

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMENTS OF EAST KENTUCKY POWER COOPERATIVE, INC.

Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by and through counsel, pursuant to the Commission’s March 16, 2023 Order, for its written comments regarding the Commission Staff’s Report on EKPC’s 2022 Integrated Resource Plan (“IRP”), respectfully states as follows:

On March 9, 2023, the Commission filed its Staff’s report regarding EKPC 2022 IRP, with recommendation from Staff on topics including Load Forecasting, Demand-Side Management (“DSM”), Supply-Side Resources, and Integration. EKPC appreciates the comprehensiveness of the Staff’s review of EKPC’s 2022 IRP and the thoroughness of the Staff Report. EKPC acknowledges and accepts its recommendations, with two minor exceptions. First, as part of its review and discussion of EKPC’s DSM programs, the Staff Report states as follows:

EKPC should consider making AMI usage data that is more closely aligned to real-time data available to customers.

EKPC owns neither the AMI equipment, nor the data retrieved from AMI equipment, and therefore is not able to directly provide that information to End-Use Retail Member (“retail member”). This data is wholly owned and operated by EKPC’s Owner-Member Cooperatives (“owner-members”) and therefore any data shared by the owner-member to the retail member is done so strictly under the owner-member’s purview.

Second, as part of its review and discussion of EKPC’s Supply-Side Resource options, the Staff Report states as follows:

To the extent possible, EKPC should consider whether transmission options would allow it to serve load at a lower cost, including whether additional transmission capacity could lower locational marginal pricing within EKPC’s PJM zone in a way that will reduce costs to customers or could provide access to additional energy from other PJM zones when necessary at a lower cost than constructing or maintaining additional reserve generation.

EKPC has no concern with evaluating whether transmission options would allow it to serve load at a lower cost. It should be noted, however, that PJM evaluates base-line transmission projects for market efficiency, and can suggest new projects based on market efficiency, through its Regional Transmission Expansion Plan (“RTEP”) process.¹ These projects are aimed at reducing transmission congestion and constraints, thus lowering energy pricing in the market. In addition, transmission projects alone cannot displace the need for reliable generation, which provides resource adequacy and price protection to EKPC’s 16 owner-members.

EKPC offers no further comments on the Staff Report.

This 31st day of March 2023.

Respectfully submitted,



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¹ See PJM Planning – RTEP Development – Market Efficiency: <https://www.pjm.com/planning/rtep-development/market-efficiency>

CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Commission on March 31, 2023; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that pursuant to prior Commission Orders, no paper copies of this filing will be made.



Counsel for East Kentucky Power Cooperative, Inc.