

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. TO)	CASE NO.
IMPLEMENT A RESIDENTIAL ELECTRIC)	2022-00439
VEHICLE OFF-PEAK CHARGING PILOT)	
PROGRAM)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO EAST KENTUCKY POWER COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc. (EKPC), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on March 29, 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 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

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).

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 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Explain why EKPC proposed an Electric Vehicle (EV) pilot program as a Demand-Side Management program rather than an optional rate tariff.
2. Refer to EKPC's response to Commission Staff's First Request for Information (Staff's First Request), Item 1b.
 - a. Explain EKPC's decision to propose a per kWh incentive instead of a flat rate incentive.

b. Explain whether EKPC considered any other incentive method when developing the proposed pilot.

(1) If so, explain in detail the different incentive methods considered and include the amounts, per incentive.

(2) If not, explain why EKPC did not consider an alternative incentive method.

3. Refer to EKPC's response to Staff's First Request, Item 1d. EKPC stated that it plans to employ two methods of quality assurance to verify accuracy.

a. Explain how the third-party vendor will collect and access the EV telematics and how the information will be provided to EKPC.

b. Explain whether the third-party vendor will perform any other tasks than collect data via EV telematics. If so, describe the additional tasks.

c. Explain what information the third-party vendor is capable of collecting that EKPC is not able to assess through the AMI and Sense Flex home energy monitors.

d. Explain whether the Sense Flex home energy monitor is going to be installed for the five owner-member cooperatives noted in Method 1. If so, explain why that is necessary.

e. Provide a cost estimate for the Sense Flex home energy monitor that includes but is not limited to installation costs.

f. Explain why the two methods of quality assurance are necessary and does not represent duplication of service.

4. Refer to EKPC's response to Staff's First Request, Item 1e.

a. Explain whether EKPC considered other methods of program enrollment.

b. Explain the benefits of EKPC choosing to randomly select the participants for the EV pilot program as compared to other methods of enrollment.

5. Refer to EKPC's response to Staff's First Request, Item 3a. Provide the estimated cost for EKPC to install a Utility-Controlled Charger at the customer's residence.

6. Refer to EKPC's response to Staff's First Request, Item 5b. Explain EKPC's plan if a participation level of 50 EVs is not reached.

7. Refer to EKPC's response to Staff's First Request, Item 5c. Refer also to EKPC's response to Staff's First Request, Item 1d. Explain which EKPC Owner-Member Cooperatives currently have AMI installed throughout their service territory.

8. Refer to EKPC's response to Staff's First Request, Item 5f. Provide cost justification for a \$48,000 DSM Software Upgrade and explain the need for this update.

9. Refer to EKPC's response to Staff's First Request, Item 7. Provide a cost estimate of EKPC's proposed advertising plan for this pilot.



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DATED MAR 13 2023

cc: Parties of Record

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