

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

**In the Matter of:**

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

**) CASE NO.  
) 2022-00098**

**SUPPLEMENTAL RESPONSES TO STAFF'S FIRST REQUEST FOR  
INFORMATION TO EAST KENTUCKY POWER COOPERATIVE, INC.  
DATED DECEMBER 9, 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**

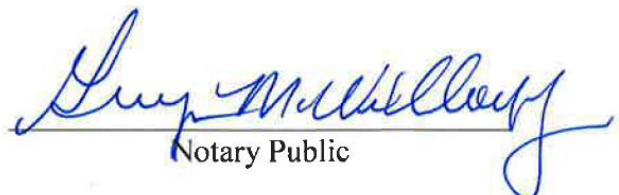
**CERTIFICATE**

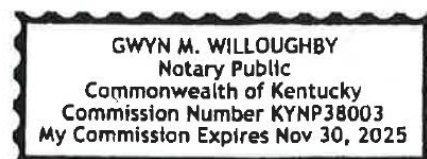
**STATE OF KENTUCKY )**  
**)**  
**COUNTY OF CLARK )**

Denise Foster Cronin, being duly sworn, states that she has supervised the preparation of the supplemental responses of East Kentucky Power Cooperative, Inc. to the Commissions First Request for Information in the above-referenced case dated June 28, 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 9<sup>th</sup> day of December 2022.

  
Notary Public



**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**PSC CASE NO. 2022-00098**  
**FIRST REQUEST FOR INFORMATION RESPONSE**

**STAFF'S FIRST REQUEST FOR INFORMATION DATED 06/28/2022**  
**REQUEST 3**

**RESPONSIBLE PERSON:** Denise Foster Cronin

**Request 3.** Refer to the IRP, Section 2, pages 50–51 regarding capacity interconnection rights (“CIRs”) for Effective Load Carrying Capability (“ELCC”) resources. State whether there is any proposed or potential language being discussed in the PJM Planning Committee (“PC”) with respect to CIRs for ELCC resources, and if so, provide any publically available document discussing the proposed or potential language.

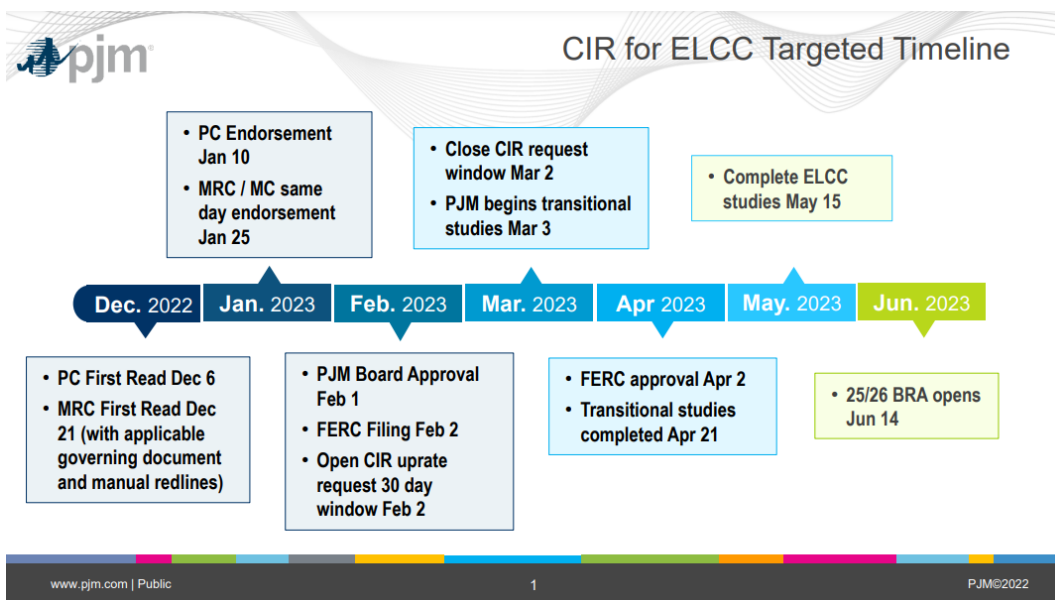
**Response 3.** Please see the link below to the PJM PC Special Sessions for Capacity Interconnection Rights for ELCC Resources. The most recent documents are provided under Meeting Materials for June 24, 2022 entitled, “PC Special Session – CIRs for ELCC Resources.” <https://www.pjm.com/committees-and-groups/committees/pc>

**SUPPLEMENTAL RESPONSE DATE 12/09/2022**

**Supplemental Response 3.** PJM members have continued to discuss how to handle Capacity Interconnection Rights (CIRs) for generation resources whose capacity accreditation is determined through the Effective Load Carrying Capability methodology

in the PJM Planning Committee. The effort is addressing the initial assignment of CIRs, the retention of CIRs through the implementation of appropriate testing procedures, the inclusion of CIRs in resource adequacy studies and the role of CIRs in determining a resource’s Unforced Capacity (UCAP) value.

The PJM membership reviewed four proposals at the December Planning Committee meeting. The membership will vote on the proposals beginning in January, 2023. A review of the stakeholder discussion and summary with comparison of the proposals was presented at the December Planning Committee. The presentation, entitled, “PC Special Session: Capacity Interconnection Rights for ELCC Resources First Read of Solution Packages” may be found on PJM’s website at: <https://www.pjm.com/-/media/committees-groups/committees/pc/2022/20221206/item-06a---cir-for-elcc-resources-first-read.ashx>



**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**PSC CASE NO. 2022-00098**  
**FIRST REQUEST FOR INFORMATION RESPONSE**

**STAFF’S FIRST REQUEST FOR INFORMATION DATED 06/28/2022**  
**REQUEST 4**

**RESPONSIBLE PERSON: Denise Foster Cronin**

**Request 4.** Refer to the IRP, Section 2, pages 55–56. Provide an update regarding the PJM backlog of projects, stating what (if any) new information is available or if EKPC’s plans with respect to the backlog have changed.

**Response 4.** On June 14, 2022 PJM submitted its “Interconnection Process Reform” filing to FERC. EKPC voted in favor of the PJM proposed changes to the interconnection process in the stakeholder process and joined with the PJM Transmission Owner group to submit supportive comments to FERC. EKPC anticipates the changes will significantly improve the process. If FERC does not approve the filing, PJM will remain in serial consideration of projects in the queue with no way to sift through the projects to allow “ready” projects to move forward.

The FERC recently issued a Notice of Proposed Rulemaking (“NOPR”) addressing Generation Interconnection after PJM made its filing. EKPC supports FERC approving the PJM filing and not allowing the rulemaking process to delay the much-needed improvements being adopted for the PJM region. The link to the filing is provided below.

<https://pjm.com/directory/etariff/FercDockets/6726/20220614-er22-2110-000.pdf>

**SUPPLEMENTAL RESPONSE DATE 12/09/2022**

**Supplemental Response 4.** The Federal Energy Regulatory Commission approved PJM’s interconnection queue reform filing on November 29, 2022. The order directed two minor compliance items. The first compliance directive is for PJM to codify how it defines “acceleration” in the new process. PJM had explained that New Service Requests that do not have any network impacts after initial study or retools and do not require additional studies may proceed to the Final Agreement Negotiation Phase of the process, and thereby be “accelerated.” The second compliance directive is for PJM to make a filing to include the actual date the new procedures will be effective in the tariff. PJM had indicated that it expects to complete Transition Cycle #1 and Transition Cycle #2 by the fourth quarter of 2026, but the Tariff will need to include a specific date by which the new interconnection study process rules will be effective following the completion of the transition period.

PJM intends to update members at its January Interconnection Process Subcommittee.

The order may be found on PJM’s website at:

<https://pjm.com/directory/etariff/FercOrders/6581/20221129-er22-2110-000%20and%20-001.pdf>

Additionally, PJM recently reported that it has continued to experience delays processing interconnection requests. Queue positions that will continue to be processed under the current methodology and not under the new approved methodology are experiencing further delays. The presentation entitled, “Interconnection Queue Status Update,”

provided to the PJM Interconnection Process Subcommittee may be found on PJM's

website

at:

<https://www.pjm.com/-/media/committees-groups/subcommittees/ips/2022/20221122/item-03---queue-status-update.ashx>