

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
A CERTIFICATES OF PUBLIC CONVENIENCE)	
AND NECESSITY AND SITE COMPATIBILITY)	
CERTIFICATES FOR THE CONSTRUCTION OF)	
A 96 MW (NOMINAL) SOLAR FACILITY IN)	CASE NO.
MARION COUNTY, KENTUCKY AND A 40 MW)	2024-00129
(NOMINAL) SOLAR FACILITY IN FAYETTE)	
COUNTY, KENTUCKY AND APPROVAL OF)	
CERTAIN ASSUMPTIONS OF EVIDENCES OF)	
INDEBTEDNESS RELATED TO THE SOLAR)	
FACILITIES AND OTHER RELIEF)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO EAST KENTUCKY POWER COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc. (EKPC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than November 15, 2024. The Commission directs EKPC to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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).

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 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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 filed Direct Testimony of Julia Tucker, page 18, line 18, referencing proposed solar projects cost "in the low to mid \$60/MWh cost range" and EKPC's

response to Commission Staff's Second Request for Information (Staff's Second Request), Item 5, referencing proposed solar projects cost "in the \$52/MWh range."

a. Provide updated separate cost per MWh calculations for the Northern Bobwhite and Bluegrass Plains projects. Include line items for depreciation of plant and land cost, operations and maintenance, debt cost, tax credits, loan forgiveness or grants, and any other factors affecting cost.

b. State the useful life EKPC will use to determine depreciation for each project element and state why that useful life was used.

c. Provide a calculation of the expected annual fuel cost savings expected to be realized by constructing the Northern Bobwhite facility.

2. State how EKPC will ensure compliance with KRS 278.214 during the construction and operation phase of the projects.

3. Refer to EKPC's response to Commission Staff's First Request for Information Item 12b. EKPC stated that it is willing to adhere to the mitigation measures listed on pages 15, 16, and 17 of the Siting Board Case No. 2020-00208 final Order.²

a. State whether EKPC is unwilling to adhere to the other mitigation measures ordered in that case, see specifically Appendix A of the final Order in Case No. 2020-00208 regarding the prior Northern Bobwhite project entered on June 18, 2024, and the subsequent orders modifying the mitigation measures. Please identify them separately by mitigation measure and explain why EKPC is unwilling to adhere to that

² Case No. 2020-00208, *Electronic Application of Northern Bobwhite Solar, LLC for a Certificate of Construction for an Approximately 96 Megawatt Merchant Solar Electric Generating Facility in Marion County, Kentucky Pursuant to KRS 278.700 and 807 KAR 5:110* (Ky. PSC June 18, 2021), final Order at 15-17.

specific mitigation measure.

b. State whether EKPC is willing to adhere to those mitigation measures for both the Northern Bobwhite Project, and the Bluegrass Plains project.

4. Regarding the Bluegrass Plains Project, state, in feet, the setback deviation EKPC is requesting from the property boundaries of adjoining property owners.

5. Regarding the Bluegrass Plains project state, in feet, the setback deviation EKPC is requesting from residential neighborhoods, schools, hospitals, or nursing facilities.

6. Regarding the Northern Bobwhite Project, state, in feet, the setback deviation EKPC is requesting from the property boundaries of adjoining property owners.

7. Regarding the Northern Bobwhite project state, in feet, the setback deviation EKPC is requesting from residential neighborhoods, schools, hospitals, or nursing facilities.

8. Explain the effect of the Bluegrass Plains project on the viewshed of the residential homes located directly across Winchester Road from the project, and state how the currently proposed mitigation measures will mitigate that impact.



Linda C. Bridwell, PE
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DATED NOV 01 2024

cc: Parties of Record

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