

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**POST-HEARING DATA REQUESTS OF JOINT INTERVENORS
KENTUCKIANS FOR THE COMMONWEALTH,
KENTUCKY SOLAR ENERGY SOCIETY, AND MOUNTAIN ASSOCIATION**

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Energy Society and Mountain
Association*

Dated: December 22, 2022

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.

10. "You" or "your" means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

11. "EKPC" or "the Cooperative" means East Kentucky Power Cooperative, Inc. and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies.

12. "Joint Intervenors" means the Mountain Association, Kentuckians For The Commonwealth, and Kentucky Solar Energy Society, who were granted the status of full joint intervention in this matter.

13. "Cryptocurrency operation" means any facility, operation or location that uses computers, machines or other equipment to generate, validate, maintain, and/or authenticate cryptocurrency transactions, ledgers, blockchain and/or hashes, including operations that may be described as data centers or data processing facilities.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.

2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.

3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.

4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**POST-HEARING DATA REQUESTS PROPOUNDED TO
EAST KENTUCKY POWER COOPERATIVE, INC., BY JOINT INTERVENORS**

- PH-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.
- PH-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

- 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.

- PH-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 on-bill 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.

- PH-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.

- PH-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.

- PH-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

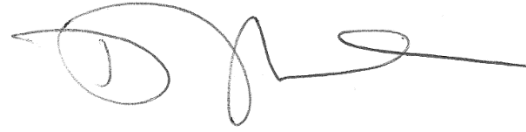
credits under the Inflation Reduction Act.

PH-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.

PH-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?

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that this electronic filing *POST-HEARING DATA REQUESTS OF JOINT INTERVENORS KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR ENERGY SOCIETY, AND MOUNTAIN ASSOCIATION* was submitted to the Commission on December 22, 2022; that the documents in this electronic filing are a true representations of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Tom FitzGerald