

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC 2022 INTEGRATED
RESOURCE PLAN OF EAST KENTUCKY
POWER COOPERATIVE, INC.**

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**CASE NO.
2022-00098**

**RESPONSES TO JOINT INTERVENORS, KENTUCKIANS FOR THE
COMMONWEALTH, KENTUCKY SOLAR ENERGY SOCIETY, AND MOUNTAIN
ASSOCIATION'S POST HEARING DATA REQUEST TO EAST KENTUCKY POWER
COOPERATIVE, INC. DATED DECEMBER 22, 2022**

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

2022 INTEGRATED RESOURCE PLAN OF EAST) CASE NO.
KENTUCKY POWER COOPERATIVE, INC.) 2022-00098

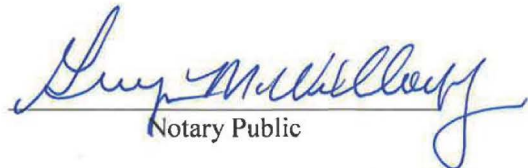
CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

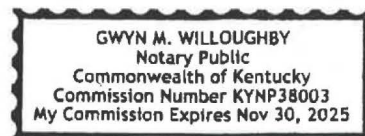
Darrin Adams, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's Post Hearing Request for Information in the above-referenced case dated December 22, 2022, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.



Subscribed and sworn before me on this 19th day of January, 2023.



Notary Public



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

2022 INTEGRATED RESOURCE PLAN OF EAST) CASE NO.
KENTUCKY POWER COOPERATIVE, INC.) 2022-00098

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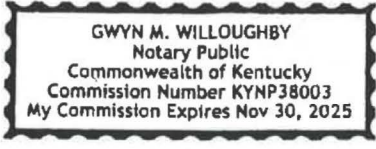
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Scott Drake, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's Post Hearing Request for Information in the above-referenced case dated December 22, 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.

Scott Drake

Subscribed and sworn before me on this 10th day of January, 2023.

Gwyn M. Willoughby
Notary Public



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

2022 INTEGRATED RESOURCE PLAN OF EAST) CASE NO.
KENTUCKY POWER COOPERATIVE, INC.) 2022-00098

CERTIFICATE

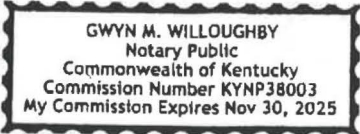
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Julia J. Tucker, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's Post Hearing Request for Information in the above-referenced case dated December 22, 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.

Julia J. Tucker

Subscribed and sworn before me on this 19th day of January, 2023.

Gwyn M. Willoughby
Notary Public



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

2022 INTEGRATED RESOURCE PLAN OF EAST) CASE NO.
KENTUCKY POWER COOPERATIVE, INC.) 2022-00098

CERTIFICATE

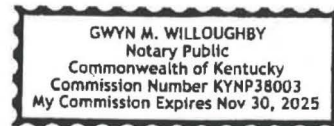
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Fernie Williams, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's Post Hearing Request for Information in the above-referenced case dated December 22, 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.

Fernie D. Williams

Subscribed and sworn before me on this 17 day of January, 2023.

Gwyn M. Willoughby
Notary Public



EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2022-00098
POST HEARING REQUEST FOR INFORMATION RESPONSE

**JOINT INTERVENORS POST HEARING DATA REQUEST DATED DECEMBER 22,
2022**

POST HEARING DATA REQUEST 1

RESPONSIBLE PARTY: Darrin Adams

Request 1. Please refer to the examination of EKPC Witness Darrin Adams, beginning at approximately 9:25 on December 13, 2022, addressing EKPC's responses to Joint Intervenors' Supplemental Request 22 and EKPC's ongoing study of potential transmission needs in the event of Cooper Station retirements.

- a. Please state when the referenced study began (approximate month and year).
- b. Please describe in full the process and expected timeline for completion of the referenced study.
- c. Please state whether EKPC will share the results of the referenced study with the Commission, Commission Staff, and stakeholders. If EKPC intends to share the results with the Commission, Commission Staff, or stakeholders, please specify how and when those results will be shared.

Response 1a. The referenced study began in April 2021.

Response 1b. EKPC staff continue to review results of the power-flow analysis that was performed in order to identify and summarize valid voltage and thermal loading violations. Also, EKPC staff has learned post-hearing of new plans for generation unit retirements and additions by

Louisville Gas & Electric/Kentucky Utilities (LG&E/KU) that will have an impact on the issues that are being studied by EKPC. EKPC plans to coordinate with LG&E/KU on these plans and update our studies accordingly. Therefore, we now expect to complete the studies in Q2 of 2023.

Response 1c. The study results will be shared with the Commission, Commission Staff, and stakeholders in any future proceeding before the Commission where the results would be supportive and informative.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2022-00098
POST HEARING REQUEST FOR INFORMATION RESPONSE

JOINT INTERVENORS POST HEARING DATA REQUEST DATED DECEMBER 22, 2022

POST HEARING DATA REQUEST 2

RESPONSIBLE PARTY: Scott Drake

Request 2. Please refer to Joint Intervenors' cross-examination of EKPC Witness Scott Drake, beginning at approximately 10:52 on December 13, 2022.

- a. Please produce copies of the four contracts with cryptocurrency facilities that were referenced in response to 5 Joint Intervenors' request 1-16(e) and discussed by Mr. Drake.
- b. Please produce copies of the two contracts that Mr. Drake referenced in his cross-examination testimony that were finalized after the discovery response was provided.
- c. Please confirm the total MW of load in the two additional contracts that were finalized after the discovery response was provided, which Mr. Drake testified were between approximately 5 MW and 8 MW each.

Response 2a. The four referenced contracts can be found on the Commission's website.

EKPC is providing the following links to the referenced contracts:

Grayson RECC:

https://psc.ky.gov/tariffs/Electric/East%20Kentucky%20Power%20Cooperative,%20Inc/Contracts/Grayson%20Rural%20Electric%20Cooperative%20Corporation/Horizon%20Mining/2022-05-01_Industrial%20Power%20Agreement%20with%20Interruptible%20Service.pdf

Cumberland Valley Electric:

https://psc.ky.gov/tariffs/Electric/East%20Kentucky%20Power%20Cooperative,%20Inc/Contracts/Cumberland%20Valley%20RECC/Exponential%20Digital,%20Inc/2021-12-24_Industrial%20Power%20Agreement%20with%20Interruptible%20Service.pdf

Cumberland Valley Electric:

https://psc.ky.gov/tariffs/Electric/East%20Kentucky%20Power%20Cooperative,%20Inc/Contracts/Cumberland%20Valley%20RECC/Exponential%20Digital,%20Inc/2022-04-30_Industrial%20Power%20Agreement%20with%20Interruptible%20Service.pdf

Jackson Energy:

https://psc.ky.gov/tariffs/Electric/East%20Kentucky%20Power%20Cooperative,%20Inc/Contracts/Jackson%20Energy%20Cooperative%20Corporation/UMine,%20LLC/2022-05-01_Industrial%20Power%20Agreement%20with%20Interruptible%20Service.pdf

Response 2b. While two additional contracts were referenced during cross-examination, in fact only one additional contract had been finalized and approved by the Commission by the time of the public hearing. It also is available on the Commission's website and the link to contract is provided below.

Jackson Energy:

https://psc.ky.gov/tariffs/Electric/East%20Kentucky%20Power%20Cooperative,%20Inc/Contracts/Jackson%20Energy%20Cooperative%20Corporation/UMine,%20LLC/2022-11-01_Industrial%20Power%20Agreement%20with%20Interruptible%20Service%20and%20Economic%20Development%20Rider.pdf

Response 2c. The total MW of load associated with the one additional contract is 5 MW.

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2022**

POST HEARING DATA REQUEST 3

RESPONSIBLE PARTY: Scott Drake

Request 3. Please refer to the examination of EKP Witness Scott Drake, beginning at approximately 11:52 on December 13, 2022.

a. Has EKPC studied or caused to be studied the potential for onbill financing programs to help customers invest in weatherization and efficiency measures at their home(s) or business(es)? If so, please produce each such study.

b. Please produce the 2017 financial analysis prepared by Meister Consultant Group titled How\$martKY™ Program Financial Analysis.

Response 3a. EKPC has not studied or caused to study the impact of on-bill financing could cause in participation levels for existing energy efficiency programs.

Response 3b. EKPC is not familiar with the referenced financial analysis of the How\$martKY program and has no record of the analysis.

EAST KENTUCKY POWER COOPERATIVE, INC.

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**JOINT INTERVENORS POST HEARING DATA REQUEST DATED DECEMBER 22,
2022**

POST HEARING DATA REQUEST 4

RESPONSIBLE PARTY: Fernie Williams

Request 4. Please refer to Joint Intervenors' cross-examination of EKPC Witness Fernie Williams, beginning at approximately 13:36 on December 13, 2022. Please produce input files documenting all of the constraints applied in the RTSim Resource Optimizer modeling.

Response 4. Please see the Excel spreadsheet attachment that is being filed under seal pursuant to a Motion for Confidential Treatment.

EAST KENTUCKY POWER COOPERATIVE, INC.

CASE NO. 2022-00098

POST HEARING REQUEST FOR INFORMATION RESPONSE

**JOINT INTERVENORS POST HEARING DATA REQUEST DATED DECEMBER 22,
2022**

POST HEARING DATA REQUEST 5

RESPONSIBLE PARTY: Counsel

Request 5. Please refer to Joint Intervenors’ cross-examination of EKPC Witness Julia Tucker, beginning at approximately 14:55 on December 13, 2022. Has EKPC received any information, analyses, data, or modeling from National Renewables Cooperative Organization (“NRCO”) related to federal funding opportunities? If so, please provide such information, analyses, data, or modeling.

Response 5. Objection. Any information, analyses, data or modeling from NRCO is proprietary information of NRCO that EKPC is not at liberty to disclose. Furthermore, EKPC has an outstanding Request for Proposals that could be manipulated if such information was made public.

EAST KENTUCKY POWER COOPERATIVE, INC.

CASE NO. 2022-00098

POST HEARING REQUEST FOR INFORMATION RESPONSE

**JOINT INTERVENORS POST HEARING DATA REQUEST DATED DECEMBER 22,
2022**

POST HEARING DATA REQUEST 6

RESPONSIBLE PARTY: Counsel

Request 6. Please refer to Joint Intervenors' cross-examination of EKPC Witness Julia Tucker, beginning at approximately 15:15 on December 13, 2022.

- a. Please explain in full how NRCO is helping to evaluate a self-build solar option, including a complete description of the process, timeline, and expected deliverable(s).
- b. Please confirm whether the updated bids for purchased solar panels account for EKPC's ability to access direct pay of tax 6 credits under the Inflation Reduction Act.

Response 6. Objection. Any information, analyses, data or modeling from NRCO is proprietary information of NRCO that EKPC is not at liberty to disclose. Furthermore, EKPC has an outstanding Request for Proposals that could be manipulated if such information was made public.

EAST KENTUCKY POWER COOPERATIVE, INC.
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**JOINT INTERVENORS POST HEARING DATA REQUEST DATED DECEMBER 22,
2022**

POST HEARING DATA REQUEST 7

RESPONSIBLE PARTY: Julia Tucker

Request 7. Please refer to Joint Intervenors’ cross-examination of EKPC Witness Julia Tucker, beginning at approximately 15:22 on December 13, 2022.

a. Please confirm that EKPC has not determined or attempted to determine which portions of its service territory qualify as an “energy community,” as the term is defined in the Inflation Reduction Act.

b. If confirmed, please explain why EKPC has not determined or attempted to determine which portions of its service territory qualify as an “energy community,” as the term is defined in the IRA.

c. If denied, please provide the following:

i. Maps, models, or work product in EKPC’s possession identifying or attempting to identify portions of EKPC’s territory that qualify as an “energy community.”

ii. The methodology, data, assumptions, and information used to determine the portions of EKPC’s territory that qualify as an “energy community.”

iii. The number of households in the EKPC service territory that qualify as “low-income,” as defined by the IRA.

Response 7. In general, an **Energy Community** for IRA is:

- **Coal Communities:** Location where coal mines or plants were closed or which previously had significant economic activity from carbon fuels
- **Low Employment Communities:** Has unemployment at or above national average.
- **Brownfield Site:** Location where pollutants, contaminants or hazardous substances impedes development

The exact definition from the legislation is,

(B) **Energy community:** For purposes of this paragraph, the term `energy community' means--

(i) a brownfield site (as defined in subparagraphs (A), (B), and (D)(ii)(III) of section 101(39) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601(39))),

(ii) a metropolitan statistical area or non-metropolitan statistical area which--

(I) has (or, at any time during the period beginning after December 31, 2009, had) 0.17 percent or greater direct employment or 25 percent or greater local tax revenues related to the extraction, processing, transport, or storage of coal, oil, or natural gas (as determined by the Secretary), and

(II) has an unemployment rate at or above the national average unemployment rate for the previous year (as determined by the Secretary), or

(iii) a census tract--

(I) in which--

(aa) after December 31, 1999, a coal mine has closed, or

(bb) after December 31, 2009, a coal-fired electric generating unit has been retired, or

(II) which is directly adjoining to any census tract described in subclause (I)."

EKPC has requested preliminary data from a third party to begin the identification of "energy communities" within its service territory. This development is in very early stages. Much more investigation will be required before a reasonable determination of what "Energy Communities" exist within the EKPC service territory.

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**JOINT INTERVENORS POST HEARING DATA REQUEST DATED DECEMBER 22,
2022**

POST HEARING DATA REQUEST 8

RESPONSIBLE PARTY: Julia Tucker

Request 8. Please refer to Joint Intervenors’ cross-examination of EKPC Witness Julia Tucker, beginning at approximately 15:23 on December 13, 2022. As referenced in response to Joint Intervenors’ request 2-31, has EKPC made any progress in understanding the IRA’s residential rebate and tax credit opportunities for weatherization, efficiency improvements, and home energy retrofits, and how this increased federal funding may impact EKPC’s load forecast?

Response 8. No, EKPC has not determined yet how potential increased federal funding for weatherization, efficiency improvements, and home energy retrofits may impact its long term load forecast. Development of this data is in very preliminary stages.