

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**APPHARVEST MOREHEAD FARM, LLC’S
SUPPLEMENTAL REQUEST FOR INFORMATION TO
EAST KENTUCKY POWER COOPERATIVE, INC.**

In accordance with the Public Service Commission’s (“Commission”) April 13, 2021 Order, Intervenor AppHarvest Morehead Farm, LLC (“AppHarvest Morehead”) propounds the following data requests upon the Applicant East Kentucky Power Cooperative, LLC (“EKPC”). EKPC shall respond to these requests in accordance with the provisions of the Commission’s April 13, 2021 Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate AppHarvest Morehead’s request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for AppHarvest Morehead.
4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please 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.

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

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

7. If EKPC objects to any request on any grounds, please notify counsel for AppHarvest Morehead as soon as possible.

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

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: 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.

10. 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.

Respectfully submitted,

/s/ M. Todd Osterloh
STURGILL, TURNER, BARKER & MOLONEY, PLLC
James W. Gardner
M. Todd Osterloh
333 W. Vine Street, Suite 1500
Lexington, Kentucky 40507
Telephone No.: (859) 255-8581
Facsimile No.: (859) 231-0851
jgardner@sturgillturner.com
tosterloh@sturgillturner.com
Attorneys for AppHarvest Morehead Farm, LLC

Requests for Information

1. Please see EKPC's response to initial data request 9a. Does this mean that EKPC receives no incremental/revenue from the new solar projects in EKPC's territory that interconnect with and use EKPC's transmission systems?
2. Please refer to Mr. Mackie's testimony on page 19, his answers to data requests 20 and 22, and EKPC's response to the Commission Staff's Second Request for information Request. Mr. Mackie refers to a 2:1 ratio increase between demand increase and energy increase. Please confirm that for Rate B that 2:1 increase does not apply, because the increase is approximately 1:1.
3. Because AppHarvest Morehead Farm is taking power that Fleming-Mason is supplied under rate B, isn't EKPC over earning since AppHarvest was not a customer during the test year? Please explain why or why not.
4. Please see RJM-3 page 1 of 5 for Rate B. Shouldn't the increase of 3.8% apply to all of Fleming-Mason's retail customers who take indirectly from this EKPC Rate B? If not, please state why not?
5. Refer to page 38 of EKPC's response to AppHarvest's First Request. EKPC describes the operation of its Residential Efficient Lighting Program.
 - a. Please state the number each of compact fluorescent light bulbs and LEDs that EKPC distributed to customers by year from 2015-2020.
 - b. EKPC's response does not provide any energy efficiency incentives for commercial lighting. Explain whether such a program would be desirable and/or cost effective, and your rationale.
6. For the periods 2015 to 2020 and 2021 to 2030, please provide:
 - a. The estimated annual peak coincident load reduction attributable specifically to energy efficiency, including broken down by source (e.g., commercial lighting, residential lighting, heat pump retrofit, etc.)
 - b. Estimated monthly and annual energy reductions attributable to lighting, broken down by residential and non-residential customers.
 - c. Monthly cost savings attributable specifically to energy efficiency, including broken down by source (e.g., commercial lighting, residential lighting, heat pump retrofit, etc.).
7. Refer to Exhibit D of EKPC's January 30, 2019 Demand-Side Management filing in Docket No. 2019-00059. On the "DSM Program Changes Explanation" sheet for the Commercial and Industrial Advanced Lighting Program, EKPC states: "Even though the

refined TRC is cost-effective, due to LEDs already becoming the baseline light of choice, EKPC and the owner-members request to discontinue the C&I Lighting program.” Please provide all justification and data underlying your statement that “LEDs already be[came] the baseline light of choice.”

8. Confirm the Installed Capacity and Unforced Capacity ratings of the Cooper Power Station.
9. Provide Cooper Power Station’s monthly electricity output during each month for the past five years.
10. For each month from 2015 to 2020, and 2021 to 2030, provide Cooper Power Station’s actual or estimated:
 - a. Monthly revenue, broken down by source (e.g., capacity, energy, ancillary services).
 - b. Monthly costs, broken down by source (maintenance, fuel cost, etc.).
11. For each day of 2020 and 2021 for which you have such data, please provide the following data concerning AppHarvest Morehead Farm (“AppHarvest”):
 - a. Off-peak energy use;
 - b. On-peak energy use;
 - c. A summary, for each month of 2020 and 2021 for which you have such data, comprised of:
 - i. AppHarvest’s total energy consumption;
 - ii. AppHarvest’s maximum demand;
 - iii. The date and time at which AppHarvest’s maximum demand occurred; and
 - iv. AppHarvest’s load factor.
12. Please provide an hourly load profile by month for each month during 2020-2021.