

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)	2024-00101
THEIR QUALIFIED COGENERATION AND)	
SMALL POWER PRODUCTION FACILITIES)	
TARIFFS)	

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 August 2, 2024. 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 Integrated Resource Plan (IRP) in Case No. 2022-00098, generally.² It is not apparent where in the IRP a reciprocating internal combustion engine (RICE) was ever considered as a resource available to EKPC's models in the resource

² Case No. 2022-00098, *Electronic 2022 Integrated Resource Plan of East Kentucky Power Cooperative, Inc.* (filed Apr. 1, 2022).

selection analyses or the production cost/portfolio optimization analyses. Provide all the citations in the IRP where RICE facilities are discussed and made available for modeling purposes and analyses.

2. Refer to EKPC's confidential response to Commission Staff's Second Request for Information (Staff's Second Request), Items 1 and 2, and Confidential-DR2-R1 and R2-CT-RICE Comparison Table 06172024. Explain why the variable operating and maintenance cost was not provided for EKPC's JK Smith combustion turbines (CT).

3. Refer to EKPC's confidential response to Staff's Second Request, Items 1 and 2, and Confidential-DR2-R1 and R2-CT-RICE Comparison Table 06172024. Also refer to EKPC's response to Commission Staff's First Request for Information, Item 3. EKPC's response indicates that the JK Smith LMS100's start-up to full-load time is faster than the other CTs and similar to the RICE generator full-load start time.

a. Explain why the discussion in Item 3 focuses on all of the other CTs, and specifically, the F-Class CT.

b. Explain the process by which PJM Interconnection LLC (PJM) coordinates with EKPC regarding CT start times.

c. Given that EKPC only has the JK Smith LMS100s with start-up to full-load times of less than 30 minutes, explain whether it has ever failed to meet PJM required generation obligations due to relatively longer CT start-up times.

d. If not, explain why the start-up time of the RICE is relevant.

4. Fuel type notwithstanding, provide a comparison of the RICE generator with EKPC's existing generators located at the various landfills.



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DATED JUL 22 2024

cc: Parties of Record

Case No. 2024-00101

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