

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF EAST KENTUCKY POWER)	2023-00009
COOPERATIVE, INC. FROM NOVEMBER 1, 2020)	
THROUGH OCTOBER 31, 2022)	

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 January 25, 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 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 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. For any correction made at the hearing to pre-filed testimony or responses to requests for information, file the corrected testimony or responses.

2. Provide a copy of PJM Manual 13: Emergency Operations and any instructions related to emergency operations or maximum emergency directions provided by PJM Interconnection, LLC (PJM) during the two-year period under review.

3. Refer to EKPC's response to Commission Staff's First Request for Information (Staff's First Request), Item 25(a).

a. Provide the full name for TGP.

b. Explain why TGP is noted as being excluded from the Fuel Adjustment Clause (FAC).

4. Refer to EKPC's response to Staff's First Request, Items 14 and 17 (Tab Aug. 22). Explain the conflict between the Item 14 response stating that Cooper 1 Generating Station was in a forced outage on August 26, 2022, and the Item 17 (Tab Aug. 22) response indicating economic dispatch at Cooper 1 Generating Station on August 26, 2022.

5. Refer to EKPC's Response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1, page 2 of 4, first bullet point. Regarding FERC's approval of changes to PJM's ARR/FTR market, which affected the rules for cost-based energy offers. EKPC's response states, "Generators must submit cost based offers that are consistent with their fuel cost policy. Generators are dispatched on their cost based offer if they are needed to relieve a transmission constraint and market power mitigation rules are triggered. The changes (1) require the costs included in the unit owner's Fuel Cost Policy to be 'verifiable and systematic' [...]."

a. Explain if generators were supposed to submit cost based offers prior to the FERC ruling. If not, then explain on what grounds the offers were based.

b. Explain if the ruling had any effect of standardizing fuel procurement policies across PJM generally.

c. Explain if EKPC had to change any of its practices as a result of the change in PJM's ARR/FTR market.

d. Explain what "verifiable and systematic" means as the standard is applied to coal and to natural gas. Also, explain if the same standard is applied to renewable PPAs.

e. Explain in detail how PJM ensures the offer is complying with the utility's Fuel Cost Policy.



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

DATED JAN 11 2024

cc: Parties of Record

*L. Allyson Honaker
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 6202
Lexington, KENTUCKY 40509

*Brittany H. Koenig
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 6202
Lexington, KENTUCKY 40509

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

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