

**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

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**AMENDED MOTION FOR CONFIDENTIAL TREATMENT**

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Comes now East Kentucky Power Cooperative, Inc. (“EKPC”), by and through counsel, pursuant to KRS 61.878, 807 KAR 5:001, Section 13 and other applicable law, and for its amended motion requesting that the Kentucky Public Service Commission (“Commission”) afford confidential treatment to a portion of the 2022 Integrated Resource Plan (“2022 IRP”), respectfully states as follows:

1. On April 1, 2022, EKPC filed its 2022 IRP, pursuant to 807 KAR 5:058, along with a Motion for Confidential Treatment for certain portions of the 2022 IRP. Specifically, EKPC requested confidential treatment for the following items:
  - a) Actual and projected cost and operating information for the base year and the basis underlying such projections for a fifteen-year period for each of EKPC’s generation resources, as required by 807 KAR 5:058 Section 8.3(b)(12) (IRP, pp. 104-110);
  - b) The projected capital cost for traditional resources as calculated by EKPC’s RTSim Resource Optimizer (IRP, p. 163);

- c) Future year revenue requirements and average system rates, including the inflation rate and discount rate assumptions used to calculate same (IRP, p. 218);
- d) Critical energy infrastructure information included in Section 11.0 of the IRP;
- e) A discussion of anticipated expansion of an interruptible load customer and said expansions impact upon the load forecast and demand response capacity (Tech. Appx. Vol 1, pp 2-3; Tech. Appx. Vol. 2, Exhibit DSM-9, p. 1 of 1); and,
- f) A publication titled “US Markets State Economies – Kentucky 2020” which is an economic outlook that was used as an input to EKPC’s load forecasting process and it is a copyrighted and proprietary document from HIS.

2. A hearing was held on the 2022 IRP on December 13, 2022. At the hearing, it was discovered that a portion of the information contained in the table on page 163 of the 2022 IRP was information that is publicly available. The last two columns of Table 8-2 with the heading “Projected Capital Cost (2020\$)” were redacted in the original filing.

3. The first four rows of these columns contain information derived from National Renewable Energy Laboratory (“NREL”) Annual Technology Baseline (“ATB”) 2021 and Energy Information Administration (“EIA”) Annual Energy Outlook (“AEO”) 2021. These sources are publicly available and should not have been redacted in the original filing.

4. However, the last two rows in the above mentioned columns contain information from Requests for Proposals and should be treated as confidential.

5. Therefore, EKPC is amending its April 1, 2022 Motion for Confidential Treatment to remove the first four rows of Table 8-2 from its request for confidential treatment. EKPC is still seeking confidential treatment for the remaining items contained in its April 1, 2022 Motion.

6. Attached to this Motion is an updated redacted Table 8-2. EKPC is also filing under seal, an updated highlighted version of Table 8-2.

WHEREFORE, on the basis of the foregoing, EKPC respectfully requests that the Commission classify and protect as confidential the Confidential Information described in its April 1, 2022 Motion with the exception of the material described in this Motion.

This 16<sup>th</sup> day of December 2022.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing was transmitted to the Commission on December 16, 2022 and that there are no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to prior Commission Orders, no paper copies of this filing will be made.



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*Counsel for East Kentucky Power Cooperative, Inc.*