

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**2019 INTEGRATED RESOURCE PLAN OF EAST  
KENTUCKY POWER COOPERATIVE, INC.**

**) CASE NO.  
) 2019-00096**

**RESPONSES TO NUCOR STEEL GALLATIN'S FIRST SET OF DATA  
REQUESTS TO EAST KENTUCKY POWER COOPERATIVE, INC.**

**DATED FEBRUARY 24, 2020**

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**PSC CASE NO. 2019-00096**

**NUCOR STEEL GALLATIN'S FIRST SET OF  
DATA REQUESTS DATED 02/24/2020**

East Kentucky Power Cooperative, Inc. ("EKPC") hereby submits responses to the information requests of Nucor Steel Gallatin ("Nucor") in this case dated February 24, 2020. Each response with its associated supportive reference materials is individually tabbed.



**EAST KENTUCKY POWER COOPERATIVE, INC.  
PSC CASE NO. 2019-00096  
FIRST REQUEST FOR INFORMATION RESPONSE**

**NUCOR STEEL GALLATIN'S FIRST SET OF DATA REQUEST DATED  
02/24/2020**

**REQUEST 1**

**RESPONSIBLE PERSON: Julia J. Tucker**

**COMPANY: East Kentucky Power Cooperative, Inc.**

**Request 1.** Please provide all presentations, memos or other documents presented to the EKPC Board of Directors or to the 16 Distribution Cooperatives regarding FERC's December 19, 2019 Order addressing the PJM Minimum Offer Price Rule.

**Response 1.** EKPC objects to this request to the extent it could be construed to request information that is protected by the attorney-client privilege, attorney work product doctrine or other such privileges. Without waiving said objection, EKPC has entered a Request for Clarification and Request for Rehearing of the Commission's December 19, 2019 order in Docket Nos. EL16-49-000 EL18-178-000 (Consolidated). EKPC also fully supports the National Rural Electric Cooperative Association's Requests for Clarification and Rehearing of the same order. EKPC has no additional information regarding the Minimum Offer Price Rule at this time.

**EAST KENTUCKY POWER COOPERATIVE, INC.  
PSC CASE NO. 2019-00096  
FIRST REQUEST FOR INFORMATION RESPONSE**

**NUCOR STEEL GALLATIN'S FIRST SET OF DATA REQUEST DATED  
02/24/2020**

**REQUEST 2**

**RESPONSIBLE PERSON: Julia J. Tucker**

**COMPANY: East Kentucky Power Cooperative, Inc.**

**Request 2.** Please provide EKPC's most recent forecast of PJM on-peak, off-peak and around-the-clock energy prices.

**Response 2.** EKPC's most recent forecast of PJM on-peak, off-peak and around-the-clock energy prices are provided in the table below.

**Forward Prices (\$/MWh) at AEP-Dayton Hub**

<b>Year</b>	<b>On-Peak</b>	<b>Off-Peak</b>	<b>7x24</b>
<b>2020</b>	<b>26.86</b>	<b>18.97</b>	<b>23.28</b>
<b>2021</b>	<b>29.36</b>	<b>21.04</b>	<b>25.54</b>
<b>2022</b>	<b>28.86</b>	<b>20.72</b>	<b>25.12</b>
<b>2023</b>	<b>28.94</b>	<b>20.89</b>	<b>25.25</b>
<b>2024</b>	<b>28.98</b>	<b>20.90</b>	<b>25.28</b>
<b>2025</b>	<b>29.13</b>	<b>20.93</b>	<b>25.36</b>

**EAST KENTUCKY POWER COOPERATIVE, INC.  
PSC CASE NO. 2019-00096  
FIRST REQUEST FOR INFORMATION RESPONSE**

**NUCOR STEEL GALLATIN'S FIRST SET OF DATA REQUEST DATED  
02/24/2020**

**REQUEST 3**

**RESPONSIBLE PERSON: Julia J. Tucker**

**COMPANY: East Kentucky Power Cooperative, Inc.**

**Request 3.** Please provide EKPC's most recent forecast of PJM capacity prices.

**Response 3.** The PJM RPM capacity market is currently suspended. The Base Residual Auction ("BRA") has not been conducted for 2022/2023 and will be delayed for 2023/2024. The underlying rules of the market are changing due to a FERC Order issued on December 19, 2019. PJM has submitted its clarifications to FERC regarding the new rules. FERC has not addressed those clarifications. History may not be a good guide for capacity market prices going forward with the new rules. Given this uncertainty, EKPC has not developed a forward view of the capacity market prices based on the new rules.

EAST KENTUCKY POWER COOPERATIVE, INC.  
PSC CASE NO. 2019-00096  
FIRST REQUEST FOR INFORMATION RESPONSE

NUCOR STEEL GALLATIN'S FIRST SET OF DATA REQUEST DATED  
02/24/2020

REQUEST 4

RESPONSIBLE PERSON: Julia J. Tucker

COMPANY: East Kentucky Power Cooperative, Inc.

**Request 4.** Please provide EKPC's most recent forecast of the capacity revenue it expects to receive from selling surplus capacity (capacity in excess of EKPC's load requirement) into the PJM base residual and incremental auctions. Please specify the amount of MW and the price per MW.

**Response 4.** EKPC has sold a total of approximately [REDACTED] MW of generation and demand reduction resources into the 2020/2021 RPM and expects to have a load obligation of approximately [REDACTED] MW, at an average price of [REDACTED] MW-Day. This creates a net revenue of approximately [REDACTED]

EKPC has sold a total of approximately [REDACTED] MW of generation and demand reduction resources into the 2021/2022 RPM and expects to have a load obligation of approximately [REDACTED] MW, at an average price of [REDACTED] MW-Day. This creates a net revenue of approximately [REDACTED]

Due to the recent FERC order that changes the rules for the RPM auction, EKPC has no additional forecast of market position or prices at this time.