COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF EAST KENTUCKY POWER)	2020-00005
COOPERATIVE, INC FROM MAY 1, 2019)	
THROUGH OCTOBER 31, 2019)	

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

East Kentucky Power Cooperative, Inc. (EKPC), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due no later than 14 days from the date of entry of this Order. The Commission directs EKPC to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085, regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-* 19 (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-* 19 (Ky. PSC Mar. 24, 2020), Order at 1–3.

association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

EKPC shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which EKPC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

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

1. Refer to EKPC's Response to Staff's First Request, Item 5, page 2 of 3. Explain in detail the reasoning of "Immediate Price Required for Hedging" given for the June 3, 2019 oral coal solicitation.

- 2. Refer to EKPC's Response to Staff's First Request, Item 5, page 2 of 3. Provide an update of the Cooper station coal test purchases and the results of those tests.

 Be sure to include any changes since the April 16, 2019 Hearing in Case No. 2019-0003.¹
- 3. Refer to EKPC's Response to Staff's First Request, Item 15 and 807 KAR 5:056 Section 1(4).
- a. EKPC has listed generation unit forced outages ranging from 9 minutes (J.K. Smith Unit 9) to 96 hours (Spurlock Unit 2). Explain how EKPC defines scheduled and forced outages.
- b. If not answered above, explain whether EKPC defines any unscheduled outage as a forced outage regardless of duration and, if so, how that comports with 807 KAR 5:056, Section 1(4).
- c. On page 4 of 56, EKPC has a scheduled outage lasting 57 minutes and an outage lasting approximately 496 hours. Explain EKPC's process for scheduling an outage and PJM's role in the process, if any.
- d. Regarding the landfill generators, there appears to be occasions in which there are multiple outages for the same generator on the same day, both forced and scheduled. For example, see page 36 of 56. Explain whether EKPC's process for defining and applying the definitions of scheduled and forced outages as applied to landfill generators is different from fossil fuel generators.

¹ Hearing held on April 16, 2019, EKPC's response at 9:40:34 AM for Case No. 2019-0003, Electronic Examination of the Application of the Fuel Adjustment Clause of East Kentucky Power Cooperative, Inc. From November 1, 2016 Through October 31, 2018.

Kent A. Chandler

Kent A. Chandler Executive Director

Public Service Commission

P.O. Box 615

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DATED _ APR 02 2020

cc: Parties of Record

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