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, APPROVAL OF DEPRECIATION STUDY, AMORTIZATION OF CERTAIN REGULATORY ASSETS, AND OTHER GENERAL RELIEF	))))))	CASE NO. 2025-00208

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 December 19, 2025. The Commission directs EKPC to the Commission's July 22, 2021 Order in Case No. 2020-00085[1] 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

[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).

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. Provide the monthly Times Interest Earned Ratio (TIER) for EKPC for the ten years, beginning in 2015.

2. Provide EKPC's final update of the actual costs incurred in conjunction with this rate case, including the actual costs incurred on behalf of the Member-Owners' pass-through cases, by January 9, 2026. Include copies of any invoices or other

documentation that support charges incurred in the preparation of this rate case. If necessary, provide an itemized estimate of remaining costs to be incurred for this case as of that date, and include a detailed explanation of how the estimate was determined, along with all supporting workpapers and calculations.

3. Provide a final revenue requirement and billing analysis, including the information provided in response to Item 2, by January 9, 2026.

4. Refer to the Hearing Testimony of Cliff Scott. Provide an example calculation, using actual data from a fiscal year in which EKPC ended the fiscal year with TIER metrics in the 1.1 to 1.2 range of the collection amount if the proposed Symmetrical Earnings Mechanism (SEM) had been in place at that time.

5. Refer to the Stipulation and Settlement Agreement, Exhibit C, "EKPC Summary" tab. Provide a similar analysis using the following scenarios:

a. $0.50/kW increase to the interruptible credit.

b. $1.00/kW increase to the interruptible credit.

c. $1.50/kW increase to the interruptible credit.

6. Provide how many Large Special Contract customers EKPC and its Owner-Members have, which owner-member serves the customer(s), and identify each of those Large Special Contracts that are interruptible.

7. Refer to Attachment CS-1, SEM Example. Explain what the average residential bill impact would be on a monthly basis and how much the impact may differ across the Owner-Member customer classes.

8. Refer to the Hearing Testimony of Anthony Campbell (Campbell Hearing Testimony). Provide the executed nuclear purchase power agreement (PPA) or explain when the executed PPA would be available.

9. Refer to Campbell Hearing Testimony. Provide a summary of the capacity performance penalty incurred from PJM during Winter Storm Elliott.

10. Refer to the Hearing Testimony of Darrin Adams.

a. Provide the annual cost allocation update from PJM for 2026 when received.

b. Provide the annual costs from PJM allocated to EKPC for 2026 when received.

11. Refer to the Rebuttal Testimony of Jacob Watson, page 7, and the Application, Exhibit 16, Attachment JRW-1 Statement of Operations. Provide where EKPC removed the portion of dues associated with lobbying specific to National Rural Electric Cooperative Association (NRECA).

12. Refer to the Stipulation and Settlement Agreement, Exhibit C, "EKPC Summary" tab. Provide the rate of return on rate base for each rate class before and after the addition of the increased interruptible credit.

13. Refer to the Hearing Testimony of Jeffrey Wernert.

a. Explain further how the increase of the interruptible credit, specifically for the Large Special Contract class, will have a "cost of service impact which will stand to improve the rate of return for that class subrationally" given that the revenue increase for that class would only be 2.25 percent.

b. Provide a detailed example of how the interruptible credit impacts each class's cost to serve.

c. Explain how increasing the Large Special Contract's target revenue by 2.25 percent, after the addition of increased interruptible credits, instead of the proposed 11 percent, properly addresses the subsidization that the Large Special Contract class receives, as shown by the rate of return on rate base of roughly (3.76) percent and a cost of service study supported revenue allocation of approximately 24.49 percent.

14. Refer to the Hearing Testimony of Cliff Scott. State whether the other party of the Pumping Station Special Contract was a party to the stipulation. If not, explain whether the agreement to amend the Pumping Station Special Contract to eliminate the existing subsidy by either: (1) updating transmission costs from the 2000 level and including PJM generation capacity cost in a market-based contract; or (2) place the 31.9 MW gas utility on a standard cost-of-service rate, was discussed with the other party to the Pumping Station Special Contract.

15. Refer to the Hearing Testimony of Cliff Scott.

a. Explain if and/or how EKPC anticipates the SEM will impact EKPC's credit ratings and, in turn, its financing costs. Include in the response quantitative examples.

b. Considering EKPC anticipates increased borrowing as a result of the Commission's approval of Certificate of Public Convenience and Necessity (CPCN) projects for new generation, explain the timeline and impact this change in rating would have on EKPC's financing costs for such borrowings.

c. Regarding EKPC's revolving credit facility, if positive changes to EKPC's credit rating were to occur in the future as a result of implementing the SEM, explain whether EKPC anticipates it would refinance debt obligations at the more favorable rates. If so, explain the impact EKPC would expect that to have on its financial condition and TIER.

16. Refer to the Hearing Testimony of Jacob Watson.

a. Provide the number of times and hours EKPC has interrupted its Large Special Contract customer(s), by date, each year for each year beginning in 2015.

b. Refer to the Application, Exhibit 16, Attachment JRW-1, Schedule 1.11. Explain the variances in EKPC's Retiree Medical Insurance expense for the years 2020–2024, including what justified the outliers in 2022 and 2023.

c. Refer to the Application, Exhibit 16, Attachment JRW-1, Schedule 1.06. State whether the adjusted Salaries and Wages figure included overtime. If yes, explain what overtime hours and overtime premium assumptions were used and how the amounts were derived.

17. Refer to the Direct Testimony of Jacob Watson, page 29.

a. Explain whether removing the 20,000-kW cap from Rate D would impact potential Rate DCP customers.

b. Confirm that the purpose of removing the 20,000-kW cap from Rate D would allow larger loads than 20,000-kWs to become interruptible. If not confirmed, explain the purpose of removing the 20,000-kW cap.

18. Refer to the Direct Testimony of Randy A. Futral (Futral Direct Testimony), which noted a methodology error in the calculation of the Generation Maintenance

Regulatory Asset Threshold, the correction of which would have increased EKPC's requested increase by approximately $9.873 million. Confirm whether this methodology error was corrected in the calculation of the stipulated increase amount. If not confirmed, provide a corrected amount.

19. Refer to Stipulation, page 7, paragraph 7d. Explain whether EKPC anticipates filing for the power production and co-generation dates during the stay-out period consistent with the proposed tariff amendment.

Linda Bridwell RP

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

DATED **DEC 11 2025**

cc: Parties of Record

*L. Allyson Honaker
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

*Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Meredith L. Cave
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

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

*J. Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Heather Temple
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

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

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

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

*Toland Lacy
Office of the Attorney General
700 Capital Avenue
Frankfort, KY 40601

*John G Horne, II
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204