COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF EAST KENTUCKY POWER)	2022-00037
COOPERATIVE, INC FROM MAY 1, 2021)	
THROUGH OCTOBER 31, 2021)	

RESPONSES TO COMMISSION STAFF'S THIRD INFORMATION REQUEST TO EAST KENTUCKY POWER COOPERATIVE, INC.

DATED JUNE 7, 2022

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF EAST KENTUCKY POWER)	2022-00037
COOPERATIVE, INC FROM MAY 1, 2021)	
THROUGH OCTOBER 31, 2021)	

CERTIFICATE

STATE OF KENTUCKY)
COUNTY OF CLARK))

Craig A. Johnson, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff Data Requests contained in the Appendix in the above-referenced case dated June 7, 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.

Subscribed and sworn before me on this 17th day of June 2022.

Votary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2022-00037 FUEL ADJUSTMENT CLAUSE RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S THIRD INFORMATION REQUEST DATED 06/07/2022 REQUEST 1

RESPONSIBLE PARTY: Craig Johnson

Request 1. Consider the hypothetical situation where a generation unit has been scheduled for a month-long maintenance outage and during the course of the outage the utility cannot complete the maintenance work due to COVID-induced labor shortages and supply chain issues. Explain why the Commission should not consider the unit outage to be a forced outage, as defined in 807 KAR 5:056, Section 1(4), as opposed to a continued maintenance outage for the time extending beyond the scheduled outage time.

Response 1. The North American Electric Reliability Corporation ("NERC") governs the rules concerning generating reporting. All generating companies must follow these guidelines. This reporting is referred to as GADS reporting ("Generating Availability Data System"). The GADS reporting manual states that as long as the original scope of work did not change that a Planned Extension is the proper designation for the outage. NERC reporting guidelines would dictate that an outage extension due to a COVID-induced labor shortage or a supply chain issue as a "planned extension" and not a "forced outage event" as long as the original scope of work was

PSC Request 1

Page 2 of 2

not changed. Based on these NERC GADS reporting guidelines, the Commission should consider the hypothetical generator outage extension as planned, as long as the original scope of work did not change.