

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
A CERTIFICATES OF PUBLIC CONVENIENCE)	
AND NECESSITY AND SITE COMPATIBILITY)	
CERTIFICATES FOR THE CONSTRUCTION OF)	
A 96 MW (NOMINAL) SOLAR FACILITY IN)	CASE NO.
MARION COUNTY, KENTUCKY AND A 40 MW)	2024-00129
(NOMINAL) SOLAR FACILITY IN FAYETTE)	
COUNTY, KENTUCKY AND APPROVAL OF)	
CERTAIN ASSUMPTIONS OF EVIDENCES OF)	
INDEBTEDNESS RELATED TO THE SOLAR)	
FACILITIES AND OTHER RELIEF)	

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, shall file with the Commission an electronic version of the following information. The information requested is due on July 19, 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

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).

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 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 response to Commission Staff's First Request for Information (Staff's First Request), Items 1 and 4.

a. Provide an update to the table in Item 4 to include EKPC's seasonal capacity and reserve margins with and without the addition of the two solar projects in this case.

b. To the extent that EKPC's estimated seasonal capacity and reserve margins differ from what was presented in EKPC's 2022 IRP, explain why.

2. Refer to Case No. 2023-00153, EKPC's response to Staff's First Request,² Item 1(a). Update the table to reflect estimated capacity position upon construction of the proposed projects.

3. Provide a calculation of estimated annual net avoided operations and maintenance cost of all generation based on the addition of the proposed projects.

4. Refer to Application, Direct Testimony of Julia J. Tucker, pages 12-13.

a. Provide estimated timelines for construction and interconnection of the two planned sites.

b. Provide an estimated timeline if EKPC were to select its own site, build, and apply for interconnection, including time required for site selection and approval, CPCN approval, construction, and interconnection.

c. Provide the estimated cost of a project described in the response to Item 4(b) above, for a facility or facilities of the same capacity, design, and transmission availability as the proposed project.

² Case No. 2023-00153, *Electronic Tariff Filing of East Kentucky Power Cooperative, Inc. and Its Member Distribution Cooperatives for Approval of Proposed Changes to Their Qualified Cogeneration and Small Power Production Facilities Tariffs* (filed June 26, 2023), EKPC's Response to Staff's First Request, Item 1(a).

5. Refer to EKPC's response to Staff's First Request, Item 5b. Provide a response to Item 5b.

6. Refer to EKPC's response to Staff's First Request, Item 12a. Without changing the number of solar panels required to generate 96 MW, explain how EKPC has been able to reduce the impact area of the original Northern Bobwhite site design as compared to the EKPC designed impact area from approximately 1,700 acres to 635 acres. Include with the response an impact overlay map illustrating the two impact areas and the panel locations within the respective project footprints.

7. Refer to EKPC's response to Staff's First Request, Item 12c and Item 14. Item 12c indicates that EKPC will accept the mitigation measures in Case No. 2020-00208. EKPC's response in Item 14 appears to indicate a possible dichotomy between the two responses regarding noise mitigation. To the extent that Lexington-Fayette Urban County Government's noise ordinance is less restrictive than the noise mitigation in Case No. 2020-00208, explain which mitigation measure will control EKPC's actions.

8. Refer to EKPC's response to Staff's First Request, Item 12c and Item 15b. Item 12c indicates that EKPC will accept the mitigation measures in Case No. 2020-00208. EKPC's response in Item 15b appears to indicate a possible dichotomy between the two responses regarding pile driving days and hours of operation. Confirm that EKPC will adhere to the mitigation measures in Case No. 2020-00208 regarding pile driving days of the week and daily hours of operation.



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DATED JUL 03 2024

cc: Parties of Record

Case No. 2024-00129

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