

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
A (1) CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY FOR THE CONSTRUCTION OF)	CASE NO.
TRANSMISSION FACILITIES IN MADISON)	2022-00314
COUNTY, KENTUCKY; AND (2) DECLARATORY)	
ORDER CONFIRMING THAT A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY IS)	
NOT REQUIRED FOR CERTAIN FACILITIES)	

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 January 20, 2023. 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 representatives of a public or private corporation or a partnership or association or a

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).

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 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 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 EKPC's response to Commission Staff's First Request for Information (Staff's First Request), Item 2, and EKPC's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 21. If the Commission determines the construction of the New Industrial Substation is not an ordinary extension of an existing system in the usual course of business, and that it requires prior Commission approval pursuant to KRS 278.020(1), provide the legal basis upon which

EKPC proposes that the Commission grant such approval given that EKPC lacks critical, basic information regarding the construction of the New Industrial Substation, including where it will be located and the specifics of its configuration.

2. Refer to EKPC's response to Staff's Second Request, Item 19. Provide information about the duration of the outages in March 2107 by the five structures that failed during a storm event. Also provide information about the duration of the outages in June 2021 caused by the cross-arm failure.

3. Refer to EKPC's response to Staff's Second Request, Item 10. Provide the right-of-way (ROW) widths for 138 kV and 69 kV transmission lines and explain whether the existing ROW is sufficient for collocating the 138 kV line with the rebuilt 69 kV line. Provide a citation to any safety regulation or industry-accepted best practice that supports the response.

4. Refer to EKPC's response to Staff's First Request, Item 11. Explain the conductor blow-out requirements, or other requirements, when there are collocated 69 kV and 138 kV lines that will not come into contact with each other. Explain what would happen if the two lines did come into contact with each other.

5. Refer to EKPC's response to Staff's Second Request, Item 14. Explain whether the 138 kV to 69 kV stepdown transformer is to be installed at the Fawkes/New Industrial Substation to connect the 138 kV and 69 kV systems. If this is not the connection, explain where the two systems will be connected.

6. Provide a detailed explanation and analysis of how the 138 kV transmission line and substation upgrades to the existing system proposed in the Application satisfies

the need and lack of wasteful duplication standard necessary for Commission approval of a CPCN..

7. Provide an estimate of the cost savings of constructing the 138 kV system upgrade as proposed instead of building a 138 kV system only when the need arises to service increased load in the future. Include in the response, a breakdown of the cost savings. If an estimate can't be provided, explain why.

8. Provide an estimate of the anticipated future load to be serviced by the 138 kV upgrade. Also explain when EKPC anticipates experiencing load growth at a level to justify the need for a 138 kV line at the location identified in the Application..



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DATED JAN 12 2023

cc: Parties of Record

Case No. 2022-00314

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