

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 )

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

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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,

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## Requests for Information

1. Did the Company use and prepare a load forecast in conjunction with this Rate Case?
  - a. If no, please state why not?
  - b. If yes, please provide a copy of same.
  - c. When was the last time the Company prepared a load forecast?
  - d. Was the load forecast used for the 2019-00096 Integrated Resource plan prepared in 2018? On what day was the load forecast for the 2019-00096 IRP completed?
  - e. Has the Company completed the load forecast yet for the 2022 IRP?
    1. If yes, please attach a copy.
    2. If not, when is the load forecast expected to be completed?
2. Why did the Company use a test year ending in 2019 and not a more recent year?
3. Did the Company make any adjustments to the 2019 data because of the pandemic?
  - a. If not, why not?
  - b. If yes, what adjustments were made?
4. When was the last meeting of the DSM collaborative?
  - a. If a report/minutes of the last meeting has been prepared, please attach of a copy of such.
  - b. Given AppHarvest Morehead Farm, LLC's ("AppHarvest") existing and anticipated high load and its expressed interest in DSM and Energy Efficiency, why hasn't AppHarvest been invited to join same?
5. Please refer to the direct testimony of Scott Drake at page 3, and the answer to question appearing at line 1.
  - a. Why didn't you attach a copy of the 2020 Annual Demand Site Management Report?
  - b. Has the 2020 report been prepared?
    1. If yes, please attach a copy of that report.
    2. If not, why not?

6. Please refer to the Exhibit 1 of Scott Drake's direct testimony at page 11, Commercial and Industrial Lighting.
  - a. Please describe in detail, the eligibility requirements and the benefits to the customer for participating.
  - b. Please attach copies of all materials related to this program, that describe the program and detail eligibility for the program.
  - c. Why must the lighting have been in service for two years?
  - d. After two years in service, will AppHarvest be eligible to participate?
  - e. Please indicate whether EKPC offers any other DSM/EE programs for Commercial and Industrial retail members.
7. Please provide a detailed listing of all bidding that EKPC did of EE/DSM savings into any of the PJM auctions for the years 2016-2020. For each such bid, please state the date, whether such bid was accepted, amount of the bid, and the nature of the bid (i.e. direct load control, energy efficiency, etc.).
8. Please provide a short description of federal and state environmental rules and requirements that apply to EKPC by each generating facility.
  - a. For each facility please distinguish between: (1) rules and requirements with which EKPC is already in compliance, (2) expected changes to rules and requirements that would have a material effect on EKPC's operations and how its operations would be affected; and (3) rules and requirements with which EKPC is not yet in compliance.
  - b. What are EKPC's plans for retirement for each of EKPC's coal fired facilities?
  - c. What is EKPC's projected generation mix in the year 2030?
  - d. What is the capacity-utilization rate (factor) for each of EKPC's coal fired facilities by year from 2015 through 2020 as well as the first 4 months of this year?
9. There are multiple utility scale merchant solar facilities that have obtained or are seeking approval to construct and interconnect with EKPC's transmission system.
  - a. Please detail and quantify the costs and benefits of this expansion of EKPC's system. For example, (1) will this provide additional revenues; (2) will the new substations be part of EKPC's rate base; (3) will there be additional transmission costs? (4) Is it

- likely that on balance more revenues will be received than expenses? (5) Why or why not?
- b. What will be the long term and short term effects on EKPC's system?
  - c. Is it anticipated that this will have an increase in demand for energy (and capacity, if applicable)?
  - d. Is it anticipated that this will have any impact on EKPC's solar share/community cooperative solar program?
  - e. Will the results of the many interconnection studies produced by PJM result in material changes to EKPC's system?
  - f. Will the sustainability goals of large customers have any impact on EKPC's transmission and generation planning?
10. Are there any current, expiring or potential credits or incentives that may be available to EKPC or its retail end-users for constructing or using renewables?
  11. Please refer to EKPC's Cooperative Solar Project.
  12. How many panels in the Cooperative Solar Project have been leased at this point?
    - a. What is the total KW's that have been leased?
    - b. From 2016 through March 2021 on an annual basis, please provide the total revenues the project has received from PJM.
  13. Please refer to the direct testimony of Denver York.
    - a. Which of the Smart Grid technologies described in response to the question beginning on line 10, page 4 are considered distribution technologies and which are considered generation or transmission technologies?
    - b. If any of the technologies described are considered distribution technologies, please state the technology, estimate its cost and state whether the distribution company paid or reimbursed EKPC for its cost, and if not, why not.
  14. Please state with specificity what regulatory changes have caused a need for the filing of this rate-case increase and approximately what percent of the rate increase relates to each regulatory change.
  15. Please state with specificity what its additional costs are to maintain G&T infrastructures and approximately what percent of the rate increase relates to increased maintenance costs.

16. Please state the amount of load by year for each year from 2016-2021. Please state the projected load from 2021-2030.
17. Please see Exhibit 23 sponsored by Isaac Scott.  
  
For each of the four rates listed (B, C, E Option 2, and G), please provide in which category each Fleming Mason tariff belongs.
  - a. Why are contract and steam calculated separately?
  - b. Is Rate E, Option 2 the wholesale rate for the 16 member co-ops?
  - c. Are the special contracts, contract category that list one (1) customer a customer in Fleming Mason's territory?
18. Is the power that AppHarvest purchases from Fleming-Mason provided to Fleming-Mason, pursuant to Rate B, Rate C, Rate E, Option 2, Rate G or contract?
  - a. If yes, which category?
  - b. If not, please explain why not?
19. Please refer to the direct testimony of John Wolfram filed in each of the distributed pass-through cases. Please see the answer to the question in lines 1-2 on page 3.
  - a. Please provide the summary provided and a copy of all work papers used to calculate the proposed increase by distribution cooperative wholesale rate class.
20. For whatever category AppHarvest belongs (B, C, E, G or contract), please provide a chart similar to Table 3 which shows the changes which would have resulted from the cost-of-service study without the adjustments Mr. Macke undertook described on page 19 of his testimony.
21. Were Mr. Macke's adjustments interclass, intraclass, or both?
22. Please show the adjustments made to each class that differed from the COS study.
23. Does EKPC have any plans to consider revising its green tariff so as to financially incent more customers? If yes, please describe its plans. Does it expect to evaluate a green tariff specifically developed to attract customers in the AgTech sector? If yes, please provide details of the evaluation.