

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2019 INTEGRATED RESOURCE)	
PLAN OF EAST KENTUCKY POWER)	CASE No.
COOPERATIVE, INC.)	2019-00096

ATTORNEY GENERAL’S SUPPLEMENTAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Data Requests to East Kentucky Power Cooperative, Inc. [hereinafter “EKPC,” or “the Company”] to be answered by the date specified in the Commission’s Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for EKPC with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If you believe any request appears confusing, request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or

otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, state: the identity of the person by whom it was destroyed or

transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,
DANIEL CAMERON
ATTORNEY GENERAL



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Certificate of Service and Filing

Pursuant to the Commission's Orders dated March 17, 2020 and March 24, 2020 in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the following. Further, the Attorney General will submit the paper originals of the foregoing to the Commission within 30 days after the Governor lifts the current state of emergency.

Hon. Michael L. Kurtz, Esq.
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This 9th day of April, 2020.



Assistant Attorney General

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Electronic 2019 Integrated Resource
Plan Of East Kentucky Power Cooperative, Inc.
Case No. 2019-00096
Attorney General's Supplemental Data Requests

1. Reference the response to AG 1-2 (c). For the most recent year available, provide the member-owners' retail power sales figures to coal mining customers.
2. Reference the response to AG 1-5. In the event the Company should develop a future need for additional supply side resources, based on the current IRP analysis provide a discussion regarding whether such a resource could or would be a self-built supply side resource, or whether the additional energy could or would be derived via a PPA. Include in your discussion whether the new resource:
 - a. could or would be renewable, or fossil-fueled;
 - b. could or would be located inside or outside its service territory. With regard to resources outside its territory, explain how congestion or the risk of congestion could affect the cost and benefits in determining resource decisions.
3. Reference the response to AG 1-7. The response did not address the question posed. Provide a relevant response.
4. Reference the responses to AG 1-9 (a) and AG 1-9 (b). The responses failed to address the question posed. Provide a relevant response.
5. Reference the response to AG 1-20. Explain why the response failed to provide data for 2019.
6. Reference the response to AG 1-25. If the work plan applicable to 2020-2021 is available, provide a copy. If not, explain when it will be available. Explain also why the work plan for 2018-2019 was available in December of 2017.
7. Reference the response to AG 1-25, at page 9 of the attached work plan, § 3.3.2. Explain when the next survey of the member systems' residential customers will be taken.
8. Explain when the data upon which the load forecast utilized in the instant IRP is premised was: (i) collected; (ii) analyzed; and (iii) approved by the EKPC Board of Directors.
9. Explain whether any of the data upon which the load forecast utilized in the instant IRP is premised was utilized in the Company's last IRP filing.

10. Reference the response to AG 1-34, Table 34-1. Provide a breakdown of what portion of the projected costs will be collected in rates charged to the members, and what portions (if any) will be collected through EKPC's OATT.
 - a. Given that over \$130 million in transmission costs is projected over the next four years, explain when EKPC expects to file its next jurisdictional base rate case.
 - b. Confirm that EKPC has not conducted any cost-benefit analyses regarding the transmission projects identified in its responses to this question.

11. Reference the response to AG 1-35. Explain whether EKPC has considered utilizing dynamic transmission line ratings (DLR) ¹ for lines prone to heating and/or thermal violations.
 - a. Explain further whether use of DLR: (i) would or could lead to cost savings; and (ii) would be authorized by PJM, and if so, whether any other transmission owners in the PJM footprint utilize DLR.
 - b. Explain whether EKPC has conducted any studies regarding the potential for DLR to reduce congestion costs. If so, provide all such studies.
 - c. Explain whether utilizing DLR could reduce the projected costs of the Company's supplemental transmission projects as set forth in response to AG 1-34.
 - d. Explain whether EKPC has considered filing a CPCN for a pilot program to investigate the usefulness of DLR in its supplemental transmission. If not, why not?
 - (i) Explain further whether PJM permission would have to be obtained for such a pilot, even if used on supplemental projects.

12. Reference the response to AG 1-36. Provide an estimate of the costs EKPC's members will bear with regard to both identified projects, and what costs other transmission owners will bear.

13. Explain whether EKPC utilizes beneficial reuse of coal ash and coal combustion byproducts.
 - a. If so, explain how this beneficial reuse occurs and the benefits EKPC's members receive.

¹ See, e.g., the 2019 U.S. Department of Energy report at the following link: https://www.energy.gov/sites/prod/files/2019/08/f66/Congressional_DLR_Report_June2019_final_508_0.pdf

- b. In addition to any current reuse, explain if EKPC has pursued any potential reuse opportunities, and if so, provide the details of those opportunities.
 - c. If EKPC has not pursued any reuse opportunities, explain why EKPC has not done so.
14. Confirm that based on recent trade publications, EKPC has announced it is reducing coal purchases by 20%. If confirmed, explain whether this is due to any changes in the Company's load forecast.
15. Reference the applications filed in Case Nos. 2020-00040² and 2020-00043.³
- a. Confirm that both the proposed Turkey Creek and Glover Creek Merchant Solar facilities, if fully approved, will be located on land adjacent to EKPC transmission lines. If so confirmed, identify those transmission lines.
 - b. Explain to what extent EKPC will have to construct new facilities to interconnect with both the Turkey Creek and Glover Creek facilities.
 - c. Provide projections of the costs necessary to construct those facilities, and explain whether EKPC's members would have to pay any portion of those costs.
 - d. Explain whether the proposed Turkey Creek and Glover Creek facilities will in any manner impact EKPC's members' distribution costs, for example in substations. If so, provide projections of the costs necessary to construct those facilities, and explain whether EKPC's members would have to pay any portion of those costs.
 - e. Explain whether EKPC intends to purchase any of the power that would be produced from the proposed Turkey Creek and/ or Glover Creek Merchant Solar facilities. If so, explain why EKPC did not discuss the purchase of such power in the instant docket.
 - f. If EKPC does purchase power from the proposed Turkey Creek and/or Glover Creek Merchant Solar facilities, explain whether such purchases would be governed by The Public Utility Regulatory Policies Act of 1978 (PURPA).⁴

² In Re: Application Of Turkey Creek Solar, LLC For a Construction Certificate to Construct a Merchant Electric Generating Facility Garrard County, Kentucky, before The Kentucky State Board on Electric Generation and Transmission Siting, Case No. 2020-00040 [hereinafter: Turkey Creek Merchant Solar facility].

³ In Re: Application of Glover Creek Solar, LLC, for a Construction Certificate to Construct a Merchant Electric Generating Facility, before The Kentucky State Board on Electric Generation and Transmission Siting, Case No. 2020-00043 [hereinafter: Glover Creek Merchant Solar facility].

⁴ 16 U.S.C. § 2601 et seq.

- g. Provide a detailed explanation and discussion regarding how the potential purchases of power from the proposed Turkey Creek and/or Glover Creek Merchant Solar facilities would affect EKPC's current order of economic dispatch. Additionally, provide copies of all reports and/or studies EKPC may have conducted in this same regard.
- (i) Include in your discussion an explanation of whether the additional power to be carried on EKPC's system will cause the company to incur any additional costs, including but not limited to O&M and transmission congestion, with regard to both its transmission and generation systems.
 - (ii) Explain whether any current or planned RTEP or supplemental transmission projects are designed to deal with the additional power that the proposed merchant solar projects will place onto EKPC's transmission system. If so: (a) identify the projects and provide either electronic links or copies of all documents pertaining to all such projects; and (b) explain whether the proposed merchant solar projects will be required to pay any of the costs associated with all such projects.
 - (iii) Explain whether the proposed merchant solar facilities will or could have an impact on the LG&E-KU transmission system, as identified in the PJM "Generation Interconnection Feasibility Study Report for Queue Project AE2-071" attached to the application in Case No. 2020-00043, at p. 13.
- h. Has EKPC entered into any agreements with either Glover Creek or Turkey Creek? If so, provide copies. If not, explain whether EKPC anticipates entering into any such agreements, and if so, describe the nature of the agreements.