

**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

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**EKPC’S COMMENTS ON  
2019 INTEGRATED RESOURCE PLAN STAFF REPORT**

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Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by and through counsel, pursuant to the Commission’s December 7, 2020 Order that included the Staff Report to EKPC’s 2019 Integrated Resource Plan (“IRP”), and hereby tenders its comments, respectfully states as follows:

EKPC appreciates the comprehensiveness of the Staff’s review of EKPC’s 2019 IRP and the thoroughness of the Staff Report. EKPC acknowledges and accepts its recommendations, with two minor exceptions. First, as part of its review and discussion of EKPC’s implementation of recommendations from the 2015 IRP regarding Demand Side Management (“DSM”) programs and the DSM Collaborative, the Staff Report states as follows:

**EKPC should continue to fully involve all members of the DSM Collaborative to identify new cost-effective DSM programs, best practices, and opportunities for enhancement of its existing programs.**

EKPC noted that Collaborative 2.0 continues to focus on best practices and open dialogue. EKPC noted that Collaborative 2.0 was halted in 2017 pending the results of cost-effectiveness evaluations and reviews by EKPC executive staff and the owner-member CEOs and the EE Study. Staff agrees that a break was necessary; however,

EKPC should restart the collaborative and require member involvement.<sup>1</sup>

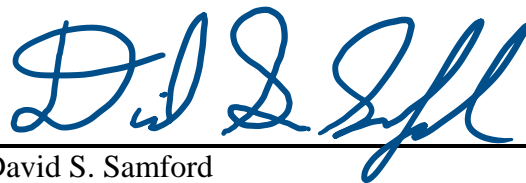
EKPC has no concern with the portion of the discussion pertaining to restarting the Collaborative, however, it has no authority or power to “require” member involvement. EKPC believes that stakeholders will participate in good faith, but believes that the language making this a mandate for EKPC should be changed. Specifically, EKPC recommends deleting the word “require” and replacing it with “encourage.” EKPC commits to encouraging the involvement of all stakeholders through the collaborative process, but wishes to be relieved of a requirement that is not within its ability to control.

Second, the Staff Report mentions that EKPC’s next IRP will be due on or before April 1, 2021. Given the significant amount of time necessary to prepare an IRP filing and the fact that the stated date is less than five months away, EKPC believes this may be a typo. EKPC therefore respectfully requests that the due date for its next IRP to be changed to April 1, 2022.

EKPC offers no further comments on the Staff Report.

This 16<sup>th</sup> day of December 2020.

Respectfully submitted,



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<sup>1</sup> See Staff Report, pp. 18-19.

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on December 16, 2020; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium will be filed with the Commission within thirty days of the current state of emergency for COVID-19 is lifted.

  
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*Counsel for East Kentucky Power Cooperative, Inc.*