

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. OF)	
AN AMENDMENT TO AN INDUSTRIAL)	
POWER AGREEMENT WITH)	CASE NO.
INTERRUPTIBLE SERVICE BETWEEN EAST)	2020-00317
KENTUCKY POWER COOPERATIVE, INC.,)	
OWEN ELECTRIC CORPORATION, INC. AND)	
NUCOR STEEL GALLATIN, LLC F/K/A)	
GALLATIN STEEL COMPANY)	

COMMISSION STAFF'S FIRST 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 November 9, 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. All responses 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.

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.

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 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 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 Attachment to Commission's September 29, 2020 Order filed in this case. In the response to Commission Staff's Requests dated July 23, 2020, Item 1, EKPC attempts to explain why the special contract was not structured under its Economic

Development Rider (EDR) tariff. However, there remain striking similarities between the special contract, EKPC's EDR tariff, and the Findings enumerated in the Commission's September 24, 1990 Order in Administrative Case 327.²

a. Provide further explanation as to why EKPC did not structure this special contract under its EDR tariff.

b. Explain why EKPC believes the EDR requirements should not be applied to the special contract.

c. Assuming the EDR requirements do apply, state whether EKPC seeks deviations from the specific requirements that the special contract does not satisfy.

2. Refer to the Attachment to Commission's September 29, 2020 Order filed in this case. In EKPC's response to Commission Staff's Requests dated July 23, 2020, the spreadsheet entitled, EKPC Expected Reserve Margins w/ 15 MW Nucor Firm Load Included. In EKPC's pending Integrated Recourse Plan, its preferred plan contained two seasonal purchases of 100 MW each, in 2024 and in 2029 respectively to mitigate reserve margin erosion.³ Explain whether the lack of capacity additions in the discovery response means that EKPC has changed its long range plan for how it will mitigate the erosion of its reserve margin. If so, explain EKPC's new preferred plan.

² See Administrative Case No. 327, *An Investigation into the Implementation of Economic Development Rates by Electric and Gas Utilities* (Ky. PSC Sept. 24, 1990), Order at 25–28.

³ See Case No. 2019-00096, *Electronic 2019 Integrated Resource Plan of East Kentucky Power Cooperative, Inc.* (filed Apr. 1, 2019), Application, Table 1-4 at 20.



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DATED OCT 16 2020

cc: Parties of Record

Case No. 2020-00317

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