

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

**In the Matter of:**

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

**RESPONSES TO COMMISSION STAFF'S THIRD INFORMATION REQUEST  
TO EAST KENTUCKY POWER COOPERATIVE, INC.  
DATED JUNE 7, 2022**



**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

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.