

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| 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 TO REOPEN DOCKET FOR THE LIMITED PURPOSE OF
AMENDING THE DATE THE ANNUAL REPORT ON INVOLVEMENT
WITH PJM INTERCONNECTION, LLC IS DUE**

Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by and through counsel, and does hereby tender its motion to reopen this docket for the limited purpose of amending the date the annual report on involvement with PJM Interconnection, LLC is due to be filed with the Kentucky Public Service Commission (“Commission”), respectfully stating as follows:

1. On December 21, 2012, the Commission entered an Order in Case No. 2012-00169 that authorized EKPC to transfer control of its electric transmission system to PJM (the “Integration Order”).¹ As part of this transfer of control of transmission assets, EKPC integrated into PJM and has been a full member and participant in PJM’s markets for nearly a decade. As part of the Integration Order, the Commission required EKPC to file an annual report that would “detail[] transmission rights, hedging strategies, and PJM benefits and costs....” The annual report was required to be filed by May 31st of each calendar year.

¹ See *In the Matter of the Application of East Kentucky Power Cooperative, Inc. to Transfer Functional Control of Certain Transmission Facilities to PJM Interconnection, LLC*, Order, Case No. 2012-00169 (Ky. P.S.C. Dec. 21, 2012).

2. Because PJM operates on a Delivery Year beginning on June 1st and ending on May 31st of each calendar year, the original iterations of the PJM annual report did not coincide with the PJM delivery years. This tended to complicate the gathering of data and made EKPC's annual report on interactions with PJM less useful. To remedy this situation, EKPC requested approval to delay the filing of the annual report until July 31st of each year. In an Order entered in Case No. 2015-00116, the Commission approved EKPC's request and delayed the filing deadline for the annual report until July 31st each year.²

3. In Case No. 2021-00103, EKPC sought a general adjustment in its base rates and to be relieved of the obligation to file additional annual reports on its PJM involvement. Although the Commission denied EKPC's request to no longer file the annual report, it did agree that the nature of the report should be modified to reflect the fact that EKPC's participation in PJM was more certain based upon a multi-year track record of membership in the regional transmission organization. However, the Order in Case No. 2021-00103 reset the deadline for filing the annual report to May 31st of each calendar year.³

4. For the same reasons set forth in Case No. 2015-00116, the May 31st annual reporting deadline will prevent EKPC from providing data that corresponds to an actual PJM delivery year. As with EKPC's earliest PJM reports, this will tend to make the information more confusing and less useful.

5. EKPC respectfully requests the Commission to reopen this docket for the limited purpose of amending its September 30, 2021 Order in this docket to change the date upon which

² See *In the Matter of East Kentucky Power Cooperative, Inc's Request to Modify the Due Date of the Annual Report on Participation in PJM Interconnection, LLC*, Order, Case No. 2015-00116 (Ky. P.S.C. May 14, 2015).

³ See *In the Matter of the 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*, Order, Case No. 2021-00104 (Ky. P.S.C. Sept. 30, 2021).

the modified PJM annual report will be due from May 31st to July 31st of each calendar year. This change would not result in any prejudice to any party and would in fact make the annual report more useful and less complicated by corresponding in time to an actual PJM delivery year.

WHEREFORE, EKPC respectfully requests the Commission to reopen this docket for the limited purpose of amending the date the annual report on involvement with PJM is due to be filed with the Commission from May 31st to July 31st each calendar year.

This 11th day of May 2022.

Respectfully submitted,



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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 May 11, 2022; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that pursuant to the Commission's Orders in Case No. 2020-00085, no paper copy of this filing will be tendered to the Commission.



Counsel for East Kentucky Power Cooperative, Inc.