## 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 THIRD 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 November 17, 2023. The Commission directs EKPC to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

<sup>&</sup>lt;sup>1</sup> 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.

- Refer to EKPC's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 18.
- a. Explain the circumstances under which PJM requires capacity purchases when EKPC units are on a planned, maintenance or forced outage.
- b. For the energy purchases to hedge against potentially volatile market prices, explain whether these are on a will call basis, whether they were for certain hours

in a day, and whether there were limits to the number of hours that the energy can be taken.

- 2. Refer to EKPC's response to Staff's Second Request, Item 24. When a unit is bid into the market as must run and PJM does not call upon it to run at a level above its minimum load level, explain whether the unit is paid the higher of its cost to run or the locational marginal price (LMP).
- 3. Explain in detail the circumstances that would result in EKPC reporting a negative dollar value for a Coal and TDF burned, Oil burned, or Gas burned under Company Generation in its Fuel Adjustment Clause (FAC) form A rate sheet filing.

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

DATED NOV 01 2023

cc: Parties of Record

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