

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. AND)	
ITS MEMBER DISTRIBUTION COOPERATIVES)	CASE NO.
FOR APPROVAL OF PROPOSED CHANGES TO)	2023-00153
THEIR QUALIFIED COGENERATION AND)	
SMALL POWER PRODUCTION FACILITIES)	
TARIFFS)	

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, shall file with the Commission an electronic version of the following information. The information requested is due on July 31, 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

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. Refer to EKPC's response to Commission Staff's First Request for Information (Staff's First Request), Item 1(a).

a. Update Table 1(a) shows a capacity deficit beginning in 2028. Provide the reason EKPC does not plan to add generation capacity until 2032.

b. Explain how EKPC will satisfy its obligations under KRS 278.030(2) when it projects a winter capacity deficit from 2028–2032.

2. Refer to EKPC’s response to Staff’s First Request, Item 1(b), Table EKPC Final Plan Projected Additions and Reserves.

a. Provide any information, including the Power Purchase Agreement (PPA), for the 200 MW addition for 2024. If EKPC has not entered into the PPA, explain when and how EKPC will determine if the 200 MW PPA contract for renewable energy will be executed.

b. Explain if the 200 MW PPA is for summer, winter, or both.

c. Explain if EKPC enters into, and exercises the 200 MW PPA strike price hedge, is EKPC obligated to take the full 200 MW of energy hourly or any amount of energy up to 200 MW.

d. As the energy LMP increases from below the 200 MW PPA strike price to above the strike price and EKPC exercises its rights under the 200 MW PPA, explain how that affects the hourly operation of EKPC’s generation units, the energy prices received by EKPC for its generation sales into PJM and the ultimate energy prices paid by EKPC as the LMP changes from below to above the strike price. Include a numerical example in the response.

e. If EKPC exercises its rights under the 200 MW PPA, explain if the 200 MWs is considered dispatchable.

3. Refer to EKPC’s response to Staff’s First Request, Item 1(b). Explain why the plan EKPC submitted in its Integrated Resource Plan included an annual 100 MW energy purchase, but EKPC stated the 100 MW energy purchase has not been entered

into prior to this proceeding. Include in the response, why the table in Item 1(b) does not include the annual 100 MW energy purchase.

4. Explain why EKPC would need to purchase the 100 MW energy if EKPC states that it does not have a capacity shortfall in the near future.

5. Explain if EKPC is certain that its current generation fleet is sufficient enough to provide adequate service to its territory for the next ten years.

6. Refer to EKPC's response to Staff's First Request, Item 3. Provide a copy of every Purchase Power Agreement EKPC has entered into for the each of the following years: 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, and 2023. For all existing contracts, identify where, in the contract, the qualify facility (QF) owner requested that its generation capacity be considered non-dispatchable.

7. Explain how EKPC plans to apply its tariff and rates uniformly across all generation types of qualifying facilities (QFs). To the extent that different types of QFs exist in EKPC's service territory, provide supporting calculations and explanations for at least three QF types.

8. Explain and provide the modeling and analysis EKPC has completed in regard to its Locational Deliverability Area (LDA) to meet the import criteria of the Capacity Emergency Transfer Objective in PJM. Provide all data in which EKPC's LDA specific ELCC is based, including both summer and winter season data. If no analysis has been conducted, explain how EKPC is assured that during a situation of high demand and a capacity shortage within its LDA, that it will be able to import sufficient power with an adequate Capacity Emergency Transfer Limit.



FOR

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

DATED JUL 20 2023

cc: Parties of Record

Case No. 2023-00153

*Aaron Baldwin
South Kentucky R.E.C.C.
200 Electric Avenue
Somerset, KY 42501

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

*Joe F. Childers
Childers & Baxter PLLC
300 Lexington Building, 201 West Sho
Lexington, KENTUCKY 40507

*Alan Q. Zaring
Attorney at Law
Zaring & Sullivan Law Office, PSC
P.O. Box 226
New Castle, KENTUCKY 40050

*Chris Adams
East Kentucky Power Cooperative, Inc.
P. O. Box 707
Winchester, KY 40392-0707

*Jennie G Phelps
Farmers R.E.C.C.
504 South Broadway
P. O. Box 1298
Glasgow, KY 42141-1298

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

*Chuck Williamson
Blue Grass Energy Cooperative Corp.
1201 Lexington Road
P. O. Box 990
Nicholasville, KY 40340-0990

*Jake A Thompson
Crawford & Baxter, P.S.C. Attorneys at Law
523 Highland Avenue
P. O. Box 353
Carrollton, KENTUCKY 41008

*April Renner
Jackson Energy Cooperative Corporation
115 Jackson Energy Lane
McKee, KY 40447

*J H Dean
Legal Counsel
Inter-County Energy Cooperative Corporation
1009 Hustonville Road
P. O. Box 87
Danville, KY 40423-0087

*Fleming-Mason Energy Cooperative, In
Fleming-Mason Energy Cooperative, Inc.
1449 Elizaville Road
P. O. Box 328
Flemingsburg, KY 41041

*Big Sandy R.E.C.C.
Big Sandy R.E.C.C.
504 11th Street
Paintsville, KY 41240

*Farmers R.E.C.C.
Farmers R.E.C.C.
504 South Broadway
P. O. Box 1298
Glasgow, KY 42141-1298

*Nolin R.E.C.C.
Nolin R.E.C.C.
411 Ring Road
Elizabethtown, KY 42701-6767

*Billy Frasure
Clark Energy Cooperative, Inc.
2640 Ironworks Road
P. O. Box 748
Winchester, KY 40392-0748

*Honorable James M Crawford
Crawford & Baxter, P.S.C. Attorneys at Law
523 Highland Avenue
P. O. Box 353
Carrollton, KENTUCKY 41008

*South Kentucky R.E.C.C.
South Kentucky R.E.C.C.
200 Electric Avenue
Somerset, KY 42501

*Bradley Cherry
Grayson R.E.C.C.
109 Bagby Park
Grayson, KY 41143

*Jennifer L McRoberts
Fleming-Mason Energy Cooperative, Inc.
1449 Elizaville Road
P. O. Box 328
Flemingsburg, KY 41041

*Blue Grass Energy Cooperative Corp.
Blue Grass Energy Cooperative Corp.
1201 Lexington Road
P. O. Box 990
Nicholasville, KY 40340-0990

*Clark Energy Cooperative, Inc.
Clark Energy Cooperative, Inc.
2640 Ironworks Road
P. O. Box 748
Winchester, KY 40392-0748

*Michael L Cobb
Manager - Corporate Accounting
Owen Electric Cooperative, Inc.
P. O. Box 400
Owenton, KY 40359

*Robin Slone
Big Sandy R.E.C.C.
504 11th Street
Paintsville, KY 41240

*Cumberland Valley Electric, Inc.
Cumberland Valley Electric, Inc.
Highway 25E
P. O. Box 440
Gray, KY 40734

*Owen Electric Cooperative, Inc.
Owen Electric Cooperative, Inc.
8205 Highway 127 North
P. O. Box 400
Owenton, KY 40359

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

*Shelby Energy Cooperative, Inc.
Shelby Energy Cooperative, Inc.
620 Old Finchville Road
Shelbyville, KY 40065

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

*Salt River Electric Cooperative Corp
Salt River Electric Cooperative Corp.
111 West Brashear Avenue
P. O. Box 609
Bardstown, KY 40004

*Inter-County Energy Cooperative Corp
Inter-County Energy Cooperative Corporation
1009 Hustonville Road
P. O. Box 87
Danville, KY 40423-0087

*Grayson R.E.C.C.
Grayson R.E.C.C.
109 Bagby Park
Grayson, KY 41143

*Jackson Energy Cooperative Corporati
Jackson Energy Cooperative Corporation
115 Jackson Energy Lane
McKee, KY 40447

*Taylor County R.E.C.C.
Taylor County R.E.C.C.
625 West Main Street
P. O. Box 100
Campbellsville, KY 42719

*Licking Valley R.E.C.C.
Licking Valley R.E.C.C.
P. O. Box 605
271 Main Street
West Liberty, KY 41472

*Robert Tolliver
Officer Manager
Cumberland Valley Electric, Inc.
Highway 25E
P. O. Box 440
Gray, KY 40734