

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.
APPROVAL OF DEPRECIATION STUDY)	2021-00103
AMORTIZATION OF CERTAIN REGULATORY)	
ASSETS AND OTHER GENERAL RELIEF)	
)	

**APPHARVEST MOREHEAD FARM, LLC'S RESPONSES TO COMMISSION STAFF'S
REQUEST FOR INFORMATION NO. 1**

REQUEST NO. 1:

1. Refer to the direct testimony of Suedeem Kelly, page 2, lines 12–14. Provide the economic support and analysis for the assertion that Cooper Station should be retired.

RESPONSE TO REQUEST NO. 1:

Ms. Kelly’s testimony is based upon her analysis of EKPC’s data submission in its RUS Form 12s.¹ EKPC has provided that in 2019 and 2020, Cooper Station’s Plant Factor was only about 7% and 6%, respectively. Kelly Dir. 3:17-4:2. EKPC’s data also showed that the plant was not used at all during more than half the year. *Id.* Ms. Kelly identified this data as significant because EKPC has said that Cooper Station is designed as a baseload generator, not a peaking unit.

Witness: Suedeem G. Kelly

¹ See EKPC Response to AG & NUCOR Initial Request for Data Dated 5/14/21, Response to Request No. 40.