE.. IOWA 30-L1						
PROBABLE RETIREMENT YEAR.. 6-2030						
NET SALVAGE PERCENT.. -5						
2012	2,139,985.18	949,710	969,395	1,277,589	9.48	134,767
	2,139,985.18	949,710	969,395	1,277,589		134,767
SPURLOCK COMMON						
INTERIM SURVIVOR CURVE.. IOWA 30-L1						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. -7						
1978	126,813.04	87,698	91,761	43,929	10.60	4,144
1979	24,284.44	16,583	17,351	8,633	10.84	796
1980	29,786.64	20,081	21,011	10,860	11.08	980
1981	54,356.29	36,163	37,838	20,323	11.32	1,795
1982	141,577.45	92,959	97,266	54,222	11.56	4,690
1983	46,357.42	30,027	31,418	18,184	11.80	1,541
1984	47,276.66	30,186	31,585	19,001	12.05	1,577
1985	95,945.94	60,407	63,206	39,456	12.29	3,210
1986	32,765.34	20,321	21,262	13,796	12.54	1,100
1987	87,579.94	53,491	55,969	37,741	12.79	2,951
1988	39,342.42	23,671	24,768	17,329	13.03	1,330
1989	51,661.45	30,586	32,003	23,275	13.28	1,753
1990	90,898.71	52,924	55,376	41,886	13.53	3,096
1991	27,535.27	15,761	16,491	12,972	13.78	941
1992	84,231.81	47,379	49,574	40,554	14.03	2,891
1993	71,148.30	39,290	41,110	35,018	14.28	2,452
1994	129,756.62	70,315	73,573	65,267	14.53	4,492
1995	44,418.54	23,602	24,695	22,832	14.78	1,545
1996	213,762.56	111,316	116,473	112,253	15.03	7,469
1997	102,102.08	52,041	54,452	54,797	15.28	3,586
1998	62,334.27	31,078	32,518	34,180	15.53	2,201
1999	115,734.06	56,359	58,970	64,865	15.78	4,111
2000	40,351.11	19,169	20,057	23,119	16.03	1,442
2001	5,671.00	2,626	2,748	3,320	16.28	204
2002	5,527.90	2,488	2,603	3,312	16.54	200
2003	239,474.99	104,696	109,547	146,692	16.79	8,737
2004	38,270.21	16,199	16,950	24,000	17.05	1,408
2005	486,910.32	198,764	207,973	313,021	17.33	18,062
2006	132,723.50	52,068	54,480	87,534	17.62	4,968
2007	30,091.57	11,281	11,804	20,394	17.93	1,137
2008	141,116.01	50,258	52,586	98,408	18.26	5,389

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 316.00 MISCELLANEOUS POWER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK COMMON						
INTERIM SURVIVOR CURVE.. IOWA 30-L1						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. -7						
2009	129,027.24	43,322	45,329	92,730	18.61	4,983
2010	62,102.03	19,452	20,353	46,096	18.99	2,427
2011	131,612.48	38,109	39,875	100,951	19.38	5,209
2012	18,958.26	4,990	5,221	15,064	19.80	761
2013	64,826.40	15,268	15,975	53,389	20.23	2,639
2014	1,100,347.24	225,820	236,282	941,089	20.69	45,485
2015	179,605.87	31,141	32,584	159,594	21.15	7,546
2016	36,606.04	5,073	5,308	33,860	21.64	1,565
2017	67,732.67	6,934	7,255	65,219	22.12	2,948
2018	84,573.16	5,310	5,556	84,937	22.62	3,755
2019	59,444.80	1,294	1,354	62,252	23.11	2,694
	4,774,642.05	1,856,500	1,942,513	3,166,354		180,210

SPURLOCK UNIT 1  
INTERIM SURVIVOR CURVE.. IOWA 30-L1  
PROBABLE RETIREMENT YEAR.. 6-2040  
NET SALVAGE PERCENT.. -7

1975	3,685.90	2,710	2,625	1,319	9.35	141
1976	105,847.18	77,110	74,682	38,575	9.53	4,048
1977	40,660.71	29,345	28,421	15,086	9.71	1,554
1978	2,674.55	1,911	1,851	1,011	9.90	102
1980	29,694.36	20,808	20,153	11,620	10.26	1,133
	182,562.70	131,884	127,731	67,611		6,978

SPURLOCK UNIT 3  
INTERIM SURVIVOR CURVE.. IOWA 30-L1  
PROBABLE RETIREMENT YEAR.. 6-2045  
NET SALVAGE PERCENT.. -7

2005	196,710.01	84,440	68,873	141,607	16.24	8,720
2016	1,010,076.23	151,461	123,538	957,243	19.88	48,151
2018	985,683.41	68,185	55,615	999,067	20.69	48,287
	2,192,469.65	304,086	248,026	2,097,917		105,158

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 316.00 MISCELLANEOUS POWER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SPURLOCK UNIT 4						
INTERIM SURVIVOR CURVE.. IOWA 30-L1						
PROBABLE RETIREMENT YEAR.. 6-2049						
NET SALVAGE PERCENT.. -7						
2009	1,713,517.24	575,322	211,495	1,621,969	18.61	87,156
2016	1,007,682.17	139,662	51,341	1,026,879	21.64	47,453
2019	1,243,021.41	27,066	9,950	1,320,083	23.11	57,122
	3,964,220.82	742,050	272,786	3,968,930		191,731
	17,072,001.02	5,894,472	5,551,006	12,541,295		830,282
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						15.1 4.86

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 341.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT COMMON						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -3						
1999	11,825,116.32	5,213,228	5,640,670	6,539,199	25.19	259,595
2001	1,879,908.18	778,221	842,029	1,094,277	25.64	42,679
2003	70,822.72	27,270	29,506	43,441	26.08	1,666
2004	274,976.66	101,590	109,920	173,306	26.30	6,590
2005	420,804.59	148,558	160,739	272,690	26.52	10,282
2008	529,002.54	158,482	171,476	373,396	27.16	13,748
2009	40,240.67	11,272	12,196	29,252	27.36	1,069
2010	2,645,321.10	686,701	743,005	1,981,676	27.57	71,878
2011	525,234.46	124,947	135,192	405,800	27.77	14,613
2013	997,147.82	190,684	206,319	820,744	28.16	29,146
2017	325,446.17	26,713	28,903	306,306	28.87	10,610
	19,534,021.23	7,467,666	8,079,954	12,040,088		461,876

SMITH CT UNIT 1  
INTERIM SURVIVOR CURVE.. IOWA 55-S1  
PROBABLE RETIREMENT YEAR.. 6-2034  
NET SALVAGE PERCENT.. -4

1999	715,236.19	438,869	422,440	321,405	13.53	23,755
2001	1,951,483.62	1,147,077	1,104,137	925,406	13.64	67,845
	2,666,719.81	1,585,946	1,526,577	1,246,812		91,600

SMITH CT UNIT 2  
INTERIM SURVIVOR CURVE.. IOWA 55-S1  
PROBABLE RETIREMENT YEAR.. 6-2034  
NET SALVAGE PERCENT.. -4

1999	715,236.19	438,869	428,100	315,746	13.53	23,337
2001	1,951,483.62	1,147,077	1,118,930	910,613	13.64	66,760
	2,666,719.81	1,585,946	1,547,030	1,226,359		90,097

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 341.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT UNIT 3						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2034						
NET SALVAGE PERCENT.. -4						
1999	715,236.19	438,869	425,362	318,484	13.53	23,539
2001	1,951,483.62	1,147,077	1,111,772	917,771	13.64	67,285
	2,666,719.81	1,585,946	1,537,134	1,236,255		90,824
SMITH CT UNIT 4						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -4						
2001	683,504.01	337,487	328,432	382,412	19.36	19,753
2002	1,244,977.47	596,296	580,297	714,480	19.48	36,678
2016	9,275.93	1,381	1,344	8,303	20.89	397
	1,937,757.41	935,164	910,073	1,105,195		56,828
SMITH CT UNIT 5						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -4						
2001	359,276.60	177,397	171,939	201,709	19.36	10,419
2002	1,230,582.90	589,402	571,267	708,539	19.48	36,373
2016	9,275.93	1,381	1,339	8,308	20.89	398
	1,599,135.43	768,180	744,544	918,557		47,190
SMITH CT UNIT 6						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -4						
2005	294,248.85	115,568	110,222	195,797	22.94	8,535
2016	9,275.93	1,204	1,148	8,499	24.47	347
	303,524.78	116,772	111,370	204,296		8,882

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 341.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT UNIT 7						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -4						
2005	294,248.85	115,568	110,220	195,799	22.94	8,535
2016	9,275.93	1,204	1,148	8,499	24.47	347
	303,524.78	116,772	111,368	204,298		8,882
SMITH CT UNIT 9						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -4						
2010	4,480,861.44	1,174,484	882,245	3,777,851	27.57	137,028
2016	9,275.93	1,046	786	8,861	28.70	309
2019	10,500.00	184	138	10,782	29.18	369
	4,500,637.37	1,175,714	883,169	3,797,494		137,706
SMITH CT UNIT 10						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -4						
2010	79,570.63	20,856	20,956	61,797	27.57	2,241
2016	9,275.94	1,046	1,051	8,596	28.70	300
	88,846.57	21,902	22,007	70,393		2,541
COOPERATIVE SOLAR						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -1						
2017	625,882.00	64,561	55,403	576,738	21.89	26,347
	625,882.00	64,561	55,403	576,738		26,347

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 341.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
GREEN VALLEY LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	1,119,860.80	548,284	495,454	646,804	17.16	37,693
	1,119,860.80	548,284	495,454	646,804		37,693
LAUREL RIDGE LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	1,200,486.53	587,758	531,124	693,372	17.16	40,406
	1,200,486.53	587,758	531,124	693,372		40,406
BAVARIAN LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	1,135,966.24	556,169	502,579	656,107	17.16	38,235
	1,135,966.24	556,169	502,579	656,107		38,235
PEARL HOLLOW LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -2						
2006	1,465,228.09	591,925	534,890	959,643	19.93	48,151
	1,465,228.09	591,925	534,890	959,643		48,151

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 341.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
PENDLETON COUNTY LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -2						
2007	312,160.26	117,134	105,848	212,556	20.86	10,190
2019	1,721,492.10	38,946	35,193	1,720,729	22.04	78,073
	2,033,652.36	156,080	141,041	1,933,284		88,263
BLUEGRASS OLDHAM COMMON						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	7,229,721.64	1,298,552	3,246,262	4,344,946	21.71	200,136
	7,229,721.64	1,298,552	3,246,262	4,344,946		200,136
BLUEGRASS OLDHAM UNIT 1						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	933,680.40	167,701	448,838	531,526	21.71	24,483
	933,680.40	167,701	448,838	531,526		24,483
BLUEGRASS OLDHAM UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	933,680.40	167,701	444,133	536,231	21.71	24,700
	933,680.40	167,701	444,133	536,231		24,700

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 341.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
BLUEGRASS OLDHAM UNIT 3						
INTERIM SURVIVOR CURVE.. IOWA 55-S1						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	933,680.40	167,701	448,802	531,562	21.71	24,485
	933,680.40	167,701	448,802	531,562		24,485
	53,879,445.86	19,666,440	22,321,752	33,459,960		1,549,325
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						21.6 2.88

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 342.00 FUEL HOLDERS, PRODUCERS AND ACCESSORIES

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT COMMON						
INTERIM SURVIVOR CURVE.. IOWA 50-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -3						
1999	3,702,254.72	1,706,424	1,894,718	1,918,605	24.78	77,426
2001	959,717.40	410,735	456,057	532,452	25.63	20,775
2004	6,952,014.84	2,610,030	2,898,031	4,262,544	26.78	159,169
2005	2,152,133.55	768,795	853,627	1,363,071	27.12	50,261
	13,766,120.51	5,495,984	6,102,433	8,076,671		307,631
SMITH CT UNIT 6						
INTERIM SURVIVOR CURVE.. IOWA 50-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -4						
2005	70,051.65	27,605	26,328	46,526	23.62	1,970
	70,051.65	27,605	26,328	46,526		1,970
SMITH CT UNIT 7						
INTERIM SURVIVOR CURVE.. IOWA 50-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -4						
2005	70,051.65	27,605	26,327	46,527	23.62	1,970
	70,051.65	27,605	26,327	46,527		1,970
SMITH CT UNIT 9						
INTERIM SURVIVOR CURVE.. IOWA 50-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -4						
2010	2,384,532.85	618,193	464,445	2,015,469	28.55	70,594
	2,384,532.85	618,193	464,445	2,015,469		70,594

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 342.00 FUEL HOLDERS, PRODUCERS AND ACCESSORIES

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT UNIT 10						
INTERIM SURVIVOR CURVE.. IOWA 50-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -4						
2010	2,116,650.59	548,744	551,382	1,649,935	28.55	57,791
	2,116,650.59	548,744	551,382	1,649,935		57,791
LAUREL RIDGE LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	106,294.19	52,232	47,199	61,221	17.62	3,475
	106,294.19	52,232	47,199	61,221		3,475
BAVARIAN LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	357,670.24	175,757	158,822	206,002	17.62	11,691
	357,670.24	175,757	158,822	206,002		11,691
BLUEGRASS OLDHAM COMMON						
INTERIM SURVIVOR CURVE.. IOWA 50-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	1,162,203.57	205,281	513,184	707,130	22.25	31,781
	1,162,203.57	205,281	513,184	707,130		31,781
	20,033,575.25	7,151,401	7,890,120	12,809,481		486,903
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						26.3 2.43

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 343.00 PRIME MOVERS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT COMMON						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -3						
1999	3,787,362.11	1,684,835	1,870,747	2,030,236	25.57	79,399
2001	11,631,511.86	4,822,733	5,354,893	6,625,564	26.24	252,499
2003	516,514.68	197,557	219,356	312,654	26.85	11,644
2005	610,199.36	212,843	236,329	392,176	27.38	14,323
2006	3,062,247.99	1,014,174	1,126,082	2,028,033	27.62	73,426
2007	1,024,264.10	320,454	355,814	699,178	27.85	25,105
2009	602,816.70	165,259	183,494	437,407	28.26	15,478
2014	395,422.38	63,887	70,937	336,348	29.08	11,566
2015	32,444.41	4,401	4,887	28,531	29.21	977
	21,662,783.59	8,486,143	9,422,539	12,890,128		484,417

SMITH CT UNIT 1						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2034						
NET SALVAGE PERCENT.. -4						
1999	17,915,941.36	10,983,533	10,572,368	8,060,211	13.81	583,650
2015	1,022,828.04	251,958	242,526	821,215	14.37	57,148
	18,938,769.40	11,235,491	10,814,894	8,881,426		640,798

SMITH CT UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2034						
NET SALVAGE PERCENT.. -4						
1999	16,963,603.17	10,399,693	10,144,504	7,497,644	13.81	542,914
2015	57,958.80	14,277	13,927	46,350	14.37	3,225
	17,021,561.97	10,413,970	10,158,430	7,543,994		546,139

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 343.00 PRIME MOVERS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT UNIT 3						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2034						
NET SALVAGE PERCENT.. -4						
1999	17,892,125.00	10,968,932	10,631,329	7,976,481	13.81	577,587
2015	57,960.80	14,278	13,839	46,441	14.37	3,232
	17,950,085.80	10,983,210	10,645,167	8,022,922		580,819
SMITH CT UNIT 4						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -4						
2001	21,477,282.01	10,552,596	10,269,461	12,066,912	19.91	606,073
2003	4,106,565.43	1,890,268	1,839,551	2,431,278	20.15	120,659
2017	274,636.97	29,842	29,041	256,581	21.17	12,120
	25,858,484.41	12,472,706	12,138,053	14,754,771		738,852
SMITH CT UNIT 5						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -4						
2001	21,221,722.26	10,427,030	10,106,209	11,964,383	19.91	600,923
2012	73,816.47	20,060	19,443	57,326	20.92	2,740
	21,295,538.73	10,447,090	10,125,651	12,021,709		603,663
SMITH CT UNIT 6						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -4						
2005	16,500,286.78	6,397,531	6,101,556	11,058,742	23.67	467,205
2017	501,280.99	47,186	45,003	476,329	24.92	19,114
	17,001,567.77	6,444,717	6,146,559	11,535,072		486,319

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 343.00 PRIME MOVERS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT UNIT 7						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -4						
2005	16,285,504.27	6,314,255	6,022,018	10,914,906	23.67	461,128
2017	468,679.30	44,117	42,075	445,351	24.92	17,871
	16,754,183.57	6,358,372	6,064,093	11,360,258		478,999
SMITH CT UNIT 9						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -4						
2010	56,441,734.04	14,449,445	10,855,788	47,843,616	28.45	1,681,674
2013	240,231.66	45,189	33,950	215,891	28.94	7,460
2015	481,979.64	66,011	49,594	451,665	29.21	15,463
2017	572,624.88	46,100	34,635	560,895	29.44	19,052
	57,736,570.22	14,606,745	10,973,966	49,072,067		1,723,649
SMITH CT UNIT 10						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -4						
2010	54,005,111.59	13,825,654	13,892,125	42,273,191	28.45	1,485,877
2015	794,932.17	108,872	109,395	717,334	29.21	24,558
2017	210,938.71	16,982	17,064	202,313	29.44	6,872
	55,010,982.47	13,951,508	14,018,584	43,192,838		1,517,307
GREEN VALLEY LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	293,827.07	142,902	129,133	170,571	17.60	9,692
2014	60,243.73	14,141	12,778	48,670	18.20	2,674
	354,070.80	157,043	141,911	219,241		12,366

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 343.00 PRIME MOVERS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
LAUREL RIDGE LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	300,785.97	146,286	132,190	174,612	17.60	9,921
	300,785.97	146,286	132,190	174,612		9,921
BAVARIAN LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	298,911.42	145,374	131,367	173,523	17.60	9,859
2014	89,217.39	20,941	18,923	72,078	18.20	3,960
	388,128.81	166,315	150,290	245,601		13,819
PEARL HOLLOW LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -2						
2006	201,654.60	80,588	72,823	132,865	20.46	6,494
	201,654.60	80,588	72,823	132,865		6,494
PENDLETON COUNTY LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -2						
2007	275,099.08	101,847	92,033	188,568	21.43	8,799
	275,099.08	101,847	92,033	188,568		8,799

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 343.00 PRIME MOVERS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
BLUEGRASS OLDHAM COMMON						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	279,890.00	49,405	118,949	174,936	22.02	7,944
2017	1,734,202.06	183,639	442,133	1,378,779	22.11	62,360
2019	393,860.23	8,933	21,507	392,046	22.20	17,660
	2,407,952.29	241,977	582,589	1,945,761		87,964
BLUEGRASS OLDHAM UNIT 1						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	46,665,248.38	8,237,140	22,046,049	26,952,462	22.02	1,223,999
2017	59,708.40	6,323	16,923	45,771	22.11	2,070
	46,724,956.78	8,243,463	22,062,972	26,998,232		1,226,069
BLUEGRASS OLDHAM UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	43,969,980.77	7,761,383	20,554,994	25,613,486	22.02	1,163,192
2017	1,538,665.58	162,933	431,506	1,184,092	22.11	53,555
	45,508,646.35	7,924,316	20,986,500	26,797,578		1,216,747
BLUEGRASS OLDHAM UNIT 3						
INTERIM SURVIVOR CURVE.. IOWA 50-R3						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	41,154,195.26	7,264,353	19,440,893	23,771,012	22.02	1,079,519
2017	59,708.46	6,323	16,922	45,772	22.11	2,070
	41,213,903.72	7,270,676	19,457,814	23,816,784		1,081,589
	406,605,726.33	129,732,463	164,187,060	259,794,427		11,464,730
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						22.7 2.82

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 344.00 GENERATORS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT COMMON						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -3						
2001	152,509.33	62,212	71,912	85,173	25.94	3,283
2016	232,778.62	25,026	28,928	210,834	28.83	7,313
	385,287.95	87,238	100,840	296,007		10,596
SMITH CT UNIT 1						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2034						
NET SALVAGE PERCENT.. -4						
1997	449,510.78	284,221	284,812	182,679	13.58	13,452
1999	4,647,137.73	2,827,802	2,833,681	1,999,343	13.70	145,937
2018	313,157.85	30,546	30,610	295,075	14.30	20,635
	5,409,806.36	3,142,569	3,149,102	2,477,097		180,024
SMITH CT UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2034						
NET SALVAGE PERCENT.. -4						
1999	4,647,137.74	2,827,802	2,871,647	1,961,376	13.70	143,166
2000	341,387.89	203,387	206,541	148,503	13.75	10,800
2018	327,448.30	31,940	32,435	308,111	14.30	21,546
	5,315,973.93	3,063,129	3,110,623	2,417,990		175,512
SMITH CT UNIT 3						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2034						
NET SALVAGE PERCENT.. -4						
1999	4,647,137.74	2,827,802	2,853,277	1,979,747	13.70	144,507
2000	341,387.90	203,387	205,219	149,824	13.75	10,896
2018	380,302.76	37,095	37,429	358,086	14.30	25,041
	5,368,828.40	3,068,284	3,095,925	2,487,657		180,444

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 344.00 GENERATORS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT UNIT 4						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -4						
2001	7,338,334.95	3,570,188	3,617,021	4,014,847	19.67	204,110
2003	372,892.55	169,988	172,218	215,590	19.90	10,834
2016	501,114.91	73,009	73,967	447,193	20.87	21,428
	8,212,342.41	3,813,185	3,863,206	4,677,630		236,372
SMITH CT UNIT 5						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -4						
2001	7,327,273.73	3,564,807	3,596,958	4,023,407	19.67	204,545
2003	380,158.71	173,300	174,863	220,502	19.90	11,081
2016	448,485.96	65,342	65,931	400,494	20.87	19,190
	8,155,918.40	3,803,449	3,837,752	4,644,403		234,816
SMITH CT UNIT 6						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -4						
2005	4,831,725.68	1,853,118	1,839,937	3,185,058	23.33	136,522
	4,831,725.68	1,853,118	1,839,937	3,185,058		136,522
SMITH CT UNIT 7						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -4						
2005	4,838,938.32	1,855,884	1,842,648	3,189,848	23.33	136,727
	4,838,938.32	1,855,884	1,842,648	3,189,848		136,727

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 344.00 GENERATORS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT UNIT 9						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -4						
2010	4,442,193.82	1,124,987	866,822	3,753,059	27.96	134,230
2019	986,624.55	16,961	13,069	1,013,021	29.15	34,752
	5,428,818.37	1,141,948	879,891	4,766,080		168,982
SMITH CT UNIT 10						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -4						
2010	4,442,193.82	1,124,987	1,168,838	3,451,043	27.96	123,428
2019	445,659.68	7,661	7,960	455,526	29.15	15,627
	4,887,853.50	1,132,648	1,176,798	3,906,570		139,055
COOPERATIVE SOLAR						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -1						
2017	15,810,305.55	1,598,757	1,428,297	14,540,112	21.84	665,756
	15,810,305.55	1,598,757	1,428,297	14,540,112		665,756
GREEN VALLEY LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	1,098,205.33	529,896	498,493	621,676	17.40	35,729
	1,098,205.33	529,896	498,493	621,676		35,729

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 344.00 GENERATORS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
LAUREL RIDGE LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	1,477,051.25	712,693	670,458	836,134	17.40	48,054
2006	486,459.49	209,699	197,272	298,917	17.61	16,974
	1,963,510.74	922,392	867,730	1,135,051		65,028
BAVARIAN LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	1,453,451.26	701,306	659,745	822,775	17.40	47,286
2011	1,162,564.91	373,153	351,039	834,777	17.88	46,688
2016	1,909,012.67	308,981	290,670	1,656,523	18.08	91,622
	4,525,028.84	1,383,440	1,301,455	3,314,074		185,596
PEARL HOLLOW LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -2						
2006	1,285,806.38	509,199	479,024	832,499	20.20	41,213
	1,285,806.38	509,199	479,024	832,499		41,213
PENDLETON COUNTY LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -2						
2007	1,680,579.61	617,246	580,668	1,133,523	21.13	53,645
	1,680,579.61	617,246	580,668	1,133,523		53,645

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 344.00 GENERATORS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
GLASGOW LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2046						
NET SALVAGE PERCENT.. -1						
2011	429,901.31	106,774	100,446	333,754	24.90	13,404
2015	2,563,852.56	379,153	356,684	2,232,807	25.30	88,253
	2,993,753.87	485,927	457,130	2,566,561		101,657
BLUEGRASS OLDHAM COMMON						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2016	17,086.14	2,421	6,300	11,640	21.79	534
	17,086.14	2,421	6,300	11,640		534
BLUEGRASS OLDHAM UNIT 1						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	7,457,690.57	1,308,567	3,646,045	4,184,530	21.73	192,569
	7,457,690.57	1,308,567	3,646,045	4,184,530		192,569
BLUEGRASS OLDHAM UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	7,457,690.57	1,308,567	3,607,830	4,222,745	21.73	194,328
	7,457,690.57	1,308,567	3,607,830	4,222,745		194,328

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 344.00 GENERATORS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
BLUEGRASS OLDHAM UNIT 3						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	7,457,690.57	1,308,567	3,645,751	4,184,824	21.73	192,583
	7,457,690.57	1,308,567	3,645,751	4,184,824		192,583
	104,582,841.49	32,936,431	39,415,445	68,795,575		3,327,688
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						20.7 3.18

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 345.00 ACCESSORY ELECTRIC EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT COMMON						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -3						
1999	4,012,658.39	1,753,483	1,946,970	2,186,068	25.35	86,235
2001	2,383,515.19	972,286	1,079,572	1,375,448	25.94	53,024
2003	16,257.17	6,127	6,803	9,942	26.48	375
2005	2,834,747.79	975,677	1,083,337	1,836,453	26.96	68,118
2017	628,918.28	49,795	55,290	592,496	28.94	20,473
	9,876,096.82	3,757,368	4,171,972	6,000,408		228,225
SMITH CT UNIT 1						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2034						
NET SALVAGE PERCENT.. -4						
1999	1,039,394.43	632,476	608,799	472,171	13.70	34,465
	1,039,394.43	632,476	608,799	472,171		34,465
SMITH CT UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2034						
NET SALVAGE PERCENT.. -4						
1999	1,039,395.53	632,476	616,956	464,015	13.70	33,870
	1,039,395.53	632,476	616,956	464,015		33,870
SMITH CT UNIT 3						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2034						
NET SALVAGE PERCENT.. -4						
1999	1,039,395.53	632,476	613,009	467,962	13.70	34,158
	1,039,395.53	632,476	613,009	467,962		34,158

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 345.00 ACCESSORY ELECTRIC EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT UNIT 4						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -4						
2001	993,996.86	483,591	470,616	563,141	19.67	28,629
	993,996.86	483,591	470,616	563,141		28,629
SMITH CT UNIT 5						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -4						
2001	993,996.86	483,591	468,711	565,046	19.67	28,726
	993,996.86	483,591	468,711	565,046		28,726
SMITH CT UNIT 6						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -4						
2005	1,251,472.92	479,979	457,774	843,758	23.33	36,166
	1,251,472.92	479,979	457,774	843,758		36,166
SMITH CT UNIT 7						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2045						
NET SALVAGE PERCENT.. -4						
2005	1,220,275.59	468,014	446,353	822,734	23.33	35,265
	1,220,275.59	468,014	446,353	822,734		35,265
SMITH CT UNIT 9						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -4						
2010	12,040,203.14	3,049,186	2,290,836	10,230,975	27.96	365,915
	12,040,203.14	3,049,186	2,290,836	10,230,975		365,915

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 345.00 ACCESSORY ELECTRIC EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT UNIT 10						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -4						
2010	1,879,693.27	476,033	478,322	1,476,559	27.96	52,810
	1,879,693.27	476,033	478,322	1,476,559		52,810
COOPERATIVE SOLAR						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -1						
2017	779,800.00	78,854	67,669	719,929	21.84	32,964
	779,800.00	78,854	67,669	719,929		32,964
GREEN VALLEY LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	344,891.29	166,414	150,379	201,410	17.40	11,575
	344,891.29	166,414	150,379	201,410		11,575
LAUREL RIDGE LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	386,164.65	186,329	168,375	225,513	17.40	12,961
	386,164.65	186,329	168,375	225,513		12,961

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 345.00 ACCESSORY ELECTRIC EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
BAVARIAN LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	357,452.26	172,475	155,856	208,745	17.40	11,997
	357,452.26	172,475	155,856	208,745		11,997
PEARL HOLLOW LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -2						
2006	452,676.95	179,267	161,993	299,737	20.20	14,838
	452,676.95	179,267	161,993	299,737		14,838
PENDLETON COUNTY LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -2						
2007	406,784.25	149,404	135,008	279,912	21.13	13,247
	406,784.25	149,404	135,008	279,912		13,247
BLUEGRASS OLDHAM COMMON						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	3,014,323.84	528,910	1,322,228	1,842,813	21.73	84,805
2019	13,938.27	313	782	13,853	21.94	631
	3,028,262.11	529,223	1,323,010	1,856,665		85,436

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 345.00 ACCESSORY ELECTRIC EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
BLUEGRASS OLDHAM UNIT 1						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	386,034.41	67,736	181,290	224,046	21.73	10,310
	386,034.41	67,736	181,290	224,046		10,310
BLUEGRASS OLDHAM UNIT 2						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	386,034.41	67,736	179,389	225,947	21.73	10,398
	386,034.41	67,736	179,389	225,947		10,398
BLUEGRASS OLDHAM UNIT 3						
INTERIM SURVIVOR CURVE.. IOWA 50-R2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -5						
2015	386,034.41	67,736	181,275	224,061	21.73	10,311
	386,034.41	67,736	181,275	224,061		10,311
	38,288,055.69	12,760,364	13,327,592	26,372,734		1,092,266
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						24.1 2.85

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 346.00 MISCELLANEOUS POWER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SMITH CT COMMON						
INTERIM SURVIVOR CURVE.. IOWA 40-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2050						
NET SALVAGE PERCENT.. -3						
1995	85,357.01	50,359	55,916	32,002	16.90	1,894
1996	52,583.01	30,086	33,406	20,755	17.54	1,183
1997	16,528.84	9,157	10,167	6,857	18.18	377
1998	139,322.00	74,569	82,797	60,704	18.83	3,224
1999	487,162.16	251,400	279,140	222,637	19.48	11,429
2001	60,587.56	28,862	32,047	30,358	20.78	1,461
2002	32,816.49	14,952	16,602	17,199	21.43	803
2003	41,749.87	18,150	20,153	22,850	22.06	1,036
2005	420,283.23	164,421	182,564	250,328	23.30	10,744
2006	2,139,646.40	789,282	876,375	1,327,461	23.89	55,566
2007	2,141,224.39	741,145	822,926	1,382,535	24.46	56,522
2008	5,935.33	1,915	2,126	3,987	25.01	159
2010	17,808.00	4,889	5,428	12,914	26.03	496
2011	284,572.19	70,994	78,828	214,282	26.50	8,086
2012	5,287,580.02	1,185,149	1,315,923	4,130,284	26.93	153,371
2013	104,487.04	20,672	22,953	84,669	27.34	3,097
2014	515,751.73	87,949	97,654	433,571	27.72	15,641
2015	3,653,912.77	519,969	577,344	3,186,186	28.07	113,509
2016	34,822.06	3,938	4,373	31,494	28.38	1,110
2018	6,505.52	330	366	6,334	28.93	219
	15,528,635.62	4,068,188	4,517,088	11,477,407		439,927

GREEN VALLEY LANDFILL  
INTERIM SURVIVOR CURVE.. IOWA 40-S2.5  
PROBABLE RETIREMENT YEAR.. 6-2038  
NET SALVAGE PERCENT.. -2

2003	65,409.45	33,185	29,988	36,730	16.37	2,244
2007	25,843.59	11,029	9,966	16,394	17.25	950
	91,253.04	44,214	39,954	53,124		3,194

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 346.00 MISCELLANEOUS POWER PLANT EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
LAUREL RIDGE LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 40-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	17,076.56	8,664	7,829	9,589	16.37	586
2015	86,354.99	17,446	15,765	72,317	18.22	3,969
	103,431.55	26,110	23,594	81,906		4,555
BAVARIAN LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 40-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2038						
NET SALVAGE PERCENT.. -2						
2003	60,998.54	30,947	27,965	34,254	16.37	2,092
	60,998.54	30,947	27,965	34,254		2,092
PEARL HOLLOW LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 40-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2041						
NET SALVAGE PERCENT.. -2						
2006	63,896.29	26,734	24,158	41,016	19.21	2,135
	63,896.29	26,734	24,158	41,016		2,135
PENDLETON COUNTY LANDFILL						
INTERIM SURVIVOR CURVE.. IOWA 40-S2.5						
PROBABLE RETIREMENT YEAR.. 6-2042						
NET SALVAGE PERCENT.. -2						
2007	50,361.67	19,557	17,673	33,696	20.17	1,671
2016	91,631.70	12,849	11,611	81,853	21.96	3,727
	141,993.37	32,406	29,284	115,549		5,398
	15,990,208.41	4,228,599	4,662,043	11,803,256		457,301
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						25.8 2.86

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 353.00 STATION EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR	ORIGINAL COST	CALCULATED ACCRUED	ALLOC. BOOK RESERVE	FUTURE BOOK ACCRUALS	REM. LIFE	ANNUAL ACCRUAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)
SURVIVOR CURVE.. IOWA 60-R2						
NET SALVAGE PERCENT.. -25						
1955	627,730.74	594,249	521,816	262,847	14.56	18,053
1956	56.10	53	47	23	14.99	2
1958	640.08	588	516	284	15.90	18
1959	176,594.71	160,553	140,983	79,760	16.36	4,875
1960	810,232.41	728,531	639,730	373,061	16.84	22,153
1961	81,133.88	72,141	63,348	38,069	17.32	2,198
1962	38,373.13	33,720	29,610	18,356	17.82	1,030
1963	6,558.44	5,695	5,001	3,197	18.32	175
1964	94,939.87	81,411	71,488	47,187	18.84	2,505
1965	391,941.81	331,842	291,394	198,533	19.36	10,255
1966	1,541,562.38	1,287,840	1,130,864	796,089	19.90	40,004
1967	12,223.31	10,074	8,846	6,433	20.44	315
1968	283,275.78	230,162	202,107	151,988	21.00	7,238
1969	375,563.59	300,765	264,105	205,349	21.56	9,525
1970	1,605,743.97	1,266,531	1,112,153	895,027	22.14	40,426
1971	15,769.88	12,248	10,755	8,957	22.72	394
1972	240,307.70	183,685	161,296	139,089	23.31	5,967
1973	18,764.05	14,104	12,385	11,070	23.92	463
1974	32,951.72	24,350	21,382	19,808	24.53	808
1975	25,215.24	18,307	16,076	15,443	25.15	614
1976	100,253.52	71,472	62,760	62,557	25.78	2,427
1977	67,467.55	47,213	41,458	42,876	26.41	1,623
1978	4,147,239.46	2,846,043	2,499,137	2,684,912	27.06	99,221
1979	2,060,969.45	1,386,440	1,217,446	1,358,766	27.71	49,035
1980	4,120,154.18	2,714,152	2,383,322	2,766,871	28.38	97,494
1981	7,932,778.15	5,114,956	4,491,491	5,424,482	29.05	186,729
1982	9,616,033.25	6,064,111	5,324,953	6,695,089	29.73	225,196
1983	2,864,367.17	1,765,166	1,550,009	2,030,450	30.42	66,747
1984	1,393,127.61	838,489	736,285	1,005,125	31.11	32,309
1985	951,341.62	558,711	490,609	698,568	31.81	21,961
1986	1,396,580.50	799,542	702,085	1,043,641	32.52	32,092
1987	250,544.42	139,679	122,653	190,528	33.24	5,732
1988	118,878.71	64,466	56,608	91,990	33.97	2,708
1989	858,440.32	452,473	397,321	675,729	34.70	19,473
1990	630,870.39	322,793	283,448	505,140	35.44	14,253
1991	492,748.06	244,422	214,629	401,306	36.19	11,089
1992	1,393,987.23	669,689	588,060	1,154,424	36.94	31,251
1993	4,294,411.79	1,995,130	1,751,942	3,616,073	37.70	95,917
1994	6,521,330.79	2,925,061	2,568,524	5,583,139	38.47	145,130
1995	4,519,746.72	1,953,830	1,715,676	3,934,007	39.25	100,229
1996	926,241.90	385,351	338,380	819,422	40.03	20,470
1997	1,928,244.41	770,888	676,924	1,733,382	40.81	42,474
1998	401,062.57	153,657	134,928	366,400	41.61	8,806

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 353.00 STATION EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. IOWA 60-R2						
NET SALVAGE PERCENT.. -25						
1999	246,784.63	90,437	79,414	229,067	42.41	5,401
2000	6,077,711.20	2,125,907	1,866,779	5,730,360	43.21	132,617
2001	1,929,138.50	642,234	563,952	1,847,471	44.02	41,969
2002	2,915,335.12	920,772	808,539	2,835,630	44.84	63,239
2003	4,169,566.37	1,244,772	1,093,046	4,118,912	45.67	90,189
2004	5,117,520.03	1,440,390	1,264,820	5,132,080	46.49	110,391
2005	16,840,276.45	4,445,201	3,903,373	17,146,973	47.33	362,286
2006	2,921,789.05	720,111	632,336	3,019,900	48.17	62,693
2007	24,195,511.66	5,539,865	4,864,607	25,379,783	49.01	517,849
2008	7,999,435.44	1,688,181	1,482,408	8,516,886	49.87	170,782
2009	40,859,511.46	7,899,676	6,936,779	44,137,610	50.72	870,221
2010	16,837,056.34	2,953,430	2,593,434	18,452,886	51.58	357,753
2011	29,178,341.20	4,589,388	4,029,985	32,442,942	52.45	618,550
2012	1,982,748.38	275,924	242,291	2,236,144	53.32	41,938
2013	5,385,700.15	650,795	571,469	6,160,656	54.20	113,665
2014	1,640,717.73	168,174	147,675	1,903,222	55.08	34,554
2015	18,027,426.20	1,517,233	1,332,297	21,201,986	55.96	378,878
2016	4,782,760.38	313,869	275,611	5,702,839	56.85	100,314
2017	8,693,949.46	407,529	357,855	10,509,582	57.75	181,984
2018	4,665,794.29	132,217	116,102	5,716,141	58.64	97,479
2019	1,933,465.70	18,126	15,916	2,400,916	59.55	40,318
	269,766,938.30	75,424,814	66,231,238	270,977,435		5,872,454
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						46.1 2.18

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 353.10 STATION EQUIPMENT - ENERGY CONTROL SYSTEM

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR	ORIGINAL COST	CALCULATED ACCRUED	ALLOC. BOOK RESERVE	FUTURE BOOK ACCRUALS	REM. LIFE	ANNUAL ACCRUAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)
SURVIVOR CURVE.. IOWA 25-S1.5						
NET SALVAGE PERCENT.. -10						
1983	4,732,532.27	4,481,140	3,956,803	1,248,982	3.48	358,903
1984	43,564.80	40,733	35,967	11,954	3.75	3,188
1985	37,576.14	34,671	30,614	10,720	4.03	2,660
1986	198,301.87	180,439	159,326	58,806	4.32	13,612
1987	16,781.34	15,056	13,294	5,165	4.61	1,120
1988	81,739.61	72,255	63,800	26,114	4.91	5,319
1989	8,365.16	7,277	6,426	2,776	5.23	531
1990	7,794.92	6,671	5,890	2,684	5.55	484
1991	10,798.55	9,080	8,018	3,860	5.89	655
1992	172,178.62	142,123	125,493	63,903	6.24	10,241
1993	67,077.41	54,306	47,952	25,833	6.60	3,914
1994	38,755.24	30,728	27,133	15,498	6.98	2,220
1995	36,571.01	28,353	25,035	15,193	7.38	2,059
1996	31,380.82	23,749	20,970	13,549	7.80	1,737
1997	77,964.87	57,529	50,798	34,963	8.23	4,248
1999	57,682.83	40,203	35,499	27,952	9.16	3,052
2000	877,507.15	592,282	522,979	442,279	9.66	45,785
2001	39,511.11	25,747	22,734	20,728	10.19	2,034
2002	175,040.31	109,827	96,976	95,568	10.74	8,898
2003	55,836.15	33,633	29,698	31,722	11.31	2,805
2004	3,694.52	2,126	1,877	2,187	11.92	183
2008	17,347.46	7,908	6,983	12,099	14.64	826
2012	2,688,609.00	843,470	744,776	2,212,694	17.87	123,822
	9,476,611.16	6,839,306	6,039,041	4,385,231		598,296
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						7.3 6.31

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 354.00 TOWERS AND FIXTURES

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. IOWA 70-R4						
NET SALVAGE PERCENT.. 0						
1957	16,792.72	13,343	11,782	5,011	14.38	348
1959	9,766.14	7,580	6,693	3,073	15.67	196
1961	165,292.41	125,126	110,485	54,807	17.01	3,222
1967	206,320.09	143,599	126,797	79,523	21.28	3,737
1968	2,678.77	1,836	1,621	1,058	22.03	48
1977	374,381.34	218,051	192,537	181,844	29.23	6,221
1979	906,904.63	505,926	446,728	460,177	30.95	14,868
1981	2,169,999.82	1,156,306	1,021,006	1,148,994	32.70	35,137
1982	1,384.99	720	636	749	33.59	22
	3,853,520.91	2,172,487	1,918,285	1,935,236		63,799
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						30.3 1.66

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 355.00 POLES AND FIXTURES

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR	ORIGINAL COST	CALCULATED ACCRUED	ALLOC. BOOK RESERVE	FUTURE BOOK ACCRUALS	REM. LIFE	ANNUAL ACCRUAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)
SURVIVOR CURVE.. IOWA 60-S2						
NET SALVAGE PERCENT.. -60						
1967	3,304,364.52	3,662,981	3,203,744	2,083,239	18.43	113,035
1968	980.10	1,074	939	629	18.90	33
1969	2,025,193.51	2,193,690	1,918,662	1,321,648	19.38	68,196
1970	737,245.33	788,947	690,035	489,558	19.87	24,638
1971	130,430.39	137,803	120,526	88,163	20.38	4,326
1972	69,648.16	72,638	63,531	47,906	20.89	2,293
1973	63,361.82	65,187	57,014	44,365	21.42	2,071
1974	459,460.63	466,077	407,644	327,493	21.96	14,913
1975	466,118.60	465,992	407,569	338,221	22.51	15,025
1976	345,469.37	340,124	297,482	255,269	23.08	11,060
1977	2,175,765.98	2,108,474	1,844,129	1,637,097	23.66	69,193
1978	946,577.67	902,399	789,263	725,261	24.25	29,908
1979	6,857,610.52	6,427,830	5,621,957	5,350,220	24.85	215,301
1980	475,570.21	437,905	383,004	377,908	25.47	14,837
1981	2,930,292.70	2,648,985	2,316,875	2,371,593	26.10	90,866
1982	570,879.34	506,183	442,722	470,685	26.75	17,596
1983	1,323,782.78	1,150,463	1,006,227	1,111,825	27.41	40,563
1984	1,682,737.23	1,431,888	1,252,369	1,440,011	28.09	51,264
1985	746,466.25	621,454	543,541	650,805	28.78	22,613
1986	3,004,299.17	2,444,298	2,137,850	2,669,029	29.49	90,506
1987	779,716.39	619,407	541,750	705,796	30.21	23,363
1988	2,176,877.18	1,686,366	1,474,942	2,008,061	30.95	64,881
1989	680,365.87	513,453	449,080	639,505	31.70	20,174
1990	996,038.62	731,220	639,545	954,117	32.47	29,385
1991	1,239,704.00	884,316	773,447	1,210,079	33.25	36,393
1992	1,162,403.53	804,383	703,535	1,156,311	34.05	33,959
1993	2,441,722.91	1,636,931	1,431,705	2,475,052	34.86	71,000
1994	534,926.05	346,778	303,302	552,580	35.69	15,483
1995	3,422,769.93	2,142,216	1,873,641	3,602,791	36.53	98,626
1996	1,194,161.85	719,994	629,726	1,280,933	37.39	34,259
1997	1,283,658.09	744,173	650,874	1,402,979	38.26	36,670
1998	867,220.14	482,410	421,929	965,623	39.14	24,671
1999	217,817.31	115,994	101,452	247,056	40.03	6,172
2000	2,169,856.14	1,102,877	964,606	2,507,164	40.94	61,240
2001	2,545,031.25	1,231,103	1,076,756	2,995,294	41.86	71,555
2002	3,155,480.06	1,448,138	1,266,581	3,782,187	42.79	88,390
2003	3,544,375.63	1,537,805	1,345,006	4,325,995	43.73	98,925
2004	7,894,347.84	3,225,062	2,820,728	9,810,229	44.68	219,566
2005	7,276,872.66	2,786,518	2,437,165	9,205,831	45.64	201,705
2006	2,207,045.60	788,639	689,765	2,841,508	46.60	60,977
2007	11,886,235.91	3,939,954	3,445,992	15,571,985	47.57	327,349
2008	6,543,017.68	1,997,767	1,747,302	8,721,526	48.55	179,640
2009	5,955,879.15	1,661,261	1,452,985	8,076,422	49.54	163,028

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 355.00 POLES AND FIXTURES

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. IOWA 60-S2						
NET SALVAGE PERCENT.. -60						
2010	11,831,358.05	2,990,967	2,615,982	16,314,191	50.52	322,925
2011	10,016,446.25	2,267,723	1,983,413	14,042,901	51.51	272,625
2012	1,878,012.44	375,092	328,066	2,676,754	52.51	50,976
2013	3,034,222.18	525,916	459,980	4,394,775	53.50	82,145
2014	7,497,426.33	1,099,663	961,795	11,034,087	54.50	202,460
2015	8,483,776.53	1,018,053	890,417	12,683,625	55.50	228,534
2016	11,075,400.38	1,033,645	904,055	16,816,586	56.50	297,639
2017	2,030,993.07	135,410	118,433	3,131,156	57.50	54,455
2018	6,342,636.60	253,705	221,897	9,926,322	58.50	169,681
2019	5,484,510.11	73,098	63,934	8,711,282	59.50	146,408
	166,166,560.01	67,794,429	59,294,869	206,571,627		4,693,496
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						44.0 2.82

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 356.00 OVERHEAD CONDUCTORS AND DEVICES

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR	ORIGINAL COST	CALCULATED ACCRUED	ALLOC. BOOK RESERVE	FUTURE BOOK ACCRUALS	REM. LIFE	ANNUAL ACCRUAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)
SURVIVOR CURVE.. IOWA 60-R4						
NET SALVAGE PERCENT.. -60						
1967	6,114,014.52	7,661,300	6,746,139	3,036,284	13.01	233,381
1968	28,657.63	35,406	31,177	14,675	13.67	1,074
1969	828,726.52	1,009,057	888,523	437,439	14.34	30,505
1970	864,509.99	1,036,956	913,089	470,127	15.02	31,300
1971	166,141.08	196,179	172,745	93,081	15.72	5,921
1972	81,427.71	94,629	83,325	46,959	16.42	2,860
1973	34,777.21	39,748	35,000	20,644	17.14	1,204
1974	704,406.44	791,381	696,849	430,201	17.87	24,074
1975	110,407.18	121,859	107,303	69,348	18.61	3,726
1976	30,498.97	33,045	29,098	19,700	19.37	1,017
1977	1,935,566.43	2,057,894	1,812,073	1,284,833	20.13	63,827
1978	1,128,341.62	1,176,183	1,035,685	769,662	20.91	36,808
1979	6,372,753.69	6,507,040	5,729,758	4,466,648	21.71	205,742
1980	604,212.73	604,048	531,893	434,847	22.51	19,318
1981	4,936,699.24	4,827,460	4,250,808	3,647,911	23.33	156,361
1982	611,792.93	584,708	514,863	464,006	24.16	19,206
1983	1,261,604.66	1,177,491	1,036,837	981,730	25.00	39,269
1984	1,640,604.64	1,494,053	1,315,585	1,309,382	25.85	50,653
1985	403,898.40	358,552	315,722	330,515	26.71	12,374
1986	3,294,196.84	2,847,082	2,506,991	2,763,724	27.59	100,171
1987	580,057.91	487,713	429,454	498,639	28.47	17,515
1988	584,537.35	477,609	420,557	514,703	29.36	17,531
1989	497,180.78	394,165	347,081	448,408	30.27	14,814
1990	2,060,760.45	1,583,752	1,394,569	1,902,648	31.18	61,021
1991	1,459,813.21	1,086,101	956,363	1,379,338	32.10	42,970
1992	1,456,305.79	1,047,375	922,263	1,407,826	33.03	42,623
1993	2,929,117.98	2,033,980	1,791,016	2,895,573	33.96	85,264
1994	405,579.97	271,466	239,039	409,889	34.90	11,745
1995	4,012,589.21	2,584,107	2,275,429	4,144,714	35.85	115,613
1996	1,807,741.44	1,118,399	984,803	1,907,583	36.80	51,836
1997	1,188,075.26	704,614	620,446	1,280,474	37.76	33,911
1998	1,326,165.60	752,562	662,667	1,459,198	38.72	37,686
1999	256,465.54	138,902	122,310	288,035	39.69	7,257
2000	4,200,052.21	2,166,085	1,907,341	4,812,743	40.66	118,366
2001	2,811,347.02	1,376,436	1,212,017	3,286,138	41.64	78,918
2002	4,856,797.44	2,250,990	1,982,104	5,788,772	42.62	135,823
2003	4,211,223.85	1,841,686	1,621,692	5,116,266	43.60	117,346
2004	2,652,899.49	1,090,872	960,565	3,284,074	44.58	73,667
2005	4,700,793.24	1,808,865	1,592,791	5,928,478	45.57	130,096
2006	867,507.51	310,915	273,775	1,114,237	46.56	23,931
2007	12,622,472.39	4,190,661	3,690,076	16,505,880	47.55	347,127
2008	4,247,628.42	1,298,075	1,143,017	5,653,188	48.54	116,465
2009	27,202,290.76	7,594,880	6,687,652	36,836,013	49.53	743,711

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 356.00 OVERHEAD CONDUCTORS AND DEVICES

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. IOWA 60-R4						
NET SALVAGE PERCENT.. -60						
2010	3,259,976.25	824,122	725,678	4,490,284	50.52	88,881
2011	1,089,408.91	246,346	216,919	1,526,135	51.52	29,622
2012	283,242.95	56,572	49,814	403,375	52.51	7,682
2013	2,882,098.87	498,811	439,227	4,172,131	53.51	77,969
2014	774,811.14	113,432	99,882	1,139,816	54.51	20,910
2015	953,846.36	114,202	100,560	1,425,594	55.51	25,682
2016	2,634,096.47	245,835	216,470	3,998,084	56.50	70,763
2017	2,869,572.77	191,320	168,467	4,422,849	57.50	76,919
2018	1,410,891.29	56,436	49,694	2,207,732	58.50	37,739
2019	5,363,066.56	71,479	62,941	8,517,965	59.50	143,159
	139,611,652.82	71,682,836	63,120,142	160,258,503		4,043,353
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						39.6 2.90

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 359.00 ROADS AND TRAILS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. IOWA 70-R4						
NET SALVAGE PERCENT.. 0						
1960	16,171.94	12,399	10,948	5,224	16.33	320
1969	7,115.71	4,800	4,238	2,878	22.78	126
	23,287.65	17,199	15,186	8,102		446
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						18.2 1.92

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 362.00 STATION EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR	ORIGINAL COST	CALCULATED ACCRUED	ALLOC. BOOK RESERVE	FUTURE BOOK ACCRUALS	REM. LIFE	ANNUAL ACCRUAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)
SURVIVOR CURVE.. IOWA 35-R0.5						
NET SALVAGE PERCENT.. -10						
1959	964.18	928	1,061			
1960	122,118.72	115,985	134,331			
1961	174.75	164	192			
1963	388.48	354	427			
1964	248.06	223	273			
1965	9,001.25	7,983	9,901			
1966	126,689.48	110,770	139,358			
1967	1,162,988.85	1,002,591	1,279,288			
1968	100,228.57	85,146	110,251			
1969	129,904.81	108,723	142,895			
1970	165,088.35	136,094	181,597			
1971	157,177.86	127,547	172,896			
1972	129,558.57	103,465	142,514			
1973	296,854.85	233,244	326,540			
1974	359,443.11	277,787	395,387			
1975	240,702.62	182,770	264,773			
1976	666,413.00	497,223	733,054			
1977	685,221.60	501,993	753,744			
1978	1,363,012.12	979,696	1,487,049	12,264	12.13	1,011
1979	977,430.13	689,035	1,045,864	29,309	12.57	2,332
1980	841,769.23	581,494	882,631	43,315	13.02	3,327
1981	1,094,457.58	740,569	1,124,086	79,817	13.47	5,926
1982	910,949.35	603,231	915,625	86,419	13.93	6,204
1983	1,663,158.62	1,076,774	1,634,400	195,074	14.40	13,547
1984	726,027.69	459,324	697,193	101,437	14.87	6,822
1985	854,779.06	527,888	801,264	138,993	15.35	9,055
1986	786,515.88	473,619	718,891	146,276	15.84	9,235
1987	563,610.53	330,711	501,976	117,996	16.33	7,226
1988	1,191,398.60	680,353	1,032,686	277,852	16.83	16,509
1989	1,645,854.66	913,494	1,386,563	423,877	17.34	24,445
1990	1,131,283.44	609,762	925,538	318,874	17.85	17,864
1991	2,270,614.44	1,186,746	1,801,323	696,353	18.37	37,907
1992	4,160,160.08	2,106,368	3,197,188	1,378,988	18.89	73,001
1993	2,089,454.65	1,022,466	1,551,968	746,432	19.43	38,416
1994	1,124,752.25	531,649	806,973	430,254	19.96	21,556
1995	2,614,151.22	1,190,484	1,806,997	1,068,569	20.51	52,100
1996	3,218,416.03	1,410,049	2,140,268	1,399,990	21.06	66,476
1997	5,801,818.26	2,441,562	3,705,968	2,676,032	21.61	123,833
1998	5,620,637.97	2,266,393	3,440,085	2,742,617	22.17	123,708
1999	249,128.22	95,994	145,706	128,335	22.74	5,644
2000	12,829,245.59	4,713,465	7,154,416	6,957,754	23.31	298,488
2001	4,841,837.51	1,690,639	2,566,166	2,759,855	23.89	115,523
2002	5,493,553.79	1,819,762	2,762,158	3,280,751	24.46	134,127

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 362.00 STATION EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. IOWA 35-R0.5						
NET SALVAGE PERCENT.. -10						
2003	6,231,261.18	1,948,634	2,957,768	3,896,619	25.05	155,554
2004	5,657,944.94	1,666,157	2,529,006	3,694,733	25.63	144,157
2005	5,472,603.64	1,510,143	2,292,197	3,727,667	26.22	142,169
2006	7,946,735.52	2,045,490	3,104,783	5,636,626	26.81	210,243
2007	9,371,697.17	2,235,581	3,393,316	6,915,551	27.41	252,300
2008	9,281,319.31	2,041,890	3,099,319	7,110,132	28.00	253,933
2009	10,905,401.44	2,193,578	3,329,561	8,666,381	28.60	303,020
2010	10,753,115.77	1,960,089	2,975,156	8,853,271	29.20	303,194
2011	7,557,915.09	1,235,167	1,874,820	6,438,887	29.80	216,070
2012	13,364,395.58	1,932,131	2,932,719	11,768,116	30.40	387,109
2013	6,591,269.60	826,545	1,254,586	5,995,811	31.01	193,351
2014	15,976,345.52	1,697,119	2,576,002	14,997,978	31.62	474,319
2015	14,361,733.59	1,250,246	1,897,707	13,900,200	32.23	431,281
2016	9,846,300.21	668,377	1,014,508	9,816,422	32.84	298,917
2017	8,324,422.71	405,558	615,583	8,541,282	33.45	255,345
2018	5,045,435.24	147,463	223,829	5,326,150	34.07	156,330
2019	13,620,505.10	132,745	201,490	14,781,066	34.69	426,090
	228,725,585.62	56,531,430	85,293,814	166,304,330		5,817,664
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						28.6 2.54

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 362.10 STATION EQUIPMENT - SCADA

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. IOWA 35-R2.5						
NET SALVAGE PERCENT.. 0						
1988	256,337.90	182,220	256,338			
1991	127,112.75	84,039	125,751	1,362	11.86	115
1992	15,350.76	9,877	14,779	572	12.48	46
1993	228,673.46	142,953	213,906	14,767	13.12	1,126
1994	141,860.89	86,049	128,758	13,103	13.77	952
1995	251,373.57	147,591	220,846	30,528	14.45	2,113
1997	603,822.61	330,376	494,354	109,469	15.85	6,907
1998	34,816.49	18,324	27,419	7,397	16.58	446
2000	187,783.67	90,833	135,917	51,867	18.07	2,870
2003	25,661.51	10,697	16,006	9,656	20.41	473
2004	999,301.74	393,435	588,711	410,591	21.22	19,349
2005	265,059.25	98,149	146,864	118,195	22.04	5,363
2006	1,653,076.06	572,907	857,262	795,814	22.87	34,797
2008	78,946.72	23,549	35,237	43,710	24.56	1,780
2009	400,485.60	109,505	163,857	236,629	25.43	9,305
2010	57,332.45	14,251	21,324	36,008	26.30	1,369
2011	531,401.95	118,731	177,662	353,740	27.18	13,015
2012	117,733.69	23,277	34,830	82,904	28.08	2,952
2013	33,317.54	5,731	8,576	24,742	28.98	854
2016	340,445.71	31,903	47,737	292,709	31.72	9,228
2019	902,166.00	12,116	18,130	884,036	34.53	25,602
	7,252,060.32	2,506,513	3,734,264	3,517,796		138,662

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 25.4 1.91

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 368.00 LINE TRANSFORMERS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. IOWA 50-R3						
NET SALVAGE PERCENT.. 0						
1968	22,397.90	18,187	22,398			
1970	221,062.16	175,435	221,062			
1971	37,824.78	29,647	37,825			
1973	34,994.16	26,701	34,994			
1974	39,492.60	29,706	39,493			
1975	12,573.01	9,314	12,573			
1976	53,263.16	38,839	53,263			
1977	12,445.90	8,926	12,446			
1978	19,142.96	13,496	19,143			
1979	12,863.67	8,904	12,864			
1980	2,731.28	1,856	2,731			
1981	39,399.88	26,240	39,400			
1982	33,880.81	22,104	33,881			
1983	22,688.25	14,489	22,688			
1984	28,918.60	18,063	28,919			
1985	20,804.00	12,695	20,804			
1987	227,568.55	132,126	218,801	8,768	20.97	418
2000	185,484.45	68,258	113,036	72,448	31.60	2,293
2001	79,357.59	27,791	46,022	33,336	32.49	1,026
2002	119,881.84	39,849	65,990	53,892	33.38	1,614
2003	42,896.29	13,487	22,335	20,561	34.28	600
2004	36,594.46	10,839	17,949	18,645	35.19	530
2008	20,235.29	4,496	7,445	12,790	38.89	329
2012	511,196.30	74,737	123,765	387,431	42.69	9,075
2013	147,308.20	18,679	30,933	116,375	43.66	2,665
2018	428,989.89	12,698	21,028	407,962	48.52	8,408
	2,413,995.98	857,562	1,281,788	1,132,208		26,958

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 42.0 1.12

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 390.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. IOWA 65-R4						
NET SALVAGE PERCENT.. 0						
1963	48,866.14	38,085	48,866			
1966	50,421.77	37,731	50,422			
1967	712.07	525	712			
1969	1,690.30	1,210	1,690			
1970	1,806,878.47	1,273,163	1,806,878			
1971	21,802.98	15,114	21,602	201	19.94	10
1972	7,842.15	5,346	7,641	201	20.69	10
1973	7,611.76	5,099	7,288	324	21.46	15
1974	8,563.32	5,635	8,054	509	22.23	23
1975	145,548.46	94,002	134,356	11,192	23.02	486
1976	23,645.42	14,984	21,416	2,229	23.81	94
1977	183,195.07	113,806	162,662	20,533	24.62	834
1978	9,889.35	6,019	8,603	1,286	25.44	51
1979	44,291.09	26,391	37,720	6,571	26.27	250
1980	45,324.53	26,414	37,753	7,572	27.12	279
1981	1,075,454.56	612,676	875,692	199,763	27.97	7,142
1982	846,513.84	471,051	673,269	173,245	28.83	6,009
1983	13,677.60	7,428	10,617	3,061	29.70	103
1984	21,035.02	11,139	15,921	5,114	30.58	167
1985	50,271.61	25,933	37,066	13,206	31.47	420
1986	10,044.83	5,043	7,208	2,837	32.37	88
1987	5,641.70	2,753	3,935	1,707	33.28	51
1988	20,207.93	9,576	13,687	6,521	34.20	191
1989	1,800.75	828	1,183	618	35.12	18
1990	73,347.29	32,667	46,691	26,656	36.05	739
1991	1,221,312.21	526,288	752,218	469,094	36.99	12,682
1992	1,332,687.01	555,011	793,272	539,415	37.93	14,221
1993	19,539.06	7,852	11,223	8,316	38.88	214
1994	4,542,197.43	1,758,875	2,513,943	2,028,254	39.83	50,923
1997	133,311.63	45,695	65,311	68,001	42.72	1,592
1999	68,169.86	21,332	30,490	37,680	44.66	844
2000	2,139,604.81	637,281	910,860	1,228,745	45.64	26,923
2001	267,151.64	75,542	107,971	159,181	46.62	3,414
2002	204,958.23	54,865	78,418	126,540	47.60	2,658
2005	36,449.37	8,097	11,573	24,876	50.56	492
2007	60,281.10	11,555	16,515	43,766	52.54	833
2008	78,506.30	13,853	19,800	58,706	53.53	1,097
2009	85,487.20	13,770	19,681	65,806	54.53	1,207
2011	273,222.72	35,645	50,947	222,276	56.52	3,933
2012	708,747.64	81,669	116,729	592,019	57.51	10,294
2013	639,911.17	63,895	91,325	548,586	58.51	9,376
2014	197,626.05	16,691	23,856	173,770	59.51	2,920

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 390.00 STRUCTURES AND IMPROVEMENTS

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. IOWA 65-R4						
NET SALVAGE PERCENT.. 0						
2015	20,001.56	1,382	1,975	18,027	60.51	298
2016	164,576.00	8,862	12,667	151,909	61.50	2,470
2018	458,801.18	10,589	15,135	443,666	63.50	6,987
	17,176,820.18	6,791,367	9,684,841	7,491,979		170,358
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						44.0 0.99

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 391.00 OFFICE FURNITURE AND EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
FULLY ACCRUED						
1976	1,856.28	1,856	1,856			
1984	5,422.46	5,422	5,422			
1985	21,465.29	21,465	21,465			
1986	10,015.47	10,015	10,015			
1987	15,071.93	15,072	15,072			
1988	6,682.20	6,682	6,682			
1989	65,870.43	65,870	65,870			
1990	6,557.32	6,557	6,557			
1991	51,102.98	51,103	51,103			
1992	14,087.11	14,087	14,087			
1993	7,769.40	7,769	7,769			
1994	45,231.24	45,231	45,231			
1995	146,487.22	146,487	146,487			
1996	160,463.18	160,463	160,463			
1997	303,941.52	303,942	303,942			
1998	558,608.63	558,609	558,609			
1999	596,044.87	596,045	596,045			
	2,016,677.53	2,016,675	2,016,678			

AMORTIZED  
SURVIVOR CURVE.. 20-SQUARE  
NET SALVAGE PERCENT.. 0

2000	449,819.46	438,574	432,072	17,748	0.50	17,748
2001	37,731.82	34,902	34,385	3,347	1.50	2,231
2002	238,550.23	208,731	205,636	32,914	2.50	13,166
2003	86,715.47	71,540	70,479	16,236	3.50	4,639
2004	128,371.09	99,488	98,013	30,358	4.50	6,746
2005	80,710.72	58,515	57,647	23,063	5.50	4,193
2006	114,505.66	77,291	76,145	38,361	6.50	5,902
2007	164,357.59	102,723	101,200	63,158	7.50	8,421
2008	218,718.27	125,763	123,899	94,820	8.50	11,155
2009	324,609.63	170,420	167,893	156,716	9.50	16,496
2010	960,883.34	456,420	449,653	511,230	10.50	48,689
2011	326,335.83	138,693	136,637	189,699	11.50	16,496
2012	35,220.62	13,208	13,012	22,208	12.50	1,777
2013	132,940.55	43,206	42,565	90,375	13.50	6,694
2014	137,236.12	37,740	37,180	100,056	14.50	6,900
2015	1,086,764.00	244,522	240,897	845,867	15.50	54,572
2016	727,003.94	127,226	125,340	601,664	16.50	36,464

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 391.00 OFFICE FURNITURE AND EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
AMORTIZED						
SURVIVOR CURVE.. 20-SQUARE						
NET SALVAGE PERCENT.. 0						
2017	1,434,239.11	179,280	176,622	1,257,617	17.50	71,864
2018	1,365,683.84	102,426	100,907	1,264,776	18.50	68,366
2019	1,250,634.87	31,266	30,802	1,219,832	19.50	62,555
	9,301,032.16	2,761,934	2,720,987	6,580,045		465,074
	11,317,709.69	4,778,609	4,737,665	6,580,045		465,074
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						14.1 4.11

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 391.10 OFFICE FURNITURE AND EQUIPMENT - PEOPLESOFT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
FULLY ACCRUED						
1999	1,353,562.97	1,353,563	1,353,563			
2000	1,418,242.17	1,418,242	1,418,242			
	2,771,805.14	2,771,805	2,771,805			
AMORTIZED						
SURVIVOR CURVE.. 15-SQUARE						
NET SALVAGE PERCENT.. 0						
2005	31,810.00	30,750	30,720	1,090	0.50	1,090
2007	25,115.72	20,930	20,910	4,206	2.50	1,682
2010	7,924,914.49	5,019,086	5,014,184	2,910,731	5.50	529,224
2011	282,970.54	160,351	160,194	122,776	6.50	18,889
2012	1,871,889.38	935,945	935,031	936,859	7.50	124,915
2013	1,286,246.61	557,369	556,825	729,422	8.50	85,814
2014	13,227.44	4,850	4,845	8,382	9.50	882
2015	1,911,602.11	573,481	572,921	1,338,681	10.50	127,493
2016	326,690.83	76,227	76,153	250,538	11.50	21,786
2017	5,681.60	947	946	4,736	12.50	379
2018	722,721.49	72,272	72,201	650,520	13.50	48,187
2019	123,818.32	4,127	4,123	119,695	14.50	8,255
	14,526,688.53	7,456,335	7,449,052	7,077,637		968,596
	17,298,493.67	10,228,140	10,220,857	7,077,637		968,596
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						7.3 5.60

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 392.00 TRANSPORTATION EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR	ORIGINAL COST	CALCULATED ACCRUED	ALLOC. BOOK RESERVE	FUTURE BOOK ACCRUALS	REM. LIFE	ANNUAL ACCRUAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)
SURVIVOR CURVE.. IOWA 11-L1.5						
NET SALVAGE PERCENT.. 0						
1957	340.15	340	340			
1962	3,434.93	3,435	3,435			
1969	5,259.72	5,260	5,260			
1971	1,603.26	1,603	1,603			
1974	5,780.00	5,780	5,780			
1976	2,706.76	2,707	2,707			
1978	14,785.09	14,785	14,785			
1981	1,627.50	1,628	1,628			
1982	27,937.47	27,937	27,937			
1984	1,286.25	1,286	1,286			
1991	62,691.77	56,366	62,692			
1992	48,433.00	42,885	48,433			
1993	28,336.66	24,730	28,337			
1994	2,251.44	1,932	2,251			
1995	42,202.76	35,642	42,203			
1996	58,193.16	48,247	58,193			
1997	37,837.07	30,751	37,837			
1998	179,030.88	142,573	179,031			
1999	120,252.50	93,578	120,252			
2000	47,520.39	36,115	47,520			
2001	115,256.37	85,395	115,256			
2002	58,719.50	42,278	58,720			
2003	81,844.05	57,216	81,844			
2004	428,683.00	289,944	428,683			
2005	210,354.82	137,496	210,355			
2006	318,336.73	200,842	310,075	8,262	4.06	2,035
2007	77,089.94	46,744	72,167	4,923	4.33	1,137
2008	63,882.86	37,226	57,472	6,411	4.59	1,397
2009	763,481.23	426,160	657,937	105,544	4.86	21,717
2010	645,510.73	343,883	530,912	114,599	5.14	22,296
2011	746,760.76	377,450	582,735	164,026	5.44	30,152
2012	726,201.12	343,958	531,027	195,174	5.79	33,709
2013	1,160,779.77	506,518	781,999	378,781	6.20	61,094
2014	1,802,226.94	707,789	1,092,736	709,491	6.68	106,211
2015	1,777,983.86	602,897	930,797	847,187	7.27	116,532
2016	1,673,924.24	462,606	714,205	959,719	7.96	120,568
2017	2,443,338.73	501,984	775,000	1,668,339	8.74	190,885
2018	1,722,045.53	220,732	340,782	1,381,264	9.59	144,032
2019	1,786,897.62	77,980	120,391	1,666,507	10.52	158,413
	17,294,828.56	6,046,678	9,084,603	8,210,226		1,010,178

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 8.1 5.84

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 393.00 STORES EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 25-SQUARE						
NET SALVAGE PERCENT.. 0						
1998	59,578.06	51,237	51,242	8,336	3.50	2,382
2001	41,556.18	30,752	30,755	10,801	6.50	1,662
2002	24,949.22	17,464	17,466	7,483	7.50	998
2019	6,890.00	138	138	6,752	24.50	276
	132,973.46	99,591	99,601	33,372		5,318
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						6.3 4.00

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 394.00 TOOLS, SHOP AND GARAGE EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
FULLY ACCRUED						
1965	1,079.44	1,079	1,079			
1968	1,114.31	1,114	1,114			
1970	5,234.82	5,235	5,235			
1971	4,598.57	4,599	4,599			
1974	3,210.75	3,211	3,211			
1976	1,110.42	1,110	1,110			
1978	3,718.01	3,718	3,718			
1979	1,172.87	1,173	1,173			
1980	12,455.82	12,456	12,456			
1981	89,554.06	89,554	89,554			
1982	17,053.56	17,054	17,054			
1983	19,926.99	19,927	19,927			
1984	19,149.41	19,149	19,149			
1985	36,671.17	36,671	36,671			
1986	8,917.22	8,917	8,917			
1987	4,030.85	4,031	4,031			
1988	1,396.50	1,396	1,396			
1989	23,724.39	23,724	23,724			
1990	11,041.96	11,042	11,042			
1991	22,112.78	22,113	22,113			
1992	41,953.86	41,954	41,954			
1993	25,727.13	25,727	25,727			
1994	91,136.68	91,137	91,137			
1995	33,359.31	33,359	33,359			
1996	35,568.11	35,568	35,568			
1997	64,571.33	64,571	64,571			
1998	101,405.42	101,405	101,405			
1999	91,165.59	91,166	91,166			
	772,161.33	772,160	772,161			

AMORTIZED  
SURVIVOR CURVE.. 20-SQUARE  
NET SALVAGE PERCENT.. 0

2000	94,240.75	91,885	90,863	3,377	0.50	3,377
2001	26,246.74	24,278	24,008	2,239	1.50	1,493
2002	44,216.38	38,689	38,259	5,958	2.50	2,383
2003	81,896.80	67,565	66,814	15,083	3.50	4,309
2004	349,291.60	270,701	267,691	81,601	4.50	18,134
2005	17,906.58	12,982	12,838	5,069	5.50	922
2006	8,160.94	5,509	5,448	2,713	6.50	417

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 394.00 TOOLS, SHOP AND GARAGE EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
AMORTIZED						
SURVIVOR CURVE.. 20-SQUARE						
NET SALVAGE PERCENT.. 0						
2007	29,127.39	18,205	18,003	11,125	7.50	1,483
2008	34,152.73	19,638	19,420	14,733	8.50	1,733
2010	5,637.08	2,678	2,648	2,989	10.50	285
2013	12,476.20	4,055	4,010	8,466	13.50	627
2016	17,896.96	3,132	3,097	14,800	16.50	897
2017	76,257.87	9,532	9,426	66,832	17.50	3,819
2018	437,028.27	32,777	32,413	404,616	18.50	21,871
2019	306,452.17	7,661	7,576	298,876	19.50	15,327
	1,540,988.46	609,287	602,512	938,476		77,077
	2,313,149.79	1,381,447	1,374,673	938,476		77,077
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						12.2 3.33

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 395.00 LABORATORY EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
FULLY ACCRUED						
1966	1,945.00	1,945	1,945			
1970	9,101.60	9,102	9,102			
1972	5,781.84	5,782	5,782			
1975	3,738.54	3,739	3,739			
1977	2,711.05	2,711	2,711			
1980	2,634.02	2,634	2,634			
1981	27,183.51	27,184	27,184			
1982	29,233.82	29,234	29,234			
1983	7,182.85	7,183	7,183			
1984	11,313.26	11,313	11,313			
1985	2,415.04	2,415	2,415			
1986	17,325.50	17,326	17,326			
1987	7,433.84	7,434	7,434			
1988	2,290.56	2,291	2,291			
1989	27,904.60	27,905	27,905			
1990	18,714.02	18,714	18,714			
1991	82,214.17	82,214	82,214			
1992	33,133.06	33,133	33,133			
1993	118,995.34	118,995	118,995			
1994	33,920.80	33,921	33,921			
1995	121,184.47	121,184	121,184			
1996	49,488.84	49,489	49,489			
1997	61,520.75	61,521	61,521			
1998	288,851.62	288,852	288,852			
1999	285,060.85	285,061	285,061			
	1,251,278.95	1,251,282	1,251,279			

AMORTIZED  
SURVIVOR CURVE.. 20-SQUARE  
NET SALVAGE PERCENT.. 0

2000	84,221.24	82,116	81,567	2,654	0.50	2,654
2001	115,256.75	106,612	105,900	9,357	1.50	6,238
2003	57,302.05	47,274	46,958	10,344	3.50	2,955
2004	53,452.52	41,426	41,149	12,303	4.50	2,734
2005	320,439.35	232,319	230,767	89,673	5.50	16,304
2006	94,815.50	64,000	63,572	31,243	6.50	4,807
2007	200,074.92	125,047	124,211	75,863	7.50	10,115
2008	169,114.52	97,241	96,591	72,523	8.50	8,532
2009	192,200.05	100,905	100,231	91,969	9.50	9,681
2010	9,335.37	4,434	4,404	4,931	10.50	470

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 395.00 LABORATORY EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
AMORTIZED						
SURVIVOR CURVE.. 20-SQUARE						
NET SALVAGE PERCENT.. 0						
2011	340,522.56	144,722	143,755	196,768	11.50	17,110
2012	171,047.44	64,143	63,714	107,333	12.50	8,587
2013	456,417.54	148,336	147,345	309,073	13.50	22,894
2014	521,627.43	143,448	142,489	379,138	14.50	26,147
2015	167,272.68	37,636	37,385	129,888	15.50	8,380
2016	327,600.95	57,330	56,947	270,654	16.50	16,403
2017	510,479.51	63,810	63,384	447,096	17.50	25,548
2018	137,259.54	10,294	10,225	127,034	18.50	6,867
2019	131,456.83	3,286	3,264	128,193	19.50	6,574
	4,059,896.75	1,574,379	1,563,859	2,496,038		203,000
	5,311,175.70	2,825,661	2,815,138	2,496,038		203,000
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						12.3 3.82

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 396.00 POWER OPERATED EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. IOWA 20-R1.5						
NET SALVAGE PERCENT.. 0						
1986	10,342.50	9,344	10,342			
1988	12,390.00	10,885	12,390			
1989	9,321.75	8,063	9,322			
1990	91,753.12	78,082	91,753			
1991	109,879.40	91,914	109,879			
1992	193,244.18	158,653	193,244			
1993	20,527.18	16,535	20,527			
1995	27,230.00	21,008	27,230			
1996	447,515.69	336,979	447,516			
1997	191,585.46	140,432	191,585			
1998	545,009.87	388,320	545,010			
1999	435,104.55	300,222	435,105			
2000	485,186.22	323,377	485,186			
2001	26,183.22	16,810	26,183			
2002	66,671.88	41,037	66,672			
2004	589,548.46	330,147	589,548			
2005	119,428.74	63,297	119,429			
2006	19,664.86	9,813	19,665			
2007	764,592.84	357,065	764,593			
2008	888,391.11	385,562	888,391			
2009	225,911.11	90,364	225,911			
2010	483,535.53	176,490	473,671	9,865	12.70	777
2011	2,972,103.01	979,308	2,628,306	343,797	13.41	25,637
2012	1,338,865.42	392,288	1,052,838	286,027	14.14	20,228
2013	1,330,729.91	340,667	914,296	416,434	14.88	27,986
2014	2,792,892.18	608,850	1,634,056	1,158,836	15.64	74,094
2015	1,041,821.90	187,528	503,295	538,527	16.40	32,837
2016	174,479.40	24,602	66,028	108,451	17.18	6,313
2017	2,090,149.37	212,150	569,377	1,520,772	17.97	84,628
2018	2,444,787.48	149,132	400,246	2,044,541	18.78	108,868
2019	736,752.14	15,103	40,534	696,218	19.59	35,539
	20,685,598.48	6,264,027	13,562,128	7,123,470		416,907

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 17.1 2.02

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 397.00 COMMUNICATION EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
FULLY ACCRUED						
1956	39,133.92	39,134	39,134			
1957	5,289.67	5,290	5,290			
1958	3,859.10	3,859	3,859			
1959	5,368.79	5,369	5,369			
1960	3,299.45	3,299	3,299			
1967	1,957.00	1,957	1,957			
1968	61,816.98	61,817	61,817			
1969	254,498.35	254,498	254,498			
1970	13,372.55	13,373	13,373			
1971	42,367.81	42,368	42,368			
1972	6,338.30	6,338	6,338			
1974	25,896.69	25,897	25,897			
1975	5,774.86	5,775	5,775			
1976	338,729.68	338,730	338,730			
1977	20,930.06	20,930	20,930			
1978	34,979.80	34,980	34,980			
1979	22,627.86	22,628	22,628			
1980	23,390.33	23,390	23,390			
1981	278,774.36	278,774	278,774			
1982	241,160.58	241,161	241,161			
1983	761,387.07	761,387	761,387			
1984	118,727.25	118,727	118,727			
1985	226,296.88	226,297	226,297			
1986	257,777.99	257,778	257,778			
1987	180,861.67	180,862	180,862			
1988	103,750.60	103,751	103,751			
1989	271,918.22	271,918	271,918			
1990	59,488.26	59,488	59,488			
1991	95,658.61	95,659	95,659			
1992	230,609.73	230,610	230,610			
1993	416,315.52	416,316	416,316			
1994	222,424.22	222,424	222,424			
1995	428,765.86	428,766	428,766			
1996	31,698.52	31,699	31,699			
1997	851,505.21	851,505	851,505			
1998	34,483.23	34,483	34,483			
1999	216,925.86	216,926	216,926			
2000	241,870.14	241,870	241,870			
2001	606,355.94	606,356	606,356			

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 397.00 COMMUNICATION EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
FULLY ACCRUED						
2002	5,720.64	5,721	5,721			
2003	503,451.62	503,452	503,452			
2004	15,981,177.70	15,981,178	15,981,178			
	23,276,736.88	23,276,740	23,276,737			
AMORTIZED						
SURVIVOR CURVE.. 15-SQUARE						
NET SALVAGE PERCENT.. 0						
2005	747,985.54	723,055	713,858	34,127	0.50	34,127
2006	458,326.24	412,494	407,247	51,079	1.50	34,053
2007	181,678.71	151,398	149,472	32,206	2.50	12,882
2008	1,274,465.45	977,094	964,666	309,799	3.50	88,514
2009	30,209.10	21,146	20,877	9,332	4.50	2,074
2010	183,024.10	115,915	114,441	68,583	5.50	12,470
2011	415,912.20	235,685	232,687	183,225	6.50	28,188
2012	6,360,561.93	3,180,281	3,139,831	3,220,731	7.50	429,431
2013	350,235.17	151,767	149,837	200,399	8.50	23,576
2014	2,328,951.18	853,957	843,095	1,485,856	9.50	156,406
2015	3,262,498.47	978,750	966,301	2,296,197	10.50	218,685
2016	1,272,985.40	297,026	293,248	979,737	11.50	85,195
2017	1,476,402.21	246,072	242,942	1,233,460	12.50	98,677
2018	3,932,442.56	393,244	388,242	3,544,200	13.50	262,533
2019	1,239,019.61	41,297	40,772	1,198,248	14.50	82,638
	23,514,697.87	8,779,181	8,667,518	14,847,180		1,569,449
	46,791,434.75	32,055,921	31,944,255	14,847,180		1,569,449
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						9.5 3.35

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 397.10 COMMUNICATION EQUIPMENT - ENERGY CONTROL SYSTEM

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
FULLY ACCRUED						
1983	480,050.01	480,050	480,050			
1984	17,625.94	17,626	17,626			
1985	11,027.00	11,027	11,027			
1986	1,669.06	1,669	1,669			
1987	6,857.89	6,858	6,858			
1992	10,588.22	10,588	10,588			
1993	27,528.40	27,528	27,528			
1994	14,288.17	14,288	14,288			
1997	72,903.79	72,904	72,904			
	642,538.48	642,538	642,538			

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 0.0 0.00

**Exhibit EKPC-03  
Depreciation Study**

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 398.00 MISCELLANEOUS EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
FULLY ACCRUED						
1972	6,340.79	6,341	6,341			
1977	1,417.50	1,418	1,418			
1983	7,350.00	7,350	7,350			
1984	7,227.43	7,227	7,227			
1985	2,415.00	2,415	2,415			
1986	1,597.78	1,598	1,598			
1987	11,506.39	11,506	11,506			
1988	13,021.58	13,022	13,022			
1989	41,686.34	41,686	41,686			
1990	14,178.01	14,178	14,178			
1991	2,818.48	2,818	2,818			
1992	30,683.69	30,684	30,684			
1993	25,981.20	25,981	25,981			
1994	19,893.82	19,894	19,894			
1995	10,120.88	10,121	10,121			
1996	2,114.70	2,115	2,115			
1997	182,982.47	182,982	182,982			
1998	14,645.99	14,646	14,646			
1999	17,900.24	17,900	17,900			
	413,882.29	413,882	413,882			

AMORTIZED

SURVIVOR CURVE.. 20-SQUARE  
NET SALVAGE PERCENT.. 0

2000	90,437.07	88,176	87,527	2,910	0.50	2,910
2001	242,506.75	224,319	222,667	19,839	1.50	13,226
2004	35,241.42	27,312	27,111	8,131	4.50	1,807
2005	101,444.22	73,547	73,005	28,439	5.50	5,171
2006	15,381.61	10,383	10,307	5,075	6.50	781
2007	189,267.95	118,292	117,421	71,847	7.50	9,580
2008	8,651.60	4,975	4,938	3,713	8.50	437
2009	100,896.47	52,971	52,581	48,316	9.50	5,086
2010	69,142.10	32,842	32,600	36,542	10.50	3,480
2011	259,991.50	110,496	109,682	150,309	11.50	13,070
2012	88,086.98	33,033	32,790	55,297	12.50	4,424
2013	88,130.08	28,642	28,431	59,699	13.50	4,422
2014	187,088.94	51,449	51,070	136,019	14.50	9,381
2015	53,500.30	12,038	11,949	41,551	15.50	2,681
2016	94,340.89	16,510	16,388	77,952	16.50	4,724

EAST KENTUCKY POWER COOPERATIVE, INC.

ACCOUNT 398.00 MISCELLANEOUS EQUIPMENT

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2019

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REM. LIFE (6)	ANNUAL ACCRUAL (7)
AMORTIZED						
SURVIVOR CURVE.. 20-SQUARE						
NET SALVAGE PERCENT.. 0						
2017	258,531.71	32,316	32,078	226,454	17.50	12,940
2018	101,398.09	7,605	7,549	93,849	18.50	5,073
2019	30,552.95	764	758	29,795	19.50	1,528
	2,014,590.63	925,670	918,854	1,095,737		100,721
	2,428,472.92	1,339,552	1,332,736	1,095,737		100,721
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..						10.9 4.15

**Exhibit EKPC-04**

**Kentucky Public Service Commission Order  
Approving Revised Depreciation Rates**

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST	)	
KENTUCKY POWER COOPERATIVE, INC.	)	
FOR A GENERAL ADJUSTMENT OF RATES,	)	CASE NO.
APPROVAL OF DEPRECIATION STUDY,	)	2021-00103
AMORTIZATION OF CERTAIN REGULATORY	)	
ASSETS, AND OTHER GENERAL RELIEF	)	

ORDER

On April 6, 2021, East Kentucky Power Cooperative (EKPC) filed an application,<sup>1</sup> pursuant to KRS 278.180, KRS 278.190, and 807 KAR 5:001, requesting a wholesale rate adjustment that supported an increase in revenue by \$48,983,937, but offered to limit the requested rate increase to \$43,000,000 due to economic conditions in EKPC's Owner-Members' service territories, with the difference being achieved through reduction of certain costs. EKPC also requested approval of four regulatory assets, relief for reporting requirements, and tariff changes. EKPC's last wholesale rate adjustment was approved in 2011.<sup>2</sup>

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General), Nucor Steel Gallatin, LLC (Nucor), and AppHarvest Morehead Farm, LLC (AppHarvest) were granted intervention status. By

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<sup>1</sup> EKPC submitted its application on April 1, 2021. By letter dated April 5, 2021, EKPC was notified that its application was rejected for filing due to certain filing deficiencies. EKPC subsequently cured the deficiencies and the application was deemed filed as of April 6, 2021.

<sup>2</sup> Case No. 2010-00167, *Application of East Kentucky Power Cooperative, Inc. for General Adjustment of Electric Rates* (Ky. PSC Jan. 14, 2011).

Order entered April 13, 2021, the Commission established a procedural schedule that provided for multiple rounds of discovery, intervenor testimony, and rebuttal testimony. The Commission suspended the proposed rates up to and including October 5, 2021.

On July 29, 2021, the parties filed a Stipulation and Settlement Agreement (Settlement) between the parties that settled all issues. In the Settlement, the parties, among other things, requested that the final Order be timely issued so that the proposed rates could go into effect for service rendered on and after October 1, 2021. A formal hearing was held on August 13–14, 2021. EKPC responded to two post-hearing data requests. EKPC, Attorney General, Nucor, and AppHarvest filed post-hearing briefs. This matter now stands submitted for a decision.

#### LEGAL STANDARD

EKPC filed its application pursuant to KRS 278.180, KRS 278.190, and 807 KAR 5:001. The Commission’s standard of review of a utility’s request for a rate increase is well established. In accordance with statutory and case law, EKPC is allowed to charge its customers “only ‘fair, just and reasonable rates.’”<sup>3</sup> Further, EKPC bears the burden of proof to show that the proposed rate increase is just and reasonable, under KRS 278.190(3).

Although the parties agreed to a unanimous Settlement and the parties may represent a diverse range of customer interests, the Commission cannot defer to the parties as to what constitutes fair, just and reasonable rates. The Commission must review the record, including the Settlement, and apply the Commission’s expertise to make an independent decision as to the level of rates that should be approved.

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<sup>3</sup> KRS 278.030; and *Pub. Serv. Comm’n v. Com. ex rel. Conway*, 324 S.W.3d 373, 377 (Ky. 2010).

SETTLEMENT

The Settlement, attached to this Order as Appendix A, reflects the agreement of the parties concerning all issues raised in the case. The major provisions of the Settlement as they relate to EKPC's revenues and rates are as follows:

- EKPC's revenues should be increased by \$38,343,000 with rates to be effective October 1, 2021, or when a final order is issued, whichever is later. The adjustments the parties agreed upon and resulted in the settled amount is shown in Exhibit A of the settlement<sup>4</sup> and is restated in the table below:

	<u>Settlement Agreement</u>
<b>EKPC Requested Increase</b>	
Required Revenue Increase Based On Original Filing	\$ 48,983,937
<b>Effects on Increase from Expense Adjustments</b>	
Reflect Normalization of Generation Maintenance Expense	(6,591,884)
Reduce Amortization Period for General Plant Reserve Surplus to 5 Years	(1,914,124)
Reduce Interest Expense on Environmental CWIP Recovered Through ES	(2,315,000)
<b>Total Adjustments to Company's Proposed TY Base RR</b>	<u>(10,821,008)</u>
<b>Adjusted Increase to Base Rates</b>	<u>\$ 38,162,929<sup>5</sup></u>

- The revenue requirement would be allocated to the rate cases as follows:

Rate Class	Increase in Dollars	Percentage Increase
Rate E	\$34,314,065	5.20%
Rate B	\$1,548,673	2.60%
Rate C	\$452,238	2.60%
Rate G	\$663,320	2.60%
Contract Steam	\$278,674	2.60%
Large Special Contract	\$1,086,030	2.60%
Pumping Stations	\$0	0.00%
<b>Total</b>	<b>\$38,343,000</b>	

<sup>4</sup> Settlement (filed Jul. 29, 2021), Exhibit A at 12.

<sup>5</sup> The adjustments included in Exhibit A of the Settlement did not result in the exact required increase of \$38,343,000 as stated in the total, and the Settlement did not address this topic.

- EKPC would be authorized to earn a 1.50 Times Interest Earned Ratio (TIER) for base rates
- EKPC would be authorized to earn a 1.475 TIER for its environmental surcharge (ES). All changes for depreciation rates, interest expense for construction work in progress (CWIP), and TIER would first be reflected in the monthly ES filing on November 19, 2021, for expense month October 2021.
- EKPC will record a generation maintenance regulatory asset or regulatory liability for 75 percent of the actual generation maintenance expense amounts in excess of or less than the \$81,067,000 in base rates, beginning with calendar year 2022.
- The parties agreed to an earnings mechanism that would return excess margins to customers in the form of a bill credit if EKPC achieves a per book margin in excess of 1.40 TIER in any calendar year.
- EKPC's depreciation study, depreciation rates, and inclusion of interim retirement and terminal net salvage should be approved as filed.
- Agreement that the Commission should approve amortization of four regulatory assets as filed in the application.
- Agreement that the Commission should grant each of EKPC's requests for relief from certain filing requirements.

Summaries of each issue and the findings of the Commission are explained in detail below.

#### TEST PERIOD

EKPC proposed the 12-month period ending December 31, 2019, as the historic test year for determining the reasonableness of its proposed rates, as provided in 807 KAR 5:001, Section 16(4)–(5). None of the intervenors contested the use of this period as the test period.

The Commission finds that it is reasonable to use the 12-month period ending December 31, 2019, as the test period in this case because, due to the timing of EKPC's filing, the 12-month period ending December 31, 2019 is a feasible period to use for setting rates. Further, except for the adjustments approved in this Order, the revenues and expenses incurred during that period are neither unusual nor extraordinary. In using this historic test period, the Commission gave full consideration to appropriate known and measurable changes.

### TIER

EKPC requested the Commission authorize a 1.50 TIER to allow it to maintain a target Debt Service Coverage (DSC) of 1.35, which allows for compliance with EKPC's lenders, support EKPC's credit ratings, and maintains financial strength.<sup>6</sup> The Settlement adopts EKPC's request, with the exception of the TIER on EKPC's ES, which the Settlement sets at 1.475 TIER.<sup>7</sup> The Commission finds that the TIER calculation for EKPC's base rates should be set to 1.50, which is a reasonable level to ensure EKPC retains its ability to meet its debt covenants and maintain its equity and cash flow to ensure financial stability in case of unforeseen circumstances. The Commission also finds that the reduced TIER of 1.475 for its ES is reasonable, because through the true-up mechanism from ES, the revenue generated by ES is generally considered more stable than revenue generated through base rates. Therefore, the Commission finds that the provisions of the Settlement regarding TIER are reasonable and should be approved.

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<sup>6</sup> Application, Exhibit 17, Direct Testimony of Thomas J. Stachnik (filed Apr. 1, 2021) at 23.

<sup>7</sup> Settlement at 3.

## REVENUE REQUIREMENT ADJUSTMENTS

### Operating Expense Adjustments

Normalize Generation Maintenance. In its application, EKPC included test-year expenses of \$87,647,565 associated with major generation outage maintenance work.<sup>8</sup> The Attorney General/Nucor's witness, Lane Kollen, recommended that an adjustment be made to reduce the major generation outage expense to a normalized level based upon the average of the past five years.<sup>9</sup> Citing the reduction of generation maintenance expense to \$76,334,481 in 2020,<sup>10</sup> Kollen stated that it is appropriate to normalize the expense because fluctuations occur due to the cyclical nature, timing, and scope of major generation outages and expenses.<sup>11</sup> As an example, EKPC's witness Isaac Scott argued that the reduction in generation maintenance expense occurred in 2020 because the COVID-19 pandemic forced the rescheduling of generation outages that would otherwise have taken place.<sup>12</sup> In addition, Scott stated that, as EKPC's generating fleet ages, increasing levels of maintenance expense will likely occur, and therefore a mix of historic and forecasted expense levels should be used in the event that a normalization adjustment is made.<sup>13</sup>

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<sup>8</sup> EKPC's Response to Attorney General/Nucor's First Request for Information (Attorney General/Nucor's First Request) (filed May 28, 2021), Items 2–19.

<sup>9</sup> Direct Testimony of Lane Kollen (Kollen Direct Testimony) (filed June 29, 2021) at 19.

<sup>10</sup> Kollen Direct Testimony at 18.

<sup>11</sup> *Id.*

<sup>12</sup> Rebuttal Testimony of Isaac S. Scott (Scott Rebuttal Testimony) (filed July 27, 2021) at 11.

<sup>13</sup> Scott Rebuttal Testimony at 12.

In the Settlement, the parties agreed to adopt the adjustment proposed by Lane Kollen, and normalize the generation maintenance expense over the five-year period from 2015 to 2019, resulting in a reduction in revenue of \$6,591,883.<sup>14</sup> In addition, the Settlement included the creation of a mechanism by which EKPC will track its actual generation maintenance expenses and compare them to the normalized total of \$81,067,839 million. In years when the actual expense exceeds the normalized total, EKPC will record a regulatory asset for 75 percent of the difference.<sup>15</sup> In years when the actual expense is less than the normalized total, EKPC will record a regulatory liability for 75 percent of the difference.<sup>16</sup> The Settlement provides that, in EKPC's next base rate case, the cumulative regulatory asset or liability will then be amortized and either recovered from or returned to EKPC's Owner-Members over a reasonable period.<sup>17</sup>

For the reasons set forth above, the Commission finds that a normalization adjustment to generation maintenance expense is appropriate, and that the period proposed by Lane Kollen is also appropriate. The Commission further finds that the Settlement terms related to the regulatory asset or liability are reasonable for the above reasons, and therefore approves EKPC's regulatory accounting treatment accordingly.

Plant Reserve Surplus. In the application, EKPC proposed to reduce depreciation expense in the test period before gross up by \$(1,910,304) for a reserve adjustment for

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<sup>14</sup> Settlement at 3–4.

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

amortization on general plant reserve surplus.<sup>18</sup> The amortization of the proposed adjustment was based on a ten-year period recommended by EKPC's depreciation consultant, John Spanos.<sup>19</sup> Mr. Spanos explained that this period would achieve consistent amortization rates for existing and future assets.<sup>20</sup> The Attorney General and Nucor recommended the amortization period on the reserve adjustment be adjusted to five years, and stated that the proposed amortization period was inordinately long and that any overrecovery should be returned expeditiously to customers in the context of a requested base rate increase.<sup>21</sup> In the Settlement, the parties agreed to adjust the revenue requirement based on the five-year amortization period as proposed by the Attorney General and Nucor. As a result, the total revenue required from base rates would be reduced by \$(1,914,124).

The Commission notes that while the argument that amortization periods should be in line with the average remaining lives of the amortization accounts is compelling, a period of ten years to return an overrecovery through base rates is excessive. Therefore, the Commission finds that the Settlement term regarding the plant reserve surplus is reasonable because a five-year amortization period is appropriate for the return of the general plant reserve surplus.

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<sup>18</sup> Application, Exhibit 13, Direct Testimony of Isaac S. Scott (Scott Direct Testimony) (filed Apr. 1, 2021), Exhibit ISS-1, Attachment 7, Workpaper 1.19, Depreciation Environmental Surcharge at 5.

<sup>19</sup> Application, Exhibit 15, Direct Testimony of John J. Spanos (Spanos Direct Testimony) (filed Apr. 1, 2021) at 13-16.

<sup>20</sup> Spanos Direct Testimony at 16.

<sup>21</sup> Kollen Direct Testimony at 34-35.

ES CWIP Interest Expense. EKPC proposed to remove Interest Expense of \$(24,450,841)<sup>22</sup> from the test year for interest on long-term debt associated with projects that are being recovered through EKPC's ES mechanism. The Attorney General and Nucor recommended the Commission reduce the revenue requirement by \$8,550,602 to remove interest expenses and associated TIER that were tied to CWIP projects also being recovered through the ES mechanism, and argued that if these expenses were approved in base rates, double recovery would occur.<sup>23</sup> In Mr. Scott's rebuttal testimony, which supports the amounts agreed upon in the Settlement, he agreed that an adjustment to remove interest expense on long-term debt associated with the CWIP amounts included in the ES should be made, but disagreed with the methodology employed by Mr. Kollen that imputed the long-term debt supporting surcharge assets only to the CWIP balance in the ES.<sup>24</sup> Mr. Scott recalculated the reduction using the interest rates of the credit facility as of June 30, 2020 to the CWIP balance included in the ES. The result of Mr. Scott's recalculation was \$(2,317,925) after gross up.<sup>25</sup> This is consistent with the reduction agreed upon in the Settlement.

The Commission agrees that if no adjustment were made to reduce long-term interest expense related to the CWIP ES, then double recovery of interest expense would occur. The Commission concurs that the use of the interest rates of the credit facility as of June 20, 2020, is a reasonable method to determine the proper reduction to interest

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<sup>22</sup> Scott Direct Testimony, Exhibit ISS-1, Schedule 1.02, Adjustments to Remove Environmental Surcharge from Base Rates.

<sup>23</sup> Kollen Direct Testimony at 46.

<sup>24</sup> Scott Rebuttal Testimony at 18.

<sup>25</sup> *Id.*

expense from base rates to be recovered through the ES. Therefore, the Commission finds the reduction of \$(2,315,000) to the revenue requirement as agreed upon in the Settlement is reasonable and should be approved.

Salaries, Wages, and Related Payroll Tax Expense. EKPC proposed to increase test-year salaries and wages and associated payroll taxes by \$4,261,906<sup>26</sup> and \$404,848,<sup>27</sup> respectively, to reflect 2020 staffing levels and merit increases awarded with an effective date of June 2020. EKPC calculated its proposed adjustment by normalizing its payroll period ending September 18, 2020, over 12 months.<sup>28</sup> The Attorney General and Nucor argued that the annualization of a single payroll period was not known and measurable and failed to reflect any offsetting savings in contractor expenses achieved after the end of the test year. The Settlement makes no adjustment to salaries and wages or corresponding payroll.

In response to Commission Staff's Second Post-Hearing Request for Information, EKPC provided its actual salaries and wages for July 1, 2020, through June 20, 2021, in the format originally presented in the application for EKPC's proposed salaries and wages adjustment.<sup>29</sup> Based on the information presented in the response, the Commission finds that while the method of normalizing a single payroll period is not conventional ratemaking, the pro forma amounts requested in the application accurately reflect, in all material respects, current and expected conditions with regard to salaries and wages for

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<sup>26</sup> Scott Direct Testimony, Exhibit ISS-1, Schedule 1.07, Adjustment to Normalize Wages and Salaries.

<sup>27</sup> Scott Direct Testimony, Exhibit ISS-1, Schedule 1.08, Adjustment to Normalize Payroll Taxes.

<sup>28</sup> Scott Direct Testimony at 19-20.

<sup>29</sup> EKPC's Response to Commission Staff's Second Post-Hearing Request for Information (filed Sept. 1, 2021), Item 1.

EKPC, and therefore are known and measurable. For this reason, the Commission finds that no further adjustment is required.

Other Post-Employment Benefits (OPEB). EKPC proposed to include test-year expenses of \$3,280,634 associated with OPEB.<sup>30</sup> EKPC proposed an adjustment to reduce retiree medical insurance by \$1,190,183 to reflect its estimate of the savings associated with moving away from a self-funded plan to a Medicare Advantage plan effective January 1, 2020.<sup>31</sup> The Attorney General and Nucor recommended that an additional adjustment be made to further reduce OPEB by \$1,034,583 to reduce the expense to EKPC's 2020 actual expense of \$1,057,933.<sup>32</sup> In rebuttal testimony, Mr. Scott proposed that the Commission reject Lane Kollen's proposed adjustment because he believes that going 12 months beyond the end of the test year is a violation of the matching principle.<sup>33</sup>

In the Settlement, the parties agreed to adopt the expense level originally proposed by EKPC. The Commission finds that the Settlement term regarding OPEB is reasonable because it reflects a fair middle ground between the historically low actual expense incurred in 2020 and the five-year average based on EKPC's post-hearing data response.<sup>34</sup>

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<sup>30</sup> EKPC's Response to Attorney General/Nucor's First Request, Item 57.

<sup>31</sup> Scott Direct Testimony, Exhibit ISS-1, Schedule 1.11, Adjustment to Retiree Medical Insurance Expense.

<sup>32</sup> Kollen Direct Testimony at 13.

<sup>33</sup> Scott Rebuttal Testimony at 10.

<sup>34</sup> EKPC's Response to Commission Staff's First Post-Hearing Request for Information (filed Aug. 23, 2021), Item 3.

Rate Case Expense. EKPC proposed to increase its test year expenses \$320,000 for a three-year amortization of estimated expenses of \$960,000, which would be incurred in relation to this proceeding.<sup>35</sup> On August 18, 2021, EKPC filed an updated report that it expended \$742,494 for rate case expenses as of August 17, 2021, which included legal services, consultants' fees for a depreciation study, consultants' fees for EKPC's cost of service study and cooperation with consultants in the owner-member flow through proceedings, legal notices, and miscellaneous supplies.<sup>36</sup>

The Commission finds that, based on the summaries provided throughout the pendency of this case and a review of the supporting invoices, the amount detailed in EKPC's August 18, 2021 filing fairly represents the total costs to prepare and fully litigate this proceeding. Therefore, the Commission finds that rate case expense should be reduced to \$724,494 amortized over three years, resulting in a test-year amortization expense of \$241,498, a reduction of \$78,502.

Request for Amortization of Regulatory Assets

The parties agreed that the Commission should approve amortization of four regulatory assets as filed in the application, which are set forth below:

Amortization of Cancelled Smith 1 Regulatory Asset. EKPC proposed to amortize and recover, for ratemaking purposes, its Cancelled Smith 1 regulatory asset and proposed to increase test-year amortization expense by \$1,911,276, which it stated is

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<sup>35</sup> Scott Direct Testimony at 31 and Exhibit ISS-1, Schedule 1.27, Amortize Rate Case Expenses.

<sup>36</sup> EKPC's Supplemental Response to Staff's First Request (filed Aug. 18, 2021), Item 39.c.

consistent with the stipulation agreement in Case No. 2015-00358 (2015 Settlement).<sup>37</sup> The adjustment was calculated based on the difference between the actual test-year amortization and an adjusted regulatory asset balance re-amortized over the remaining 63 months of the specified 120 months beginning January 1, 2017, set by the 2015 Settlement.<sup>38</sup> The Attorney General and Nucor proposed to decrease test-year amortization by \$(3,493,669), based on the interpretation of the 2015 Settlement that the amortization period that remained for ratemaking purposes was 84 months, based on a 120 month amortization period and 36 months of recorded amortization.<sup>39</sup>

The Commission concludes that the 2015 Settlement is clear that the amortization period for the regulatory asset for ratemaking purposes was set for 10 years beginning January 1, 2017. However, EKPC's proposal to increase test-year expenses based on the adjusted balance of the regulatory asset as of December 31, 2019, is not appropriate. For accounting purposes, EKPC is amortizing the regulatory asset from January 1, 2017 until present. In order for the Commission's Order approving the 2015 Settlement to comply with accounting standards that require realization of revenue that offsets the amortization expense of a regulatory asset,<sup>40</sup> EKPC had to "realize certain PJM Capacity Market Benefits,"<sup>41</sup> alongside EKPC's amortization expense beginning January 1, 2017

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<sup>37</sup> Case No. 2015-00358, *Application of East Kentucky Power Cooperative, Inc. for Deviation from Obligation Resulting from Case No. 2012-00169* (filed Aug. 8, 2016), Exhibit A, Stipulation and Recommendation. See also Scott Direct Testimony at 26.

<sup>38</sup> Scott Direct Testimony, Exhibit ISS-1, Schedule 1.20, Adjustment to Amortize Smith 1 Regulatory Asset at 1.

<sup>39</sup> Kollen Direct Testimony at 36-38.

<sup>40</sup> ASC 980-340-25-1.

<sup>41</sup> 2015 Settlement at 3.

and the “Net PJM Capacity Market Benefit[s] . . . impact[ed] EKPC’s margins in the appropriate accounting periods.”<sup>42</sup> However, the 2015 Settlement noted that for the year in which EKPC’s next rate case is brought, the 2015 Settlement would permit EKPC to “request an amortization adjustment” for the test year using both the actual results of EKPC’s mitigation and salvage efforts during the period of January 1, 2017, through the end of the test period in the rate case, and the net PJM Capacity Market benefits starting with the 2016-2017 PJM Delivery year and concluding at the end of the test year, or the end of calendar year 2019.<sup>43</sup> The 2015 Settlement further clarifies that the requested amortization adjustment based on the 2019 PJM Capacity Market Benefit should only be reflected if the full Net PJM Capacity Market Costs are known and measurable.<sup>44</sup> If the 2019 PJM Capacity Market Costs are not known and measurable at the time of the filing of the rate case, then EKPC would request the amortization adjustment that reflects only the Net PJM Capacity Market Benefit realized through the end of the test period included in the rate case.<sup>45</sup> The Commission recognizes EKPC’s request in its pending application as an attempt to comply with the terms of the 2015 Settlement. However, the Commission is not bound to approve EKPC’s request simply because it was outlined in the 2015 settlement that EKPC was to make such a request in its next rate proceeding. Further, even though the 2015 Settlement does not explicitly discuss the issue of timing, the Commission believes that the terms of the 2015 Settlement were originally agreed to on

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<sup>42</sup> *Id.* at 4.

<sup>43</sup> *Id.* at 5–6.

<sup>44</sup> *Id.* at 6.

<sup>45</sup> *Id.*

the idea that EKPC would file its next base rate case prior to the end of calendar year 2019. Regardless, if the Commission were to approve the adjustment as proposed by EKPC, the resulting adjustment would allow EKPC to retroactively collect from customers the amortization already expensed for accounting purposes on EKPC's books and creates a mismatch of revenue collected and the actual expense incurred. The balance of a regulatory asset is not reduced by the corresponding revenue collected by EKPC, but rather, by realizing the associated amortization expense. To adjust the going forward amortization expense included in rates for the shortfall of EKPC's offsetting revenues would be a violation of the accounting standard that allows the creation of a regulatory asset only when it is probable that future revenues in an amount approximately equal to the capitalized cost will result from inclusion of that cost in allowable costs for ratemaking purposes.<sup>46</sup> In short, because the amortization period began on January 1, 2017, the amortization expense should not be adjusted to recapture amortization expense already incurred or the shortfall of EKPC's offsetting revenues. Therefore, the Commission finds that EKPC's request to adjust its test-year amortization expense in its application is unreasonable and should be denied. In the converse, the proposal by the Attorney General and Nucor is also not reasonable because the period set for the ten-year amortization is clearly stated to commence on January 1, 2017, and therefore should not be extended.

For the historical test period ending December 31, 2019, the Commission finds, for the reasons set forth above, that the reasonable amortization expense, for ratemaking purposes, are the amounts actually expensed in the test year. Therefore, the

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<sup>46</sup> ASC 980-340-25-1.

Commission finds that the agreed upon revenue requirement in the Settlement should be reduced by \$(1,915,099), which reflects the removal of the proposed pro forma adjustment made by EKPC, including gross up for the fees associated with the regulatory assessment.

Amortization of Dale Surcharge Projects 5 and 10. EKPC proposed to amortize and recover the Dale regulatory asset for Surcharge Projects 5 and 10, which are associated with EKPC's ES. In Case No. 2015-00302,<sup>47</sup> the Commission approved two regulatory assets for the 2015 retirement of Dale generation station: one for Dale assets recovered through base rates, and a second for Dale assets recovered through the ES. The Commission found that the ES-related regulatory asset should be deferred for potential recovery in EKPC's next base rate case, and that the decision would be made after fully examining the reasonableness of these costs in the context of the future rate case. EKPC proposed to amortize the \$749,484 regulatory asset balance over two years, which increases test-year amortization expense by \$374,742.<sup>48</sup>

Upon review of costs in the Dale Surcharge Projects 5 and 10, the Commission concludes that the costs are reasonable, and therefore finds that the proposed increase to amortization is reasonable and should be approved.

Amortization of Dale Station Asbestos Asset Retirement Obligations. EKPC requested to amortize its established regulatory asset for depreciation and accretion expenses associated with Dale generating station asbestos abatement and ash removal

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<sup>47</sup> Case No. 2015-00302, *Application of East Kentucky Power Cooperative, Inc. for an Order Approving the Establishment of a Regulatory Asset for the Undepreciated Balance of the William C. Dale Generating Station* (Ky. PSC Feb. 11, 2016).

<sup>48</sup> Scott Direct Testimony, Exhibit ISS-1, Schedule 1.21, Adjustment to Amortize Dale Regulatory Asset for Surcharge Projects 5 and 10.

costs. EKPC stated that the Commission approved this asset in Case No. 2014-00432<sup>49</sup> and that EKPC has not previously requested recovery of this asset. EKPC explained that Dale was retired in 2015 and the asbestos abatement and ash removal costs have been settled, but the regulatory asset remains on EKPC's books. EKPC proposed to amortize the regulatory asset balance of \$1,360,551 over a two-year period, which increases test-year amortization expense by \$680,276.

Because the asbestos abatement and ash removal costs have been settled, the Commission finds the proposed increase to test-year amortization as described above is reasonable and should be approved.

Amortization of Spurlock 2019 Major Maintenance Expenses. EKPC requested to amortize 2019 major maintenance expenses at Spurlock generating station that EKPC recorded as a regulatory asset, which EKPC asserted is consistent with the Commission's December 20, 2019 Order in Case No. 2019-00146.<sup>50</sup> In that order, the Commission denied EKPC's request to establish regulatory asset(s) for present and future major maintenance expenses, and stated that the United States Department of Agriculture Rural Utilities Service (RUS) was the more appropriate regulatory authority to petition for departures from standard accounting practices.<sup>51</sup>

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<sup>49</sup> Case No. 2014-00432, *Application of East Kentucky Power Cooperative, Inc. for an Order Approving the Establishment of Regulatory Assets for the Depreciation and Accretion Expenses Associated with Asset Retirement Obligations* (Ky. PSC Mar. 6, 2015).

<sup>50</sup> Case No. 2019-00146, *Application of East Kentucky Power Cooperative, Inc. for an Order Approving the Establishment of Regulatory Assets for Present and Future Maintenance Expenses* (Ky. PSC Dec. 20, 2019), Order.

<sup>51</sup> *Id.* at 10.

EKPC explained that it subsequently received approval from the RUS on January 30, 2020, to record the regulatory asset with an eight-year amortization period.<sup>52</sup> EKPC explained that RUS advised EKPC to submit a request for specific projects rather than the broad authorizations that were requested in Case No. 2019-00146. EKPC established the regulatory asset balance of \$7,244,184 at the end of the test year with an eight-year amortization period.<sup>53</sup> No Intervenor in this proceeding objected to EKPC's request for amortization.

In the December 20, 2019 Order in Case No. 2019-00146, the Commission denied EKPC's request to record regulatory assets for minor units of property and major maintenance expense each year without explicit prior Commission approval. Instead, the Commission instructed EKPC that the wide-ranging departure from ordinary accounting rules that EKPC was proposing to endeavor on should be sought from RUS, noting that RUS was the more appropriate authority to address departures from Uniform System of Accounts (USoA) as RUS has procedures per 7 C.F.R. 1767.13 for such requests. The Commission concludes that the evidence presented in this case, including letters EKPC issued to RUS, indicate that EKPC went to RUS initially in good faith to request a departure from the USoA (for the request envisioned by the Commission), but when that request was denied, EKPC further requested RUS approve the recognition of a regulatory asset. RUS approved this recognition under the standards set by the USoA. Upon RUS approval, EKPC booked the regulatory asset without the Commission's approval. The

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<sup>52</sup> Application, Exhibit 14, Direct Testimony of Michelle K. Carpenter (filed Apr. 1, 2021) at 12, lines 5–7. Scott Direct Testimony at 30.

<sup>53</sup> Scott Direct Testimony, Exhibit ISS-1, Schedule 1.26, Amortize Spurlock 2019 Regulatory Asset for Major Maintenance at 1.

Commission never envisioned EKPC would seek ordinary regulatory deferral accounting for a single year's expense from RUS, nor did the Commission direct it to do so. There is a material difference between the request EKPC made to the Commission (and for which the Commission said RUS would be the better avenue for relief) and the one sought, and ultimately received, from RUS. EKPC's actions in booking the regulatory asset for 2019 expenses is in direct violation of the Commission's Order in Case No. 2016-00180, which put all jurisdictional utilities on notice that Commission authorization is required before a utility can record a regulatory asset for expenses that meet one or more of the four criteria the Commission uses to determine the reasonableness of a request to authorize the establishment of a regulatory asset.<sup>54</sup>

EKPC established and subsequently requested rate recognition of a regulatory asset that was never approved by the Commission. There are significant financial consequences for EKPC if the Commission denies EKPC's request to amortize or recover this regulatory asset. If EKPC were an investor-owned utility, then its shareholders would bear the financial burden of a denial to recover in the regulatory asset balance in rates. However, as a generation and transmission cooperative, the financial burden would fall on EKPC's Owner-Members and their retail customers if the Commission denied recovery of this regulatory asset balance. Because a denial of recovery of this regulatory asset would harm customers, the Commission reluctantly finds that it should approve, *ex post facto*, for ratemaking purposes, the booking and amortization associated with the

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<sup>54</sup> Case No. 2016-00180, *Application of Kentucky Power Company for an Order Approving Accounting Practices to Establish Regulatory Assets and Liabilities Related to the Extraordinary Expenses Incurred by Kentucky Power Company in Connection with Two 2015 Major Storm Events* (Ky. PSC Nov. 3, 2016) at 9.

regulatory asset established for the Spurlock 2019 major maintenance expenses. However, this approval after the fact does not impact the reality that EKPC violated a Commission Order when it booked this regulatory asset without prior Commission approval. Therefore, the Commission also finds that a future, separate proceeding should be established, with EKPC’s officers and directors named as parties, so that the issue of the violation of a Commission Order may be properly investigated.

Revenue Requirement Summary

After considering the pro forma adjustment to the amortization of the Cancelled Smith 1 regulatory asset in addition to the reduction of rate case expense to actual expenditures, EKPC’s adjusted Required Revenue Increase from Base Rates is as follows:

	Commission Adjustments
Increase Stipulated in Settlement Proposal	\$ 38,343,000
Decrease to Normalize Amortization Period of Smith 1 Regulatory Asset to Test Year Level	(1,911,276)
Decrease Rate Case Expense to Filed Actuals	(72,501)
Less: Gross Up	(3,968)
Required Revenue Increase from Base Rates	36,355,255

REVENUE ALLOCATION AND RATE DESIGN

Cost of Service Study (COSS) and Revenue Allocation

EKPC performed a COSS based on actual plant, expense, and revenue data for the 2019 test year together with pro forma test year adjustments. EKPC’s COSS applies an Average and Excess Demand (AED) production cost allocation methodology as a means of classifying production plant and to allocate the demand-related production costs to rate classes. The Attorney General/KIUC’s witness, Stephen J. Baron, filed testimony asserting that the filed COSS contained three errors. First, Mr. Baron stated that EKPC

erroneously applied 15 minute coincident peak demands to allocate production demand and transmission costs for all rate classes except for Nucor, where 15-minute billing demands were applied.<sup>55</sup> Mr. Baron argued that hourly demands are the basis for generation and transmission planning and thus should be applied.<sup>56</sup> Second, Mr. Barron noted that the AED methodology was incorrectly applied to the COSS and this error resulted in double counting of the excess demand.<sup>57</sup> Third, Mr. Baron averred that the COSS failed to annualize the Nucor expansion.<sup>58</sup> This expansion was online for only one month of the 2019 test year, and EKPC used this one month as the peak expense allocator resulting in a larger expense being allocated to Nucor.<sup>59</sup> Baron also included recommendations to include the Fuel Adjustment Clause (FAC) and ES in the COSS as its removal fails to reflect the cost imbalances associated with different on-peak and off-peak usage patterns among the rate classes.<sup>60</sup>

In response, EKPC provided a revised COSS with adjustments made to correct for the three primary errors alleged by Mr. Baron, concurring that the revisions are consistent with industry and EKPC practice.<sup>61</sup> EKPC rejected the proposed adjustments regarding

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<sup>55</sup> Direct Testimony of Stephen J. Baron (Baron Direct Testimony) (filed July 29, 2021) at 10.

<sup>56</sup> Baron Direct Testimony at 13.

<sup>57</sup> *Id.* at 19.

<sup>58</sup> *Id.* at 9.

<sup>59</sup> *Id.* at 25.

<sup>60</sup> *Id.* at 29; and Attorney General/Nucor's Post-Hearing Brief (filed Aug. 24, 2021) at 4–5.

<sup>61</sup> Rebuttal Testimony of Richard J. Macke (Macke Rebuttal Testimony) (filed July 28, 2021), Exhibit RJM-4.

the FAC and ES stating that it is not necessary or consistent with prior treatment of the standalone recovery mechanism of the FAC by the Commission.<sup>62</sup>

The results of the revised COSS illustrate the amount of cross-subsidization between the rate classes.<sup>63</sup> The revised COSS indicated no existing revenue requirement deficiency for Rates B, C, or TGP. The results for Rate G estimated a revenue deficiency. For Rate Class E, the COSS results indicated that approximately 95 percent of the increase was necessary to cover the cost to serve. The Settlement allocates 2.6 percent of the revenue increase to Rates B, C, and G, Special Contract, and Steam with the remaining revenue allocated to Rate E.

The Commission accepts EKPC's revised COSS and EKPC's proposal to use the AED method as a guide to determining revenue allocation. The Commission recognizes that the Settlement does not follow the COSS results and thus continues to allow for the alleged cross-subsidization between the rate classes. The Commission also recognizes that the class which benefits from the Settlement's revenue allocation, Rate Class E, contains the bulk of the sales and is comprised of residential and commercial end-use customers. Therefore, the Commission finds that, while the revenue allocation included in the Settlement does not necessarily align with the revised COSS, it reduces the increase to Rate E and this benefit will accrue to the majority of the end-use customers and the residential class, and therefore finds the Settlement revenue allocation to be reasonable.

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<sup>62</sup> Macke Rebuttal Testimony at 6.

<sup>63</sup> Macke Rebuttal Testimony, Exhibit RJM-4 at 17.

Consistent with the spirit of the Settlement, the Commission finds that the reduction in EKPC's Settlement revenue increase, as found reasonable elsewhere in this Order, should be allocated to Rate Class E with all other Rate Classes remaining unchanged from the allocation set forth in the Settlement. Based on the reduction in EKPC's Settlement revenue increase, the Commission finds that the revenue increase should be allocated as follows:

Line No.	Description	Present Rates	Commission Adjustment		
		Amount	Amount	Increase	As Percent
1		\$	\$	\$	
2	<b><u>Totals Revenues by Rate</u></b>				
3	Rate B	59,815,719	61,364,392	1,548,673	2.6%
4	Rate C	17,153,311	17,605,550	452,238	2.6%
5	Rate E	664,081,280	696,480,246	32,326,320	4.9%
6	Rate G	25,516,274	26,179,595	663,320	2.6%
7	Contract	41,786,791	42,872,821	1,086,030	2.6%
8	Steam	10,716,264	10,994,937	278,674	2.6%
9	Rate TGP	6,349,849	6,349,849	-	0.0%
10	<b>Sub-Total COS Based Revenues</b>	825,419,487	863,762,487	36,355,255	4.4%
11	Rate H	49,170	49,170		0.0%
12	DSM Riders	(1,109,853)	(1,109,853)		0.0%
13	<b>Total Revenues by Rate</b>	824,358,804	862,701,804	\$ 36,355,255	4.4%

### Rate Design

The revised COSS illustrated that current demand rates are below cost to serve as compared to energy rates. EKPC proposed a 2:1 ratio for the percent increase to the demand rate to energy rate in order to maintain existing rate design as well as to remove some of the subsidization between the demand and energy rates.<sup>64</sup> EKPC maintained that the proposed rate design avoided rate distortion and possible erosion of EKPC Owner-Member's revenue margin that may result in the pass through of the wholesale rate increase to the Owner-Members.

<sup>64</sup> Application, Exhibit 16, Direct Testimony of Richard J. Macke (filed Apr. 1, 2021) at 18–19.

The Commission finds this proposed rate design to be reasonable as it recognizes the COSS results while balancing the impact upon its Owner-Members and maintains the rate design for Rate E.

### OTHER ISSUES

#### Generation Maintenance Tracker

As discussed above, in the Settlement, the parties accepted the adjustment proposed by Attorney General/Nucor's witness, Lane Kollen, to normalize generation maintenance over a five-year period of 2015–2019. The parties also agreed to a generation maintenance tracking mechanism. EKPC will track and compare the annual actual generation maintenance expenses to the normalized expense in base rates (\$81,067,000). If the annual actual expense is higher than the normalized expense, EKPC will record a regulatory asset for 75 percent of the difference. If the annual actual expense is lower than the normalized expense, EKPC will record a regulatory liability for 75 percent of the difference.

In support of the proposed mechanism, EKPC argued that the calculation of this mechanism is so straightforward that it would be a waste of Commission time and resources to have an annual docket for the generation maintenance expense tracking mechanism. Instead, EKPC would file an annual report whether it would record a regulatory asset or regulatory liability, with supporting calculation. In EKPC's next base rate case, the net accumulated balance would be amortized and either collected from or returned to EKPC Owner-Members.

The Commission is concerned that a wholesale approval of the General Maintenance Tracker as discussed and agreed upon in the Settlement limits Commission

oversight of the regulatory asset/liability accounting that will occur as a result of the tracker. The Commission also recognizes that it has limited staff and resources to establish an annual case to determine the reasonableness of the accounting treatment of the expenditures that would be eligible for the mechanism.

Based upon a review of the case record, the Commission finds that the Generation Maintenance Tracker is reasonable and should be approved, but subject to the condition that EKPC should establish a separate regulatory asset account to record the annual entries. Further, the Commission reserves the right to review the generation maintenance expenses that are eligible for this mechanism when EKPC requests to amortize the regulatory asset or regulatory liability in its next base rate case.

#### Earnings Mechanism

In the Settlement, the parties agreed to an earning mechanism that would return excess margins to customers in the form of a bill credit if EKPC achieves a per book margin in excess of 1.40 TIER in any calendar year. EKPC proposed to file an annual report on or before April 30 each year with the calculation. The parties agreed that the earnings mechanism would remain in place until EKPC's next base rate case.

Also in the Settlement, the parties proposed to allocate the bill credit based upon the percentage of each rate class's total revenue. However, the Settlement was silent as to how the bill credits will be applied, such as by kWh sales or by the number of customer accounts. The Settlement was also silent to the frequency of the bill credit, specifically whether it is a monthly or annual bill credit.

Based upon the case record, the Commission finds that the proposed earnings mechanism is reasonable and should be approved as presented in the settlement. EKPC

should file the annual filing as of April 30. At the time of the first filing, the Commission will initiate a proceeding to review the reasonableness and determine a reasonable frequency for a bill credit and how the bill credits will be applied to customer accounts.

### Depreciation Rates

In the Settlement, the parties agreed that EKPC's depreciation study, depreciation rates, and inclusion of interim retirement and terminal net salvage should be approved as filed. EKPC's last depreciation study was conducted in 2005. In this proceeding, EKPC requested approval of its most recent deprecation study for plant as of December 31, 2019. The 2019 depreciation study including net terminal salvage, interim retirements, and revised service lives.

In rebuttal testimony, EKPC's witness, Mr. Spanos, explained that including net terminal salvage and interim retirements in depreciation is consistent with and approved by the Federal Energy Regulatory Commission's (FERC) USoA.<sup>65</sup> Mr. Spanos further explained that deferring such components results in intergenerational inequity, because those customers who received the benefit of the asset would not be the same customers who pay the cost of those assets.<sup>66</sup>

Also in rebuttal testimony, EKPC's witness, Craig A. Johnson, explained that the basis for the 35-year estimated service lives of Smith Units 1–3 is largely due to the limited availability of replacement parts.<sup>67</sup> Mr. Johnson further explained that there are only seven units similar to Smith Units 1–3 in operation. Mr. Johnson maintained the Smith

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<sup>65</sup> Rebuttal Testimony of John J. Spanos (Spanos Rebuttal Testimony) (filed July 28, 2021) at 2–4.

<sup>66</sup> Spanos Rebuttal Testimony at 5.

<sup>67</sup> Rebuttal Testimony of Craig A. Johnson (Johnson Rebuttal Testimony) (filed July 28, 2021) at 4–6.

Units 1–3 have reduced service lives because there is only one vendor, the original equipment manufacturer (OEM), that supports that type of unit and that the OEM does not manufacture all of the necessary parts of the unit.<sup>68</sup> Mr. Johnson also claimed that the frequency of dispatch of Smith Units 1–3 impacts its service life.<sup>69</sup> EKPC witnesses explained that the basis for the assigned 40-year service lives for Smith Units 4–10 and Bluegrass Station are consistent with the lifespan estimates for similar facilities used by other utilities and are appropriate, supported by an attached summary of the 2020 Form EIA-860 Data included with Mr. Spanos’s rebuttal testimony.<sup>70</sup>

Based upon the case record, the Commission finds that the depreciation study is reasonable and should be approved because the methodology employed in the study is consistent with the FERC USoA definition of depreciation<sup>71</sup> and the USoA General Instruction 22-A.<sup>72</sup>

#### Relief from Reporting Requirements

The parties agreed that the Commission should grant EKPC’s request for relief from certain filing requirements as follows:

1. Monthly financial reporting related to 12-month margins, budgets, TIER, DSC, and variable interest rates on loans that were established in Case Nos. 1995-

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<sup>68</sup> Johnson Rebuttal Testimony at 4–5.

<sup>69</sup> *Id.* at 6.

<sup>70</sup> Spanos Rebuttal Testimony, Attachment\_A-EIA\_Data\_through\_2020.xlsx.

<sup>71</sup> Spanos Rebuttal Testimony at 2.

<sup>72</sup> *Id.* at 3.

00135<sup>73</sup> and 2006-00472.<sup>74</sup> EKPC asserted that the reports are no longer necessary based upon changed circumstances. EKPC explained that the purpose for filing the monthly reports was to monitor the impact of interest rate volatility, dating from 1995, and to monitor EKPC's financial condition, dating from 2007. EKPC contended that, since that time, its financial condition has been significantly improved, and therefore the need to monitor EKPC's monthly financial reporting no longer exists. EKPC asserted that variable interest rates no longer have the volatility present in 1995, and thus monitoring is no longer necessary.

2. Semi-annual reports summarizing the status of mitigation efforts to reduce the balance of the Smith 1 regulatory asset that was established in Case No. 2010-00449.<sup>75</sup> EKPC explained that the mitigation has been completed and that there are no more physical assets to sell or scrap. With nothing further to report, EKPC requests to be relieved of the reporting obligation.

3. Annual report of Dale Station Projects 5 and 10 regulatory assets, detailing the beginning balance, monthly carrying costs, monthly costs by account, and ending balance, that was established in Case No. 2015-00302.<sup>76</sup> EKPC explained that, because

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<sup>73</sup> Case No. 1995-00135, *Application of East Kentucky Power Cooperative, Inc. for the Approval of Financing in the Amount of Approximately \$6,734,000 for Transmission Facilities and System Improvements* (Ky. PSC May 26, 1995).

<sup>74</sup> Case No. 2006-00472, *General Adjustment of Electric Rates of East Kentucky Power Cooperative, Inc.* (Ky. PSC Dec. 5, 2007).

<sup>75</sup> Case No. 2010-00449, *Application of East Kentucky Power Cooperative, Inc. for an Order Approving the Establishment of a Regulatory Asset for the Amount Expended on Its Smith 1 Generating Unit* (Ky. PSC Feb. 28, 2011).

<sup>76</sup> Case No. 2015-00302, *Application of East Kentucky Power Cooperative, Inc. for an Order Approving the Establishment of a Regulatory Asset for the Undepreciated Balance of the William C. Dale Generating Station* (Ky. PSC Feb. 11, 2016).

it seeks to recover the regulatory asset in this case, the need for the monthly report is extinguished if EKPC's request to amortize the regulatory asset is granted.

4. Annual report comparing actual benefits and costs derived from membership in PJM and projected benefits and costs if EKPC was not a member of PJM that was established in Case No. 2012-00169.<sup>77</sup> EKPC maintained that, given the passage of time since the reporting requirement was established, comparing the actual experience to speculation what would have happened if EKPC had not joined PJM is difficult to estimate based on transmission availability assumptions about potential purchases.

5. Annual report of prior calendar year interruptions or change in load of two industrial customers established in Case Nos. 2013-00174<sup>78</sup> and 2015-00422.<sup>79</sup> EKPC asserted that the reporting requirements were established to demonstrate that EKPC could follow its interruptible tariff and whether interruptions impacted the industrial customers. EKPC argued that, based upon successful implementation of interruptible tariffs, the reporting requirement is no longer necessary. Neither of the industrial customers filed an objection to the request.

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<sup>77</sup> Case No. 2012-00169, *Application of East Kentucky Power Cooperative, Inc. to Transfer Functional Control of Certain Transmission Facilities to PJM Interconnection, LLC* (Ky. PSC Dec. 20, 2012).

<sup>78</sup> Case No. 2013-00174, *Application of East Kentucky Power Cooperative, Inc. for Approval of a Special Contract between EKPC, Owen Electric Cooperative, and Gallatin Steel Company* (Ky. PSC Feb. 27, 2014).

<sup>79</sup> Case No. 2015-00422, *Application of East Kentucky Power Cooperative, Inc. for the Approval of a Special Contract* (Ky. PSC March 14, 2016).

6. Annual report on performance of Bluegrass Station that was established in Case No. 2015-00267.<sup>80</sup> EKPC asserted that this reporting requirement resulted from concerns about EKPC's risk exposure to potential penalties arising from PJM's capacity performance rules. EKPC argued that, based upon Bluegrass Station's performance and reliability since 2015, this requirement is no longer needed.

7. Annual report on the consideration given to price elasticity in the forecasted demand, energy, and reserve margin information already provided in relation to the annual resource assessment filed in compliance with Administrative Case No. 387.<sup>81</sup> EKPC maintained that the 2015 study that addresses the issue has not changed and is unlikely to change, and that filing the same information that is unlikely to change is redundant.

Based upon a review of the case record and being otherwise sufficiently advised, the Commission finds that EKPC established good cause to be relieved of the requested reporting requirements, with the exception of the requirement established in Case No. 2012-00169 regarding EKPC's membership in PJM and the requirement established in Case No. 2015-00267 regarding Bluegrass Station. The Commission concludes that the reporting requirements arising from Case Nos. 1995-00135, 2006-00472, 2010-00449, 2015-00302, 2013-00174, and 2015-00422, and from Administrative Case No. 387 have been rendered either unnecessary or moot based upon changed circumstances. By

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<sup>80</sup> Case No. 2015-00267, *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* (Ky. PSC Dec. 1, 2015).

<sup>81</sup> Administrative Case No. 387, *Electronic Review of the Adequacy of Kentucky's Generation Capacity and Transmission System* (Ky. PSC May 13, 2013), Letter from Commission Executive Director.

separate Order, the Commission will relieve all parties in Administrative Case No. 387 from the annual filing requirement related to price elasticity.

The Commission finds that EKPC's request to be relieved of the reporting requirement established in Case No. 2012-00169 regarding its membership in PJM should be denied. The Commission further finds that the reporting requirement should be revised and that, starting in 2022, EKPC should file an annual report identifying benefits and costs that accrue from its PJM membership and comparing these to benefits and costs if EKPC left PJM. This is because the benefits and costs of PJM membership should be monitored to ensure that EKPC Owner-Members, and the Owner-Members' retail customers, accrue actual net benefits from EKPC's PJM membership.

The Commission further finds the request to be relieved of the reporting requirement in Case No. 2015-00267 should be denied because the Commission's concern regarding the risk exposure continues to exist, and thus should be monitored.

#### Demand-Side Management Rider Mechanism

Consistent with requirements established in Case Nos. 2008-00408<sup>82</sup> and 2019-00059,<sup>83</sup> EKPC provided certain information regarding its demand-side management (DSM) programs. Utilities are required to include discussion of cost-effective energy efficiency (EE) resources in each rate case.

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<sup>82</sup> Case No. 2008-00408, *Consideration of the New Federal Standards of the Energy Independence and Security Act of 2007* (Ky. PSC July 24, 2012).

<sup>83</sup> Case No. 2019-00059, *Demand-Side Management Filing of East Kentucky Power Cooperative, Inc.* (Ky. PSC Nov. 26, 2019). The Commission required EKPC to file testimony in its next base rate case supporting the value of the DSM programs to EKPC and supporting recovery of DSM program costs in base rates rather than a rider specific to each Owner-Member to address our concern that including DSM program costs in EKPC's base rates was not transparent to Owner-Members' customers and could result in subsidization between the EKPC's Owner-Members.

EKPC explained that it evaluates new and existing EE resources or programs in the same manner as supply-side resources in its supply-side resource evaluation for EKPC's Integrated Resource Plan.<sup>84</sup> EKPC's current programs include Button-Up Weatherization, Touchstone Energy Home, Community Assistance Resources for Energy Savings, Heat Pump Retrofit, and Energy Star Manufactured Home.<sup>85</sup> EKPC asserted that these programs are cost-effective based upon the industry standard California Tests, specifically the Participant and Total Resource Cost Tests.<sup>86</sup> EKPC and its Owner-Members track costs, participation levels, improvement measures, and energy and demand savings through a Distributed Energy Resource software system.<sup>87</sup> EKPC claimed that they are continually evaluating new DSM technologies, specifically retail level Smart Grid initiatives, and recognize the benefits of a well-designed EE or demand response program.<sup>88</sup>

Regarding DSM cost recovery and program costs, EKPC reviewed the last six year's program costs and base rate recoveries. EKPC calculated that DSM program costs averaged \$7,800,000 while cost recovery averaged \$6,100,000.<sup>89</sup> EKPC noted that cost recovery was close to the \$6,000,000 that was embedded in base rates in Case No. 2010-00167. However, DSM program costs varied from \$3,700,000 to \$10,800,000

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<sup>84</sup> Scott Direct Testimony at 4.

<sup>85</sup> For a complete description of each program, see Application, Exhibit 18, Direct Testimony of Scott Drake (Drake Direct Testimony) (filed Apr. 1, 2021) at 4–5.

<sup>86</sup> Drake Direct Testimony at 5.

<sup>87</sup> See Drake Direct Testimony, Exhibit GSD–1 for the most recent 2019 DSM Report.

<sup>88</sup> Drake Direct Testimony at 7.

<sup>89</sup> Scott Direct Testimony at 39–40.

during the six years because costs depended upon the programs offered, the cost structure of each program, and participation.<sup>90</sup> EKPC then reviewed the relative percentages of cost recovery and program costs by each Owner-Member to determine any possible subsidization. On average, for 10 of the 16 Owner-Members, the relative percentage of cost recovery dollars were within 1.5 percent of the program costs; for three Owner-Members, cost recovery was greater than program costs; and for three Owner-Members, program costs were greater than cost recovery.<sup>91</sup> EKPC maintained that, based on these results, although the possibility of subsidization between the Owner-Members is not eliminated, subsidization was not significant.<sup>92</sup>

EKPC asserted that because it cannot separately identify the residential load portion for Rate E for each Owner-Member, a rider was developed specific to each Owner-Member would present significant logistical issues.<sup>93</sup> Further, EKPC argued that a DSM program budget would have to be developed separately for each Owner-Member rather than holistically, which would be inefficient and more costly.<sup>94</sup> EKPC concluded that because subsidization is minimal, the increased complexity of the budgeting, the addition 16 separate riders and true-up mechanisms, and possible rate volatility do not

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<sup>90</sup> *Id.* at 40.

<sup>91</sup> *Id.* at 40–41.

<sup>92</sup> *Id.* at 41.

<sup>93</sup> *Id.* at 42.

<sup>94</sup> *Id.* at 42–43.

warrant a change in the current rate structure.<sup>95</sup> EKPC determined that recovery of DSM costs through base rates is still an appropriate, fair and reasonable approach.<sup>96</sup>

Based upon a review of the case record, the Commission finds that recovering DSM costs in base rates is reasonable given the increased costs and limited benefits associated with changing the process of DSM cost recovery. As an additional consideration, the Commission notes that, in their respective responses to discovery in their respective pass-through rate cases, the Owner-Members agreed with the current base rate recovery.<sup>97</sup> The Commission directs EKPC to continue evaluating appropriate DSM programs that will minimize the need for more expensive supply-side resources and to continue monitoring the DSM costs between the Owner-Members so that any subsidization continues to be minimal.

## Tariff Changes

### Rate C

In revising Rate B, EKPC added clarifying language to the Minimum Monthly Charge section clarifying that the fuel base per kWh included in the description is the fuel base established in the FAC.<sup>98</sup> EKPC later indicated that making the same change in Rate C would also provide clarity to the tariff.<sup>99</sup> The Commission finds that the Minimum

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<sup>95</sup> *Id.* at 43.

<sup>96</sup> *Id.*

<sup>97</sup> See, e.g., Case No. 2021-00104, *Electronic Application of Big Sandy Rural Electric Cooperative Corporation for Pass-Through of East Kentucky Power Cooperative, Inc. Wholesale Rate Adjustment* (filed May 27, 2021), Big Sandy RECC Response to Commission Staff's First Request for Information, Item 1.

<sup>98</sup> Scott Direct Testimony at 35.

<sup>99</sup> EKPC's Response to Commission Staff's Second Request for Information (Staff's Second Request) (filed May 28, 2021), Item 1.

Monthly Charge section of Rate C should be revised to clarify that the fuel base per kWh included in the description is the fuel base established in the FAC.

### Rate G

EKPC proposed to establish a minimum demand of 15,000 kW for Rate G, indicating that it has generally limited offering Rate G to owner-members and retail members with a minimum demand of 15,000 kW.<sup>100</sup> EKPC indicated that during its 2008 base rate case, it was advised by consultants that, based on the configuration of rates, the Rate G minimum demand should not go below 15,000 kW.<sup>101</sup> In preparing the instant proceeding, EKPC indicated that it realized that a minimum demand should be established for Rate G and they set the minimum demand at the level it had been following for the last decade or more.<sup>102</sup> EKPC stated that it made exceptions to the informal demand limit in the past and that if circumstances warranted, EKPC would still grant exceptions and work them into special contracts.<sup>103</sup> With EKPC indicating that it is willing to make exceptions to the minimum demand limit, the Commission concludes that instead of setting a limit in the tariff, such decisions should be made when negotiating a special contract. Therefore, the Commission finds that adding a minimum demand limit to the tariff is unreasonable and should be rejected.

EKPC also proposed to include a provision in Rate G that would allow for the possibility of a temporary waiver of the ratchet provision for new or expanding loads.<sup>104</sup>

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<sup>100</sup> Scott Direct Testimony at 36.

<sup>101</sup> EKPC's Response to Staff's Second Request, Item 19.

<sup>102</sup> *Id.*

<sup>103</sup> August 3, 2021 Hearing Video Transcript (HVT) at 11:36:08.

<sup>104</sup> Scott Direct Testimony at 36.

EKPC explained that new customers and existing customers expanding their operations usually experience an initial ramping up period of a year or more. During this period, the actual loads can fluctuate from month to month rather than showing a consistent build up. EKPC states that it is reasonable to temporarily waive the ratchet provisions during a customer's ramping up period to allow them to settle into normal operating conditions.<sup>105</sup>

While the Commission concludes that it may be reasonable to temporarily waive the ratchet provision for new customers or existing customers expanding their operations who will be served under Rate G, the Commission does not conclude that such a provision should be part of a tariff. Such waivers can be included in a special contract with a new customer or existing customer expanding their operations to be served under Rate G. Because these contracts must be filed with the Commission, the Commission can ascertain whether such a provision is reasonable on a case-by-case basis. For these reasons, the Commission finds that adding a provision to Rate G allowing for the possibility of a temporary waiver of the ratchet provision for new or expanding loads is unreasonable and should be rejected.

Finally, EKPC indicated that revising the Minimum Monthly Charge section of Rate G to clarify that the base fuel component included in the description is the fuel base established in the FAC would bring clarity to the tariff.<sup>106</sup> The Commission finds that the Minimum Monthly Charge section of Rate G should be revised to clarify that the base fuel component included in the description is the fuel base established in the FAC.

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<sup>105</sup> EKPC's Response to Staff's Second Request, Item 20.

<sup>106</sup> *Id.*, Item 3.

Rate H – Wholesale Renewable Energy Program

In its initial application in this proceeding, EKPC filed a revised Rate H, Wholesale Renewable Energy Program, to reflect the discontinuance of Rate A and a minor text revision in the Applicability section. EKPC later discovered that the version of Rate H filed with the application was the tariff that was in effect prior to March 25, 2020, which was when Rate H was amended and approved by the Commission in Case No. 2019-00378.<sup>107</sup> On May 20, 2021, EKPC made a Notice of Filing to replace the version of Rate H filed with the application with the correct version of Rate H. The Commission finds that the replacement of the version of Rate H filed with the application with the updated version of Rate H is reasonable and should be approved.

Wholesale Power Invoice

EKPC proposed to revise the Nucor Wholesale Power Invoice to provide for additional metering data points and the deletion of references to certain bill credits that will no longer be in effect. Specifically, EKPC indicated that the addition of “CPS1” and “12 Mo” were references to earlier contract provisions that are no longer in effect. Therefore, EKPC requested that the Commission permit it to withdraw the addition of those two items to the Nucor Wholesale Power Invoice. The Commission finds that EKPC’s request to remove the references to “CPS 1” and “12 Mo” is reasonable and should be approved.

IT IS THEREFORE ORDERED that:

1. The rates and charges proposed by EKPC are denied.

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<sup>107</sup> Case No. 2019-00378, *Electronic Tariff Filing of East Kentucky Power Cooperative, Inc. to Implement a New Green Energy Option for Non-Residential Retail Customers* (Ky. PSC Mar. 25, 2020).

2. The provisions in the Settlement, as set forth in Appendix A to this Order, are approved subject to the adjustments approved in this Order.

3. The rates and charges for EKPC, as set forth in Appendix B to this Order, are fair, just and reasonable rates for EKPC, and are approved for service rendered on and after October 1, 2021.

4. EKPC is authorized to amortize the Smith 1, Dale ES Projects 5 and 10, Dale Asbestos ARO, and Spurlock Maintenance regulatory assets as set forth in this Order.

5. EKPC is authorized to establish a Generation Maintenance Tracker as outlined in the Settlement, but, as a term of the establishment of the tracker, EKPC shall establish a separate regulatory asset account to record the annual entries. The Commission reserves the right to review the generation maintenance expenses that are eligible for this mechanism upon such time that EKPC requests to amortize the regulatory asset or regulatory liability in its next base rate case.

6. The earnings mechanism outlined in the Settlement is approved as filed. EKPC shall file its first annual filing no later than April 30. The Commission will initiate a proceeding at that time to review the reasonableness and determine a reasonable frequency for a bill credit and how the bill credits will be applied to customer accounts.

7. The depreciation study filed by EKPC in the application is approved and the service lives and salvage values therein are approved for EKPC's depreciable assets on and after the date of this Order.

8. EKPC's request to be relieved of reporting requirements set forth in Case Nos. 1995-00135, 2006-00472, 2010-00449, 2015-00302, 2013-00174, and 2015-00422 is granted.

9. EKPC's request to be relieved of price elasticity reporting requirements set forth in Administrative Case No. 387 is granted.

10. EKPC's request to be relieved of reporting requirements established in Case No. 2012-00169 is denied. EKPC's reporting requirement its PJM membership is modified as set forth above. Beginning in 2022, EKPC shall file a report by May 31 each year identifying benefits and costs that accrue from its PJM membership and comparing them to benefits and costs if EKPC left PJM.

11. EKPC's request to be relieved of reporting requirements established in Case No. 2015-00267 is denied.

12. EKPC's revised proposal to amend the Minimum Monthly Charge section of Rate C is approved.

13. EKPC's proposal to establish a minimum demand of 15,000 kW for Rate G, is denied.

14. EKPC's proposal to add a provision to Rate G allowing for the possibility of a temporary waiver of the ratchet provision for new or expanding loads is denied.

15. EKPC's revised proposal to amend the Minimum Monthly Charge section of Rate G is approved.

16. EKPC's revised proposal to replace the version of Rate H filed with the application with the updated version of Rate H is approved.

17. EKPC's revised proposal to remove the references to "CPS 1" and "12 Mo" is approved.

18. Except for the tariffs that have been modified or denied in this Order, EKPC's proposed tariffs as originally filed and revised by the Settlement are approved as filed.

19. EKPC shall continue to recover DSM costs in base rates.

20. Within 20 days of the date of this Order, EKPC shall file with the Commission, using the Commission's electronic Tariff Filing System, its revised tariffs as set forth in this Order reflecting that they were approved pursuant to this Order.

21. This case is closed and removed from the Commission's docket.

By the Commission



ATTEST:

  
Executive Director

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE  
COMMISSION IN CASE NO. 2021-00103 DATED SEP 30 2021

FORTY-FOUR PAGES TO FOLLOW  
Stipulation and Settlement Agreement

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

<b>ELECTRONIC APPLICATION OF EAST KENTUCKY</b>	)	
<b>POWER COOPERATIVE, INC. FOR A GENERAL</b>	)	
<b>ADJUSTMENT OF RATES, APPROVAL OF</b>	)	<b>CASE NO.</b>
<b>DEPRECIATION STUDY, AMORTIZATION OF</b>	)	<b>2021-00103</b>
<b>CERTAIN REGULATORY ASSETS, AND OTHER</b>	)	
<b>OTHER GENERAL RELIEF</b>	)	

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JOINT STIPULATION, SETTLEMENT  
AGREEMENT AND RECOMMENDATION

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On April 1, 2021, East Kentucky Power Cooperative, Inc. (“EKPC”) tendered its Application with the Kentucky Public Service Commission (“Commission”), pursuant to KRS 278.180, KRS 278.190 and other applicable law, for an adjustment of its wholesale rates, approval of a depreciation study, amortization of certain regulatory assets and other general relief (“Application”). The Application was accepted for filing on April 6, 2021. Motions for intervention by the Attorney General (“AG”), Nucor Steel Gallatin (“Nucor”) and AppHarvest Morehead Farm, LLC (“AppHarvest”) were granted on March 5, 2021, March 25, 2021 and April 27, 2021, respectively. EKPC, the AG, Nucor and AppHarvest are collectively referred to herein as the “Parties.” The Parties have filed testimony supporting their respective positions relating to EKPC’s Application. The Parties and the Commission Staff have also engaged in substantial discovery of the Parties’ respective positions by issuing numerous information requests to which the Parties have responded.

The Parties, representing diverse interests and viewpoints, have reached a complete settlement of all the issues raised in this proceeding and have executed this Joint Stipulation,

Settlement Agreement and Recommendation (“Stipulation”) for purposes of documenting and submitting their agreement to the Commission for consideration and approval. It is the intent and purpose of the Parties to express their agreement on a mutually satisfactory resolution of all issues in the instant proceeding.

The Parties understand that this Stipulation is not binding upon the Commission, but believe it is entitled to careful consideration by the Commission. The Parties agree that this Stipulation, viewed in its entirety, constitutes a reasonable resolution of all issues in this proceeding. The Parties request that the Commission issue an Order approving this Stipulation in its entirety pursuant to KRS 278.190, including the rate increase, rate structure, depreciation study, amortization of regulatory assets, relief from certain existing reporting obligations, approval of textual changes to tariffs and recovery of rate case expense as described herein. The request is based upon the belief that the Parties’ participation in settlement negotiations and the materials on file with the Commission adequately support this Stipulation. Adoption of this Stipulation will eliminate the need for the Commission and the Parties to expend significant resources in litigation of this proceeding and will eliminate the possibility of, and any need for, rehearing or appeals of the Commission’s final Order herein.

NOW, THEREFORE, for and in consideration of the mutual premises set forth above and the terms and conditions set forth herein, the Parties agree as follows:

1. Revenue Increase: The Parties agree that EKPC’s adjusted base rate revenue requirement is \$481.565 million. This represents an increase of \$38.343 million over the test year revenue that would be collected at current rates. A summary of the adjustments agreed to by the Parties to arrive at this revenue increase are set forth in Exhibit A to this Stipulation.

2. Revenue Allocation. The Parties agree that that the foregoing revenue requirement will be allocated as follows:

Rate Class	Increase in Dollars	Percentage Increase
Rate E	\$34,314,065	5.20%
Rate B	\$1,548,673	2.60%
Rate C	\$452,238	2.60%
Rate G	\$663,320	2.60%
Contract Steam	\$278,674	2.60%
Large Special Contract	\$1,086,030	2.60%
Pumping Stations	\$0	0.00%
Total	\$38,343,000	

3. Base Rate Times Interest Earned Ratio (“TIER”) Ratio: The Parties agree that EKPC should be authorized to continue to earn a 1.50 TIER for base rates.

4. Environmental Surcharge: The Parties agree that EKPC’s TIER for its environmental surcharge should be reduced to 1.475. The Parties further agree that all changes for depreciation rates, interest expense for Construction Work in Progress (“CWIP”), and TIER would first be reflected in the monthly surcharge filing for the Expense Month of October 2021, which will be filed with the Commission on November 19, 2021. The Parties understand that the adjustments to CWIP and TIER will reduce revenues collected by EKPC through the environmental surcharge by \$7.1 million annually.

5. Generation Maintenance Regulatory Asset/Liability. The Parties agree that the normalized generation maintenance expense reflected in Exhibit A is \$81.067 million per year. Beginning with calendar year 2022, and in each year thereafter, EKPC will track its actual generation maintenance expense and record a regulatory asset for seventy-five percent (75%) of all expenses in excess of the normalized amount and, if the actual annual generation maintenance expense is less than the normalized generation maintenance expense, record a regulatory liability for seventy-five percent (75%) of the difference between the actual annual generation maintenance

expense and the normalized generation maintenance expense. EKPC agrees to make an annual filing with the Commission (on or before April 30<sup>th</sup> of each year) which sets forth its calculation of any regulatory asset or liability recorded for the prior year, and including a cumulative net calculation of all such assets or liabilities. In EKPC's next base rate case, the cumulative regulatory asset or regulatory liability shall be amortized and either recovered from, or returned to, EKPC's Owner-Members as appropriate over a reasonable period of time.

6. Earnings Mechanism: The Parties agree that EKPC should return any excess margins to its Owner-Members for contemporaneous pass-through to ratepayers in the form of a bill credit in the event that EKPC achieves per book margin in excess of a 1.40 TIER in any calendar year. Any excess margins will be returned to EKPC's Owner-Members for contemporaneous pass-through to ratepayers in the form of a bill credit that is allocated based upon the percentage of each rate class's total revenue for the most recent calendar year. EKPC agrees to make an annual filing with the Commission which sets forth its calculations of margins and any required bill credit on or before April 30<sup>th</sup> of each year. This earnings mechanism will remain in place until EKPC's base rates are next adjusted. EKPC will file a tariff for Commission review within thirty (30) days of the Commission entering a final Order approving this Stipulation.

7. AppHarvest Matters:

a. Demand Response: EKPC agrees to work in good faith with AppHarvest to develop a demand response program whereby AppHarvest will be able to participate in PJM Interconnection, LLC's ("PJM") demand response program with EKPC acting as its Curtailment Service Provider. EKPC shall charge a reasonable administrative fee to cover its costs for any such program. The use of the term "demand response" in this section includes, but is not limited

to, energy efficiency programs. Any program developed by AppHarvest and EKPC must be submitted to and approved by the Commission prior to being implemented.

b. AgriTech Tariff: EKPC agrees to work in good faith with AppHarvest to develop an AgriTech Tariff that considers the unique energy requirements of large scale indoor agricultural technology. In particular, but without limitation, the Parties will study whether a reasonable and cost-effective commercial and industrial energy efficient lighting program similar to the general commercial and industrial lighting demand side management program that was terminated by EKPC in 2019 may be reinstated in this context. Any AgriTech Tariff must be submitted to and approved by the Commission.

c. Pass-Through Rate Mechanism: Nothing in this Stipulation limits the ability of AppHarvest to litigate the issues it raised in the pass-through case filed by Fleming-Mason Energy Cooperative, Inc. and docketed by the Commission as Case No. 2021-00109.

8. TGP Special Contract: The Parties agree that EKPC shall inquire and consult with Fleming-Mason Energy Cooperative, Inc. and Taylor County Rural Electric Cooperative Corporation regarding the status and reasonableness of two Special Industrial Power Agreements with Tennessee Gas Pipeline Company.

9. Other Items: The Parties agree that, except as limited herein, all other requests in EKPC's Application should be approved, including, without limitation:

a. Depreciation Study: EKPC's depreciation study and related accounting treatments should be approved with an effective date for the new depreciation rates to be the same day that EKPC's new rates become effective.

b. Amortization of Certain Regulatory Assets: The four regulatory assets identified in EKPC's Application are acknowledged to be included within its revenue requirement and will be approved as proposed:

i. Cancellation of the Smith Unit 1 generation station authorized in Case No. 2010-00449, consistent with the provisions of the Stipulation Agreement approved in Case No. 2015-00358;

ii. Retirement of the William C. Dale Generation Station ("Dale Station"), specifically certain assets recovered through EKPC's environmental surcharge, pursuant to the Commission's Order in Case No. 2015-00302;

iii. Depreciation and accretion expense associated with the Dale Station asbestos abatement asset retirement obligation, pursuant to Case No. 2014-00432; and

iv. 2019 Major Maintenance expenses at the Spurlock generation station, as permitted by the Rural Utilities Service accounting treatment and consistent with the Commission's Order in Case No. 2019-00146.

c. Relief From Certain Existing Reporting Obligations: EKPC should no longer be required to make certain informational filings with the Commission that appear to be obsolete:

i. Monthly financial reporting relating to twelve (12) month margins, budgets, the calculation of twelve (12) month TIER and Debt Service Coverages ("DSC") and variable interest rates on outstanding loans;

ii. Semi-Annual reports summarizing the status of mitigation efforts to reduce the balance of the Smith 1 regulatory asset;

iii. Annual Report of Dale Station Projects 5 and 10 and Regulatory Asset Authority;

iv. Annual comprehensive report detailing transmission rights, hedging strategies, and PJM benefits and costs;

v. Annual report detailing the prior calendar year's interruptions or change in load of Nucor Gallatin Steel;

vi. Annual operating reports setting forth details of the performance of the Bluegrass Station;

vii. Annual report detailing the prior calendar year's interruption of AGC; and

viii. Annual report discussing the consideration given to price elasticity in the forecasted demand, energy and reserve margin information already provided in relation to the annual resource assessment filed in compliance with Administrative Case 387;

d. Tariff Changes: The Parties agree all proposed textual changes to EKPC's tariffs should be approved as set forth in the Application.

e. Rate Case Expense: The Parties agree that EKPC should be authorized to recover its reasonable rate case expense (final amount to be filed within fifteen days following the conclusion of any hearing on EKPC's Application) on an amortized basis over three (3) years.

10. Proof of Revenue: Attached to this Stipulation as Exhibit B are updated tariffs that reflect the revenue requirement and revenue allocation set forth herein. Attached to this Stipulation as Exhibit C are proof-of-revenue sheets, showing that the rates set forth in Attachment B, plus projected off-system sales, leased property income and other operating revenues, will generate the

revenue needed to recover the Company's test year revenue requirement to which the Parties have agreed.

11. Filing of Stipulation: Following the execution of this Stipulation, the Parties shall cause the Stipulation to be filed with the Commission with a request to the Commission for consideration and approval of this Stipulation so that EKPC may begin billing under the approved adjusted rates for service rendered on and after October 1, 2021.

12. Commission Approval: The Parties to this Stipulation shall act in good faith and use their best efforts to recommend to the Commission that this Stipulation be accepted and approved. Each Party hereto waives all cross-examination of the witnesses of the other Party hereto except in support of the Stipulation or unless the Commission fails to adopt this Stipulation in its entirety. Each Party further stipulates and recommends that the Notice of Intent, Notice, Application, direct testimony, rebuttal testimony, pleadings and responses to data requests filed in this proceeding be admitted into the record. The Parties further agree and intend to support the reasonableness of this Stipulation before the Commission, and to cause their counsel to do the same in this proceeding and in any appeal from the Commission's adoption and/or enforcement of this Stipulation. If the Commission issues an order adopting this Stipulation in its entirety, each of the Parties hereto agrees that it shall file neither an application for rehearing with the Commission, nor an appeal to the Franklin County Circuit Court with respect to such order.

13. Effect of Non-Approval: If the Commission does not accept and approve this Stipulation in its entirety or imposes any additional conditions or requirements upon the signatory Parties, then: (a) any Party may elect, in writing docketed in this proceeding, within ten (10) days of such Commission Order, that this Stipulation shall be void and withdrawn by the Parties hereto from further consideration by the Commission and neither Party shall be bound by any of the

provisions herein; and (b) each Party shall have the right, within twenty (20) days of the Commission's Order, to file a petition for rehearing, including a notice of termination of and withdrawal from the Stipulation; and, (c) in the event of such termination and withdrawal of the Stipulation, neither the terms of this Stipulation nor any matters raised during the settlement negotiations shall be binding on any of the signatory Parties to this Stipulation or be construed against any of the signatory Parties. Should the Stipulation be voided or vacated for any reason after the Commission has approved the Stipulation and thereafter any implementation of the terms of the Stipulation has been made, then the Parties shall be returned to the *status quo* existing at the time immediately prior to the execution of this Stipulation.

14. Commission Jurisdiction: This Stipulation shall in no way be deemed to divest the Commission of jurisdiction under Chapter 278 of the Kentucky Revised Statutes.

15. Successors and Assigns: This Stipulation shall inure to the benefit of and be binding upon the Parties hereto, their successors and assigns.

16. Complete Agreement: This Stipulation constitutes the complete agreement and understanding among the Parties hereto, and any and all oral statements, representations or agreements made prior hereto or contained contemporaneously herewith shall be null and void and shall be deemed to have been merged into this Stipulation.

17. Implementation of Stipulation: For the purpose of this Stipulation only, the terms are based upon the independent analysis of the Parties to reflect a just and reasonable resolution of the issues herein and are the product of compromise and negotiation. Notwithstanding anything contained in the Stipulation, the Parties recognize and agree that the effects, if any, of any future events upon the operating income of EKPC are unknown and this Stipulation shall be implemented as written.

18. Admissibility and Non-Precedential Effect: Neither the Stipulation nor any of the terms set forth herein shall be admissible in any court or administrative agency, including the Commission, except insofar as such court or agency is addressing litigation arising out of the implementation of the terms herein or the approval of this Stipulation. This Stipulation shall not have any precedential value in this or any other jurisdiction.

19. No Admissions: Making and entering into this Stipulation shall not be deemed in any respect to constitute an admission by any Party that any computation, formula, allegation, assertion or contention made by any Party in these proceedings is true or valid. Nothing in this Stipulation shall be used or construed for any purpose to imply, suggest or otherwise indicate that the results produced through the compromise reflected herein represent fully the objectives of a Party.

20. Authorizations: The signatories hereto warrant that they have informed, advised, and consulted with the respective Parties hereto in regard to the contents of this Stipulation, and based upon the foregoing, are authorized to execute this Stipulation on behalf of the Parties hereto.

21. Commission Approval: This Stipulation is subject to the acceptance of and approval by the Commission.

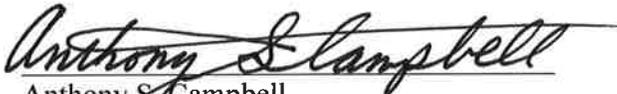
22. Interpretation of Stipulation: This Stipulation is a product of negotiation among all Parties hereto, and no provision of this Stipulation shall be strictly construed in favor of or against any Party.

23. Counterparts: This Stipulation may be executed in multiple counterparts.

24. Future Proceedings: Nothing in this Stipulation shall preclude, prevent or prejudice any Party hereto from raising any argument/issue or challenging any adjustment in any future rate case proceeding of EKPC.

IN WITNESS WHEREOF, this Stipulation has been agreed to and is effective as of this 29<sup>th</sup> day of July, 2021. By affixing their signatures below, the undersigned Parties respectfully request the Commission to issues its Order approving and adopting this Stipulation the Parties hereto have hereunto affixed their signatures.

EAST KENTUCKY POWER COOPERATIVE, INC.

BY:   
Anthony S. Campbell  
President and Chief Executive Officer

ATTORNEY GENERAL DANIEL CAMERON

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

NUCOR STEEL GALLATIN

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

APPHARVEST MOREHEAD FARM, LLC

BY: \_\_\_\_\_

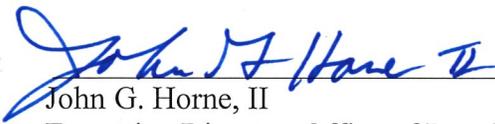
TITLE: \_\_\_\_\_

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EAST KENTUCKY POWER COOPERATIVE, INC.

BY: \_\_\_\_\_  
Anthony S. Campbell  
President and Chief Executive Officer

ATTORNEY GENERAL DANIEL CAMERON

BY:  \_\_\_\_\_  
John G. Horne, II  
Executive Director, Office of Rate Intervention

NUCOR STEEL GALLATIN

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

APPHARVEST MOREHEAD FARM, LLC

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

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EAST KENTUCKY POWER COOPERATIVE, INC.

BY: \_\_\_\_\_  
Anthony S. Campbell  
President and Chief Executive Officer

ATTORNEY GENERAL DANIEL CAMERON

BY: \_\_\_\_\_  
TITLE: \_\_\_\_\_

NUCOR STEEL GALLATIN

BY: Mill P. Kunt  
TITLE: Counsel for NUCOR

APPHARVEST MOREHEAD FARM, LLC

BY: \_\_\_\_\_  
TITLE: \_\_\_\_\_

IN WITNESS WHEREOF, this Stipulation has been agreed to and is effective as of this 29<sup>th</sup> day of July, 2021. By affixing their signatures below, the undersigned Parties respectfully request the Commission to issues its Order approving and adopting this Stipulation the Parties hereto have hereunto affixed their signatures.

EAST KENTUCKY POWER COOPERATIVE, INC.

BY: \_\_\_\_\_  
Anthony S. Campbell  
President and Chief Executive Officer

ATTORNEY GENERAL DANIEL CAMERON

BY: \_\_\_\_\_  
TITLE: \_\_\_\_\_

NUCOR STEEL GALLATIN

BY: \_\_\_\_\_  
TITLE: \_\_\_\_\_

APPHARVEST MOREHEAD FARM, LLC

BY:  \_\_\_\_\_  
TITLE: Chief Financial Officer

**Exhibit A**

**Summary of Revenue Adjustments**

Amount (Millions)	Description
\$48.984	Original Revenue Requirement Calculated by EKPC
(\$6.592)	Normalize Generation Maintenance over Five Most Recent Years (2015-2019)
(\$1.914)	General Plant Reserve Surplus Amortized Over 5 Years
(\$2.315)	Reduce Interest Expense on Environmental Construction Work in Progress Currently Being Recovered for the Spurlock CCR/ELG in the Environmental Surcharge Mechanism
<hr/> \$38.343	Adjusted Revenue Requirement Calculation Agreed to by Parties

**Exhibit B  
Revised Tariff Sheets**

**Rate B**

**Applicability**

In all territories of owner-member cooperatives ("owner-members") of East Kentucky Power Cooperative, Inc. ("EKPC").

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**Availability**

Available to owner-members and end-use retail members ("retail members") willing to execute EKPC-approved contracts for demands of 500 kW or greater and a monthly minimum energy usage equal to or greater than 400 hours per kW of contract demand. Wholesale monthly contract demand shall be agreed between the owner-member and EKPC. The electric power and energy furnished hereunder shall be separately metered for each point of delivery.

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**Monthly Rate**

Demand Charge per kW of Contract Demand	\$7.49	T I
Demand Charge per kW of Billing Demand in Excess of Contract Demand	\$9.98	T
Energy Charge per kWh	\$.039884	I

**Billing Demand**

The billing demand shall be the contract demand plus any excess demand. Excess demand occurs when the retail member's highest demand during the current month, coincident with EKPC's system peak (coincident peak), exceeds the contract demand. EKPC's system peak demand is the highest average rate at which energy is used during any fifteen(15)-minute interval in the below listed hours for each month and adjusted for power factor as provided herein:

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T

<u>Months</u>	<u>Hours Applicable for Demand Billing - EPT</u>
October through April	7:00 a.m. to 12:00 noon 5:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

**Minimum Monthly Charge**

- The minimum monthly charge shall not be less than the sum of (a) and (b) below:
- a. The product of the contract demand multiplied by the demand charge, plus
  - b. The product of the contract demand multiplied by 400 hours and the energy charge per kWh minus the fuel base per kWh as established in the Fuel Adjustment Clause.

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DATE OF ISSUE: April 1, 2021

DATE EFFECTIVE: Service rendered on and after May 1, 2021

ISSUED BY:   
Anthony S. Campbell,  
President and Chief Executive Officer

Rate C

Applicability

In all territories of owner-member of EKPC.

T

Availability

Available to owner-members and retail members willing to execute EKPC-approved contracts for demands of 500 kW or greater and a monthly minimum energy usage equal to or greater than 400 hours per kW of billing demand. The electric power and energy furnished hereunder shall be separately metered for each point of delivery.

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Monthly Rate

Demand Charge per kW of Billing Demand	\$7.49	I
Energy Charge per kWh	\$.039884	I

Billing Demand

The billing demand shall be the greater of (a) or (b) listed below:

T

- a. The contract demand; or
- b. The retail member's highest demand during the current month or preceding eleven months coincident with EKPC's system peak demand. EKPC's system peak demand is the highest average rate at which energy is used during any fifteen (15)-minute interval in the below listed hours for each month and adjusted for power factor as provided herein:

T

<u>Months</u>	<u>Hours Applicable for Demand Billing - EPT</u>
October through April	7:00 a.m. to 12:00 noon 5:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

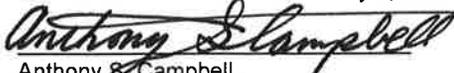
Minimum Monthly Charge

The minimum monthly charge shall not be less than the sum of (a) and (b) below:

- a. The product of the billing demand multiplied by the demand charge, plus
- b. The product of the billing demand multiplied by 400 hours and the energy charge per kWh minus the fuel base per kWh.

DATE OF ISSUE: April 1, 2021

DATE EFFECTIVE: Service rendered on and after May 1, 2021

ISSUED BY:   
Anthony S. Campbell,  
President and Chief Executive Officer

**Rate E**

**Applicability**

In all territories of owner-member of EKPC.

T

**Availability**

Available to all owner-members of EKPC for all power usage at the load center not subject to the provisions of Rate B, Rate C, or Rate G of this tariff and special contract participants. The electric power and energy furnished hereunder shall be separately metered for each point of delivery.

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**Monthly Rate - Per Load Center**

An owner-member may select either Option 1 or Option 2 of this section of the tariff to apply to all load centers. The owner-member must remain on a selected option for at least one (1) year and may change options, no more often than every twelve (12) months, after giving a minimum notice of two (2) months advance notice of an election to change options.

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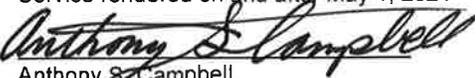
	<u>Option 1</u>	<u>Option 2</u>	
Demand Charge per kW of Billing Demand	\$8.52	\$6.55	I
Energy Charge per kWh			
On-Peak kWh	\$ .042956	\$ .051527	I
Off-Peak kWh	\$ .042378	\$ .042802	I

On-peak and off-peak hours are provided below:

<u>Months</u>	<u>On-Peak Hours - EPT</u>	<u>Off-Peak Hours – EPT</u>
October through April	7:00 a.m. to 12:00 noon 5:00 p.m. to 10:00 p.m.	12:00 noon to 5:00 p.m. 10:00 p.m. to 7:00 a.m.
May through September	10:00 a.m. to 10:00 p.m.	10:00 p.m. to 10:00 a.m.

**DATE OF ISSUE:** April 1, 2021

**DATE EFFECTIVE:** Service rendered on and after May 1, 2021

**ISSUED BY:**   
 Anthony S. Campbell,  
 President and Chief Executive Officer

Issued by authority of an Order of the Public Service Commission of Kentucky in Case No. 2021-00103 dated \_\_\_\_\_, 2021.

Rate E (continued)

Billing Demand

The billing demand is based on EKPC's system peak demand (coincident peak) which is the highest average rate at which energy is used during any fifteen (15)-minute interval in the below listed hours for each month and adjusted for power factor as provided herein:

T

<u>Months</u>	<u>Hours Applicable for Demand Billing – EPT</u>
October through April	7:00 a.m. to 12:00 noon 5:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

Billing demand applicable to this rate is equal to the load center's contribution to EKPC's system peak demand minus the actual demands of Rate B, Rate C, Rate G, and special contract participants coincident with EKPC's system peak demand.

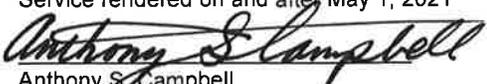
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Billing Energy

Billing energy applicable to this rate is equal to the total energy provided at the load center minus the actual energy provided to Rate B, Rate C, Rate G, and special contract participants.

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DATE OF ISSUE: April 1, 2021  
DATE EFFECTIVE: Service rendered on and after May 1, 2021  
ISSUED BY:   
Anthony S. Campbell,  
President and Chief Executive Officer

Rate G

**SPECIAL ELECTRIC CONTRACT RATE**

Applicability

In all territories of owner-member of EKPC.

Availability

Available to all owner-members and retail members willing to execute EKPC-approved contracts for demands of 15,000 kW or greater and a monthly minimum energy usage equal to or greater than 400 hours per kW of billing demand. The electric power and energy furnished hereunder shall be separately metered for each point of delivery.

Character of Service

Three-phase 60 Hertz alternating current as specified in the special contract for purchased power.

Monthly Rate

Demand Charge per kW of Billing Demand	\$7.30	T I
Energy Charge per kWh	\$.037780	T I

Determination of Billing Demand

The billing demand shall be the greater of (a) or (b) listed below:

- a. The contract demand; or
- b. The retail member's highest demand during the current month or preceding eleven months coincident with EKPC's system peak demand. EKPC's system peak demand is the highest average rate at which energy is used during any fifteen (15)-minute interval in the below listed hours for each month and adjusted for power factor as provided herein:

<u>Months</u>	<u>Hours Applicable for Demand Billing – EPT</u>
October through April	7:00 a.m. to 12:00 noon 5:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

**DATE OF ISSUE:** April 1, 2021

**DATE EFFECTIVE:** Service rendered on and after May 1, 2021

**ISSUED BY:**   
Anthony S. Campbell,  
President and Chief Executive Officer

Rate G (con't.)

Notwithstanding the foregoing, a special contract for purchased power may waive a demand ratchet for any new or expanding load for the period in which the new or expanded load has not yet been fully brought on-line or reached full production status.

N  
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Minimum Monthly Charge

The minimum monthly charge shall not be less than the sum of (a), (b), and (c) below:

- (a) The metering and substation charge, plus
- (b) The product of the billing demand multiplied by the demand charge, plus
- (c) The product of the billing demand multiplied by 400 hours and the energy charge per kWh minus the fuel base per kWh.

T  
T  
D

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DATE OF ISSUE: April 1, 2021

DATE EFFECTIVE: Service rendered on and after May 1, 2021

ISSUED BY:   
Anthony S. Campbell,  
President and Chief Executive Officer

Issued by authority of an Order of the Public Service Commission of Kentucky in Case No. 2021-00103 dated \_\_\_\_\_, 2021.

Rate ES – Environmental Surcharge

Applicability

In all territories of owner-members of EKPC.

T

Availability

This rate schedule shall apply to EKPC Rates B, C, E, and G and all special contracts with rates subject to adjustment upon the approval of the Commission.

T

Rate

The Environmental Surcharge shall provide for monthly adjustments based on a percent of revenues equal to the difference between the environmental compliance costs in the base period and in the current period based on the following formula:

$$CESF = E(m) / R(m)$$

$$MESF = CESF - BESF$$

MESF = Monthly Environmental Surcharge Factor  
CESF = Current Environmental Surcharge Factor  
BESF = Base Environmental Surcharge Factor of 0%

where E(m) is the total of each approved environmental compliance plan revenue requirement of environmental costs for the current expense month and R(m) is the revenue for the current expense month as expressed below.

**Definitions**

1.  $E(m) = [(RB/12)(RORB) + OE - BAS + (Over)Under Recovery$

where:

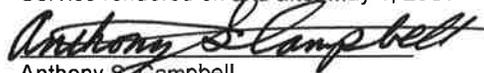
- a. RB is the Environmental Compliance Rate Base, defined as electric plant in service for applicable environmental projects adjusted for accumulated depreciation, CWIP, cash working capital, spare parts and limestone inventory, emission allowance inventory;
- b. RORB is the Rate of Return on the Environmental Compliance Rate Base, designated as the average cost of debt for environmental compliance plan projects approved by the Commission plus application of a times-interest-earned ratio of 1.475;

R

DATE OF ISSUE: April 1, 2021

DATE EFFECTIVE: Service rendered on and after May 1, 2021

ISSUED BY:

  
Anthony S. Campbell,  
President and Chief Executive Officer

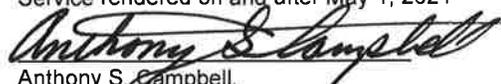
Rate ES – Environmental Surcharge (continued)

- c. OE is the Monthly Pollution Control Operating Expenses, defined as the average of the twelve month operating and maintenance expense; depreciation expense, property taxes, insurance expense, emission allowance expense, and consulting fees.;
  - d. BAS is the net proceeds from By-Products and Emission Allowance Sales, and;
  - e. (Over) or Under recovery amount resulting from the amortization of amounts determined by the Commission during six-month and two-year reviews and the one-month "true-up" adjustment.
2. Total E(m) is multiplied by the "Member System Allocation Ratio" to arrive at Net E(m). The "Member System Allocation Ratio" is based on the ratio of the twelve (12)-month total revenue from sales to owner-members to which the Surcharge will be applied, ending with the current expense month, divided by the twelve (12)-month total revenue from sales to owner-members and off-system sales.
  3. The revenue R(m) is the average monthly revenue, including base revenues and automatic adjustment clause revenues less Environmental Cost Recovery Surcharge revenues, for EKPC for the twelve (12)-months ending with the current expense month.
  4. The current expense month (m) shall be the second month preceding the month in which the Environmental Surcharge is billed.

DATE OF ISSUE: April 1, 2021

DATE EFFECTIVE: Service rendered on and after May 1, 2021

ISSUED BY:

  
 Anthony S. Campbell,  
 President and Chief Executive Officer

**Rate B**

**Applicability**

In all territories of owner-member cooperatives (“owner-members”) of East Kentucky Power Cooperative, Inc. (“EKPC”).

**Availability**

Available to all cooperative associations which are or shall be owner-members of EKPC and end-use retail members (“retail members”) willing to which execute EKPC-approved contracts with the end-use retail members (retail member). for demands of 500 kW or greater and a monthly minimum energy usage equal to or greater than 400 hours per kW of contract demand. Wholesale monthly contract demand shall be agreed between the owner-member and EKPC. The electric power and energy furnished hereunder shall be separately metered for each point of delivery.

**Applicability**

Applicable to owner members and retail members willing to contract for demands of 500 kW or greater and a monthly minimum energy usage equal to or greater than 400 hours per kW of contract demand. Wholesale monthly minimum demand shall be agreed between the owner member and EKPC.

**Monthly Rate**

Demand Charge per kW of <del>Contract Minimum</del> Demand	\$7.17 .49
Demand Charge per kW of Billing Demand in Excess of <del>Contract Minimum</del> Demand	\$9.98
Energy Charge per kWh	\$ .038982 39884

**Billing Demand**

The billing demand (~~kilowatt demand~~) shall be the ~~contract minimum~~ demand plus any excess demand. Excess demand occurs when the retail member’s highest demand during the current month, coincident with EKPC’s system peak (coincident peak), exceeds the ~~contract minimum~~ demand. EKPC’s system peak demand is the highest average rate at which energy is used during any fifteen (15)-minute interval in the below listed hours for each month and adjusted for power factor as provided herein:

<u>Months</u>	<u>Hours Applicable for Demand Billing - EPT</u>
October through April	7:00 a.m. to 12:00 noon 5:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

**Minimum Monthly Charge**

The minimum monthly charge shall not be less than the sum of (a) and (b) below:

- a. The product of the ~~contract minimum~~ demand multiplied by the demand charge, plus
- b. The product of the ~~contract minimum~~ demand multiplied by 400 hours and the energy charge per kWh minus the fuel base per kWh as established in the Fuel Adjustment Clause.

**DATE OF ISSUE:** ~~January 7, 2020~~ April 1, 2021

**DATE EFFECTIVE:** Service rendered on and after ~~February 1, 2020~~ May 1, 2021

**ISSUED BY:** \_\_\_\_\_  
Anthony S. Campbell,  
President and Chief Executive Officer

Issued by authority of an Order of the Public Service Commission  
of Kentucky in Case No. ~~2019-00003~~ 2021-00103 dated ~~December 26, 2019~~ \_\_\_\_\_, 2021.

Rate C

Applicability

In all territories of owner-members of EKPC.

Availability

Available to all cooperative associations which are or shall be owner-members and retail members willing to of EKPC and which execute EKPC-approved contracts with the retail members. for demands of 500 kW or greater and a monthly energy usage equal to or greater than 400 hours per kW of billing demand. The electric power and energy furnished hereunder shall be separately metered for each point of delivery.

Applicability

Applicable to owner members and retail members willing to contract for demand of 500 kW or greater and a monthly energy usage equal to or greater than 400 hours per kW of billing demand.

Monthly Rate

Demand Charge per kW of Billing Demand	\$7.17 .49
Energy Charge per kWh	\$.038982 39884

Billing Demand

The kilowatt billing demand shall be the greater of (a) or (b) listed below:

- a. The contract demand; or
- b. The retail member's highest demand during the current month or preceding eleven months coincident with EKPC's system peak demand. EKPC's system peak demand is the highest average rate at which energy is used during any fifteen (15)-minute interval in the below listed hours for each month and adjusted for power factor as provided herein:

<u>Months</u>	<u>Hours Applicable for Demand Billing - EPT</u>
October through April	7:00 a.m. to 12:00 noon 5:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

Minimum Monthly Charge

The minimum monthly charge shall not be less than the sum of (a) and (b) below:

- a. The product of the billing demand multiplied by the demand charge, plus
- b. The product of the billing demand multiplied by 400 hours and the energy charge per kWh minus the fuel base per kWh.

DATE OF ISSUE: ~~January 7, 2020~~ April 1, 2021

DATE EFFECTIVE: Service rendered on and after ~~February 1, 2020~~ May 1, 2021

ISSUED BY: \_\_\_\_\_

Anthony S. Campbell,  
President and Chief Executive Officer

**Exhibit EKPC-04**  
**Kentucky PSC Order**

Issued by authority of an Order of the Public Service Commission  
of Kentucky in Case No. ~~2019-00003~~ 2021-00103 dated ~~December 26, 2019~~ \_\_\_\_\_, 2021.

**Rate E**

**Applicability**

In all territories of owner-members of EKPC.

**Availability**

Available to all cooperative associations which are or shall be owner-members of EKPC for all power usage at the load center not subject to the provisions of Rate B, Rate C, or Rate G of this tariff and special contract participants. The electric power and energy furnished hereunder shall be separately metered for each point of delivery.

**Applicability**

Applicable to all power usage at the load center not subject to the provisions of Rate A, Rate B, Rate C, or Rate G of this tariff.

**Monthly Rate - Per Load Center**

An owner-member may select either Option 1 or Option 2 of this section of the tariff to apply to all load centers. The owner-member must remain on a selected option for at least one (1) year and may change options, no more often than every twelve (12) months, after giving a minimum notice of two (2) months advance notice of an election to change options.

	<u>Option 1</u>	<u>Option 2</u>
Demand Charge per kW of Billing Demand	<del>\$7.99</del> 8.52	\$6.02 55
Energy Charge per kWh		
On-Peak kWh	\$.041232 2956	\$.049379 51527
Off-Peak kWh	\$.040654 2378	\$.040654 2802

On-peak and off-peak hours are provided below:

<u>Months</u>	<u>On-Peak Hours - EPT</u>	<u>Off-Peak Hours – EPT</u>
October through April	7:00 a.m. to 12:00 noon 5:00 p.m. to 10:00 p.m.	12:00 noon to 5:00 p.m. 10:00 p.m. to 7:00 a.m.
May through September	10:00 a.m. to 10:00 p.m.	10:00 p.m. to 10:00 a.m.

**DATE OF ISSUE:** ~~January 7, 2020~~ April 1, 2021

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**ISSUED BY:** \_\_\_\_\_  
Anthony S. Campbell,  
President and Chief Executive Officer

**Rate E (continued)**

**Billing Demand**

The billing demand (kilowatt demand) is based on EKPC’s system peak demand (coincident peak) which is the highest average rate at which energy is used during any fifteen (15)-minute interval in the below listed hours for each month and adjusted for power factor as provided herein:

<u>Months</u>	<u>Hours Applicable for Demand Billing – EPT</u>
October through April	7:00 a.m. to 12:00 noon 5:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

Billing demand applicable to this rate is equal to the load center’s contribution to EKPC’s system peak demand minus the actual demands of ~~Rate A, Rate B, and Rate C, Rate G, and special contract~~ participants coincident with EKPC’s system peak demand.

**Billing Energy**

Billing energy applicable to this rate is equal to the total energy provided at the load center minus the actual energy provided to ~~Rate A, Rate B, and Rate C, Rate G, and special contract~~ participants.

**DATE OF ISSUE:** ~~October 2, 2017~~ April 1, 2021

**DATE EFFECTIVE:** Service rendered on and after ~~November 2, 2017~~ May 1, 2021

**ISSUED BY:** \_\_\_\_\_  
 Anthony S. Campbell,  
 President and Chief Executive Officer

*Issued by authority of an Order of the Public Service Commission of Kentucky in Case No. 2021-00103 dated \_\_\_\_\_, 2021.*

**Rate G**

**SPECIAL ELECTRIC CONTRACT RATE**

**Applicability**

In all territories of owner-members of EKPC.

**Availability**

Available to all owner-members and retail members willing to execute EKPC-approved contracts for demands of 15,000 kW or greater and a monthly energy usage equal to or greater than 400 hours per kW of billing demand. The electric power and energy furnished hereunder shall be separately metered for each point of delivery.

**Character of Service**

Three-phase 60 Hertz alternating current as specified in the *special contract Agreement* for Purchased Power.

**Monthly Rate**

Demand Charge per kW of Billing Demand kW	<del>\$6.98</del> 7.30
Energy Charge per ALL kWh	<del>\$.036947</del> 7780

**Determination of Billing Demand**

The ~~billing kilowatt~~ demand shall be the greater of (a) or (b) listed below:

- a. The contract demand; or
- b. The retail member's highest demand during the current month or preceding eleven months coincident with EKPC's system peak demand. EKPC's system peak demand is the highest average rate at which energy is used during any fifteen (15)-minute interval in the below listed hours for each month and adjusted for power factor as provided herein:

<u>Months</u>	<u>Hours Applicable for Demand Billing – EPT</u>
October through April	7:00 a.m. to 12:00 noon 5:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

**DATE OF ISSUE:** ~~January 7, 2020~~ April 1, 2021

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**ISSUED BY:** \_\_\_\_\_  
Anthony S. Campbell,  
President and Chief Executive Officer

**Rate G (con't.)**

*Notwithstanding the foregoing, a special contract for purchased power may waive a demand ratchet for any new or expanding load for the period in which the new or expanded load has not yet been fully brought on-line or reached full production status.*

**Minimum Monthly Charge**

The minimum monthly charge shall not be less than the sum of (a), (b), and (c) below:

- (a) The metering and substation charge, plus
- (b) The product of the billing demand multiplied by the demand charge, plus
- (c) *The product of the billing demand multiplied by 400 hours and the energy charge per kWh minus the fuel base per kWh. The result of: (Energy Rate minus EKPC's base fuel component in the Energy Rate) times Billing Demand times 400 hours.*

**Power Factor Adjustment**

Refer to EKPC General Wholesale Power Tariffs, Power Factor Adjustment.

**Fuel Adjustment Clause**

Refer to EKPC General Wholesale Power Tariffs, Fuel Adjustment.

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*Issued by authority of an Order of the Public Service Commission of Kentucky in Case No. 2021-00103 dated \_\_\_\_\_, 2021.*

**Rate ES – Environmental Surcharge****Applicability**

Applicable to all rates in this tariff. This rate schedule shall apply to each owner-member. In all territories of owner-members of EKPC.

**Availability**

This rate schedule shall apply to EKPC Rates A, B, C, E, and G and all special contracts with rates subject to adjustment upon the approval of the Commission.

**Rate**

The Environmental Surcharge shall provide for monthly adjustments based on a percent of revenues equal to the difference between the environmental compliance costs in the base period and in the current period based on the following formula:

$$CESF = E(m) / R(m)$$

$$MESF = CESF - BESF$$

MESF = Monthly Environmental Surcharge Factor  
CESF = Current Environmental Surcharge Factor  
BESF = Base Environmental Surcharge Factor of 0%

where E(m) is the total of each approved environmental compliance plan revenue requirement of environmental costs for the current expense month and R(m) is the revenue for the current expense month as expressed below.

**Definitions**

$$1. E(m) = [(RB/12)(RORB) + OE - BAS + (Over)Under Recovery$$

where:

- a. RB is the Environmental Compliance Rate Base, defined as electric plant in service for applicable environmental projects adjusted for accumulated depreciation, CWIP, cash working capital, spare parts and limestone inventory, emission allowance inventory;
- b. RORB is the Rate of Return on the Environmental Compliance Rate Base, designated as the average cost of debt for environmental compliance plan projects approved by the Commission plus application of a times-interest-earned ratio of 1.50 .475;

**DATE OF ISSUE:** ~~October 2, 2017~~ April 1, 2021

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**ISSUED BY:**

\_\_\_\_\_  
Anthony S. Campbell,  
President and Chief Executive Officer

Issued by authority of an Order of the Public Service Commission of Kentucky in Case No. 2021-00103 dated \_\_\_\_\_, 2021.

Rate ES – Environmental Surcharge (continued)

- c. OE is the Monthly Pollution Control Operating Expenses, defined as the average of the twelve month operating and maintenance expense; depreciation expense, property taxes, insurance expense, emission allowance expense, and consulting fees.;
  - d. BAS is the net proceeds from By-Products and Emission Allowance Sales, and;
  - e. (Over) or Under recovery amount resulting from the amortization of amounts determined by the Commission during six-month and two-year reviews and the one-month “true-up” adjustment.
2. Total E(m) is multiplied by the “Member System Allocation Ratio” to arrive at Net E(m). The “Member System Allocation Ratio” is based on the ratio of the twelve (12)-month total revenue from sales to owner-members to which the Surcharge will be applied, ending with the current expense month, divided by the twelve (12)-month total revenue from sales to owner-members and off-system sales.
  3. The revenue R(m) is the average monthly revenue, including base revenues and automatic adjustment clause revenues less Environmental Cost Recovery Surcharge revenues, for EKPC for the twelve (12)-months ending with the current expense month.
  4. The current expense month (m) shall be the second month preceding the month in which the Environmental Surcharge is billed.

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**DATE OF ISSUE:** ~~October 2, 2017~~ April 1, 2021

**DATE EFFECTIVE:** Service rendered on and after ~~November 2, 2017~~ May 1, 2021

**ISSUED BY:** \_\_\_\_\_  
Anthony S. Campbell,  
President and Chief Executive Officer

**Increase in Steam Service**

Effective for Service Rendered on and after May 1, 2021  
Pursuant to KPSC Order dated \_\_\_\_\_, 2021 in Case No. 2021-00103

T  
T

Rates

<u>Description</u>	<u>Prior Contract Rate</u>	<u>Current Approved Rate</u>	
Demand Charge	\$577.15/mmbtu/month	\$604.75/mmbtu/month	I
Energy Rate	\$4.166/mmbtu	\$4.266/mmbtu	I

**Increase in Contract**

Effective for Service Rendered on and after May 1, 2021  
 Pursuant to KPSC Order dated \_\_\_\_\_, 2021 in Case No. 2021-00103

T  
 T

Rates

<u>Description</u>	<u>Feb. 1, 2020 Contract Rate</u>	<u>Current Approved Rate</u>	
Demand Charge – Billing Demand at or below 180 MW In On-Peak Periods [Paragraph 3(b)]	\$ 6.92/kW/month	\$ 7.15/kW/month	I
Interruptible Credit – 10 Minute Interruptible Demand Service [Paragraph 4(a)]	\$ 6.22/kW/month	\$ 6.22/kW/month	
Interruptible Credit – 90 Minute Interruptible Demand Service [Paragraph 4(b)]	\$ 4.20/kW/month	\$ 4.20/kW/month	
Energy Rate – Off-Peak [Paragraph 12]	\$0.035477/kWh	\$0.036139/kWh	I
Energy Rate – On-Peak [Paragraph 12]	\$0.038905/kWh	\$0.039567/kWh	I

**Increase in Steam Service**

Effective for Service Rendered on and after May 1, 2021  
Pursuant to KPSC Order dated \_\_\_\_\_, 2021 in Case No. 2021-00103

Rates

<u>Description</u>	<u>Prior Contract Rate</u>	<u>Current Approved Rate</u>
Demand Charge	\$577.15/mmbtu/month	<del>\$577.15</del> 604.75/mmbtu/month
Energy Rate	\$4.166/mmbtu	<del>\$4.166</del> 4.266/mmbtu

**Increase in Contract**

Effective for Service Rendered on and after May 1, 2021  
 Pursuant to KPSC Order dated \_\_\_\_\_, 2021 in Case No. 2021-00103

Rates

<u>Description</u>	<u>Feb. 1, 2020 Contract Rate</u>	<u>Current Approved Rate</u>
Demand Charge – Billing Demand at or below 180 MW In On-Peak Periods [Paragraph 3(b)]	\$ 6.92/kW/month	<del>\$ 6.92</del> 7.15 /kW/month
Interruptible Credit – 10 Minute Interruptible Demand Service [Paragraph 4(a)]	\$ 6.22/kW/month	\$ 6.22/kW/month
Interruptible Credit – 90 Minute Interruptible Demand Service [Paragraph 4(b)]	\$ 4.20/kW/month	\$ 4.20/kW/month
Energy Rate – Off-Peak [Paragraph 12]	\$0.035477/kWh	<del>\$0.035477</del> .036139 /kWh
Energy Rate – On-Peak [Paragraph 12]	\$0.038905/kWh	<del>\$0.038905</del> .039567 /kWh

**Exhibit C**  
**Proof of Revenues**

**East Kentucky Power Cooperative, Inc.**

**Revenue Summary by Rate Class  
 Present and Settlement Rate Revenues**

Summary of Settlement Rate Change by Rate Schedule					
Line No.	Description	Present Rates	Settlement Rates		As Percent
		Amount	Amount	Increase	
1		\$	\$	\$	
2	<b>Totals Revenues by Rate</b>				
3	Rate B	59,815,719	61,364,392	1,548,673	2.6%
4	Rate C	17,153,311	17,605,550	452,238	2.6%
5	Rate E	664,081,280	698,395,345	34,314,065	5.2%
6	Rate G	25,516,274	26,179,595	663,320	2.6%
7	Contract	41,786,791	42,872,821	1,086,030	2.6%
8	Steam	10,716,264	10,994,937	278,674	2.6%
9	Rate TGP	6,349,849	6,349,849	-	0.0%
10	<b>Sub-Total COS Based Revenues</b>	825,419,487	863,762,487	38,343,000	4.6%
11	Rate H	49,170	49,170	-	0.0%
12	DSM Riders	(1,109,853)	(1,109,853)	-	0.0%
13	<b>Total Revenues by Rate</b>	824,358,804	862,701,804	38,343,000	4.7%

**East Kentucky Power Cooperative, Inc.**  
**Present and Settlement Rates**

Line No.	Description	Units	Present Rates		Settlement Rates			
			Rate	Amount	Rate	Amount		
1				\$		\$		
2	<b>Rate B</b>							
3	Metering Charge	Meters		71	\$0.00		\$0.00	
4	Demand Charges							
5	Demand Charge	CP kW		1,767,954	\$7.17	12,676,230	\$7.49	13,241,975
6	Excess Demand Charge	CP kW		59,568	\$9.98	594,489	\$9.98	594,489
7	Interruptible (400 Hrs)	CP kW		235,184	-\$5.60	(1,317,030)	-\$5.60	(1,317,030)
8	EDR Discount					(23,719)		(24,736)
9	Energy Charges					-		-
10	Energy Charge	kWh		1,090,848,453	\$0.038982	42,523,454	\$0.039884	43,507,400
11	Min kWh Adjustment	kWh		4,543,620	-\$0.026240	(119,225)	-\$0.026240	(119,225)
12	Sub-Total Base Rates					54,334,199		55,882,872
13	Net Buy Through Charge					77,890		77,890
14	Fuel Adjustment	kWh		1,086,304,833	-\$0.002702	(2,935,048)	-\$0.002702	(2,935,048)
15	Environmental Surcharge				16.200%	8,338,677	15.749%	8,338,677
16	<b>Total Rate B</b>					59,815,719		61,364,392
17								
18	<b>Rate C</b>							
19	Metering Charge	Meters		9	\$0.00			\$0
20	Demand Charges							
21	Demand Charge	CP kW		582,643	\$7.17	4,177,550	\$7.49	4,363,996
22	Energy Charges					-		-
23	Energy Charge	kWh		294,670,389	\$0.038982	11,486,841	\$0.039884	11,752,634
24	Min kWh Adjustment	kWh		4,208,946	-\$0.026240	(110,443)	-\$0.026240	(110,443)
25	Sub-Total Base Rates					15,553,949		16,006,187
26	Fuel Adjustment	kWh		290,461,443	-\$0.002684	(779,575)	-\$0.002684	(779,575)
27	Environmental Surcharge				16.100%	2,378,938	15.624%	2,378,938
28	<b>Total Rate C</b>					17,153,311		17,605,550

**East Kentucky Power Cooperative, Inc.**  
**Present and Settlement Rates**

Line No.	Description	Units	Present Rates		Settlement Rates		
			Rate	Amount	Rate	Amount	
29	<b>Rate E</b>						
30	<i>Demand Charges</i>						
31	Demand Charge	CP kW	23,934,636	\$6.02	144,086,507	\$6.55	156,771,864
32	Power Factor Penalty	CP kW	15,979	\$6.02	96,194	\$6.55	104,662
33	<i>Energy Charges</i>						
34	On-Peak Energy Charge	kWh	4,998,176,543	\$0.049379	246,804,960	\$0.051527	257,542,958
35	Off-Peak Energy Charge	kWh	4,732,348,143	\$0.040654	192,388,881	\$0.042802	202,555,778
36	Metering Charge	Meters	328	\$144.00	566,208	\$151.20	594,518
37	<i>Sub-Station Charges</i>						
38	1000-2999 kVa	Subs	3	\$1,088.00	39,168	\$1,142.40	41,126
39	3000-7499 kVa	Subs	39	\$2,737.00	1,280,916	\$2,873.85	1,344,962
40	7500-14999 kVa	Subs	224	\$3,292.00	8,848,896	\$3,456.60	9,291,341
41	15000 kVa and Up	Subs	57	\$5,310.00	3,632,040	\$5,575.50	3,813,642
42	Sub-Total Base Rates				597,743,770		632,060,852
43	Special Adjustments				(117,842)		(117,842)
44	Fuel Adjustment	kWh	9,730,524,686	-\$0.002698	(26,249,938)	-\$0.002698	(26,252,956)
45	Environmental Surcharge			16.225%	92,705,290	15.303%	92,705,290
46	<b>Total Rate E</b>				664,081,280		698,395,345
47							
48	<b>Rate G</b>						
49	Metering Charge	Meters	1	\$144.00	1,728	\$151.20	\$1,814.40
50	Sub-Station Charges	Subs	1	\$5,310.00	63,720	\$5,575.50	\$66,906.00
51	<i>Demand Charges</i>						
52	Demand Charge	CP kW	797,497	\$6.98	5,566,529	\$7.30	5,821,728
53	Interruptible (200 Hrs)	CP kW	83,048	-\$4.20	(348,802)	-\$4.20	(348,802)
54	<i>Energy Charges</i>						
55	Energy Charge	kWh	485,775,112	\$0.036947	17,947,933	\$0.037780	18,352,584
56	Sub-Total Base Rates				23,231,109		23,894,231
57	Net Buy Through Charge				24,178		24,178
58	Fuel Adjustment	kWh	485,775,112	-\$0.002710	(1,316,649)	-\$0.002710	(1,316,451)
59	Environmental Surcharge			16.310%	3,577,636	15.846%	3,577,636
60	<b>Total Rate G</b>				25,516,274		26,179,595

**East Kentucky Power Cooperative, Inc.**  
**Present and Settlement Rates**

Line No.	Description	Units	Present Rates		Settlement Rates			
			Rate	Amount	Rate	Amount		
61	<b>Contract</b>							
62	Metering Charge	Meters		1	\$0.00	\$0.00	\$0.00	
63	<i>Demand Charges</i>							
64	Demand Charge	CP kW		1,906,996	\$6.92	13,196,412	\$7.15	13,635,021
65	Interruptible (10 Min)	CP kW		1,440,000	-\$6.22	(8,956,800)	-\$6.22	(8,956,800)
66	Interruptible (90 Min)	CP kW		286,996	-\$4.20	(1,205,383)	-\$4.20	(1,205,383)
67	<i>Energy Charges</i>							
68	On-Peak Energy Charge	kWh		292,976,846	\$0.038905	11,398,264	\$0.039567	11,592,340
69	Off-Peak Energy Charge	kWh		684,368,004	\$0.035477	24,279,324	\$0.036139	24,732,668
70	Min kWh Adjustment	kWh		9,167,968	-\$0.026240	(240,567)	-\$0.026240	(240,567)
71	Sub-Total Base Rates					38,471,250		39,557,279
72	Load Following Charge					34,539		34,539
73	Net Buy Through Charge					148,228		148,228
74	Fuel Adjustment	kWh		968,176,882	-\$0.002731	(2,638,182)	-\$0.002731	(2,638,182)
75	Environmental Surcharge				16.130%	5,770,957	15.617%	5,770,957
76	<b>Total Gallatin</b>					<u>41,786,791</u>		<u>42,872,821</u>
77								
78	<b>Steam</b>							
79	Metering Charge	Meters		1	\$0.00	\$0.00	\$0.00	\$0.00
80	<i>Demand Charges</i>							
81	Demand Charge	CP kW		397,389				
82	x MMBTU Conversion			0.00917				
83	x Steam Adjustment			1.01600	\$577.15	2,136,440	\$604.75	2,238,034
84	<i>Energy Charges</i>							
85	Energy Charge	kWh		195,836,964				
86	x MMBTU Conversion			0.00917				
87	x Steam Adjustment	kWh		1.01600	\$4.166	7,605,674	\$4.266	7,782,438
88	Sub-Total Base Rates					9,742,113		10,020,473
89	Fuel Adjustment	kWh		198,970,355	-\$0.002662	(529,973)	-\$0.002662	(529,659)
90	Environmental Surcharge				16.328%	1,504,124	15.848207%	1,504,124
91	<b>Total Steam</b>					<u>10,716,264</u>		<u>10,994,937</u>
92								
93	<b>Rate TGP</b>							
94	Metering Charge	Meters		-	\$0.00	\$0.00	\$0.00	\$0.00
95	<i>Demand Charges</i>							
96	Demand Charge	CP kW		477,063	\$1.75	834,860	\$1.75	834,860
97	<i>Energy Charges (Averaged)</i>							
98	On-Peak Energy Charge	kWh		84,629,228	\$0.030160	2,552,749	\$0.030160	2,552,749
99	Off-Peak Energy Charge	kWh		98,387,617	\$0.022270	2,190,711	\$0.022270	2,190,711
100	Sub-Total Base Rates					5,578,320		5,578,320
101	Net Buy Through Charge					218,754		218,754
102	Fuel Adjustment	kWh		183,016,845	\$0.000000	-	\$0.000000	-
103	Environmental Surcharge				9.909%	552,775	9.909%	552,775
104	<b>Total Rate TGP</b>					<u>6,349,849</u>		<u>6,349,849</u>

**East Kentucky Power Cooperative, Inc.**  
**Present and Settlement Rates**

Line No.	Description	Units	Present Rates		Settlement Rates		
			Rate	Amount	Rate	Amount	
105	<b>Rate E1 - RATE DESIGN ONLY -- THERE IS CURRENTLY NO LOAD ON THIS RATE</b>						
106	<i>Demand Charges</i>						
107	Demand Charge	CP kW	23,934,636	\$7.99	191,237,740	\$8.52	203,923,097
108	Power Factor Penalty	CP kW	15,979	\$7.99	127,672	\$8.52	136,141
109	<i>Energy Charges</i>						
110	On-Peak Energy Charge	kWh	4,998,176,543	\$0.041232	206,084,815	\$0.042956	214,701,930
111	Off-Peak Energy Charge	kWh	4,732,348,143	\$0.040654	192,388,881	\$0.042378	200,547,694
112	Metering Charge	Meters	328	\$144.00	566,214	\$151.20	594,524
113	<i>Sub-Station Charges</i>						
114	1000-2999 kVa	Subs	3	\$1,088.00	39,168	\$1,142.40	41,126
115	3000-7499 kVa	Subs	39	\$2,737.00	1,280,916	\$2,873.85	1,344,962
116	7500-14999 kVa	Subs	224	\$3,292.00	8,848,896	\$3,456.60	9,291,341
117	15000 kVa and Up	Subs	57	\$5,310.00	3,632,040	\$5,575.50	3,813,642
118	Sub-Total Base Rates				604,206,342		634,394,457
119	Special Adjustments		-		(117,842)		(117,842)
120	Fuel Adjustment	kWh	9,730,524,686	-\$0.002698	(26,252,956)	-\$0.002698	(26,252,956)
121	Environmental Surcharge		-		92,705,290	15.303%	92,705,290
122	<b>Total Rate E</b>				<u>670,540,835</u>		<u>700,728,950</u>

APPENDIX B

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE  
COMMISSION IN CASE NO. 2021-00103 DATED SEP 30 2021

The following rates and charges are prescribed for the customers in the area served by East Kentucky Power Cooperative, Inc. All other rates and charges not specifically mentioned herein shall remain the same as those in effect under the authority of this Commission prior to the effective date of this Order.

WHOLESALE POWER RATE SCHEDULE

Monthly Rate:

Metering Point Charge:

1. Applicable to each metering point and to each substation
2. Charge: \$151.20

Substation Charge:

1. Applicable to each substation based on size
2. Charges:

1,000 to 2,999 kVa substation	\$ 1,142.40
3,000 to 7,499 kVa substation	\$ 2,873.85
7,500 to 14,999 kVa substation	\$ 3,456.60
15,000 and over kVa substation	\$ 5,575.50

SCHEDULE B

Monthly Rate:

Demand Charge per kW of Contract Demand	\$ 7.49
Demand Charge per kW of Billing Demand in Excess of Contract Demand	\$ 9.98
Energy Charge per kWh	\$ 0.039884

SCHEDULE C

Monthly Rate:

Demand Charge per kW of Billing Demand	\$ 7.49
Energy Charge per kWh	\$ 0.039884

SCHEDULE E

Monthly Rate - Per Load Center:

Option 1

Demand Charge per kW of Billing Demand	\$ 8.49
Energy Charge per kWh:	
On-Peak	\$ 0.042591
Off-Peak	\$ 0.042013

Option 2

Demand Charge per kW of Billing Demand	\$ 6.52
Energy Charge per kWh:	
On-Peak	\$ 0.051399
Off-Peak	\$ 0.042674

SCHEDULE G

Monthly Rate:

Demand Charge per kW of Billing Demand	\$ 7.30
Energy Charge per all kWh	\$ 0.037780

SPECIAL CONTRACT – GALLATIN

Monthly Rate:

Demand Charge per kW of Billing Demand:	
Firm Demand	\$ 7.15
10 Minute Interruptible Demand	\$ (6.22)
90 Minute Interruptible Demand	\$ (4.20)
Energy Charge per kWh:	
On-Peak Energy	\$ 0.039567
Off-Peak Energy	\$ 0.036139

SPECIAL CONTRACT - INLAND STEAM

Monthly Rate:

Demand Charge - MMBTU	\$ 604.75
Energy Charge - MMBtu	\$ 4.266

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**Exhibit EKPC-04  
Kentucky PSC Order**

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**Exhibit EKPC-05**

**Rate Impact Analysis**

East Kentucky Power Cooperative, Inc.  
 Analysis of Change in Depreciation Rates (Docket No. 2021-000163) on FERC Formula Transmission Rates

Exhibit EKPC-05  
 Rate Impact Analysis

Depreciation Impact (per Accounting)		9Mo old; 3Mo new Ferc Form No 1 Company Total	3 Months Depr Rate Change Impact	(12 Mo old) 2021 Restated	(12 Mo New) 2022 Restated
Item	Page, Line, Col				Monthly Change
<u>Depreciation Expense</u>					
403500 Transmission	336.7.f	\$ 11,895,626.00	\$ 1,629,878.12	\$ 10,265,747.88	\$ 543,292.71
403,700,702,404,405 General and Intangible Common	336.9.f 336.10.f	\$ 6,511,264.00 \$ -	\$ (1,081,939.23)	\$ 7,593,203.23 \$ -	\$ (360,646.41) \$ -
Total		\$ 18,406,890.00	\$ 547,938.88	\$ 17,858,951.12	\$ 182,646.29
<u>Accumulated Depreciation</u>					
Production	219.20-24.c	\$ 1,286,813,124.00	\$ 3,193,625.30	\$ 1,283,619,498.70	\$ 1,064,541.77
Transmission	219.25.c	\$ 194,354,223.00	\$ 1,629,878.12	\$ 192,724,344.88	\$ 543,292.71
Distribution	219.26.c	\$ 98,103,787.00	\$ 202,746.78	\$ 97,901,040.22	\$ 67,582.26
General & Intangible Common	219.28.c	\$ 75,814,590.00 \$ -	\$ (1,081,939.23)	\$ 76,896,529.23 \$ -	\$ (360,646.41) \$ -
Total		\$ 1,655,085,724.00	\$ 3,944,310.96	\$ 1,651,141,413.04	\$ 1,314,770.32
			\$ 3,944,311.00		

True Up Calculation of 2021 Figures (per Pricing)	Actual (9old, 3 new)	Restated (12mo old)	
Gross Rev Req	\$83,270,717	\$1,321,111	\$81,949,606
less: Rev Cr (O)/U Rec	\$1,459,466	(\$0)	\$1,459,466
Net Rev Req	\$81,811,251	\$1,321,111	\$80,490,140
1-CP (Actual Feb-21)	2,839,104		2,839,104
Network Rate (\$/kW/Mo)	\$2.401	\$0.039	\$2.363
Appx C - True Up	\$1,009,666	\$1,407,988	(\$398,322)

2022-23 Formula Rate (per Pricing)	Actual	Restated	
Gross Rev Req	\$90,044,280	\$5,299,092	\$84,745,188
less: Rev Cr (O)/U Rec from Appx C	\$1,462,989 \$1,009,666	(\$0) \$1,407,988	\$1,462,989 (\$398,322)
Net Rev Req	\$89,590,957	\$6,707,080	\$82,883,877
1-CP (Estimate Dec-22)	3,169,000		3,169,000
Network Rate (\$/kW/Mo)	<b>2.356</b>	<b>0.176</b>	<b>2.180</b>