

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2025 INTEGRATED RESOURCE)	CASE NO.
PLAN OF EAST KENTUCKY POWER)	2025-00087
COOPERATIVE, INC.)	

COMMISSION STAFF'S AMENDED FIRST 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 31, 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 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

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).

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 2025 Integrated Resource Plan (IRP), page 72. All requests posed within the context of the discussions at the informal conference held on May 28, 2025.

a. As an additional High Case Economic Optimistic scenario, perform a production cost and resource optimization modeling analysis to estimate how best to reasonably serve a hypothetical 1.0 GW load with a very high load factor. The

assumptions for the analysis should be consistent with those used in in the IRP to arrive at EKPC's preferred generation portfolio, the only change being the 1.0 GW load addition. The timing of the load addition should be as soon as EKPC could reasonably expect to be able to serve the anticipated load. The analyses results should be presented in a table similar to Exhibit JJT-4 EKPC Capacity Expansion Plan – Revised March 4, 2025 in Case No. 2024-00370.²

b. Assume that the 1.0 GW load has been brought online on EKPC's system. In the event that the 1.0 GW load suddenly dropped off the system, provide a detailed qualitative discussion of how EKPC and to the extent applicable PJM, would insulate and protect the transmission system (and possibly neighboring interconnected systems) from damage. Include in the response what necessary equipment and steps it in coordination with PJM transmission operators would take to insulate the generation and transmission system.

c. Based on the production cost and resource optimization modeling analysis performed in response to Item 1(a) above, explain how this modeling would change EKPC's preferred portfolio and explain reasons for the changes in detail.

² Case No 2024-00370, *Electronic Application of East Kentucky Power Cooperative, Inc. For 1) Certificates of Public Convenience and Necessity to Construct a New Generation Resources; 2) For a Site Compatibility Certificate Relating to the Same; 3) Approval of Demand Side Management Tariffs; and 4) Other General Relief* (filed Nov. 25, 2024).



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DATED JUL 01 2025

cc: Parties of Record

Case No. 2025-00087

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