

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|---|---|----------------------------|
| THE ELECTRONIC APPLICATION OF EAST |) | |
| KENTUCKY POWER COOPERATIVE, INC. |) | |
| FOR A GENERAL ADJUSTMENT OF RATES |) | Case No. 2021-00103 |
| APPROVAL OF DEPRECIATION STUDY |) | |
| AMORTIZATION OF CERTAIN REGULATORY |) | |
| ASSETS AND OTHER GENERAL RELIEF |) | |

EAST KENTUCKY POWER COOPERATIVE, INC.’S
MOTION FOR CONFIDENTIAL TREATMENT

Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by and through counsel, pursuant to KRS 61.878, 807 KAR 5:001, Section 13 and other applicable law, and for its Motion requesting that the Kentucky Public Service Commission (“Commission”) afford confidential treatment to certain information filed in its Responses to: (1) the Supplemental Joint Requests for Information from the Attorney General (“AG”) and Nucor Steel Gallatin (“Nucor”) (AG/Nucor-DR2”); and (2) Nucor’s Supplemental Data Requests (“Nucor-DR2”), in the above-captioned proceeding, respectfully states as follows:

1. EKPC’s Application in the above-styled proceeding was deemed filed on April 6, 2021.
2. Both AG/Nucor-DR2 and Nucor-DR2 were issued on June 4, 2021. A portion of the material being provided as part of the responses to these data requests includes information that is confidential and proprietary in nature and confidential treatment is necessary to assure that load, peak, billing demand, bill credit and metering information concerning specific industrial

customers of EKPC's Owner-Member Cooperative's ("owner-members"), EKPC's own proprietary formulas and data and other information remain confidential. In particular, EKPC seeks confidential treatment for documents and information provided in response to: AG/Nucor-DR2-11; AG/Nucor-DR2-13; Nucor-DR2-3a; Nucor-DR2-3b; Nucor-DR2-4; Nucor-DR2-5; Nucor-DR2-7; and Nucor-DR2-10. Collectively this information and these documents are hereinafter referred to as the "Confidential Information."

3. AG/Nucor-DR2-11 states as follows:

Refer to the Company's responses to AG-Nucor 1-13 and 1-14. Indicate whether the Company performed a calculation of the weather normalized revenues in the test year for any reason(s). If so, describe the calculation(s), the reason(s) for the calculation(s), and provide a copy of the calculation(s), including all assumptions, data, analyses, and electronic spreadsheet files in live format and with all formulas intact.

4. In response, EKPC is providing two spreadsheets – *AG Nucor DR2 Response 11 Coop Sales CONFIDENTIAL.xlsx* and *AG Nucor DR2 Response 11 FAC CONFIDENTIAL.xlsx* – that include the requested calculations. These spreadsheets also include detailed customer load information that is both historic and projected. This information is so detailed that it concerns individual commercial and retail customers of EKPC's owner-members, which gives tremendous insight into their load characteristics and power purchases. This information would also be very valuable for other jurisdictions that might seek to entice them to leave Kentucky and create a resulting loss of jobs and investment. Moreover, it is well-understood that individual customers have a reasonable expectation of privacy with regard to their unique transactions with a regulated utility.¹ Also, the spreadsheets contain formulas and other trade secret information that is closely

¹ See 807 KAR 5:001, Section 4(10); *In the Matter of the Electronic Application of Duke Energy Kentucky, Inc. for: 1) An Adjustment of the Electric Rates; 2) Approval of an Environmental Compliance Plan and Surcharge Mechanism; 3) Approval of New Tariffs; 4) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities and 5) All Other Required Approvals and Relief*, Order, Case No. 2017-00321 (Ky. P.S.C. May 3, 2018); *In the Matter of*

held by EKPC and is not otherwise publicly available. The disclosure of this information would harm EKPC and its owner-members by causing the loss of valuable data, planning assumptions and analysis that was expensive and time-consuming to develop.

5. AG/Nucor-DR2-13 states as follows:

Provide calculations of adjustments to annualize test year revenues for changes in customers and usage within the test year. For increases or reductions in customers or loads that were added or lost during the year, then annualize the base revenues that were added or lost. For customers that migrated from one tariff to another during the test year, provide the annualized effect on revenues as if they had been on the most recent tariff for the entire test year. This request specifically does not address or request post-test year changes in customers and usage. Provide all supporting assumptions, data, and calculations, including electronic workpapers in live format with all formulas intact.

6. In response, EKPC is providing a spreadsheet – *AG Nucor DR2 Response 13 CONFIDENTIAL.xlsx* – which provides the requested information. However, this information is drawn from, and similar to, EKPC’s prior response to AG/Nucor-DR1-16, which includes information by rate class on individual commercial and industrial customers of EKPC’s owner-members and financial information that is outside the test year. This information is already subject to a motion for confidential treatment filed by EKPC, which it adopts and incorporates herein as if set forth in full.²

7. Nucor-DR2-3a and 3b state as follows:

Please provide in an excel file the following information for each month of the 2019 test year:

- a. The on-peak, off-peak and total MWh energy associated with Nucor’s Pickle Galvanizing Line (PGL), as recorded on Nucor meter M-5. Please confirm that these MWh amounts are

the Proposed Revision of Rules Regarding the Provision of Wholesale Water Service by the City of Versailles to Northeast Woodford Water District, Order, Case No. 2011-00419 (Ky. P.S.C. Mar. 14, 2012) (commercial account information).

² See EKPC Motion for Confidential Treatment, Case No. 2021-00103 (filed May 28, 2021).

included in the total MWh shown for Nucor Gallatin in the EKPC class cost of service study and in the EKPC rate design analysis.

- b. The coincident peak kW demand (CP demand) associated with Nucor's Pickle Galvanizing Line (PGL), as recorded on Nucor meter M-5. Please confirm that these CP kW demand amounts are included in the total Nucor CP billing demand shown for Nucor Gallatin in the EKPC class cost of service study and in the EKPC rate design analysis.

8. In response, EKPC is providing an Excel spreadsheet – *Nucor DR2 Response 3-4 CONFIDENTIAL.xlsx*– that provides the energy usage, metering data and bill credit of a single customer at a single meter. Information that is unique to a customer is generally regarded as confidential with customers enjoying a reasonable expectation of privacy with regard to their unique information. Moreover, this spreadsheet provides extraordinary insight into the operations of large commercial and industrial customer within the EKPC system. The Commission has already determined that the bill credit is confidential.³

9. Nucor-DR2-4 states as follows:

With regard to the response to AG & Nucor Initial Request 18, please provide in an excel file with formulas intact, on a monthly basis, the on and off-peak kWh and CP kW billing demand used to calculate the revenues for 2019 and 2020. Also show the calculation of the revenues shown in the response to Request 18, using these billing determinants.

10. In response, EKPC is providing an Excel spreadsheet – *Nucor DR2 Response 3-4 CONFIDENTIAL.xlsx* – that again lists peak and coincident peak billing demand for a single industrial customer of one of EKPC's owner-members and financial information by rate case that is outside the test year.

11. Nucor-DR2-5 states as follows:

³ See *In the Matter of the Electronic Tariff Filing of East Kentucky Power Cooperative, Inc. of an Amendment to an Industrial Power Agreement with Interruptible Service Between East Kentucky Power Cooperative, Inc. Owen Electric Corporation, Inc. and Nucor Steel Gallatin, LLC f/k/a Gallatin Steel Company*, Order, Case No. 2020-00317 (Ky. P.S.C. March 9, 2021).

With regard to the response to Nucor Initial Request 1, please provide the hourly loads for the year 2019, in an excel spreadsheet, for Rate TGP, Steam and the Nucor Gallatin Meter M-5.

12. In response, EKPC is providing a spreadsheet – *Nucor DR2 Response 5 CONFIDENTIAL.xlsx* – that includes information regarding test year hourly loads for three particular industrial customers of EKPC’s Owner-Members. As set forth above, customers generally enjoy a reasonable expectation of privacy with regard to their unique transactions with a regulated utility.

13. Nucor-DR2-7 states as follows:

Please confirm that EKPC calculated both its 12 CP demands and its Maximum NCP Demands by Class in its class cost of service study using 15-minute demands, not hourly demands. Please provide the corresponding 12 CP demand and Maximum NCP Demands by Class based on hourly demands in an excel spreadsheet.

14. In response, EKPC is providing a spreadsheet – *Nucor DR2 Response 7 CONFIDENTIAL.xlsx* – which includes detailed data on EKPC’s coincident peaks and non-coincident peaks at 60-minute intervals. This data is proprietary to EKPC and is derived from information which is already subject to a motion for confidential treatment.⁴ If disclosed, the information would reveal detailed information about specific customer information of industrial customers of EKPC’s owner members. As set forth above, customers generally have a reasonable expectation of privacy with regard to their data.

15. Nucor-DR2-10 states as follows:

Please reconcile the "Sum of Maximum Class NCP" from line 80, tab 'Revenue Input' of the spreadsheet" PSC DR Response 16 App Exhibit 39 CCOSS and RD Confidential.xlsx" to the maximum hourly demand for each rate class provided in the spreadsheet "Nucor DR1 Response 1 CONFIDENTIAL.xlsx". If there are

⁴ See EKPC Motion for Confidential Treatment (filed May 28, 2021).

additional metered loads included in the Sum of Maximum Class NCP for any rate class which were not provided in response to Nucor DR1, please provide those on the same hourly basis.

16. In response, EKPC is providing a spreadsheet – *Nucor DR2 Response 10 2019 CCOSS CONFIDENTIAL.xlsx* – which includes the entire CCOSS spreadsheet, including billing determinants for all customers. This spreadsheet includes all of the formulas, data, assumptions and other information built into EKPC’s CCOSS and is therefore very valuable. It is the product of significant investment by EKPC and constitutes a trade secret under Kentucky law. *See* KRS 365.880(4).

17. In accordance with the provisions of 807 KAR 5:001, Section 13(2), EKPC is filing one copy of the Confidential Information separately under seal. Because the Confidential Information is included on spreadsheets, the Confidential Information is so pervasive that confidential treatment should be afforded for the entire file and no redacted file may be uploaded to the Commission’s website without compromising the integrity of the filing.

18. The Confidential Information is retained by EKPC on a “need-to-know” basis and is not publicly available. If disclosed, the Confidential Information would give competitors of the specific industrial clients involved a tremendous advantage in each of the areas detailed above. This information would also be useful to other jurisdictions that might seek to lure these businesses out of Kentucky. The loss of these loads would likely translate into higher costs for EKPC and, by extension, detrimentally higher rates for EKPC’s Owner-Members. Thus, disclosure of the Confidential Information would be highly prejudicial to EKPC, EKPC’s owner-member cooperatives and those owner-members’ end-use retail members.

19. The Kentucky Open Records Act exempts the Confidential Information from public disclosure. *See* KRS 61.878(1). Moreover, the Kentucky Supreme Court has stated, “information

concerning the inner workings of a corporation is ‘generally accepted as confidential or proprietary.’” *Hoy v. Kentucky Industrial Revitalization Authority*, 907 S.W.2d 766, 768 (Ky. 1995). Because the Confidential Information is critical to EKPC’s effective execution of business decisions and strategy, it satisfies both the statutory and common law standards for being afforded confidential treatment.

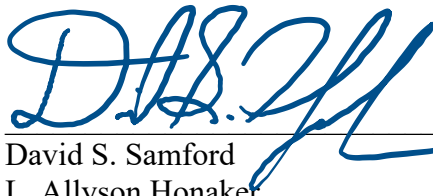
20. EKPC does not object to limited disclosure of the Confidential Information, pursuant to an acceptable confidentiality and nondisclosure agreement, to the Attorney General and Nucor who have a legitimate interest in reviewing the same for the sole purpose of participating in this case. EKPC tendered a confidentiality agreement AppHarvest Morehead Farms, LLC (“AppHarvest”) on May 26, 2021, but has not yet received a signed copy back from AppHarvest. However, due to ongoing contractual negotiations with AppHarvest’s affiliates, EKPC does not believe that it is appropriate to provide any of the spreadsheets provided in response to AG/Nucor-DR2 or Nucor-DR2 to AppHarvest notwithstanding any confidentiality agreement AppHarvest may be willing to enter into. These spreadsheet includes detailed information about each of the other significant commercial and industrial loads served by EKPC and its owner-members and a commercial billing credit term that is currently subject to contract negotiation, which would give AppHarvest a significant and unprecedented insight into the load profiles and characteristics of other similarly situated customers and unique bargaining leverage in negotiating an interruptible billing credit. Under the circumstances, such disclosures would be unfair to EKPC’s other retail commercial and industrial customers.

21. In accordance with the provisions of 807 KAR 5:001, Section 13(3), EKPC respectfully requests that the Confidential Information be withheld from public disclosure for an indefinite period of time.

WHEREFORE, on the basis of the foregoing, EKPC respectfully requests the Commission to enter an Order granting this Motion for Confidential Treatment and to so afford such protection from public disclosure to the unredacted copies of Confidential Information, which is filed herewith under seal, for the periods set forth herein.

This 16th day of June, 2021.

Respectfully submitted,



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Lexington, KY 40504
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allyson@gosssamfordlaw.com

Counsel for East Kentucky Power Cooperative, Inc.

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 June 16, 2021; 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 delivered to the Commission within thirty (30) days of the conclusion of the present COVID-19 related state of emergency.



Counsel for East Kentucky Power Cooperative, Inc.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF EAST)
KENTUCKY POWER COOPERATIVE, INC.)
FOR A GENERAL ADJUSTMENT OF RATES,)
APPROVAL OF DEPRECIATION STUDY,)
AMORTIZATION OF CERTAIN REGULATORY)
ASSETS, AND OTHER GENERAL RELIEF)**

**CASE NO.
2021-00103**

**NUCOR STEEL GALLATIN'S SUPPLEMENTAL SET OF DATA REQUESTS
TO EAST KENTUCKY POWER COOPERATIVE, INC.
DATED JUNE 4, 2021**

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

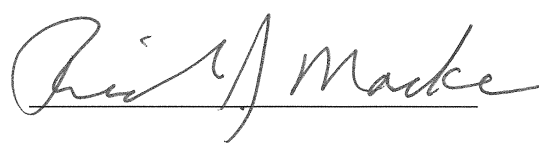
In the Matter of:

| | | |
|------------------------------------|---|------------|
| ELECTRONIC APPLICATION OF EAST |) | |
| KENTUCKY POWER COOPERATIVE, INC. |) | |
| FOR A GENERAL ADJUSTMENT OF RATES, |) | CASE NO. |
| APPROVAL OF DEPRECIATION STUDY, |) | 2021-00103 |
| AMORTIZATION OF CERTAIN REGULATORY |) | |
| ASSETS, AND OTHER GENERAL RELIEF |) | |

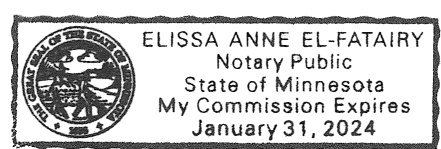
CERTIFICATE

STATE OF MINNESOTA)
)
COUNTY OF ANOKA)

Richard J. Macke, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to Nucor Steel Gallatin's Supplemental Set of Data Requests in the above-referenced case dated June 4, 2021, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.



Subscribed and sworn before me on this 15 day of June __, 2021.





Notary Public - # 31034367

Commission expires - 12/31/24

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
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| ELECTRONIC APPLICATION OF EAST |) | |
| KENTUCKY POWER COOPERATIVE, INC. |) | |
| FOR A GENERAL ADJUSTMENT OF RATES, |) | CASE NO. |
| APPROVAL OF DEPRECIATION STUDY, |) | 2021-00103 |
| AMORTIZATION OF CERTAIN REGULATORY |) | |
| ASSETS, AND OTHER GENERAL RELIEF |) | |

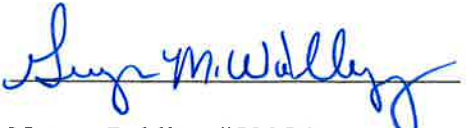
CERTIFICATE

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF CLARK)

Isaac S. Scott, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Nucor Steel Gallatin’s Supplemental Set of Data Requests in the above-referenced case dated June 4, 2021, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.



Subscribed and sworn before me on this 16th day of June 2021.



Notary Public - #590567
Commission expires - 11/30/2021



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|---|---|-------------------|
| ELECTRONIC APPLICATION OF EAST |) | |
| KENTUCKY POWER COOPERATIVE, INC. |) | |
| FOR A GENERAL ADJUSTMENT OF RATES, |) | CASE NO. |
| APPROVAL OF DEPRECIATION STUDY, |) | 2021-00103 |
| AMORTIZATION OF CERTAIN REGULATORY |) | |
| ASSETS, AND OTHER GENERAL RELIEF |) | |

CERTIFICATE

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF CLARK)

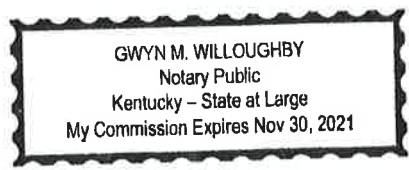
Julia J. Tucker, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Nucor Steel Gallatin's Supplemental Set of Data Requests in the above-referenced case dated June 4, 2021, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

Julia J. Tucker

Subscribed and sworn before me on this 16th day of June 2021.

Gwyn M. Willoughby

Notary Public - #590567
 Commission expires - 11/30/2021



EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00103
SUPPLEMENTAL SET OF DATA REQUESTS RESPONSE

NUCOR STEEL GALLATIN'S SET OF DATA REQUESTS DATED 6/4/21
REQUEST 1

RESPONSIBLE PERSON: **Julia J. Tucker**

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

Request 1. For each of the rate classes B, C and G, please indicate whether the rate class's load during the monthly CP hours was interrupted subject to an interruptible rate in test year. If so, provide the MW load amount interrupted each month by rate class at the time of the month EKPC coincident peak.

Response 1. The only interruptions that occurred during the EKPC monthly Coincident Peak ("CP") in 2019 were in October. The CP occurred on October 3, 2019 in hour ending 1800. The following MW load was interrupted:

Rate B – 15.43 MW

Rate C – 0 MW (no interruptible customers in this class)

Rate G – 6.18 MW

Rate E – 3.662 MW

Nucor Gallatin Special Contract – 128.19 MW

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00103
SUPPLEMENTAL SET OF DATA REQUESTS RESPONSE

NUCOR STEEL GALLATIN'S SET OF DATA REQUESTS DATED 6/4/21
REQUEST 2

RESPONSIBLE PERSON: **Richard J. Macke**

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

Request 2. Refer to PSC DR Response 16 App Exhibit 39 CCOSS and RD Confidential.xls, Tab Rate G Pres2020, cell "C95" and "C91" and cells "F95" and "F91". Please explain how the average demand (actual energy/hours during the month) for the months of January 2019 and April 2019 can be larger than the actual CP demand for those months.

Response 2. This is simply because the load during the CP was less than the average load during the month. There are other months when the load during the CP was higher than the average load. This is due to fluctuations in production that can coincide with CP times.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00103
SUPPLEMENTAL SET OF DATA REQUESTS RESPONSE

NUCOR STEEL GALLATIN'S SET OF DATA REQUESTS DATED 6/4/21
REQUEST 3

RESPONSIBLE PERSON: Isaac S. Scott

COMPANY: East Kentucky Power Cooperative, Inc.

Request 3. Please provide in an excel file the following information for each month of the 2019 test year:

Request 3a. The on-peak, off-peak and total MWh energy associated with Nucor's Pickle Galvanizing Line (PGL), as recorded on Nucor meter M-5. Please confirm that these MWh amounts are included in the total MWh shown for Nucor Gallatin in the EKPC class cost of service study and in the EKPC rate design analysis.

Response 3a. Please see the Excel spreadsheet *Nucor DR2 Response 3-4 CONFIDENTIAL.xlsx*, which is subject to a motion for confidential treatment. The energy is stated in kWh rather than MWh. EKPC confirms that the total kWh for 2019 was included in the total kWh shown for Nucor Gallatin in the cost of service study and rate design analysis.

Request 3b. The coincident peak kW demand (CP demand) associated with Nucor's Pickle Galvanizing Line (PGL), as recorded on Nucor meter M-5. Please confirm that these CP kW demand amounts are included in the total Nucor CP billing demand shown for Nucor Gallatin in the EKPC class cost of service study and in the EKPC rate design analysis.

Response 3b. Please see the Excel spreadsheet *Nucor DR2 Response 3-4 CONFIDENTIAL.xlsx*, which is subject to a motion for confidential treatment. EKPC confirms.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00103
SUPPLEMENTAL SET OF DATA REQUESTS RESPONSE

NUCOR STEEL GALLATIN'S SET OF DATA REQUESTS DATED 6/4/21
REQUEST 4

RESPONSIBLE PERSON: Isaac S. Scott

COMPANY: East Kentucky Power Cooperative, Inc.

Request 4. With regard to the response to AG & Nucor Initial Request 18, please provide in an excel file with formulas intact, on a monthly basis, the on and off-peak kWh and CP kW billing demand used to calculate the revenues for 2019 and 2020. Also, show the calculation of the revenues shown in the response to Request 18, using these billing determinants.

Response 4. Please see the Excel spreadsheet *Nucor DR2 Response 3-4 CONFIDENTIAL.xlsx*, which is subject to a motion for confidential treatment.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00103
SUPPLEMENTAL SET OF DATA REQUESTS RESPONSE

NUCOR STEEL GALLATIN'S SET OF DATA REQUESTS DATED 6/4/21
REQUEST 5

RESPONSIBLE PERSON: **Julia J. Tucker**

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

Request 5. With regard to the response to Nucor Initial Request 1, please provide the hourly loads for the year 2019, in an excel spreadsheet, for Rate TGP, Steam and the Nucor Gallatin Meter M-5.

Response 5. The 2019 hourly loads for Nucor Gallatin Meter M-5 and the Rate TGP are provided in the Excel spreadsheet *Nucor DR2 Response 5 CONFIDENTIAL.xlsx*, which is subject to a motion for confidential treatment. Steam data is provided from the Spurlock plant on a daily basis in pounds. The conversion to equivalent mmbtu is performed on the monthly total value of steam. No hourly data is readily available for steam.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00103
SUPPLEMENTAL SET OF DATA REQUESTS RESPONSE

NUCOR STEEL GALLATIN'S SET OF DATA REQUESTS DATED 6/4/21
REQUEST 6

RESPONSIBLE PERSON: **Richard J. Macke**

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

Request 6. With regard to the response to Nucor Initial Request 1, please reconcile the maximum hourly kW demand shown for the Contract class in 2019 with the value shown for the maximum NCP demand for the Contract class in EKPC's class cost of service study (Maximum NCP Demand by Class).

Response 6. The maximum hourly kW demand shown in the data provided in response to Nucor Initial Request 1 does not reconcile with the maximum NCP demand for the Contract class in the class cost of service study. Using the data that was available when the class cost of service study was completed, the maximum NCP demand for the Contract class used in the class cost of service study was set to be equal to the peak billing demand. Upon review of more recent data provided by EKPC in response to Nucor Initial Request 1, it is believed that the maximum NCP demand for the Contract class to be used in the class cost of service should come from that file, which would change it from approximately 175 MW to 164 MW. The impact of this change is summarized in the response provided to Nucor Second Request 10.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00103
SUPPLEMENTAL SET OF DATA REQUESTS RESPONSE

NUCOR STEEL GALLATIN'S SET OF DATA REQUESTS DATED 6/4/21
REQUEST 7

RESPONSIBLE PERSON: **Richard J. Macke**

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

Request 7. Please confirm that EKPC calculated both its 12 CP demands and its Maximum NCP Demands by Class in its class cost of service study using 15-minute demands, not hourly demands. Please provide the corresponding 12 CP demand and Maximum NCP Demands by Class based on hourly demands in an excel spreadsheet.

Response 7. The 12 CP demands are based upon the billing data provided by EKPC. EKPC bills demand based on a 15-minute demand and so that is what the 12 CP demand represents. The NCP demand by class was provided by EKPC as 60-minute (hourly) demands. The requested 12 CP demand based on a 60-minute interval can be obtained from the hourly data provided by EKPC in response to Nucor Initial Request 1. Please see the Excel spreadsheet *Nucor DR2 Response 7 CONFIDENTIAL.xlsx*, which is subject to a motion for confidential treatment, for the CP and NCP based on a 60-minute interval.

**EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00103
SUPPLEMENTAL SET OF DATA REQUESTS RESPONSE**

**NUCOR STEEL GALLATIN'S SET OF DATA REQUESTS DATED 6/4/21
REQUEST 8**

RESPONSIBLE PERSON: Julia J. Tucker

COMPANY: East Kentucky Power Cooperative, Inc.

Request 8. Please confirm that EKPC plans its system to meets its hourly peak demands in the winter and summer, not its 15-minute demands as used by EKPC to bill its customers.

Response 8. EKPC plans its generation requirements based on hourly peak demands in the winter and summer. The transmission system must be able to meet instantaneous peaks and considers the 15-minute demands.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00103
SUPPLEMENTAL SET OF DATA REQUESTS RESPONSE

NUCOR STEEL GALLATIN'S SET OF DATA REQUESTS DATED 6/4/21
REQUEST 9

RESPONSIBLE PERSON: **Julia J. Tucker**

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

Request 9. Please confirm that EKPC's capacity obligation in PJM is based on its obligation peak load which is calculated using 1 hour demands, not 15-minute demands as used by EKPC to bill its customers.

Response 9. Yes, EKPC's capacity obligation in PJM is based on hourly demand and not 15-minute demand.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00103
SUPPLEMENTAL SET OF DATA REQUESTS RESPONSE

NUCOR STEEL GALLATIN'S SET OF DATA REQUESTS DATED 6/4/21
REQUEST 10

RESPONSIBLE PERSON: **Richard J. Macke**

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

Request 10. Please reconcile the "Sum of Maximum Class NCP" from line 80, tab 'Revenue Input' of the spreadsheet" PSC DR Response 16 App Exhibit 39 CCOSS and RD Confidential.xlsx" to the maximum hourly demand for each rate class provided in the spreadsheet "Nucor DR1 Response 1 CONFIDENTIAL.xlsx". If there are additional metered loads included in the Sum of Maximum Class NCP for any rate class which were not provided in response to Nucor DR1, please provide those on the same hourly basis.

Response 10. The table below reconciles the class NCP demands contained in the referenced sources. The two exceptions are as follows: First, as indicated in response to Nucor Second Request 6, the Contract NCP in the CCOSS should be updated to reconcile to the hourly demand as provided in "Nucor DR1 Response 1 CONFIDENTIAL.xlsx". Second, EKPC has advised that the information provided previously for Rate Schedule C, for purposes of the CCOSS does not match the

information provided in “Nucor DR1 Response 1 CONFIDENTIAL.xlsx” due to a member from Rate C moving to Rate G. While the dataset that the CCOSS used included the move to Rate G, EKPC has found that the member’s data had not been removed from Rate C, thus the NCP class demand in the CCOSS was overstated for Rate C.

| | Nucor DR1 Response 1 CONFIDENTIAL.xlsx (NCP MW) | CCOSS (NCP MW) |
|----------|---|-------------------|
| Rate E | 2,589.80 | 2,589.80 |
| Rate B | 155.51 | 155.51 |
| Rate C | 45.16 | 61.94 |
| Rate G | 67.22 | 67.22 |
| Contract | 164.00 | 175.03 |

These changes reduce the cost allocation to Rate C and Contracts and increase the cost allocation to the other rate classes slightly. The table below and the Excel spreadsheet *Nucor DR2 Response 10 2019 CCOSS CONFIDENTIAL.xlsx*, which is subject to a motion for confidential treatment, illustrate the impact of these two changes.

| | As Filed | | Nucor DR2 Response 10 | |
|----------|-----------------------|------------|-----------------------|------------|
| | Revenue Deficiency | As Percent | Revenue Deficiency | As Percent |
| Total | \$48,773,161 | 11.6% | \$48,773,161 | 11.6% |
| Rate B | \$2,000,381 | 7.4% | \$2,032,216 | 7.5% |
| Rate C | \$971,419 | 12.2% | \$36,837 | 0.5% |
| Rate E | \$37,838,133 | 11.1% | \$39,299,131 | 11.5% |
| Rate G | \$1,839,735 | 17.0% | \$1,851,694 | 17.1% |
| Contract | \$5,814,264 | 24.5% | \$5,244,054 | 22.1% |
| Steam | \$309,227 | 6.8% | \$309,227 | 6.8% |
| TGP | \$0 | 0.0% | \$0 | 0.0% |