

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2019 INTEGRATED)	CASE NO.
RESOURCE PLAN OF EAST KENTUCKY)	2019-00096
POWER COOPERATIVE, INC.)	

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 an electronic version of the following information. The information requested herein is due on May 8, 2020. The Commission directs EKPC to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency.¹ Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 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 shall 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 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 the period between the filing of EKPC's last Integrated Resource Plan in Case No. 2015-00134² and the current case.

a. Provide a list of capital projects that have been implemented, are in the capital budget but not completed or planned, and the purpose of those projects.

² Case No. 2015-00134, *The 2015 Integrated Resource Plan of East Kentucky Power Cooperative, Inc.* (Ky. PSC May 3, 2016).

b. Provide a list of capital projects that had been planned or approved and then deleted from the capital budget and the reason it was deleted.

c. When EKPC is evaluating the costs and benefits of undertaking a capital project, explain whether contingency costs are explicitly included in the cost calculations.

2. Refer to the application generally. Explain the extent to which the COVID-19 virus is impacting EKPC and the member cooperatives and whether there are any anticipated longer-term effects.

3. Refer to the application generally, regarding the Federal Minimum Offer Price Rule (MOPR) that is currently under consideration. If the MOPR as it stands now is enacted:

a. Explain how it will affect EKPC's participation in PJM Interconnection, LLC (PJM).

b. If not explained above, explain whether EKPC's actions will be affected under recent Capacity Performance requirements.

c. Explain whether EKPC's participation in PJM would still be beneficial in the future.

d. Explain whether and how EKPC's PPA/ capacity and transmission planning and capital projects will be affected.

e. Explain whether it would still be beneficial to add dual fuel capability to Bluegrass Station.

4. Refer to the application generally. Explain whether EKPC has any industrial or large commercial customers that are wanting to implement their own green energy initiatives and how EKPC is working with these customers.

5. Refer to EKPC's response to Commission Staff's First Request (Staff's First Request), Item 2. Provide the May 31, 2019 Annual Report regarding its participation in PJM.

6. Refer to EKPC's response to Staff's First Request, Item 3. Identify and explain all existing and contemplated hedging strategies for EKPC including any cost-benefit ratio studies and other studies related thereto.

7. Refer to EKPC's response to Staff's First Request, Item 4. Provide examples of plant improvement efficiency measures that EKPC could consider and that would serve as a compliance option under the Federal Affordable Clean Energy Rule.

8. Refer to EKPC's response to Staff's First Request, Item 21. Provide updates to the case as they become available. Consider this an ongoing request throughout this proceeding.

9. Refer to EKPC's response to Staff's First Request, Item 33. Provide updates as they become available for the state implementation process under the ACE Rule and judicial developments. Consider this an ongoing request throughout this proceeding.

10. Refer to EKPC's response to Staff's First Request, Item 46. Provide updates as they become available as they relate to the study of dual fuel capacity at Bluegrass Station. Consider this an ongoing request throughout this proceeding.

11. Refer to EKPC's request to the Attorney General's First Request for Information (Attorney General's First Request), Item 10. Provide an update to the estimates of costs for environmental controls as they become available. Consider this an ongoing request throughout this proceeding.

12. Refer to EKPC's response to the Attorney General's First Request , Item 19.

a. For Cooper Station, both Maintenance and Non-Fuel Operations costs increased significantly from 2018 to 2019. Provide an explanation of these cost increases and whether these are expected to extend into the future.

b. For Smith Station, both Maintenance and Non-Fuel Operations costs have decreased significantly since 2017. Provide an explanation of the actions EKPC has taken to reduce these costs and whether the 2019 cost levels can be sustained into the future.

c. For Bluegrass Station, Maintenance costs have fallen and Non-Fuel Operations costs have seen significant cost reductions since 2016. Explain the actions that EKPC has taken to lower these costs and whether the 2019 cost levels can be sustained in the future.

13. Refer to EKPC's response to the Attorney General's First Request, Item 20. Provide the requested information for 2019.

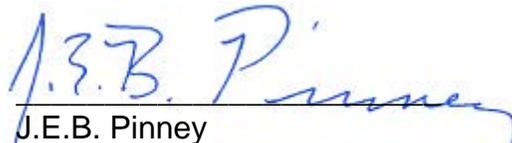
14. Refer to EKPC's response to the Attorney General's First Request, Item 24. Regarding the direct load control program:

a. For those customers who participate, explain whether all the customers have their meter replaced with the special meter or the special meter is in addition to the AMI meter.

b. Explain whether the cost of the additional meter is included in the program cost benefit analysis.

c. As the summer and winter peaks increase, explain whether EKPC anticipates that the direct load control program and any other related demand-side management products will play an increasingly necessary role in EKPC's participation in PJM.

15. Refer to EKPC's response to the Attorney General's First Request, Item 26. Given that EKPC's summer peak is growing faster than the winter peak, explain whether and how this will impact EKPC's participation in PJM as a Reliability Pricing Model versus Fixed Resource Requirement participant.


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DATED APR 14 2020

cc: Parties of Record

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