

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST	)	
KENTUCKY POWER COOPERATIVE, INC. FOR	)	
APPROVAL TO AMEND ITS ENVIRONMENTAL	)	
COMPLIANCE PLAN AND RECOVER COSTS	)	CASE NO.
PURSUANT TO ITS ENVIRONMENTAL	)	2023-00177
SURCHARGE, AND FOR ISSUANCE OF	)	
CERTIFICATES OF PUBLIC CONVENIENCE	)	
AND NECESSITY AND OTHER RELIEF	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO EAST KENTUCKY POWER COOPERATIVE, INC.

East 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 September 26, 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

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<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).

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. For the past five years, provide a summary of any major forced outages at each of EKPC's Spurlock Station and Cooper Station generating facilities and provide the associated root cause analysis for each outage.

2. Confirm if EKPC considered the beneficial reuse of fly ash, bottom ash and/or gypsum by products of coal combustion residual. If yes, provide the analysis,

including cost comparisons, conclusions, and any supporting documentation for the conclusions. If not, explain why not.

3. Refer to the Cooper Station landfill capping project as described in the EKPC application, page 16, paragraph 32(d). Confirm that the stormwater drainage ditch leachate be monitored and treated. If it is, provide the associated costs to monitor and treat the leachate as well as any supporting documentation or estimates. If it will not be monitored, explain how EKPC reached that decision and include any supporting documentation.

4. Refer to EKPC's response to Commission Staff's First Request for Information, Item 1 and Item 2. Provide variable production cost data in \$/MWH for the past five years for the Cooper Station facility as provided in the chart provided in the actual response file for Item 1.

5. Refer to the Application, page 16, "[t]he anticipated cost for the CFI Closure in Place project is \$47.2 million". Provide a breakdown of the cost estimate and any supporting documentation.

6. Provide a chart with a breakdown of cost comparison for each proposed project as well as each alternative considered.

7. Provide the environmental protection measure(s) that will be taken in the closure of the Cooper Station ash pond, including whether or not the area will be lined prior to final cap. Explain whether EKPC considered future environmental regulations related to legacy ponds in its evaluation of the closure plan.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
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DATED SEP 11 2023

cc: Parties of Record

Case No. 2023-00177

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