

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
A CERTIFICATE OF PUBLIC CONVENIENCE)	CASE NO.
AND NECESSITY TO CONSTRUCT A 161 KV)	2025-00311
TRANSMISSION LINE IN PULASKI COUNTY,)	
KENTUCKY AND OTHER GENERAL RELIEF)	

COMMISSION STAFF'S 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 December 17, 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 the Application, Direct Testimony of Darrin Adams (Adams Direct Testimony), Attachment DA-1, page 6. Between the 2022 and 2025 Transmission Series models, confirm and describe any transmission studies/analyses associated with the 2,200 MW load added in the Maysville area, south of EKPC's Spurlock Station specifically, which were performed.

2. Provide the transmission studies/analyses associated with the 2,200 MW load added in the Maysville area, south of EKPC's Spurlock Station, and explain any indicated upgrades to the transmission system and capacity additions or purchases to specifically serve the modeled 2,200 MW load. Explain whether the additional generation capacity needs would be satisfied solely through generation being built/owned by EKPC or in combination with a capacity purchase.

3. Refer to the Application, Adams Direct Testimony, Attachment DA-1, Figure 6.2.2, page 24, and Figure 6.3.2, page 25.

a. Explain whether Alternative 2 or Alternative 3 is intended to mitigate the indicated Overload Elements on lines (upper left) that include the Liberty RICE units. If not, explain what additional measures does EKPC intend.

b. For Figure 6.3.2, explain whether the two indicated Alternative Overload Elements (center and center right) that remain after the double circuit is added to the model still require additional mitigation and if so, what measures does EKPC intend.

4. Refer to the Direct Testimony of Lucas Spencer (Spencer Direct Testimony) Attachment LS-4. On each map, identify the parcel of property affected by the project, including the right-of-way, with corresponding identification of the property owner(s).

5. Refer to the Spencer Direct Testimony page 4, line 17. Provide a breakdown of the cost elements comprising the \$1,108,966 annual operating & maintenance (O&M) cost.

6. Refer to the Spencer Direct Testimony, Table 1 page 5. The table includes "Miscellaneous (7400)" cost category totaling \$1,988,983.

a. Provide a complete and itemized breakdown of all individual cost components included in the Miscellaneous (7400) category.

b. For each item identified, provide the vendor's name or internal EKPC department responsible for the charge, a detailed description of the purpose of the expenditure and the cost of the expenditure.

c. Explain why each item identified in the Miscellaneous (7400) category was not recorded to a more specific and applicable FERC (Federal Energy Regulatory Commission) construction account. Provide references to EKPC's accounting policies or FERC Uniform System of Accounts guidance that supports such classification.

d. State whether any portion of the Miscellaneous (7400) category includes contingency amounts. If so, identify the contingency amount and describe the methodology used to allocate contingency to this category.

7. Refer to the Spencer Direct Testimony, Table 1, page 5.

a. Identify the total contingency amount included in the \$20,126,432 cost estimate.

b. Provide the contingency percentage and explain how this percentage was developed.

c. State which cost categories include a contingency and provide a breakdown showing the contingency allocation by the category.

d. Provide all internal or consultant documents supporting the contingency determination.

8. Refer to the Application, Exhibit 6. Provide documentation, such as registered mail receipts or signature cards, showing that each affected property owner has received notice of the planned construction.



Linda C. Bridwell, PE
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Public Service Commission
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DATED **DEC 4 2025**

cc: Parties of Record

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