## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

## ELECTRONIC 2022 JOINT INTEGRATED RESOURCE PLAN OF EAST KENTUCKY POWER COOPERATIVE INC.

CASE NO. 2022-00098

## MOTION OF JOINT INTERVENORS FOR LEAVE TO FILE A CORRECTED EXPERT REPORT

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Come now Kentuckians for the Commonwealth (KFTC), Kentucky Solar Energy Society (KYSES) and Mountain Association (MA) (collectively "Joint Intervenors"), by and through counsel, and move for leave to file a corrected expert report in support of their Initial Comment on East Kentucky Power Cooperative Inc.'s 2022 Integrated Resource Plan. *See* Exhibit A, Corrected Energy Futures Group Report.

On October 11, 2022, the Joint Intervenors filed their Initial Comment on EKPC's 2022 IRP. Exhibit 1 to that Comment was the Joint Intervenors' expert report, prepared by Energy Futures Group ("EFG"). After submission of this report, counsel caught a few errors that need to be corrected to improve clarity for the reader. There is only one minor substantive edit pertaining to the Cooper Station, which has been brought to the attention of counsel for EKPC.

The Joint Intervenors now seek leave to file its corrected EFG Report in support of their Initial Comment on EKPC's 2022 Integrated Resource Plan. This report contains confidential information, which is redacted in the public filing. A clean (redacted) copy of the Corrected EFG Report is attached as Exhibit A. A redlined (redacted) copy of the Corrected EFG Report, showing each change that was made, is attached as Exhibit B. Should leave to file be granted by the Commission, the Joint Intervenors will submit the confidential versions of these documents via email to psced@ky.gov. On October 31, 2022, the undersigned provided a confidential version of the Corrected EFG Report (clean and redlined copies) via email to Allyson Honaker, counsel for EKPC.

WHEREFORE, for the reasons stated above, the Joint Intervenors seek leave from this Court to submit a corrected expert report in support of their Initial Comment on East Kentucky Power Cooperative Inc.'s 2022 Integrated Resource Plan.

Respectfully submitted,

/s/ Ashley Wilmes

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Counsel for Joint Intervenors

## CERTIFICATE OF SERVICE

This is to certify that electronic version of the foregoing motion is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on November 1, 2022 and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Ashley Wilmes

Ashley Wilmes