

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
1) CERTIFICATES OF PUBLIC CONVENIENCE)	
AND NECESSITY TO CONSTRUCT A NEW)	CASE NO.
GENERATION RESOURCES; 2) FOR A SITE)	2024-00370
COMPATIBILITY CERTIFICATE RELATING TO)	
THE SAME; 3) APPROVAL OF DEMAND SIDE)	
MANAGEMENT TARIFFS; AND 4) OTHER)	
GENERAL RELIEF)	

COMMISSION STAFF'S POST-HEARING 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 no later than May 7, 2025. 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

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).

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. Provide the quantitative analysis for the cost impact of the Corporate Sustainability Plan to reduce carbon emissions by 35 percent.
2. On May 8, 2024, the United States Environmental Protection Agency (EPA) finalized changes to the regulations for inactive surface impoundments at inactive electric

facilities, referred to as Legacy Surface Impoundments (LSIs). Provide a list of the 11 facilities that EKPC owns or operates that may be subject to the Legacy Rule.

a. How many of the facilities proposed to be co-fired are part of that list of 11 facilities?

b. State whether the expense estimates of the projects include expenses related to addressing future compliance with the Legacy Rule.

3. Provide a copy of all contracts related to the proposed natural gas pipeline expansion projects.

4. Provide any updates to the permitting process regarding the construction of the facilities or any environmental approvals necessary to construct the facilities.

5. Provide updates on the current status of the air and water permitting process for each of the following projects:

a. Cooper Combine Cycle Gas Turbine (CCGT) project.

b. Cooper Unit 2 natural gas co-firing project.

c. Spurlock Units 1–4 natural gas co-firing projects.

6. Refer to Scott Drake's April 22, 2025, hearing testimony.

a. Provide a list of each member cooperative and demand-side management (DSM) program they currently implement.

b. Provide the EKPC budget for the DSM programs for each of the years 2019-2024.

c. Provide the amount of incentive payments made to each owner-member cooperative for each year for the years 2019-2024 and 2025 to the present date.

7. Provide documentation to demonstrate the financial impacts of the storm-related capacity shortfall reflected in EKPC's response to Staff's Third Request for Information (Staff's Third Request), Item 3, referring to the Bluegrass Units 2 and 3, which were off-line for extended periods during the December 2022 Winter Storm Elliott, resulting in a loss of 400 MW of capacity.

8. Provide updated figures for the range of transmission expense previously provided in EKPC's response to Staff's Third Request for Information (Staff's Third Request), Item 1, and later discussed in Darrin Adams' hearing testimony.

9. Refer to Staff's First Request for Information (Staff's First Request), Items 2 and 3, and Staff's Second Request for Information (Staff's Second Request), Item 5. Provide an update on FERC's order approving the PJM Reliability Resource Initiative (RRI) filing (ER25-712) and the status of the Cooper and Spurlock projects as participants in the RRI.

10. Refer to Staff's Second Request, Item 5. Provide an update on FERC dockets ER25-682 (filed Dec. 9, 2024) and ER25-785 (filed Mar. 6, 2025), where PJM proposed revisions to its Reliability Pricing Model (PRM) and the potential impact of any FERC order accepting these filings on EKPC's CPCN.

11. Refer to EKPC's response to Staff's Second Request, Item 14. Confirm that the Spurlock Units could support up to 50 percent natural gas co-fire.

a. State whether EKPC expects Spurlock Units 1 and 2 to run with natural gas at all hours.

b. State whether EKPC expects that the co-firing percentage of natural gas being burned relative to coal will vary hour to hour or whether the percentage will

remain fairly constant. Also, state whether the natural gas percentage will vary as the units ramp up and down.

c. State whether EKPC expects that the coal-associated compliance costs are a significant factor in the offer price in the PJM Day Ahead and Realtime energy markets.

d. Provide whether the relative fuel costs will be a significant factor in EKPC's decision to determine the gas-to-coal burn ratio in the units.

e. State whether there will be any environmental cost savings if a 50 percent gas-to-coal burn ratio is maintained in the Spurlock units versus burning only coal.

12. Refer to EKPC's response to Staff's Second Request, Item 14.

a. State whether there would be significant cost savings if Cooper Unit 2 were run on a 100 percent natural gas burn ratio.

b. Provide the co-fire natural gas percentage that EKPC expects to run Cooper Unit 2.

c. State whether EKPC expects to run Cooper Unit 2 with natural gas during all hours.

d. State whether limiting the CCGT at the Cooper facility to a 40 percent natural gas burn ratio was considered in EKPC's expansion plan.

13. Refer to EKPC's response to the Attorney General's First Request for Information, Item 9. Provide the same chart reflecting the natural gas prices and add a column to reflect the contract price of the natural gas, including the fixed costs associated with the pipeline project.

14. Refer to Application, Attachment SD 11, Tariff Sheet 62, redline version. Confirm that “EKPC all also” should have been “EKPC will also.” If not confirmed, provide the correct wording.

15. Refer to the Application, Attachment SD-11, Tariff Sheet 84, redline version. Confirm that the lost revenues and administrative cost reimbursement are in addition to the maximum reimbursement amounts listed of the owner member cooperatives in the tariff. If not confirmed, provide the full amount of maximum reimbursement for the owner member cooperatives.

16. Refer generally to the Direct Testimony of Mark Horn. Provide the costs of the natural gas pipeline that will be installed to support the Cooper and Spurlock Projects, respectively. Also, include the impact these capital costs will have on the fuel costs over the period of the natural gas contract.

17. Refer to the Direct Testimony of Brad Young (Young Direct Testimony), page 14. The cost of providing co-firing capability at Cooper Unit 2 is estimated at \$73.8 million. If the EPA were to roll back the May 2024 Mercury and Air Toxics Standards (MATS) and Greenhouse Gas (GHG) regulations, state whether EKPC would elect to postpone the co-firing project. If not, state how EKPC would justify the costs of the co-firing project.

18. Refer to Young Direct Testimony, page 17. The cost of providing co-firing capability at the Spurlock Units 1-4 is estimated at \$186 million. If the EPA were to roll back the May 2024 MATS and GHG regulations, state whether EKPC would elect to postpone the co-firing project. If not, state how EKPC would justify the costs of the co-firing project.

19. Refer to the Project Scoping Report (BY-1), page 7.2. Provide a detailed description of the EKPC Project Management Organization that will manage the Cooper Combined Cycle Project utilizing a multi-prime contracting methodology. Include a description of each Project Management Organization member's specific skill sets and numbers of Full Time Equivalent employees.

20. Refer to the Project Scoping Report (BY-2), page 7.2. Provide a detailed description of the EKPC Project Management Organization that will manage the Cooper Unit 2 co-firing project utilizing a multi-prime contracting methodology. Include a description of each Project Management Organization member's specific skill sets and numbers of Full Time Equivalent employees.

21. Refer to the Project Scoping Report (BY-3), page 7.2. Provide a detailed description of the EKPC Project Management Organization that will manage the Spurlock Units 1-4 co-firing project utilizing a multi-prime contracting methodology. Include a description of each Project Management Organization member's specific skill sets and numbers of Full Time Equivalent employees.

22. Refer to Julia Tucker's April 22, 2025, hearing testimony in which she stated that the 300 MW hydro PPA is no longer available. Describe how this will impact the EKPC 2024 Expansion Plan.

23. Refer to Denise Foster Cronin's April 22, 2025, hearing testimony. Provide a summary of EKPC's PJM Performance Assessment Intervals (PAIs) bonuses and penalties for the period 2019 through 2024, as well as 2025 to present date.

24. Refer to EKPC's response to Staff's Third Request, Item 5. Provide the Owner Engineer's report verifying that the Spurlock Unit 3 Circulating Fluidized Bed (CFB)

boiler can be modified to meet the EPA's May 2024 MATS regulations. Include the cost estimates of the proposed modifications.

25. Confirm the contract with Siemens must be acted upon by July 1, 2025. If not confirmed, provide the date by which contract deposits would be lost if not acted upon.

26. Refer to the Direct Testimony of Julia Tucker in Case No. 2024-00310² where EKPC states that the RICE units become more economic than CTs when operated for more than 6,000 hours annually, implying a 73 percent capacity factor. Explain how this projected operation aligns with industry data indicating that RICE units typically operate at a 20 percent capacity factor (approximately 1,762 hours annually).



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DATED APR 24 2025

cc: Parties of Record

² Case No. 2024-00310, *The Electronic Application of East Kentucky Power Cooperative, Inc. for 1) A Certificate of Public Convenience and Necessity to Construct a New Generation Resource; 2) A Site Compatibility Certificate; 3) Other General Relief.*

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