

**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, APPROVAL OF
DEPRECIATION STUDY, AMORTIZATION OF CERTAIN
REGULATORY ASSETS, AND OTHER RELIEF

:
:
:
:
:
:
:

Case No. 2021-00103

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

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: 513.421.2255 fax: 513.421.2764
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com

COUNSEL FOR NUCOR STEEL GALLATIN

Dated: May 14, 2021

DEFINITIONS

1. "Document(s)" is used in its customary broad sense and includes electronic mail and all written, typed, printed, electronic, computerized, recorded or graphic statements, memoranda, reports, communications or other matter, however produced or reproduced, and whether or not now in existence, or in your possession.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion whether preliminary or final.
3. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, including the type of document, its date, the date or approximate date it was lost, discarded or destroyed, the identity of the person (s) who last had possession of the document and the identity of all persons having knowledge of the contents thereof.
4. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
5. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
6. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it.
7. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
8. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
9. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
10. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
11. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
12. "EKPC" or "Company" means East Kentucky Power Cooperative, Inc. and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Nucor Steel Gallatin. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

**NUCOR STEEL GALLATIN's FIRST SET OF DATA REQUESTS TO
EAST KENTUCKY POWER COOPERATIVE, INC.
Docket No. 2021-00103**

- Q1.1. Please provide test year hourly loads for each EKPC rate class in the test year that is allocated fuel and purchased energy cost or is subject to the FAC.
- Q1.2. For each PJM load zone(s) at which EKPC serves load, please provide the following:
- a. The EKPC hourly load during the test year for that zone that was submitted to PJM in the day-ahead market.
 - b. Hourly day-ahead LMPs during the test year.
 - c. The EKPC hourly load during the test year for that zone that was billed in the real time PJM energy market.
 - d. Hourly real time LMPs during the test year.
 - e. An identifying name of the PJM load zone.
 - f. To the extent that the Special Contract class (NUCOR) is served by a single load zone, please identify that zone.
- Q1.3. Please provide a detailed breakdown of EKPC's test year fuel and purchased power energy expenses on the following basis:
- a. Purchases from the PJM day-ahead energy market.
 - b. Purchases and credits from the PJM real time energy market.
 - c. Bilateral contracts, delineated by contract. Also provide a description of the contract, including term and pricing provisions.
 - d. All other purchases, with a description of the source.
- Q1.4. Please provide a reconciliation between the dollar amounts provided in response to Questions 3a and 3b and the costs produced by pricing the hourly loads at PJM LMP, as provided in response to Questions 2a through 2d above.
- Q1.5. Please provide a breakdown of all other PJM items included in the Company's Fuel and Purchased Power expense, including Sales into the PJM energy markets.
- Q1.6. Please provide a reconciliation of the booked test year Fuel and Purchased Power expense to the amounts provided in response to the previous questions.
- Q1.7. With regard to PSC DR1 Response 16 – App Exhibit 39 COSS and RD Confidential, please provide the following:
- a. Monthly system CP demands for each month of the test year calculated in the same manner as the 3,105 MW demand shown on TAB AED Plant Ex ESC, cell G172.
 - b. A reconciliation between the total system energy value of 12,186,820 shown on TAB AED Plant Ex Esc, cell E173 and the Energy Sales (MWH) value of 12,953,761 shown on TAB AED Alloc Factor, cell E30.
 - c. The monthly CP demands for each rate class consistent with the 12 CP demands shown on Row 26 of TAB AED Alloc Factor.

- d. Provide a copy, in excel with formulas intact, of each workpaper (“WP”) referenced in the spreadsheet. For example, WP2.1, WP2.2, WP 17.
- e. With regard to footnote #2 (“In 2019, 55.91% of fuel and purchased energy cost occurred during the on-peak period, with the remaining 44.09% occurring during the off-peak period.”) in TAB AED Cost Alloc Ex ESC, please provide the supporting analysis used to develop these factors, including hourly LMPs and any loads used to weight those LMPs.
- f. Please provide the definition of On-Peak and Off-Peak used in the determination of the On-Peak/Off-Peak split, and any supporting documentation for the definition used.
- g. With regard to TAB Summary Comparison, please provide the support for the values shown in Columns H and I, at rows 17 to 27. Include a narrative explaining how these amounts were developed, the excel spreadsheet used to develop the amounts (dollars in Column H and percentages in Column I) and an explanation of “Opt 1”. If Opt 1 is a model, please provide a copy of the model.

- Q1.8. Please provide a detailed schedule of all fuel expense, purchased power, and sales which remain in the Company's CCOSS after removing the FAC expense.
- Q1.9. Please provide a schedule of all 2019 purchased power or sales demand or capacity charges, and whether those charges are recovered through the FAC mechanism or base rates.
- Q1.10. Please provide a copy of EKPC 2019 COS and RD V5.xlsx, with formulas intact.
- Q1.11. Please explain why the Steam class does not receive an allocation of the Fuel and Purchased Power remaining in the COSS when it is subject to the FAC.
- Q1.12. Please provide an explanation of how the Fuel and Purchased Power expense attributable to the Steam class is determined.
- Q1.13. With regard to Mr. Macke’s testimony on page 12, please provide the support for the following statement at lines 6 -7: “*Account 556, System Control and Dispatch was evaluated by EKPC staff and was functionalized/classified as Production Energy.*”
- Q1.14. Refer to Exhibit RJM-2, page 17 or 17, line 30. Please provide an explanation for assigning an average 5.2% revenue increase to Rate G, versus 8% for the Contract class, in light of the cost of service-based increase shown for Rate G on line 30.

Respectfully submitted,

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

513.421.2255 Fax: 513.421.2764

E: mail: mkurtz@BKLawfirm.com

kboehm@BKLawfirm.com

jkylercohn@BKLawfirm.com

COUNSEL FOR NUCOR STEEL GALLATIN

May 14, 2021