

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY, NOLIN)	
RURAL ELECTRIC COOPERATIVE)	
CORPORATION, AND EAST KENTUCKY POWER))	
COOPERATIVE, INC. FOR APPROVAL OF AN)	CASE NO.
AGREEMENT MODIFYING AN EXISTING)	2021-00462
TERRITOTIAL BOUNDARY MAP AND)	
ESTABLISHING THE RETAIL ELECTRIC)	
SUPPLIER FOR GLENDALE MEGASITE IN)	
HARDIN COUNTY, KENTUCKY)	

**RESPONSES TO COMMISSION STAFF’S FIRST INFORMATION REQUEST
TO EAST KENTUCKY POWER COOPERATIVE, INC.**

DATED JANUARY 5, 2022

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY, NOLIN)	
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TERRITOTIAL BOUNDARY MAP AND)	
ESTABLISHING THE RETAIL ELECTRIC)	
SUPPLIER FOR GLENDALE MEGASITE IN)	
HARDIN COUNTY, KENTUCKY)	

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF HARDIN)

Greg Lee, being duly sworn, states that he has supervised the preparation of the responses of Nolin Rural Electric Cooperative Corporation to the Public Service Commission Staff Data Requests in the above-referenced case dated January 5, 2022, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Gregory R. Lee

Subscribed and sworn before me on this 11th day of January 2022.

Allison S. Coffey

 Notary Public



COMMONWEALTH OF KENTUCKY
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HARDIN COUNTY, KENTUCKY)	

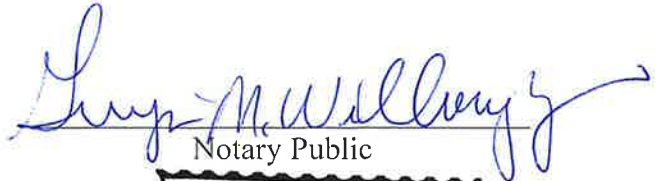
CERTIFICATE

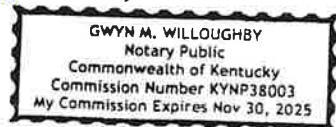
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Mary Jane Warner, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff Data Requests in the above-referenced case dated January 5, 2022, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.



Subscribed and sworn before me on this 11th day of January 2022.


Notary Public



EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00462
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 1/5/2022
REQUEST 3

RESPONSIBLE PARTY: Greg Lee and Mary Jane Warner

Request 3. Provide projected costs for Nolin RECC extending service to the Glendale MegaSite.

Response 3. The attached confidential document was prepared by East Kentucky Power Cooperative, Inc. ("EKPC") as a conceptual estimate for transmission facilities needed to support Nolin RECC ("Nolin") service to the Glendale site based on a gross load of 190 MW. Beyond general load information that allowed for EKPC's estimate to provide adequate power supply to the site, Nolin RECC has not been provided any site-level planning that would allow it to generate estimated costs of distribution services.

Page 2 of 2 of this request is subject to confidential treatment.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00462
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 1/5/2022

REQUEST 4

RESPONSIBLE PARTY: Mary Jane Warner

Request 4. Provide all documents, studies, and workpapers supporting the projected costs for Nolin RECC extending service to the Glendale MegaSite.

Response 4. The attached confidential documents support the conceptual estimate for EKPC transmission facilities needed to support Nolin RECC service to the Glendale MegaSite. They include assumptions about the generic EKPC transmission facilities that would be needed to serve a 190 MW load at this location. In addition to the facilities specified in the detailed estimates, line terminal equipment for two circuits at Central Hardin was added at [REDACTED], and a 20.4 MVAR capacitor bank at the Glendale 69/34.5 kV substation was added at [REDACTED]. The remaining difference is rounding and a small contingency for the price accuracy of the capacitor bank and terminal equipment.

Page 2 of 6 of this request is subject to confidential treatment.

Page 3 of 6 of this request is subject to confidential treatment.

Page 4 of 6 of this request is subject to confidential treatment.

Page 5 of 6 of this request is subject to confidential treatment.

Page 6 of 6 of this request is subject to confidential treatment.

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2021-00462

FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 1/6/2022

REQUEST 5

RESPONSIBLE PARTY: Greg Lee

Request 5. Refer to the Application, Exhibit 1, Joint Settlement Agreement, page 5.

Request 5a. Provide an explanation for how this settlement sum was determined.

Response 5a. The amount of the settlement payment was determined through negotiations with KU. The settlement payment is only one portion of the consideration that supports the Joint Settlement, however. A material element of the Joint Settlement is the transfer of acreage near the Glendale MegaSite and the T. J. Patterson industrial park from KU's service territory to Nolin RECC's service territory. While it is not possible to precisely quantify the net present value of the territory coming to Nolin RECC, it is believed that future development will lead to load growth for Nolin RECC and enhancement of its margins. Thus, the settlement payment will offer Nolin RECC an immediate benefit from the transfer and the territory swap will likely provide longer-term value as the Hardin County community continues to grow. When viewed in its entirety, Nolin RECC believes the Joint Settlement will afford Nolin RECC's members with value that is reasonably equivalent to serving any electric consuming facilities located within the Glendale

MegaSite. Based on available load data, Nolin RECC appraised a net present value of avoided life cycle margins from servicing the Glendale MegaSite. Information used to derive the net present value is demonstrated through the projected rate sheet found below. The settlement sum represents approximately half of the net present value of avoided life cycle margins. With respect to territorial exchange, the spreadsheet attached shows all parcels designated for transfer between the parties.

Request 5b. Provide all documents, studies, and workpapers supporting the determination of the settlement sum.

Response 5b. See pages 3 and 4 of 4 of this response.

Page 3 of 4 of this request is subject to confidential treatment.

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EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00462
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 1/5/2021

REQUEST 6

RESPONSIBLE PARTY:

Request 6. Refer to the Application, Exhibit 1, Joint Settlement Agreement, page 1. Describe the nature of the issue or disagreement regarding territorial boundaries that precipitated the creation of the Joint Settlement Agreement.

Response 6. Nolin RECC and KU do not agree as to whether the proposed Ford project constitutes a single “electric-consuming facility” (“ECF”) or multiple ECFs under Kentucky law. Nolin RECC and KU also both believe they have a right to serve Ford’s project under Kentucky law and the present location of the territorial boundaries. However, rather than enter into what would likely be prolonged and costly litigation, Nolin RECC and KU determined that a compromise would be in the best interests of both companies, the Hardin County community and Kentucky as a whole. As part of the agreement, EKPC agreed to remove its transmission facilities within the Glendale MegaSite. Moreover, Nolin RECC and EKPC understand that Ford had expressed its preference to be served by KU with whom it has an existing commercial relationship by virtue of its operations in Jefferson County and that state leaders believed a compromise should be achieved in order to facilitate this investment in Kentucky. Thus, Nolin RECC entered into discussions with KU to develop a contract pursuant to KRS 278.018(6) for the purpose of

allocating territories and consumers between Nolin RECC and KU and for designating which territories and consumers are to be served by each of them. When viewed in its entirety, the Joint Settlement Agreement will allow Nolin RECC and KU to provide adequate and reasonable service to all areas and consumers affected by the agreement and that the Joint Settlement should be approved.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00462
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 1/5/2022

REQUEST 7

RESPONSIBLE PARTY: Greg Lee and Mary Jane Warner

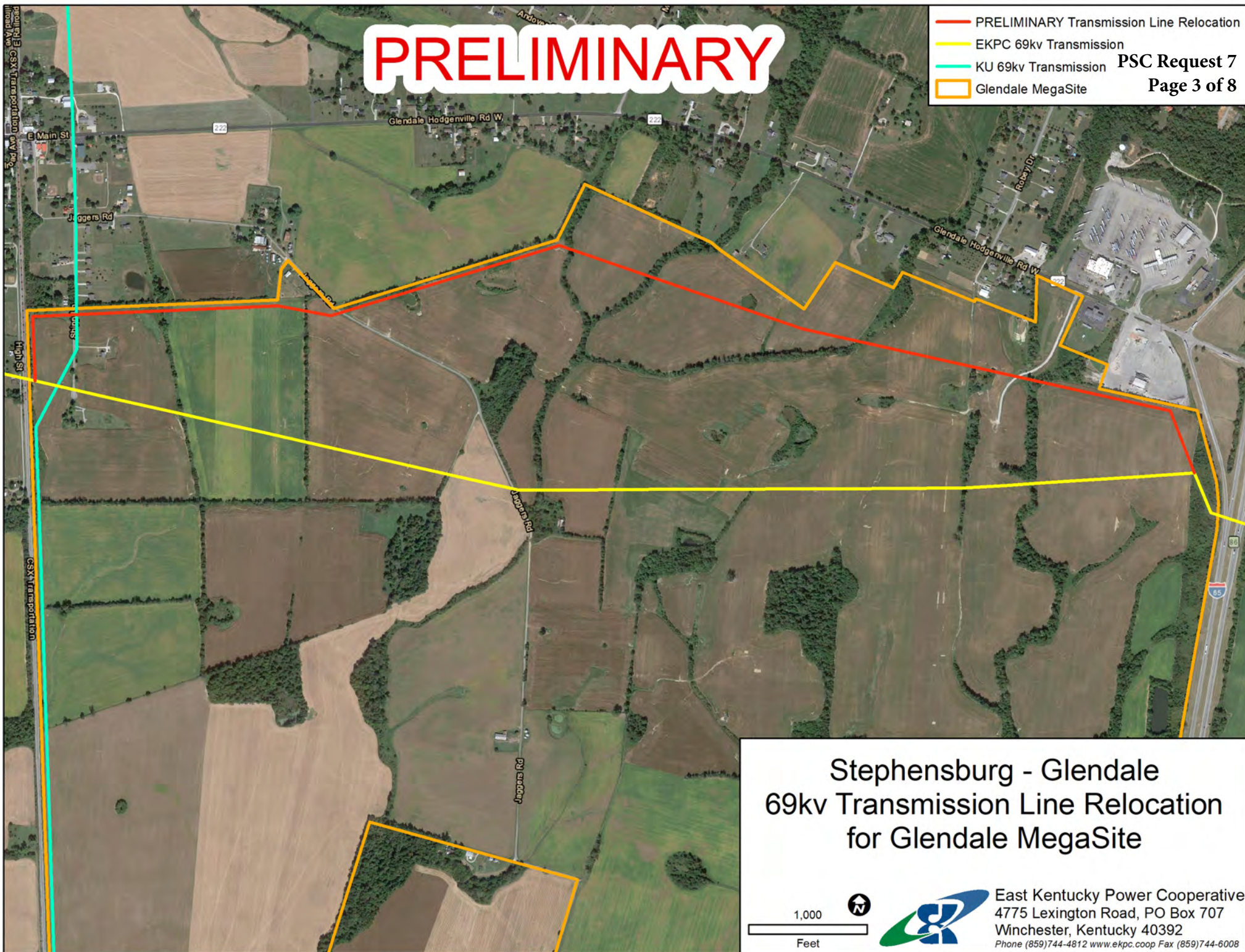
Request 7. Refer to the Application, Exhibit 1, Joint Settlement Agreement, page 6. Provide all documents reflecting projected costs for moving or removing Nolin RECC and EKPC facilities.

Response 7. Nolin RECC and EKPC have not yet been provided with a proposed site plan arrangement that would be needed to develop routes or plans for relocation of existing facilities. EKPC developed a generic estimate of \$1,350,000 based on an assumed location for the relocated centerline of the Stephensburg – Glendale line. The removal cost is embedded in the construction units for this estimate, but assuming the entire length of existing EKPC transmission facilities and Nolin RECC distribution facilities on the site would be removed or relocated, the approximate cost for removal only would be \$60,000 for the transmission line. Simply removing the transmission facilities is not possible, however. To support reliability in the area, the existing facilities will need to be relocated. The same reliability concern applies to portions of the distribution facilities along the perimeter of the site. Removal estimates for the distribution facilities vary depending on final site location. To remove single phase distribution facilities along Jagers Road through the central section of the site, costs are approximately \$20,000. If single

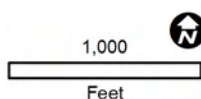
phase facilities along Gilead Church Rd. at the southern periphery of the Glendale MegaSite must be removed, costs increase to approximately \$40,000. In the event that three phase facilities at the periphery of the site must also be removed, costs increase to approximately \$60,000. Costs for reconstruction of needed replacement of both transmission and distribution facilities in new locations cannot be determined at this time. Under the terms of the Joint Settlement Agreement, these removal and reconstruction costs will be borne entirely by KU, and will not be charged to EKPC's Owner-Members or Nolin's members. See the attached map, on page 3 of 8 of this response, for the existing centerline location of the Stephensburg – Glendale 69kV transmission line. The yellow line is the current location and the orange line is the relocated centerline assumed by EKPC for this conceptual estimate. See also the estimate support for this line relocation in response to PSC Request #4. Also attached are Nolin staking sheets utilized to project facility retirement cost estimates.

PRELIMINARY

- PRELIMINARY Transmission Line Relocation
 - EKPC 69kv Transmission
 - KU 69kv Transmission
 - Glendale MegaSite
- PSC Request 7
Page 3 of 8



Stephensburg - Glendale 69kv Transmission Line Relocation for Glendale MegaSite



East Kentucky Power Cooperative
4775 Lexington Road, PO Box 707
Winchester, Kentucky 40392
Phone (859)744-4812 www.ekpc.coop Fax (859)744-6008

Glendale Megasite

Legend

Green Circuit

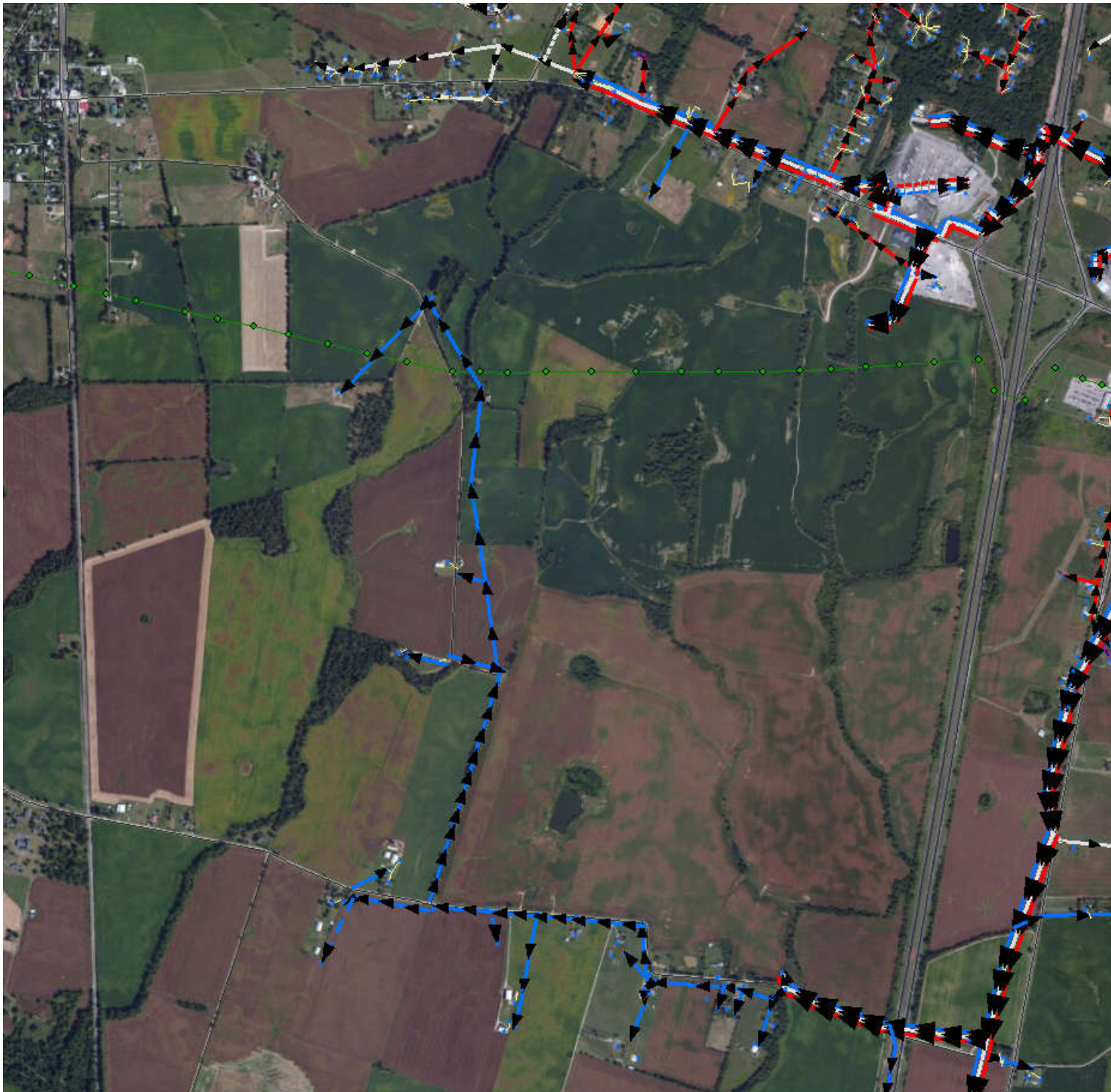
EKPC 69 kV

Blue Circuit

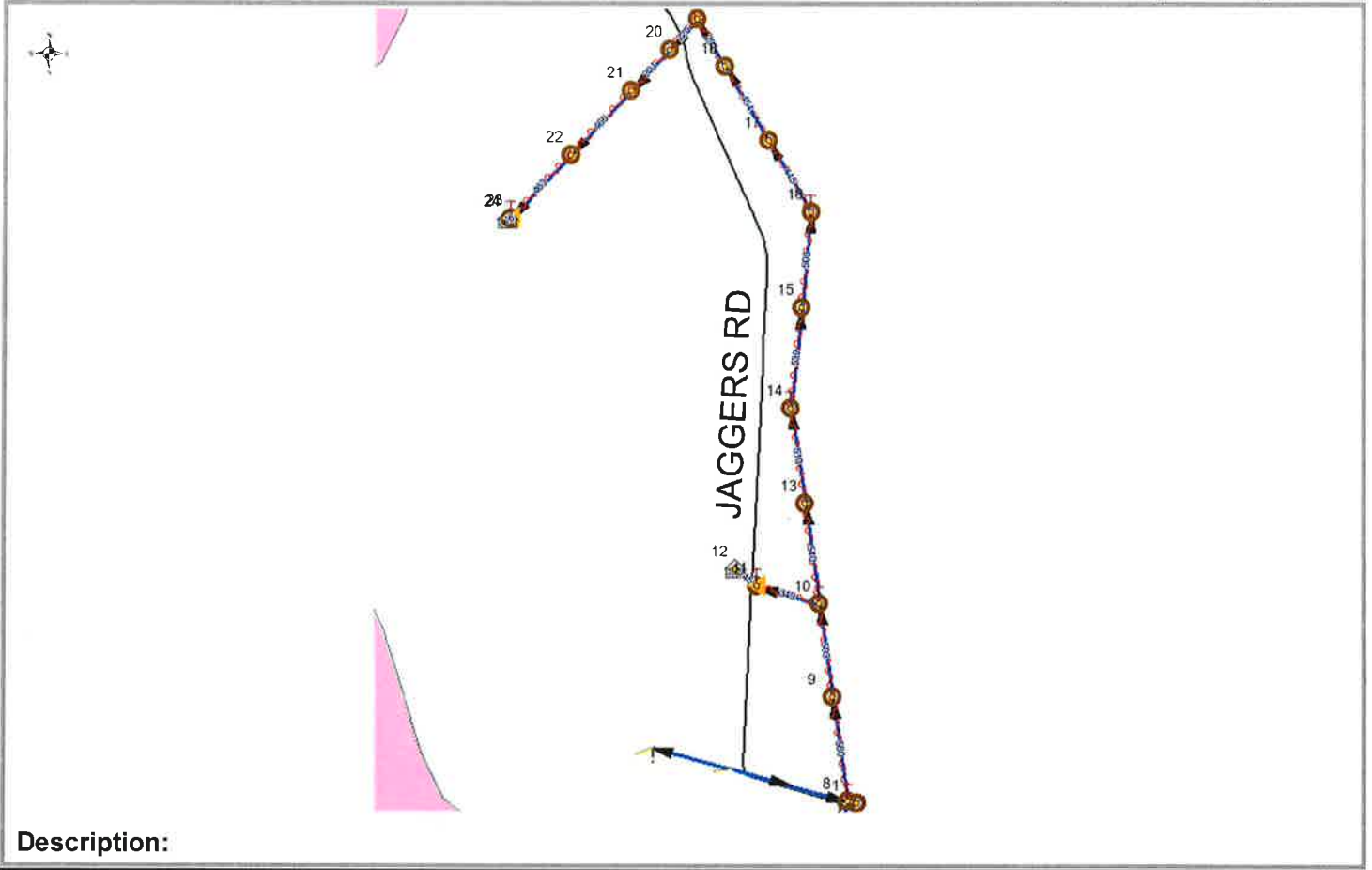
Nolin RECC 7.2 kV Single Phase

R-W-B Circuit

Nolin RECC 12 kV Three Phase



Cust Name:		W/O:	MEGA_RETIRE	811 Ex Date:		
Address:		Acct#:		811 Tkt ID:		
County:	Hardin	Ref_740C:		Staked By:		
Township:		Comments:		Stake Date:	01/06/2022	
Directions:					Sub:	3 - 3 Glendale
TAG POLES					Fd:	5
					Phase:	



Description:

Person in Charge _____

As Built Date _____

- 1** **E** 1 - 30' CL6
- 8** **E** 1 - 35 CL6, 1 - A6 (A6.2), 1 - E2-3 (E2-3 (E1.4L))
 - R** 1 - A5-1, 2 - M2-1 (H1.1), 1 - M5-10 (S1.02)
 - C** 1 - E1-3 (E1.1L), 1 - E3-10 (E3.10), 1 - E9-3 (E1.5), 1 - F1-3S (F2.10)
- 9** **R** 1 - 45 CL4, 1120' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
- 10** **R** 1 - 40 CL4, 1006' - 4-ACSR-P-O-AL, 1 - A5-1, 1 - A9 (A2.21), 1 - E1-3 (E1.1L), 1 - E3-10 (E3.10), 1 - F1-2/7 (F1.8.7), 2 - M2-1 (H1.1)
- 11** **R** 1 - 25-OH-1BU-120/240, 1 - 40 CL4, 698' - 4-ACSR-P-O-AL, 1 - A5 (A5.1), 1 - E1-3 (E1.1L), 1 - E3-10 (E3.10), 1 - F1-2/7 (F1.8.7), 1 - G10 (G1.6), 1 - K11C, 2 - M2-1 (H1.1)
- 12** **R** 145' - 1/0-TPX-S-O-AL, 1 - I210+ METER CL200, 1 - K11C

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| 13 |
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R

 1 - 40 CL3, 1080' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)

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R

 1 - 40 CL4, 1026' - 4-ACSR-P-O-AL, 1 - A2 (A2.3), 1 - E1-3 (E1.1L), 1 - E3-10 (E3.10), 1 - F1-2/7 (F1.8.7), 1 - M2-1 (H1.1)

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| 15 |
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R

 1 - 40 CL6, 1078' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 1 - M2-1 (H1.1)

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| 16 |
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R

 1 - 35 CL5, 1016' - 4-ACSR-P-O-AL, 1 - A3 (A3.4), 1 - E1-3 (E1.1L), 1 - E3-10 (E3.10), 1 - F1-2/7 (F1.8.7), 2 - M2-1 (H1.1)

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| 17 |
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R

 1 - 40 CL3, 890' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)

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| 18 |
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R

 1 - 40 CL4, 908' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)

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| 19 |
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R

 1 - 40 CL3, 584' - 4-ACSR-P-O-AL, 1 - A5 (A5.1), 1 - A5-1, 2 - E1-3 (E1.1L), 2 - E3-10 (E3.10), 1 - F1-2/7 (F1.8.7), 1 - F1-3S (F2.10), 2 - M2-1 (H1.1)

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| 20 |
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R

 1 - 40 CL4, 440' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 1 - M2-1 (H1.1)

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| 21 |
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R

 1 - 40 CL4, 602' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 1 - M2-1 (H1.1)

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| 22 |
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R

 1 - 40 CL4, 932' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 1 - M2-1 (H1.1)

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| 23 |
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R

 1 - 15-OH-1BU-120/240, 1 - 40 CL4, 926' - 4-ACSR-P-O-AL, 1 - A5 (A5.1), 1 - E1-3 (E1.1L), 1 - E3-10 (E3.10), 1 - F1-2/7 (F1.8.7), 1 - G10 (G1.6), 1 - K11C, 2 - M2-1 (H1.1)

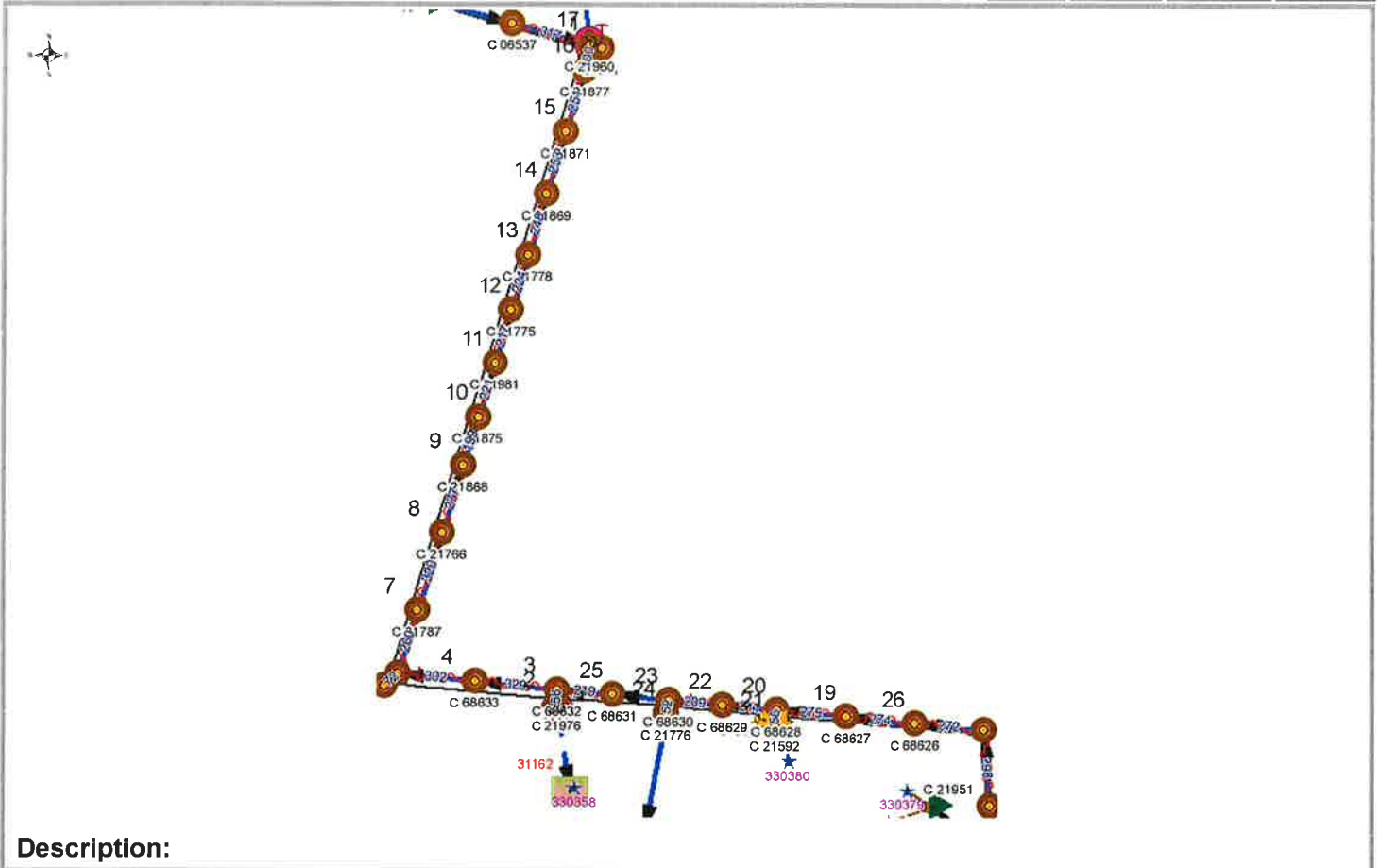
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| 24 |
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R

 16' - 1/0-TPX-S-O-AL, 1 - I210+ METER CL200, 1 - K11C

Retirement of Line Relocate

Cust Name:		W/O:	MEGA_LOC	RETR Date:	
				811 Tkt ID:	
Address:		Acct#:			
County:	Hardin	Ref_740C:		Staked By:	
Township:		Comments:		Stake Date:	01/10/2022
Directions:				Sub:	3 - 3 Glendale
TAG POLES				Fd:	5
				Phase:	



Description:

Person in Charge _____

As Built Date _____

- 1** **R** 1 - 30' CL6, 1 - E1-3 (E1.1L), 1 - E3-10 (E3.10), 1 - F1-2/7 (F1.8.7)
- 2** **E** 1 - 40 CL4, 112' - 4-ACSR-P-O-AL, 1 - A5 (A5.1), 2 - M2-1 (H1.1), 1 - UA1B
- 3** **R** 438' - 2-ACSR-P-O-AL, 1 - 45 CL3, 1 - A1 (A1.1), 1 - A5-1, 2 - M2-1 (H1.1), 1 - M5-ET
- 4** **R** 1 - 45 CL3, 658' - 4-ACSR-P-O-AL, 1 - A1-1 (A2.1), 2 - M2-1 (H1.1)
- 5** **R** 1 - 40 CL4, 604' - 4-ACSR-P-O-AL, 1 - A4 (A4.1), 1 - A5-1, 2 - E1-3 (E1.1L), 2 - E3-10 (E3.10), 2 - F1-3S (F2.10), 2 - M2-1 (H1.1)
- 6** **R** 144' - 2-ACSR-P-O-AL, 1 - 40 CL4, 1 - A4 (A4.1), 2 - M2-1 (H1.1)
- 7** **R** 1 - 40 CL5, 520' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)

8	R	1 - 40 CL5, 640' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
9	R	1 - 40 CL5, 554' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
10	R	1 - 40 CL5, 398' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
11	R	1 - 45 CL3, 442' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
12	R	1 - 40 CL5, 434' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
13	R	1 - 40 CL5, 448' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 1 - M2-1 (H1.1)
14	R	1 - 40 CL5, 496' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
15	R	1 - 40 CL5, 506' - 4-ACSR-P-O-AL, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
16	R	1 - 40 CL5, 502' - 4-ACSR-P-O-AL, 1 - A1-1 (A2.1), 1 - M2-1 (H1.1)
17	R	1 - 35 CL6, 200' - 4-ACSR-P-O-AL, 1 - A5-1, 1 - A6 (A6.2), 1 - E2-3 (E2-3 (E1.4L), 2 - M2-1 (H1.1), 1 - M2-1 (H1.1), 1 - M5-10 (S1.02)
18	R	634' - 2-ACSR-P-O-AL, 1 - 45 CL3, 1 - A1-1 (A2.1), 2 - M2-1 (H1.1)
19	R	1 - 45 CL3, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
20	R	550' - 2-ACSR-P-O-AL, 1 - 45 CL3, 1 - A1 (A1.1), 1 - A5-1, 2 - M2-1 (H1.1), 1 - M5-ET
21	E	1 - 15-OH-1BU-120/240, 1 - 40 CL4, 112' - 4-ACSR-P-O-AL, 1 - A5 (A5.1), 1 - G10 (G1.6), 2 - M2-1 (H1.1), 1 - M26-5
22	R	422' - 2-ACSR-P-O-AL, 1 - 45 CL3, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
23	R	418' - 2-ACSR-P-O-AL, 1 - 45 CL3, 1 - A1 (A1.1), 1 - A5-2 (A5.3), 1 - E1-3 (E1.1L), 1 - E3-10 (E3.10), 1 - F1-3S (F2.10), 2 - M2-1 (H1.1), 1 - M5-ET
24	R	1 - 45 CL3, 104' - 4-ACSR-P-O-AL, 1 - A1-1 (A2.1), 2 - M2-1 (H1.1)
25	R	1 - 45 CL3, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
26	R	548' - 2-ACSR-P-O-AL, 1 - 45 CL3, 1 - A1 (A1.1), 2 - M2-1 (H1.1)
27	R	544' - 2-ACSR-P-O-AL, 1 - 45 CL3, 1 - A4 (A4.1), 2 - E1-3 (E1.1L), 2 - E3-10 (E3.10), 2 - F1-3S (F2.10), 2 - M2-1 (H1.1)
28	R	596' - 2-ACSR-P-O-AL, 1 - 45 CL3, 1 - A1-1 (A2.1), 2 - M2-1 (H1.1)

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00462
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 1/5/2022

REQUEST 11

RESPONSIBLE PARTY: Greg Lee

Request 11. Explain when Joint Applicants first became aware that the Glendale MegaSite was to be located in Nolin RECC's and KU's territories.

Response 11. Nolin RECC became aware that the Glendale MegaSite fell in both service territories when it was formed in 2002. Based on current territory boundaries, Nolin serves 81% of the site, and KU serves 19% of the site. Regarding Ford's site-specific plans to construct facilities across the Glendale MegaSite, Nolin RECC has no knowledge as to what electric-consuming facilities may fall within its territory as it has not received any planning data for the site.

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REQUEST 12

RESPONSIBLE PARTY: Greg Lee

Request 12. Revise Exhibit 2.3 to the Application to include only the coordinates that define the new boundary line, excluding coordinates that are not on the new boundary line. The revised map should contain certified signatures and date of signing.

Response 12. Nolin RECC has reviewed the map attached to KU's Response to this Request as revised Exhibit 2.3 and agrees with it.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00462
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 1/5/2022
REQUEST 13

RESPONSIBLE PARTY: Greg Lee

Request 13. Refer to the Application, Exhibit 2.3. It is not clear what point 10 connects to and whether points 18, 19, 20, 21, 22, 23, 24, 25, and 26 define a line with jogs in it. The revised Exhibit 2.3, discussed above, should clarify those issues.

Response 13. Nolin RECC has reviewed the map attached to KU's Response as revised Exhibit 2.3 and agrees with it.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00462
FIRST REQUEST FOR INFORMATION RESPONSE

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REQUEST 14

RESPONSIBLE PARTY: Greg Lee

Request 14. Provide a map that defines the new and expanded KU boundary into Nolin RECC's service territory, and include the coordinate points and coordinate table. The map should be signed and dated. By way of explanation, according to the Application, Exhibit 2.2, the map should start at Coordinate 35 and end at Coordinate 83, as depicted in Exhibit 2.2.

Response 14. Nolin RECC has reviewed the map attached to KU's Response to this Request and agrees with it.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00462
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REQUEST 15

RESPONSIBLE PARTY: Greg Lee

Request 15. Refer to the Application, Exhibit 3.8, which shows point 106 coincident with the existing service territory. This does not match the existing service territory boundary that was filed pursuant to Case No. 1994-00331. If the existing line runs as indicated on Exhibit 3.8, and if you use 2020 imagery, there is a home on Hackberry Road that is serviced by KU and the rest are serviced by Nolin RECC. Provide a corrected boundary map by revising Exhibit 3.8 or submitting a new map, and insert additional points that define the boundary in this area of the Lakewood subdivision. The map should be signed and dated.

Response 15. Nolin RECC has reviewed the map attached to KU's Response as revised Exhibit 3.8 and agrees with it.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00462
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 1/6/2022
REQUEST 16

RESPONSIBLE PARTY: Greg Lee

Request 16. Refer to KRS 278.016, which states that the purpose of the electric service areas is “to avoid wasteful duplication of distribution facilities, to avoid unnecessary encumbering of the landscape of the Commonwealth of Kentucky, to prevent the waste of materials and natural resources.” Describe how the proposed boundary changes are better served by Nolin than KU in the following areas, given the location of existing KU and Nolin distribution lines.

Response 16. Please see Response to 5a above. Nolin RECC acknowledges the policy espoused in KRS 278.016 but relies upon KRS 278.018(6), which allows the Commission to approve a contract between retail electric suppliers to allocate territories and consumers so long as the outcome will allow the retail electric suppliers to provide adequate and reasonable service to all affected areas and consumers. In this instance, the Joint Settlement Agreement resolves what would likely be prolonged and costly litigation without changing any existing customer’s retail electric supplier. Thus, the Joint Settlement Agreement should be approved pursuant to KRS 278.018(6).

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00462
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 1/6/2022

REQUEST 17


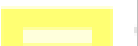
RESPONSIBLE PARTY: Greg Lee

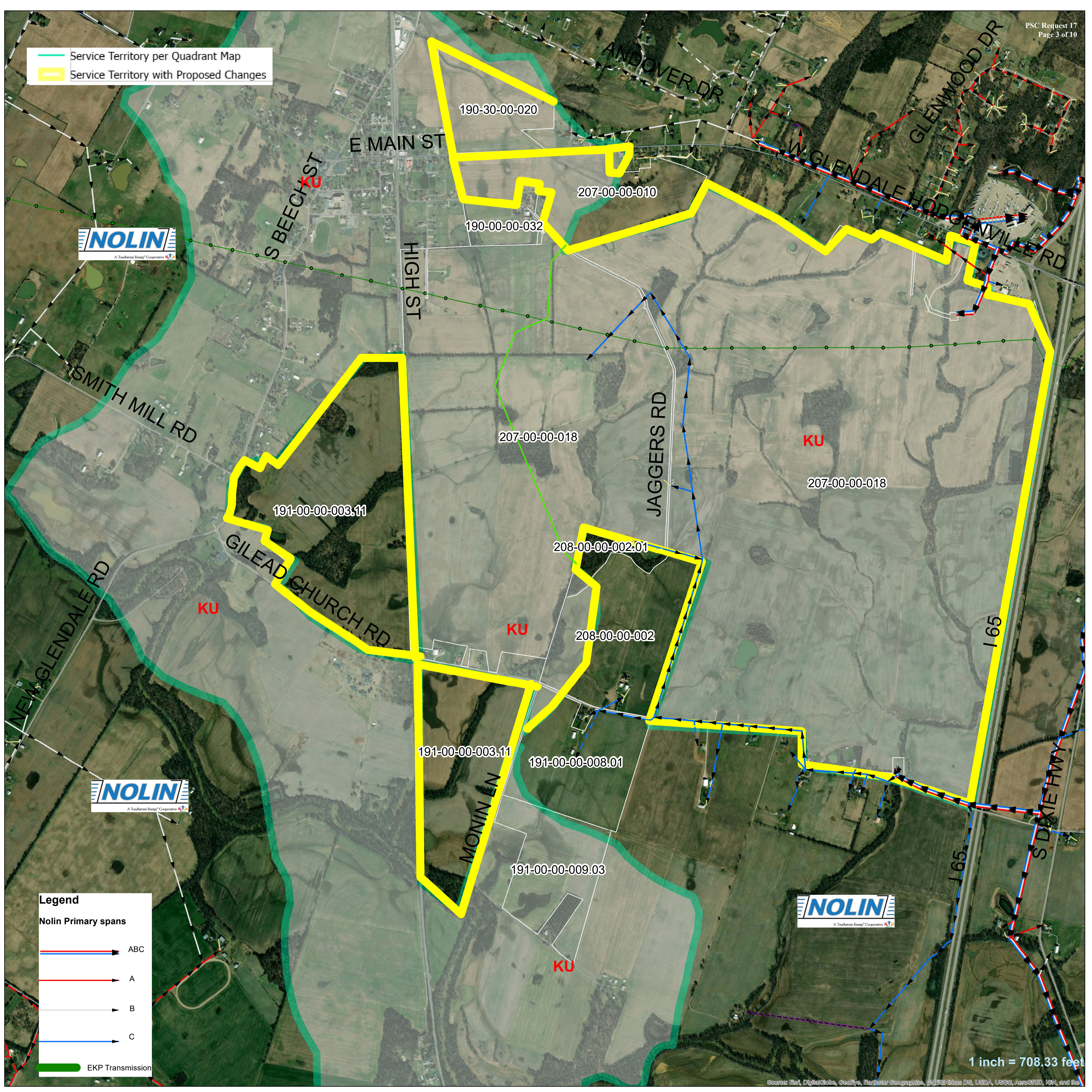
Request 17. Refer to the Application, Exhibit 3.2. Provide maps that show the existing distribution lines and the following parcels with the new and old electric service area boundaries:

- a. Parcels 17 and 17a
- b. Parcels 16 and 20
- c. Parcels 6 and 24
- d. Parcels 3, 4, 1, 12, 13, 9, and 10
- e. Parcels 18, 19, 29, 28, 27, and 26
- f. Parcels 7, 8, and 21

Response 17. The attached Exhibit 3.1 is a territory-wide view of the parcels in question for Request 17 letters a through f, see page 3 of 10 of this request. The attached Exhibit 3.3 adds clarification to Request 17 and provides maps of Parcels 2, 14, and 15 as demarked in the Application, see page 4 of 10 of this request. For Request 17a and Request 17b, see the attached Exhibit 2.2 on page 5 of 10 of this request. For Request 17c, see the attached Exhibit 3.8 on page 6 of 10 of this request. For Request 17d, see the attached Exhibit 3.4 and Exhibit 3.5 on pages 7 and 8 of 10 of this request. For Request 17e, see the attached Exhibit 3.6 and Exhibit 3.7





on pages 9 and 10 of 10 of this request. For Request 17f, see the attached Exhibit 3.6 on page 9 of 10 of this request.


 Service Territory per Quadrant Map
 Service Territory with Proposed Changes



Legend

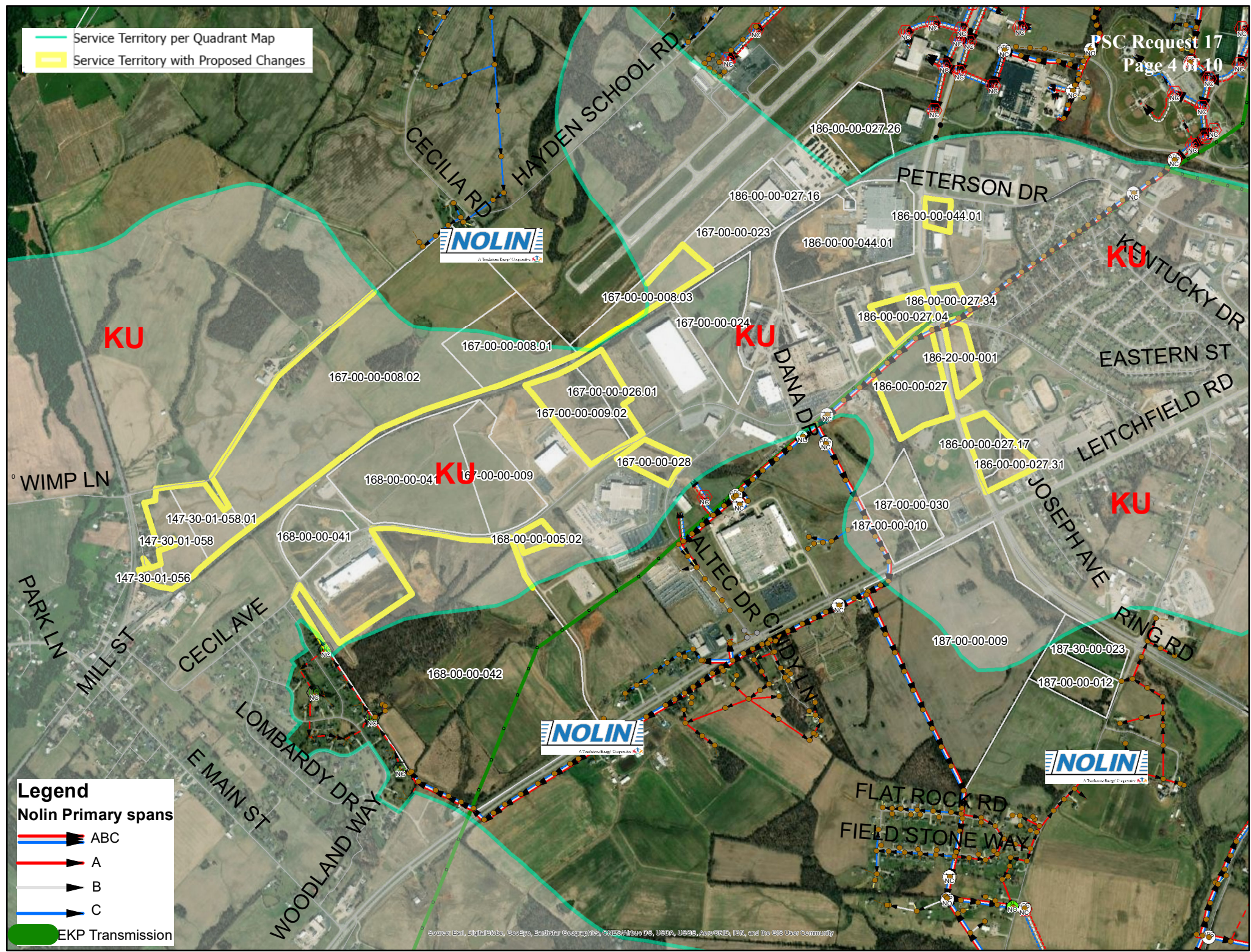
Nolin Primary spans

-  ABC
-  A
-  B
-  C

 EKP Transmission

1 inch = 708.33 feet

Service Territory per Quadrant Map
Service Territory with Proposed Changes



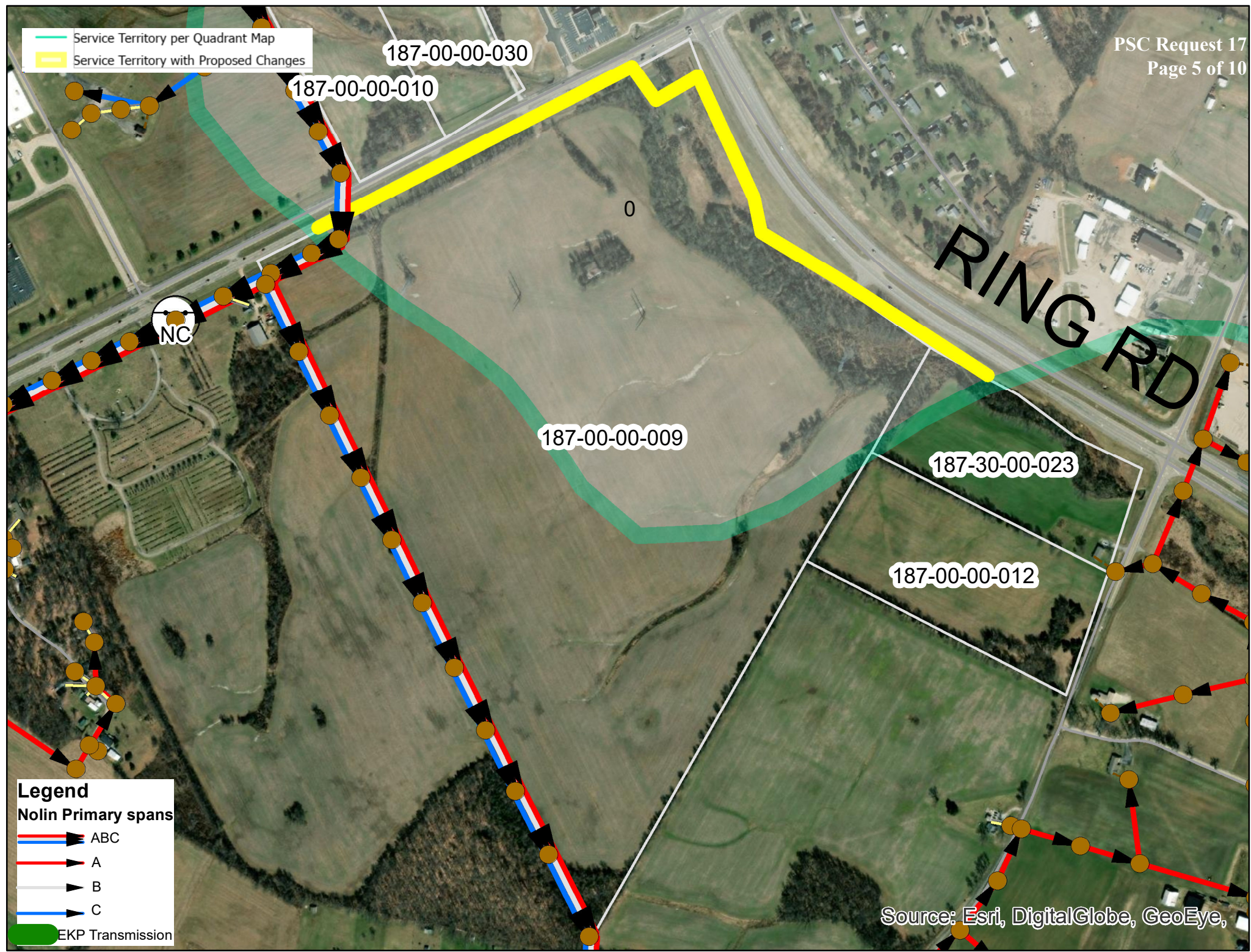
Legend

Nolin Primary spans

- ABC
- A
- B
- C
- EKP Transmission

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Service Territory per Quadrant Map
Service Territory with Proposed Changes



Legend

Nolin Primary spans

- ABC
- A
- B
- C

EKP Transmission

Service Territory per Quadrant Map
Service Territory with Proposed Changes



168-00-00-041

167-00-00-009

N BLACK BRANCH RD

147-30-01-058.01

168-00-00-041

168-00-00-005.02

CECIL AVE

168-00-00-042

ALTEC DR

LEITCHFIELD RD

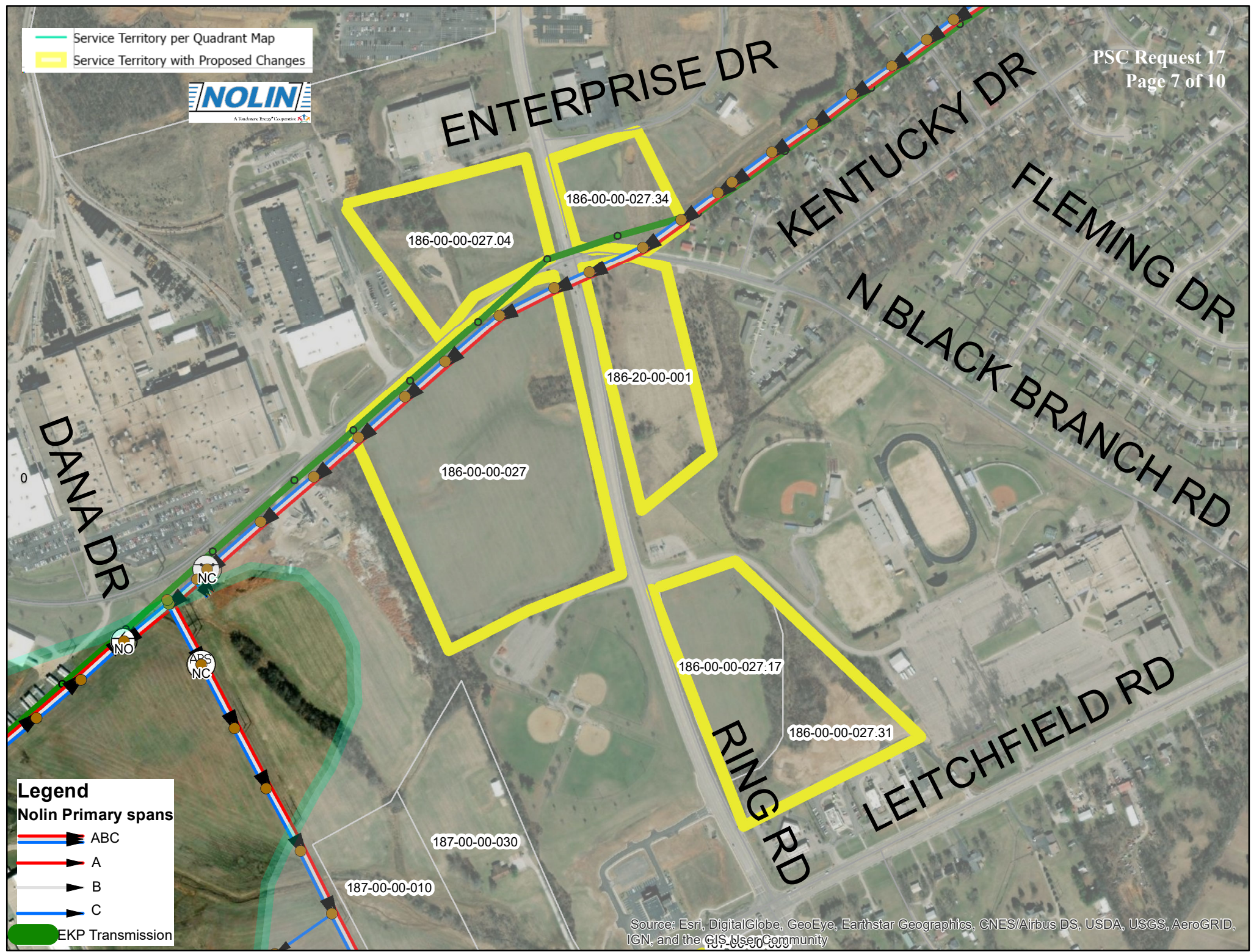
LOMBARDY DR

Legend

Nolin Primary spans

- ABC
- A
- B
- C
- EKP Transmission

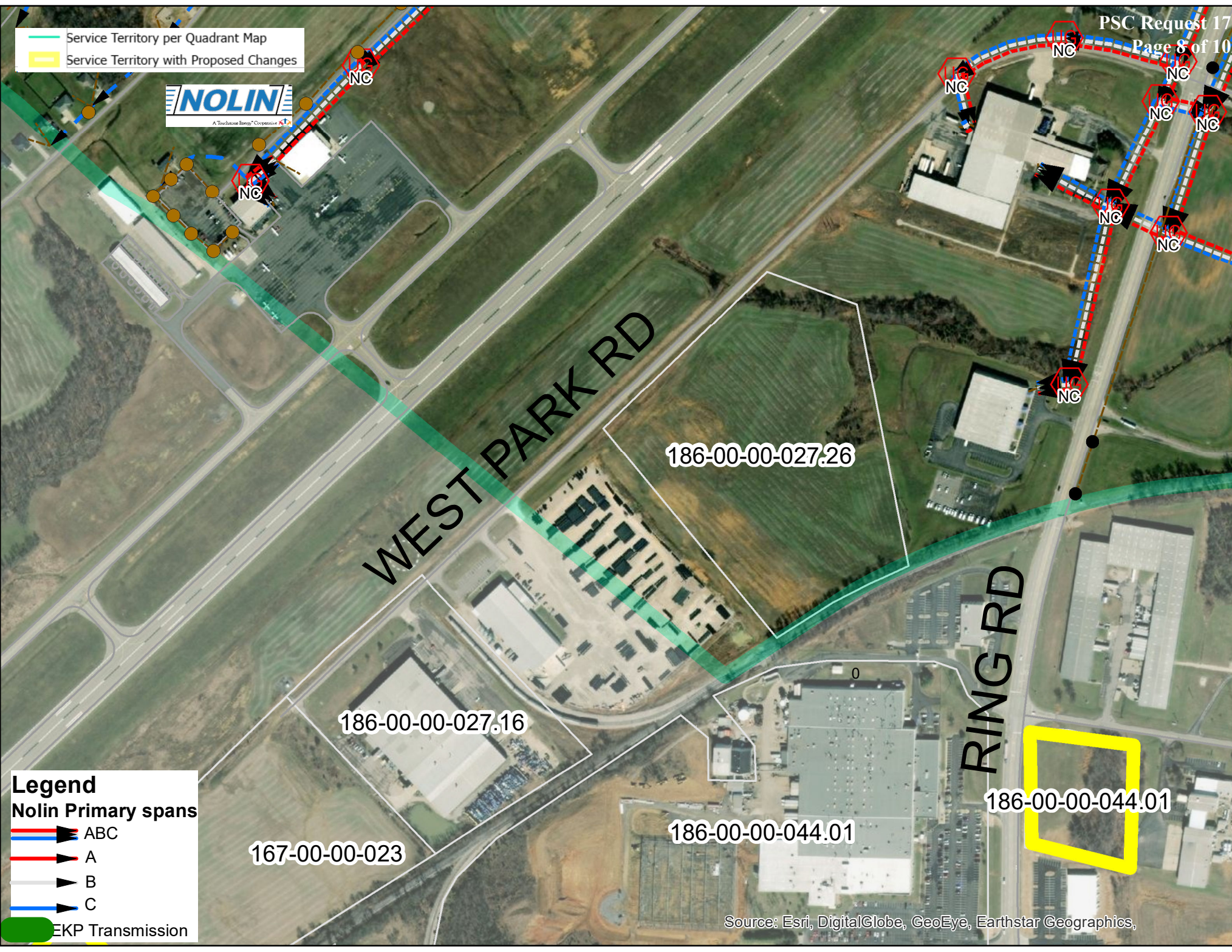
Service Territory per Quadrant Map
Service Territory with Proposed Changes



Legend
Nolin Primary spans

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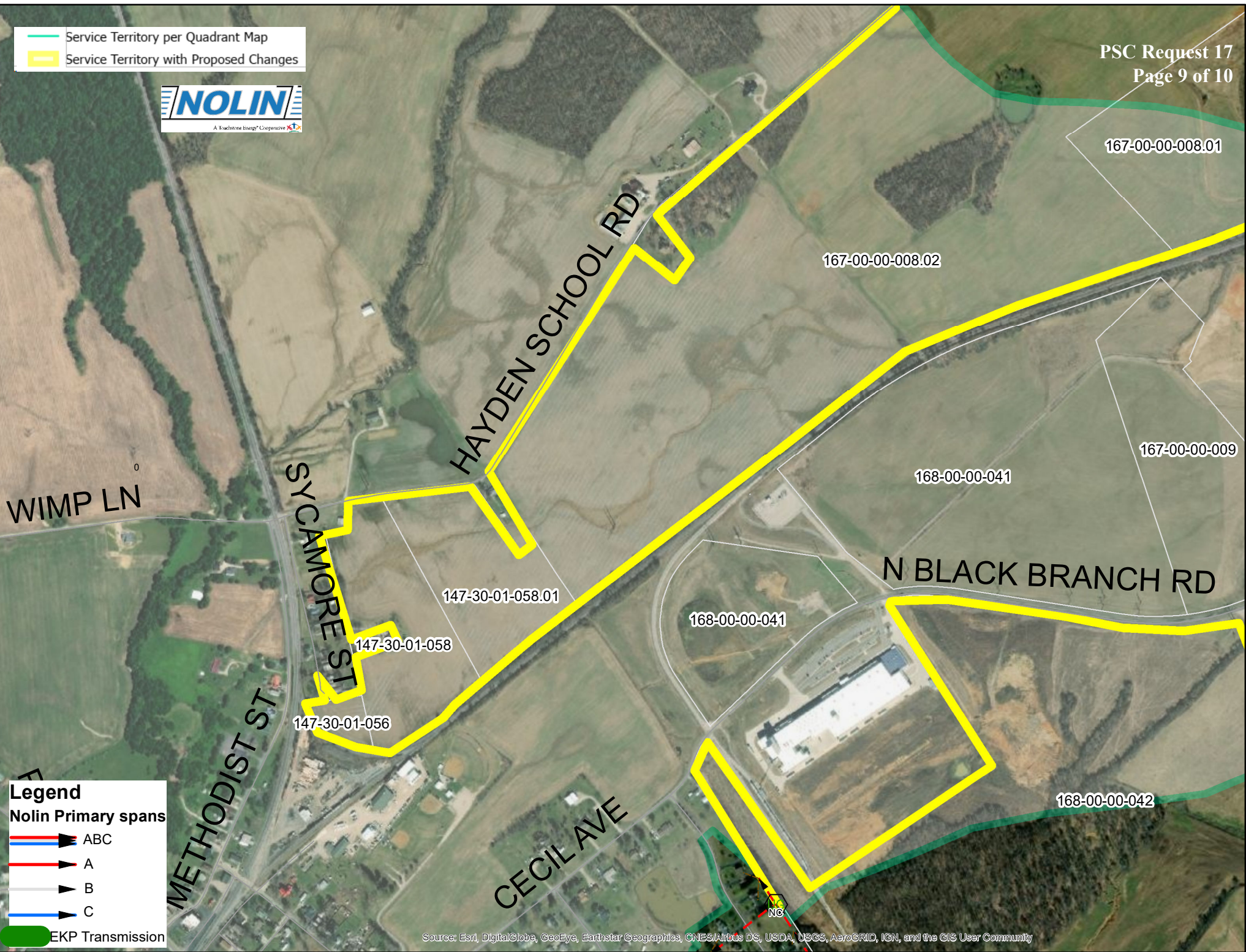
Service Territory per Quadrant Map
Service Territory with Proposed Changes



Legend
Nolin Primary spans

- ABC
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- EKP Transmission

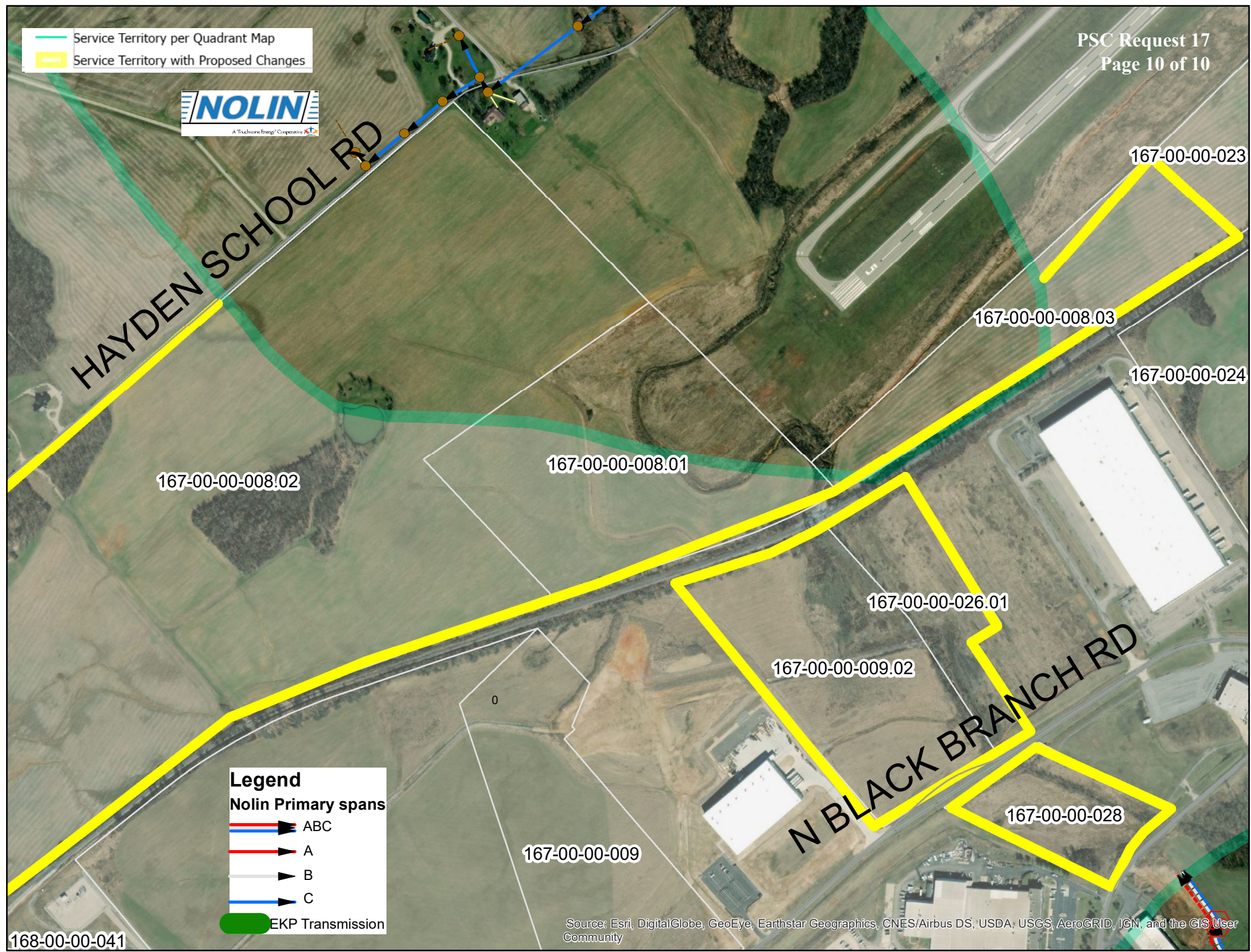
Service Territory per Quadrant Map
Service Territory with Proposed Changes



Legend
Nolin Primary spans

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- EKP Transmission

Service Territory per Quadrant Map
Service Territory with Proposed Changes



Legend
Nolin Primary spans

- ABC
- A
- B
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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

168-00-00-041

**EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2021-00462
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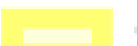
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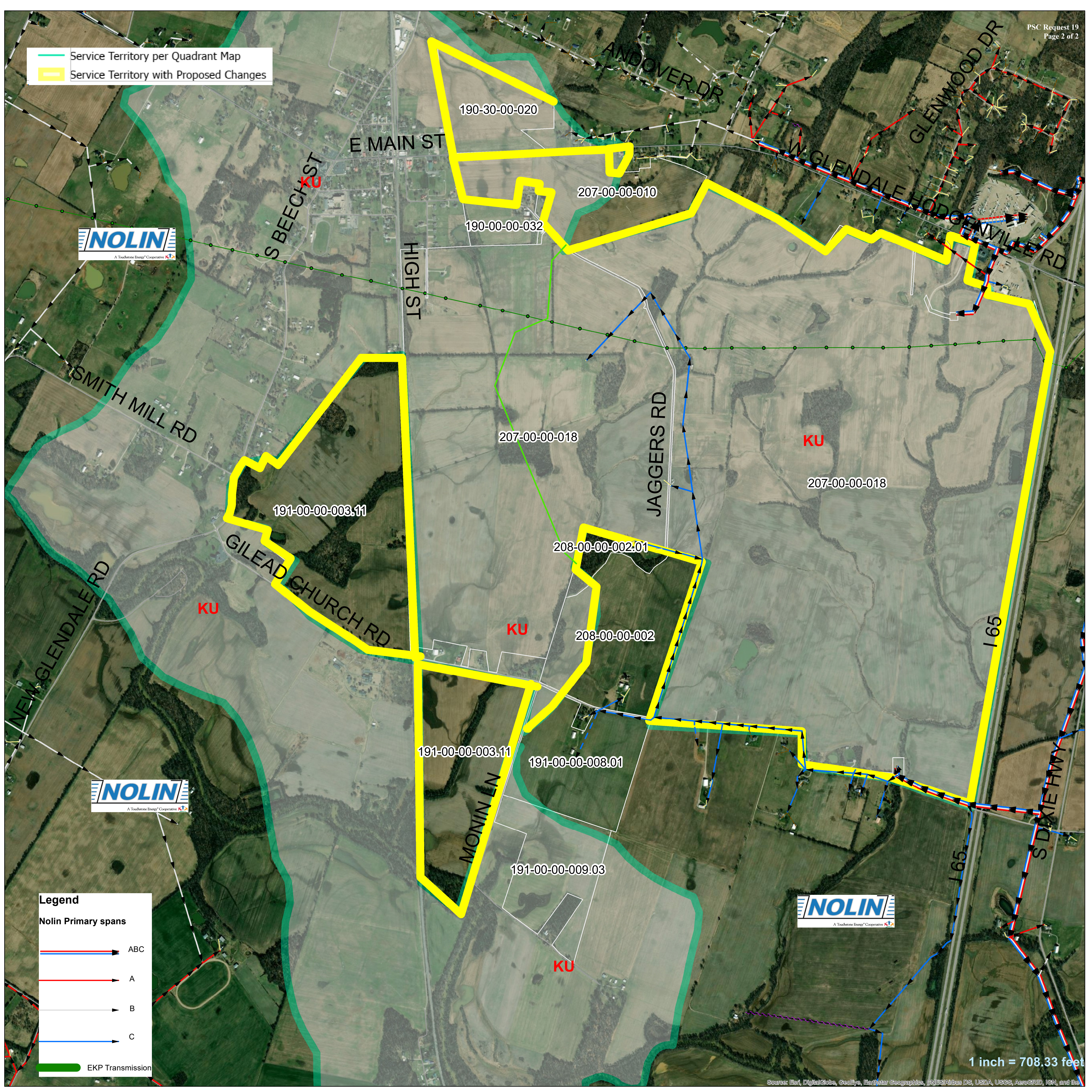
REQUEST 19

RESPONSIBLE PARTY: Greg Lee and Mary Jane Warner

Request 19. Provide a map that shows the facilities belonging to either Nolin RECC or EKPC, and indicate those that will be removed or moved, and the facilities belonging to KU that will be expanded to serve the Glendale MegaSite. Include the boundaries of the Glendale MegaSite.





Response 19. See attached Exhibit 2.2 on page 2 of 2 of this response. At this time, Nolin RECC is uncertain as to which distribution facilities need to be moved or removed as it has not seen specific site planning documents. EKPC anticipates it would need to relocate approximately 2 miles of the existing Stephensburg – Glendale 69 kV transmission line.


 Service Territory per Quadrant Map
 Service Territory with Proposed Changes



Legend

Nolin Primary spans

-  ABC
-  A
-  B
-  C

 EKP Transmission

1 inch = 708.33 feet