## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

ln th	e N	/lat	ter	of
n th	e N	/lat	ter	of

AN ELECTRONIC EXAMINATION OF THE	)	
APPLICATION OF THE FUEL ADJUSTMENT	)	CASE NO.
CLAUSE OF EAST KENTUCKY POWER	)	2022-00037
COOPERATIVE, INC. FROM MAY 1, 2021	)	
THROUGH OCTOBER 31, 2021	)	

## COMMISSION STAFF'S THIRD 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 is due on June 17, 2022. The Commission directs EKPC to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

<sup>&</sup>lt;sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID- 19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 EKPC obtains information that indicates 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, EKPC shall provide a written explanation of the specific grounds for its 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. Consider the hypothetical situation where a generation unit has been scheduled for a month-long maintenance outage and during the course of the outage the utility cannot complete the maintenance work due to COVID-induced labor shortages and supply chain issues. Explain why the Commission should not consider the unit outage to be a forced outage, as defined in 807 KAR 5:056, Section 1(4), as opposed to a continued maintenance outage for the time extending beyond the scheduled outage time.

Sinda G. Bridwell

Linda C. Bridwell, PE Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

DATED \_\_JUN 07 2022

cc: Parties of Record

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

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

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

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