## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF EAST KENTUCKY POWER	)	
COOPERATIVE, INC. FOR A CERTIFICATE OF	)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY FOR	)	2018-00292
THE CONSTRUCTION OF BACKUP FUEL	)	
FACILITIES AT ITS BLUEGRASS GENERATING	)	
STATION	)	

## 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 the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due on or before November 26, 2018. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Responses that are required to be provided on electronic medium 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 association or a governmental agency, be accompanied by a signed certification of the preparer or 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 it obtains 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, EKPC shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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 filing a document containing personal information, EKPC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

- Refer to EKPC's response to Staff's First Request for Information (Staff's First Request), Items 2 and 9.
- a. Does EKPC have any natural gas-fired units with black-start capability? If so, identify such units.
- b. Was any consideration given to upgrade any of the units at Bluegrass
   Generating Station to have black-start capability?
- c. If the response to Item b. above is negative, explain the reason(s)
   black-start capability was not considered.
- d. Did EKPC consider the environmental impacts of dual-fuel capability in the 2020-21 delivery year in the May 2017 Reliability Pricing Model auction?
- e. What impact will existing environmental standards have on the total unforced capacity in delivery years after the proposed project is completed?

2. Refer to EKPC's response to Staff's First Request, Item 8. Explain why the annual capacity factor for Bluegrass Unit 3 is greater than that of Bluegrass Units 1 and 2.

Gwen R. Pinson Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED NOV 0 7 2018

cc: Parties of Record

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