

**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

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Case No. 2021-00103

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

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Dated: June 4, 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 SUPPLEMENTAL SET OF DATA REQUESTS TO
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Docket No. 2021-00103**

- Q.2-1. 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.
- Q.2-2. 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.
- Q.2-3. 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 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.
- Q.2-4. 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.
- Q.2-5. 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.
- Q.2-6. 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).
- Q.2-7. 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.
- Q.2-8. Please confirm that EKPC plans its system to meet its hourly peak demands in the winter and summer, not its 15-minute demands as used by EKPC to bill its customers.
- Q.2-9. 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.
- Q.2-10. 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.

Respectfully submitted,

/s/ Michael L. Kurtz

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