

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)	2024-00109
SURCHARGE, AND FOR THE ISSUANCE OF A)	
CERTIFICATE OF PUBLIC CONVENIENCE AND)	
NECESSITY AND OTHER GENERAL 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 August 13, 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 response to Commission Staff's First Request for Information (Staff's First Request), Item 4, page 2. Are the six costs identified as construction costs provided for in the construction contract? Provide the name of the construction contractor. Provide the contract and any attachments for review.

2. Refer to EKPC's response to Staff's First Request, Item 4, page 2. EKPC estimated a cost of \$1,550,000 for geotechnical inspection, survey, design engineering, and construction quality assurance engineering. Provide additional support for the total cost estimate as well as for each of the cost components listed in the response.

3. Refer to EKPC's response to Staff's First Request, Item 4, page 2. Provide support for the estimated owner's cost of \$500,000.

4. Refer to EKPC's response to Staff's First Request, Item 4, page 2. Provide support for the estimated environmental costs, legal fees, and miscellaneous construction costs.

5. Refer to EKPC's response to Staff's First Request, Item 9, pages 1 and 2 and page 9a. EKPC received a response to a Request for Proposal (RFP) for the sale of the Spurlock Station gypsum. The potential purchaser offered to purchase 100,000 tons of gypsum at a rate of \$12.35 per ton. This beneficial use of the Spurlock Station gypsum could generate \$1,235,000 of additional income and a reduction in the volume of gypsum that is placed in the landfill. EKPC noted that the potential purchaser identified gypsum quality restrictions, which could significantly reduce the benefits of this proposed option. Provide any analysis that was completed to determine the costs associated with modifications that would be required to meet the vendor's gypsum quality requirements. Include an outline of modifications and associated costs that are required to the current Spurlock Station gypsum handling system.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED JUL 30 2024

cc: Parties of Record

Case No. 2024-00109

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