COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF EAST KENTUCKY POWER COOPERATIVE, INC. FROM NOVEMBER 1, 2020 THROUGH OCTOBER 31, 2022	**)** **)** **)** **)** **)**	**CASE NO. 2023-00009**

RESPONSES TO PSC'S FIRST INFORMATION REQUEST

TO EAST KENTUCKY POWER COOPERATIVE, INC.

DATED SEPTEMBER 6, 2023

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF EAST KENTUCKY POWER COOPERATIVE INC, FROM NOVEMBER 1, 2020 THROUGH October 31, 2022	**)))))**	**CASE NO. 2023-00009**

DIRECT TESTIMONY OF JULIA J. TUCKER ON BEHALF OF EAST KENTUCKY POWER COOPERATIVE, INC.

Filed: September 22, 2023

Q. Please state your name and address.

A. My name is Julia J. Tucker, and my business address is 4775 Lexington Road, Winchester, Kentucky 40391.

Q. By whom are you employed and in what capacity?

A. I am employed by East Kentucky Power Cooperative, Inc., ("EKPC") as Director, Power Supply.

Q. As background for your testimony, please briefly describe your educational background and work responsibilities at EKPC.

A. I have a Bachelor's degree in Electrical Engineering from the University of Kentucky. I am a licensed Professional Engineer, Registration Number 15532, in the state of Kentucky. I have worked for EKPC for the past 17 years. I am responsible for the cooperative's integrated resource planning, renewables planning, load forecasting and market operations functions.

Q. Were there any changes in the wholesale electric power market that occurred during the review period or that EKPC expects to occur within the next two years that have significantly affected or will significantly affect EKPC's electric power procurement practices?

A. PJM has implemented various changes to its business rules as a normal course of action to address stakeholder concerns. EKPC has been able to meet its requirements for these rules utilizing good utility practices, and expects to continue doing so in the two year forward period. Current natural gas and energy market prices reflect a reversion back to expectations prior to the invasion of Ukraine_by Russia. During the invasion and other international events impacting the energy markets, "implied" heat rate for the market had substantially increased over several months. The higher "implied" heat rate

indicated that EKPC could purchase gas at the published price and burn it in the combustion turbines at J.K. Smith Station for less than it could purchase a forward energy product. This dynamic caused EKPC to evaluate and purchase physical forward gas for the J.K. Smith Station, a practice it had never done in the past. Combustion turbines are peaking units and dispatch of those units tends to be very sporadic. During the past two years, operating conditions have shown that the combustion turbines were dispatched on a fairly regular basis and purchasing forward physical gas in manageable quantities was prudent. EKPC will continue to monitor this market condition and operate accordingly.

Q. Describe what actions were taken by EKPC to mitigate high fuel or purchased power related costs for its customers.

A. EKPC evaluates its portfolio position on a monthly basis and looks forward for the next three years. When the cost of power to its Owner Members indicates that fluctuations could occur as compared to expectations, EKPC reviews all options it has for hedging that energy price position. That evaluation is presented to the Executive Team as well as the Board Risk Oversight Committee on a seasonal basis. The next peak season expectations are presented along with recommended actions to secure the position. These hedges are reviewed on an on-going basis. EKPC also looks forward on a weekly basis and makes a recommendation to its Executive Management to buy a forward hedge of gas or energy or to rely on the current resources for the next week.

Q. Discuss any planned outages that extended beyond the estimated time of the outage and how EKPC addressed the extended outage, and any resulting capacity and energy shortfalls;

A. EKPC did not purchase any capacity or energy products to replace extended outage generation during the review period. EKPC did purchase capacity and energy to replace the energy and capacity lost during the Smith Unit 9 forced outage starting in November 2021. The details of those purchases are provided in EKPC's Response to Commission Staff's Request No. 12 from Appendix B to the Order initiating this proceeding.

Q. Describe if EKPC engaged in any off systems sales or intersystem sales to offset high fuel or power costs during the period under review;

A. The only off system or intersystem sales that EKPC engaged in were on a real time economic basis. EKPC did not make any firm off system sales during the review period. Any sales made would have been because the generation system was economically running, based on PJM dispatch, at a level that exceeded the demand of the EKPC native load.

Q. Describe how EKPC bids its generating units into PJM Interconnection, Inc's (PJM) energy markets, including, but not limited to: how EKPC determines the manner in which individual generating units are offered into PJM's day ahead market (must run, economic dispatch, etc); who makes those decisions; and what level of control PJM has over the dispatch of EKPC's generating units.

A. All of EKPC's generating units, with the exceptions of Bluegrass 2, Cooper 1 and Smith 9 and 10, , are obligated in the PJM Reliability Pricing Model ("RPM"), referred

to as the capacity market, and therefore must be offered into the PJM energy market daily. Bluegrass 2, Cooper 1 and Smith 9 and 10 can be offered at EKPC's discretion. Each day EKPC must describe the availability of each unit. It is either fully available, partially available with partial derate, or on outage due to planned maintenance, short term maintenance or forced outage. For the units that are available or partially available, EKPC offers them into the daily energy market as reserve standby and ready for economic dispatch or as must run units. Each unit is fully described as to its cost and operating parameters based on criteria set by the PJM Operating Agreement. Units described as must run will be required to stay online for that day at least at the minimum load available for dispatch. Units that are on reserve standby and ready for economic dispatch will be considered in PJM's daily energy market clearings through its reliability constrained economic dispatch model. The model will economically dispatch the available units, both must run and ready for dispatch, to meet load and reliability requirements.

EKPC places its Spurlock Station coal fired units in must run status when they are available most of the time. Exceptions would be when the unit is available to start up or shut down. The unit could be placed in economics to ensure that it is brought online or taken offline in the most economic manner. Otherwise, EKPC does not desire to incur the additional operating and maintenance costs that would ensue with multiple startups and shutdowns that could occur if the units are left in economic status. Must run ensures that the units remain online and available at least at minimum load levels. EKPC generally describes Cooper Station as available for economic dispatch. Once the unit is online, the status could change to must run to avoid daily startups and

shutdowns. The combustion turbines are almost always described as available for economic dispatch. An exception could be when known testing will occur and the units are put into must run status to perform those tests. EKPC defines the dispatch of the SEPA hydro purchases based on water conditions.

The decision to place a unit in economic dispatch or must run status is made in the EKPC Market Operations Center ("MOC"). MOC personnel are certified NERC and PJM Operators and are experts in PJM rules and procedures. The planned status of each unit is discussed on a morning operations' call each weekday that includes MOC personnel, Executive Staff, plant personnel, environmental personnel and ACES personnel. Any concerns with the defined status are brought up and discussed.

PJM has full authority to request the dispatch of all of EKPC's generating units with the exception of Bluegrass 2, Cooper 1 and Smith 9 and 10. PJM calls the MOC to make the dispatch request. The MOC contacts the plant and relays the request to dispatch. The plant will notify the MOC operator when it is ready to come online or will let them know that they cannot come online and why. The MOC operator will subsequently call PJM back and request them to allow the unit to come online as requested or will notify PJM that the unit is not able to come online and define the reason.

Q. Describe any cost-benefit analysis EKPC has performed regarding its participation in PJM.

A. EKPC evaluates its participation within PJM each year and submits the findings of that evaluation to the Executive Director of the Kentucky Public Service Commission. The most recent report was filed in July 2023.

Q. Does this conclude your testimony?

A. Yes

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AFFIDAVIT

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Julia J. Tucker, being duly sworn, states that she has read the foregoing prepared testimony and that he would respond in the same manner to the questions if so asked upon taking the stand and that the matters and things set forth therein are true and correct, to the best of her knowledge, information and belief.

Julia J. Tucker

Subscribed and sworn before me on this 22nd day of September 2023.

Gwyn M. Willoughby
Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN ELECTRONIC EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT CLAUSE OF EAST KENTUCKY POWER COOPERATIVE, INC. FROM NOVEMBER 1, 2020 THROUGH OCTOBER 31, 2022	**)** **)** **)** **)** **)**	**CASE NO. 2023-00009**

DIRECT TESTIMONY OF MARK HORN
ON BEHALF OF EAST KENTUCKY POWER COOPERATIVE, INC.

Filed: September 22, 2023

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

A. My name is Mark Horn; my business address is 4775 Lexington Road, Winchester, Kentucky 40391; I am employed by EKPC as Manager, Fuel and Emissions in the Power Supply Business Unit.

Q. PLEASE STATE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I have a Bachelor's degree in Chemistry from Eastern Kentucky University. I have worked for EKPC for the past 27 years. I was a Lab Technician at Dale Power Station from September 1996 to April 2000, a Chemist at Central Lab from April 2000 to November 2002, then Senior Chemist from November 2002 to August 2008, and a Fuel Buyer from August 2008 to December 2013. I have been in my current position since December 2013.

Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR DUTIES AT EKPC.

A. I am responsible for procurement of EKPC's fuel and fuel-related commodities.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to provide responses regarding EKPC's fuel procurement practices and demonstrate reasonableness of fuel purchases as needed in regards to the Fuel Adjustment Clause.

Q. ADDRESS THE REASONABLENESS OF EKPC'S FUEL PROCUREMENT PRACTICES DURING THE REVIEW PERIOD.

A. EKPC's fuel procurement objectives are to ensure an adequate supply of fuel of proper quality, purchased at competitive prices, and in accordance with the requirements of lending and regulatory agencies; to ensure ethical, fair, and sound business practices are followed; and to avoid any conflict of interest or appearance of any such conflict of interest. Fuel procurement techniques, such as the competitive bid process for contract or spot fuel supply is utilized, whether the Request For Proposal ("RFP") is written or verbal. The fuel procurement practices, including any such negotiations, follow EKPC's approved Policy, Strategy, and Procedure. To stay current, the Fuel Procurement Manual is reviewed and updated at least annually. EKPC's fuel procurement practices are structured to combat volatile fuel costs and have the characteristics of being fair, just, and reasonable.

Q. ADDRESS THE COAL SUPPLIERS' ADHERENCE TO CONTRACT DELIVERY SCHEDULES DURING THE REVIEW PERIOD.

A. Most of EKPC's coal suppliers have adhered to the contract delivery schedules during the review period as expected. One coal supplier in the Illinois Basin sent a letter of notice of an Event of Force Majeure in August of 2021. That supplier struggled to adhere to the contract delivery schedule and experienced a tonnage shortfall for 2021 and 2022 due to the loss of coal production. An agreement was

reached in regards to the tonnage shortfall and the supplier is now performing and adhering to the contract delivery schedules. Other coal suppliers on the lower Ohio River were negatively impacted by lock and dam maintenance along with low water issues during the review period. Those issues were relatively short-term and were resolved when the conditions improved

Q. EXPLAIN EKPC'S EFFORTS TO ENSURE COAL SUPPLIERS' ADHERENCE TO CONTRACT DELIVERY SCHEDULES DURING THE REVIEW PERIOD.

A. A Fuel Buyer, employed by and loyal to EKPC, is specifically assigned to manage the coal supply agreements and monitor the performance of each coal supplier. The Fuel Buyer oversees the monthly commitment for each coal supplier to each plant in EKPC's generating fleet. EKPC communicates with the suppliers and the barge carrier on a routine basis. Physical and financial due diligence is conducted on all coal supply contracts to ensure that the supplier is capable of performing and adhering to the contract delivery schedule over the full term of the coal supply contract. The delivery schedules are also shared with management at least on a monthly basis for further review and oversight. As an additional control, EKPC has internal reports that track delivered coal tons versus committed coal tons that are also distributed on a monthly basis. Delivery schedules, with adequate and proper notification, may be adjusted if mutually agreeable with Buyer and Seller.

Q. EXPLAIN EKPC'S EFFORTS TO MAINTAIN THE ADEQUACY OF ITS COAL SUPPLIES IN LIGHT OF ANY COAL SUPPLIER'S INABILITY OR UNWILLINGNESS TO MAKE CONTRACT COAL DELIVERIES.

A. EKPC has put forth considerable effort to work diligently with coal suppliers and transportation companies to maintain adequacy of coal supply and physical inventory at EKPC's coal-fired generating assets. In a case where a coal supplier is behind on coal deliveries, due to their claim and notice of an Event of Force Majeure, EKPC and the counterparty have worked together to establish a delivery schedule for a pro rata portion of the coal tons produced. As necessary, upper management and Legal counsel get more involved. Additionally, EKPC has been able to secure short-term incremental spot coal tons to mitigate the impacts of any coal supplier shortfall of tons and/or an increased projected coal burn. Physical coal inventories at EKPC's coal-fired generating assets are monitored closely with a goal to stay within the target ranges as defined by Board Policy.

Q. DESCRIBE ANY CHANGES IN THE COAL MARKET CONDITIONS THAT OCCURRED DURING THE REVIEW PERIOD OR THAT EKPC EXPECTS TO OCCUR WITHIN THE NEXT TWO YEARS THAT HAVE SIGNIFICANTLY AFFECTED OR WILL SIGNIFICANTLY EFFECT EKPC'S COAL PROCUREMENT PRACTICES

A. EKPC's coal purchasing practices continue to follow established Policy, Strategy, and Procedure for all of its coal generating units. Flexibility to make minor modifications to the coal purchasing practices due to changes in the coal market conditions, such as market volatility and near illiquidity, while maintaining compliance with the detailed internal controls, is an integral part of a nimble coal procurement process. EKPC's coal procurement process is designed to provide an

adequate fuel resource for EKPC's generating units that will enable EKPC to continue to generate power for the lowest cost possible for its Member Systems. EKPC has a ladder-type coal hedging policy for the current and future years to provide price stability, where the percentage of fully-hedged coal tons step down in each forward year. When spot coal is readily available at a lower price, EKPC may target the lower end of the hedge range for each calendar year. This approach keeps fuel cost stable, but also allowed EKPC to participate in economic opportunities from the spot market. With the spot coal market becoming more shallow, EKPC is now targeting the upper end of the hedge range. Hedging more of the projected coal needs helps to stabilize the fuel cost in globally volatile spot coal market.

EKPC has a procurement procedure for long-term contract purchases complimented with various types of short-term spot purchases. These procedures are for Traditional Spot, Emergency Spot, Economy Spot, and Test Spot supply agreements that are typically executed as short-term purchase orders. Historically, the most common type of spot coal purchase for EKPC has been a Traditional Spot Purchase, which consists of the fair competitive bidding process that is initiated with a written or verbal RFP. In this process it may take weeks or even months before a coal supply agreement is fully executed. This is not an issue when coal is readily available and there is considerable lead time prior to the beginning of the delivery term. During the review period, time was often of the essence, coal supply agreements need to be fully executed in a more timely manner. With spot coal in limited supply and in high domestic and international demand, a coal supply

agreement may need to be fully executed within hours, or the offer for coal is at risk of being retracted, resulting in the coal being sold to another party. This immediate need for spot coal has led EKPC to utilize more Emergency Spot Purchases and Test Spot Purchases to secure coal supply in an effort to match the increased coal burn or simply to maintain physical coal inventory within the target levels. EKPC continues to pursue opportunities for coal supplier diversification and for longer term coal supply contracts. The coal market is currently less volatile than experienced in 2022, with a return of more stability. Domestic coal pricing has softened, but not to the levels they were available during the early part of the review period.

Q. DESCRIBE ACTIONS TAKEN BY EKPC TO MITIGATE HIGH FUEL OR PURCHASED POWER RELATED COSTS FOR ITS CUSTOMERS.

A. EKPC mitigates high fuel costs for its customers primarily by prudent execution of the coal hedge. This hedge blends and stabilizes the price of coal over a period of multiple years. Some coal supply contracts have market price reopeners that allow for market transparency. The coal supply contracts are executed and the term expires on a chronological stagger, limiting the exposure to the current coal market at any one time. Supplier diversification from various coal basins with a sundry of coal qualities also helps to mitigate high fuel costs. Transporting coal by barge, which is EKPC's primary mode of transport, historically is considerably more economical than rail or trucking. Coal is procured based on the lowest evaluated delivered cost with quantitative and qualitative factors that are fair, just, and reasonable. Staying informed of potential domestic and international coal

market drivers is important when it comes to making key procurement decisions for the customers. As a not-for-profit Generation and Transmission cooperative, fuel procurement decisions are made focused on the best interest of the Owner-Members ("Customers")

Q. EXPLAIN HOW COAL CONSUMPTION IS RECORDED FOR A UNIT THAT IS IN RESERVE SHUTDOWN.

A. A unit in reserve shutdown is not actually consuming coal, therefore consumption is not recorded during those times, but physical inventory at the generating facility continues to be updated and recorded as coal deliveries are made. A unit that is in reserved shutdown is fully available to be brought on-line as needed.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

COMMONWEALTH OF KENTUCKY

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AFFIDAVIT

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Mark Horn, being duly sworn, states that he has read the foregoing prepared testimony and that he would respond in the same manner to the questions if so asked upon taking the stand and that the matters and things set forth therein are true and correct, to the best of his knowledge, information and belief.

Mark Horn

Subscribed and sworn before me on this 22nd day of September 2023.

Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025

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CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Michelle K. Carpenter, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's First Request for Information in the above-referenced case dated September 6, 2023, 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.

Michelle K. Carpenter

Subscribed and sworn before me on this 22nd day of September, 2023.

Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025

COMMONWEALTH OF KENTUCKY

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CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Mark Horn, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's First Request for Information in the above-referenced case dated September 6, 2023, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Mark Horn

Subscribed and sworn before me on this 22nd day of September, 2023.

Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
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My Commission Expires Nov 30, 2025

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CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Craig Johnson, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's First Request for Information in the above-referenced case dated September 6, 2023, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Craig Johnson

Subscribed and sworn before me on this 22nd day of September, 2023.

Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025

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STATE OF KENTUCKY)
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COUNTY OF CLARK)

Isaac S. Scott, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's First Request for Information in the above-referenced case dated September 6, 2023, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Isaac S. Scott

Subscribed and sworn before me on this 22nd day of September, 2023.

Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
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CERTIFICATE

STATE OF KENTUCKY)
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COUNTY OF CLARK)

Julia J. Tucker, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's First Request for Information in the above-referenced case dated September 6, 2023, 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.

Julia J. Tucker

Subscribed and sworn before me on this 22nd day of September, 2023.

Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 203-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 1
RESPONSIBLE PARTY: Mark Horn

Request 1. For the period from May 1, 2022, to October 31, 2022 (the last six months of the period under review), provide the amount of coal purchased in tons and the percentage of purchases that were spot versus contract.

Response 1. Please see pages 2 through 8 of this response. All coal purchases have been filed with the Commission.

Supplier	Spot/Contract	Order Number	Quantity (Tons)

Cooper

May 2022			
B & W RESOURCES INC	Spot Market	0000251621	1,322.13
NALLY & HAMILTON ENTERPRISES, INC.	Spot Market	0000251622	852.49
4TH GEN FUELS LLC	Spot Market	0000251634	7,896.97
BLACKHAWK COAL SALES, LLC	Spot Market	0000251635	1,413.24
		May 2022	**11,484.83**
June 2022			
B & W RESOURCES INC	Spot Market	0000251621	7,412.90
FOSSIL FUELS, LLC	Spot Market	0000251633	1,127.19
4TH GEN FUELS LLC	Spot Market	0000251634	4,779.08
BLACKHAWK COAL SALES, LLC	Spot Market	0000251635	5,683.50
4TH GEN FUELS LLC	Spot Market	0000251639	7,759.53
CARBON PARTNERS, INC.	Spot Market	0000251643	5,331.17
		June 2022	**32,093.37**
July 2022			
B & W RESOURCES INC	Spot Market	0000251621	1,861.72
BLACKHAWK COAL SALES, LLC	Spot Market	0000251635	4,778.97
4TH GEN FUELS LLC	Spot Market	0000251639	15,246.38
CARBON PARTNERS, INC.	Spot Market	0000251643	4,314.51
		July 2022	**26,201.58**
August 2022			
B & W RESOURCES INC	Spot Market	0000251621	3,052.88
FOSSIL FUELS, LLC	Spot Market	0000251633	1,086.77
BLACKHAWK COAL SALES, LLC	Spot Market	0000251635	8,192.72
4TH GEN FUELS LLC	Spot Market	0000251639	21,223.14
CARBON PARTNERS, INC.	Spot Market	0000251643	5,602.83
		August 2022	**39,158.34**
September 2022			
B & W RESOURCES INC	Spot Market	0000251621	3,197.62
NALLY & HAMILTON ENTERPRISES, INC.	Spot Market	0000251622	1,008.58
FOSSIL FUELS, LLC	Spot Market	0000251633	615.38
BLACKHAWK COAL SALES, LLC	Spot Market	0000251635	6,599.53
4TH GEN FUELS LLC	Spot Market	0000251639	19,324.48
		September 2022	**30,745.59**

Supplier	Spot/Contract	Order Number	Quantity (Tons)
October 2022			
B & W RESOURCES INC	Spot Market	0000251621	123.29
NALLY & HAMILTON ENTERPRISES, INC.	Spot Market	0000251622	1,765.94
BLACKHAWK COAL SALES, LLC	Spot Market	0000251635	5,875.90
4TH GEN FUELS LLC	Spot Market	0000251639	17,725.42
H L & S, INC.	Spot Market	0000251661	904.08
		October 2022	**26,394.63**
COOPER PERCENTAGE SPOT	**100%**		
COOPER PERCENTAGE CONTRACT	**0%**		

Spurlock Unit Nos. 1 & 2

May 2022			
ALPHA THERMAL COAL SALES COMPANY	L T Contract	0000000538	4,658.39
FORESIGHT COAL SALES LLC	L T Contract	0000000550	3,557.96
FORESIGHT COAL SALES LLC	L T Contract	0000000550	7,253.72
FORESIGHT COAL SALES LLC	L T Contract	0000000552	12,353.00
FORESIGHT COAL SALES LLC	L T Contract	0000000552	3,507.38
ALLIANCE COAL LLC	L T Contract	0000000554	26,810.79
FORESIGHT COAL SALES LLC	L T Contract	0000000556	6,959.20
FORESIGHT COAL SALES LLC	Spot Market	0000551614	39,265.38
FORESIGHT COAL SALES LLC	Spot Market	0000551614	28,679.55
ALLIANCE COAL LLC	L T Contract	0000551623	12,711.80
ALLIANCE COAL LLC	L T Contract	0000551632	37,120.61
		May 2022	**182,877.78**
June 2022			
ALPHA THERMAL COAL SALES COMPANY	L T Contract	0000000538	14,100.70
FORESIGHT COAL SALES LLC	L T Contract	0000000550	23,077.80
FORESIGHT COAL SALES LLC	L T Contract	0000000550	21,582.85
FORESIGHT COAL SALES LLC	L T Contract	0000000552	14,208.21
FORESIGHT COAL SALES LLC	L T Contract	0000000556	16,175.76
FORESIGHT COAL SALES LLC	L T Contract	0000000556	17,627.96
ALLIANCE COAL LLC	L T Contract	0000551623	20,633.29
ALLIANCE COAL LLC	L T Contract	0000551632	66,026.08
CARBON PARTNERS, INC.	Spot Market	0000551637	9,338.16
CARBON PARTNERS, INC.	Spot Market	0000551638	1,571.68
RIVER TRADING COMPANY, LTD	Spot Market	0000551642	1,631.80
		June 2022	**205,974.29**

Supplier	Spot/Contract	Order Number	Quantity (Tons)
July 2022			
ALPHA THERMAL COAL SALES COMPANY	L T Contract	0000000538	15,776.71
FORESIGHT COAL SALES LLC	L T Contract	0000000550	10,129.28
FORESIGHT COAL SALES LLC	L T Contract	0000000552	10,333.74
FORESIGHT COAL SALES LLC	L T Contract	0000000556	11,933.86
FORESIGHT COAL SALES LLC	L T Contract	0000000556	3,609.75
FORESIGHT COAL SALES LLC	Spot Market	0000551614	8,773.25
FORESIGHT COAL SALES LLC	Spot Market	0000551614	8,196.74
ALLIANCE COAL LLC	L T Contract	0000551623	3,493.05
ALLIANCE COAL LLC	L T Contract	0000551632	66,597.56
RIVER TRADING COMPANY, LTD	Spot Market	0000551636	6,325.77
CARBON PARTNERS, INC.	Spot Market	0000551637	7,894.77
CARBON PARTNERS, INC.	Spot Market	0000551638	7,952.48
RIVER TRADING COMPANY, LTD	Spot Market	0000551642	11,184.94
BLACKHAWK COAL SALES, LLC	Spot Market	0000551646	19,339.98
CCU COAL & CONSTRUCTION, LLC	Spot Market	0000551647	13,866.77
ALLIANCE COAL LLC	L T Contract	0000551648	10,104.33
COLUMBIA RESOURCE GROUP, LLC	Spot Market	0000551649	11,952.74
PRIME MET, INC.	Spot Market	0000551650	9,213.90
		July 2022	**236,679.62**
August 2022			
ALPHA THERMAL COAL SALES COMPANY	L T Contract	0000000538	22,291.48
ALLIANCE COAL LLC	L T Contract	0000000542	15,072.20
FORESIGHT COAL SALES LLC	L T Contract	0000000550	11,706.28
FORESIGHT COAL SALES LLC	L T Contract	0000000550	6,510.91
FORESIGHT COAL SALES LLC	L T Contract	0000000552	6,647.71
FORESIGHT COAL SALES LLC	L T Contract	0000000552	13,376.82
FORESIGHT COAL SALES LLC	L T Contract	0000000556	4,937.36
FORESIGHT COAL SALES LLC	L T Contract	0000000556	11,585.91
FORESIGHT COAL SALES LLC	Spot Market	0000551614	13,163.71
FORESIGHT COAL SALES LLC	Spot Market	0000551614	4,882.17
ALLIANCE COAL LLC	L T Contract	0000551632	65,499.48
RIVER TRADING COMPANY, LTD	Spot Market	0000551636	3,153.78
CARBON PARTNERS, INC.	Spot Market	0000551637	6,474.71
CARBON PARTNERS, INC.	Spot Market	0000551638	4,857.00
RIVER TRADING COMPANY, LTD	Spot Market	0000551642	16,106.44
CCU COAL & CONSTRUCTION, LLC	Spot Market	0000551647	11,857.02
ALLIANCE COAL LLC	L T Contract	0000551648	6,529.14
COLUMBIA RESOURCE GROUP, LLC	Spot Market	0000551649	1,644.52
COLUMBIA RESOURCE GROUP, LLC	Spot Market	0000551649	8,311.23
PRIME MET, INC.	Spot Market	0000551650	10,809.97
CARBON PARTNERS, INC.	Spot Market	0000551651	4,665.45
		August 2022	**250,083.29**

Supplier	Spot/Contract	Order Number	Quantity (Tons)
September 2022			
ALPHA THERMAL COAL SALES COMPANY	L T Contract	0000000538	14,561.75
ALLIANCE COAL LLC	L T Contract	0000000542	24,964.50
FORESIGHT COAL SALES LLC	L T Contract	0000000550	8,693.32
FORESIGHT COAL SALES LLC	L T Contract	0000000550	19,352.64
FORESIGHT COAL SALES LLC	L T Contract	0000000552	17,344.70
FORESIGHT COAL SALES LLC	L T Contract	0000000552	7,059.57
ALLIANCE COAL LLC	L T Contract	0000000554	18,186.32
FORESIGHT COAL SALES LLC	L T Contract	0000000556	4,956.28
FORESIGHT COAL SALES LLC	L T Contract	0000000556	10,509.73
FORESIGHT COAL SALES LLC	Spot Market	0000551614	13,516.17
FORESIGHT COAL SALES LLC	Spot Market	0000551614	6,687.46
ALLIANCE COAL LLC	L T Contract	0000551632	36,955.59
RIVER TRADING COMPANY, LTD	Spot Market	0000551636	8,189.47
CARBON PARTNERS, INC.	Spot Market	0000551637	8,101.85
CARBON PARTNERS, INC.	Spot Market	0000551638	1,736.50
RIVER TRADING COMPANY, LTD	Spot Market	0000551642	12,849.19
CCU COAL & CONSTRUCTION, LLC	Spot Market	0000551647	16,613.65
COLUMBIA RESOURCE GROUP, LLC	Spot Market	0000551649	6,495.20
PRIME MET, INC.	Spot Market	0000551650	5,917.42
CARBON PARTNERS, INC.	Spot Market	0000551651	12,646.36
CARBON PARTNERS, INC.	Spot Market	0000551655	3,339.43
		September 2022	**258,677.10**

Supplier	Spot/Contract	Order Number	Quantity (Tons)
October 2022			
ALPHA THERMAL COAL SALES COMPANY	L T Contract	0000000538	6,418.61
ALLIANCE COAL LLC	L T Contract	0000000542	28,280.20
FORESIGHT COAL SALES LLC	L T Contract	0000000550	3,284.72
FORESIGHT COAL SALES LLC	L T Contract	0000000550	17,651.28
FORESIGHT COAL SALES LLC	L T Contract	0000000552	1,744.20
FORESIGHT COAL SALES LLC	L T Contract	0000000552	10,958.64
ALLIANCE COAL LLC	L T Contract	0000000554	43,137.99
FORESIGHT COAL SALES LLC	L T Contract	0000000556	6,655.54
FORESIGHT COAL SALES LLC	L T Contract	0000000556	10,932.75
FORESIGHT COAL SALES LLC	Spot Market	0000551614	8,075.51
FORESIGHT COAL SALES LLC	Spot Market	0000551614	6,634.35
RIVER TRADING COMPANY, LTD	Spot Market	0000551636	6,251.88
CARBON PARTNERS, INC.	Spot Market	0000551638	4,644.58
RIVER TRADING COMPANY, LTD	Spot Market	0000551642	20,544.25
CCU COAL & CONSTRUCTION, LLC	Spot Market	0000551647	14,690.34
CARBON PARTNERS, INC.	Spot Market	0000551651	1,649.25
CARBON PARTNERS, INC.	Spot Market	0000551655	7,868.66
COLUMBIA RESOURCE GROUP, LLC	Spot Market	0000551656	3,419.36
		October 2022	**202,842.11**

SPURLOCK 1 & 2 PERCENTAGE SPOT **33%**

SPURLOCK 1 & 2 PERCENTAGE CONTRACT **67%**

Spurlock Unit Nos. 3 & 4

Supplier	Spot/Contract	Order Number	Quantity (Tons)
May 2022			
B & N COAL INC	L T Contract	0000000824	16,411.19
B & N COAL INC	L T Contract	0000000832	12,784.58
CCU COAL & CONSTRUCTION, LLC	L T Contract	0000000836	28,251.80
ALLIANCE COAL LLC	L T Contract	0000000838	16,496.00
B & N COAL INC	L T Contract	0000000840	8,206.65
RIVER TRADING COMPANY, LTD	Spot Market	0000851590	1,674.77
FORESIGHT COAL SALES LLC	Spot Market	0000851615	14,418.92
CCU COAL & CONSTRUCTION, LLC	Spot Market	0000851617	8,709.33
ALLIANCE COAL LLC	Spot Market	0000851628	10,792.93
		May 2022	**117,746.17**
June 2022			
B & N COAL INC	L T Contract	0000000824	16,410.55
B & N COAL INC	L T Contract	0000000832	1,611.87
CCU COAL & CONSTRUCTION, LLC	L T Contract	0000000836	27,090.19
ALLIANCE COAL LLC	L T Contract	0000000838	22,991.20
B & N COAL INC	L T Contract	0000000840	8,223.46
FORESIGHT COAL SALES LLC	L T Contract	0000000842	17,776.95
FORESIGHT COAL SALES LLC	L T Contract	0000000842	6,832.28
CCU COAL & CONSTRUCTION, LLC	Spot Market	0000851617	5,402.46
BLACKHAWK COAL SALES, LLC	Spot Market	0000851641	12,711.95
		June 2022	**119,050.91**
July 2022			
B & N COAL INC	L T Contract	0000000824	22,887.06
B & N COAL INC	L T Contract	0000000832	19,501.73
CCU COAL & CONSTRUCTION, LLC	L T Contract	0000000836	47,847.92
ALLIANCE COAL LLC	L T Contract	0000000838	13,379.71
B & N COAL INC	L T Contract	0000000840	11,411.94
FORESIGHT COAL SALES LLC	L T Contract	0000000842	4,962.75
FORESIGHT COAL SALES LLC	Spot Market	0000851615	14,130.11
FORESIGHT COAL SALES LLC	Spot Market	0000851615	4,962.43
CCU COAL & CONSTRUCTION, LLC	Spot Market	0000851617	6,792.21
		July 2022	**145,875.86**

Supplier	Spot/Contract	Order Number	Quantity (Tons)
August 2022			
B & N COAL INC	L T Contract	0000000824	17,872.32
B & N COAL INC	L T Contract	0000000832	9,763.50
CCU COAL & CONSTRUCTION, LLC	L T Contract	0000000836	37,152.46
ALLIANCE COAL LLC	L T Contract	0000000838	16,819.45
B & N COAL INC	L T Contract	0000000840	9,565.26
FORESIGHT COAL SALES LLC	L T Contract	0000000842	6,580.04
FORESIGHT COAL SALES LLC	Spot Market	0000851615	1,621.03
CCU COAL & CONSTRUCTION, LLC	Spot Market	0000851617	11,761.03
		August 2022	**111,135.09**
September 2022			
B & N COAL INC	L T Contract	0000000824	22,734.19
B & N COAL INC	L T Contract	0000000832	4,875.34
CCU COAL & CONSTRUCTION, LLC	L T Contract	0000000836	36,078.68
ALLIANCE COAL LLC	L T Contract	0000000838	18,367.62
B & N COAL INC	L T Contract	0000000840	3,182.80
FORESIGHT COAL SALES LLC	L T Contract	0000000842	1,649.63
FORESIGHT COAL SALES LLC	L T Contract	0000000842	6,757.61
FORESIGHT COAL SALES LLC	Spot Market	0000851615	3,222.60
CCU COAL & CONSTRUCTION, LLC	Spot Market	0000851617	4,917.12
		September 2022	**101,785.59**
October 2022			
B & N COAL INC	L T Contract	0000000824	16,146.37
B & N COAL INC	L T Contract	0000000832	11,139.76
CCU COAL & CONSTRUCTION, LLC	L T Contract	0000000836	39,259.57
ALLIANCE COAL LLC	L T Contract	0000000838	5,040.61
B & N COAL INC	L T Contract	0000000840	12,382.65
FORESIGHT COAL SALES LLC	L T Contract	0000000842	4,865.67
FORESIGHT COAL SALES LLC	L T Contract	0000000842	1,682.55
FORESIGHT COAL SALES LLC	Spot Market	0000851615	1,603.77
FORESIGHT COAL SALES LLC	Spot Market	0000851615	3,188.86
CCU COAL & CONSTRUCTION, LLC	Spot Market	0000851617	17,914.02
KIMBLE COMPANY	Spot Market	0000851657	3,213.15
BLACKHAWK COAL SALES, LLC	Spot Market	0000851659	12,948.11
		October 2022	**129,385.09**

SPURLOCK 3 & 4 PERCENTAGE SPOT	**19%**
SPURLOCK 3 & 4 PERCENTAGE CONTRACT	**81%**
TOTAL SYSTEM PERCENTAGE SPOT	**34%**
TOTAL SYSTEM PERCENTAGE CONTRACT	**66%**

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 2
RESPONSIBLE PARTY: Mark Horn

Request 2. For the last six months of the period under review, list each coal purchase made under a long-term contract (one year or greater). For each purchase, list the following: a. Contract or purchase order number;

b. The supplier's name;

c. The location(s) of production facilities from which the coal is sourced;

d. The method of delivery, (i.e., barge, truck, rail, or other);

e. The actual quantity received during the review period; and

f. Current price paid per ton.

Response 2. Please see pages 2 through 4 of this response.

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC FUEL ADJUSTMENT CLAUSE CASE NO. 2022-00264

RESPONSE TO PSC ORDER DATED 9/13/22

(a)	(b)	(c)	(d)	(e)	(f)	(g)
Contract No.	**Supplier**	**Production Facility**	**Delivery Method**	**Actual Quantity Received During 11/1/21—4/30/22**	**Tonnage Requirement During 11/1/21—4/30/22**	**Current Price Paid Per Ton**
Spurlock Station						
Contract No. 824	B & N Coal, Inc. P. O. Box 100 Dexter City, OH 45727	Whigville, West Fork, Schramm, & Estadt—Noble, OH	Barge	126,273.20	120,000	$44.82402
Contract No. 532	Foresight Coal Sales Suite 2600 One Metropolitan Square 211 N. Broadway St. Louis, MO 63102	Deer Run Hillsboro, IL MC #1 & Viking Macedonia, IL Pond Creek Marion, IL	Barge	5,274.28	20,000	$34.50
Contract No. 832	B & N Coal, Inc. P. O. Box 100 Dexter City, OH 45727	Whigville, West Fork, Schramm, & Estadt—Noble, OH	Barge	52,561.95	60,000	$44.82402
Contract No. 538 (Formerly Contura Coal Sales, LLC)	Alpha Metallurgical Coal Sales, LLC 340 Martin Luther King Jr. Blvd. Bristol, TN 37620	Cumberland Mine Green, PA	Barge	89,950.62	110,000	$40.00

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC FUEL ADJUSTMENT CLAUSE CASE NO. 2022-00264

RESPONSE TO PSC ORDER DATED 9/13/22

(a)	(b)	(c)	(d)	(e)	(f)	(g)
Contract No.	**Supplier**	**Production Facility**	**Delivery Method**	**Actual Quantity Received During 11/1/21—4/30/22**	**Tonnage Requirement During 11/1/21—4/30/22**	**Current Price Paid Per Ton**
Spurlock Station (continued)						
Contract No. 542	Alliance Coal, LLC Suite 400 1717 South Boulder Tulsa, OK 74119	River View Mine Union, KY	Barge	129,689.84	120,000	$42.00
Contract No. 836	CCU Coal & Const, LLC 544 Chestnut Street P. O. Box 427 Coshocton, OH 43812	Sandy Ridge & Harrison Harrison, OH; Schodey Hollow Belmont, OH	Barge	85,632.04	180,000	$44.96576
Contract No. 838	Alliance Coal, LLC Suite 400 1717 South Boulder Tulsa, OK 74119	River View Mine Union, KY	Barge	113,277.25	120,000	$42.00
Contract No. 550	Foresight Coal Sales Suite 2600 One Metropolitan Square 211 N. Broadway St. Louis, MO 63102	Deer Run Hillsboro, IL MC #1 & Viking Macedonia, IL Pond Creek Marion, IL	Barge	44,584.30	100,000	$29.25
Contract No. 840	B & N Coal, Inc. P. O. Box 100 Dexter City, OH 45727	Whigville, West Fork, Schramm, & Estadt—Noble, OH	Barge	44,559.65	60,000	$38.56584

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC FUEL ADJUSTMENT CLAUSE CASE NO. 2022-00264

RESPONSE TO PSC ORDER DATED 9/13/22

(a)	(b)	(c)	(d)	(e)	(f)	(g)
Contract No.	**Supplier**	**Production Facility**	**Delivery Method**	**Actual Quantity Received During 11/1/21—4/30/22**	**Tonnage Requirement During 11/1/21—4/30/22**	**Current Price Paid Per Ton**
Spurlock Station (continued)						
Contract No. 552	Foresight Coal Sales Suite 2600 One Metropolitan Square 211 N. Broadway St. Louis, MO 63102	Deer Run Hillsboro, IL MC #1 & Viking Macedonia, IL Pond Creek Marion, IL	Barge	71,594.23	100,000	$28.50
Contract No. 554	Alliance Coal, LLC Suite 400 1717 South Boulder Tulsa, OK 74119	River View Mine Union, KY	Barge	310,176.32	320,000	$36.00
Contract No. 556	Foresight Coal Sales Suite 2600 One Metropolitan Square 211 N. Broadway St. Louis, MO 63102	Deer Run Hillsboro, IL MC #1 & Viking Macedonia, IL Pond Creek Marion, IL	Barge	18,089.31	60,000	$31.25
Contract No. 842	Foresight Coal Sales Suite 2600 One Metropolitan Square 211 N. Broadway St. Louis, MO 63102	Deer Run Hillsboro, IL MC #1 & Viking Macedonia, IL Pond Creek Marion, IL	Barge	5,548.45	40,000	$34.75

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 3
RESPONSIBLE PARTY: Mark Horn

Request 3. a. As of the last day of the review period, state the coal inventory level in tons and in number of days' supply. Provide this information by generating station and in the aggregate.

b. Describe the criteria used to determine the number of days' supply.

c. State the target coal inventory level for each generating station and for the total system.

d. If actual coal inventory exceeds the target inventory by ten days' supply, state the reasons for the excessive inventory.

(1) State whether any significant changes in the current coal inventory target are expected within the next 12 months.

(2) If so, state the expected change and the reasons for this change.

Response 3. East Kentucky's aggregate coal inventory level as of October 31, 2022, was 742,273.72 tons—37 days' supply. By generating station, the levels are as follows:

	Tons	Days
Cooper	165,987.44	46
Spurlock	576,286.28	36

Request 3b. Describe the criteria used to determine number of days' supply.

Response 3b. Number of days' supply is determined by actual tons in inventory divided by the total maximum daily usage for East Kentucky's generating units.

Request 3c. State the target coal inventory level for each generating station and for the total system.

Response 3c. East Kentucky's aggregate coal inventory as of October 31, 2022, was below its target range of 25-50 days' supply. The Cooper Power Station inventory was within its target range entering winter and summer of 25-60 days' supply. The Spurlock Power Station was below its range of 25-45 days' supply.

Request 3d. If actual coal inventory exceeds the target inventory by ten days' supply, state the reasons for the excessive inventory. (1) State whether any significant changes in the current coal inventory target are expected within the next 12 months. (2) If so, state the expected change and the reasons for this change.

Response 3d. East Kentucky's coal inventory did not exceed its inventory target by ten days. East Kentucky does not expect significant changes in its current coal inventory target within the next 12 months. Physical coal inventory at Cooper and Spurlock is expected to increase, possibly exceeding current coal inventory target ranges.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 4
RESPONSIBLE PARTY: Mark Horn

Request 4. List each written coal-supply solicitation issued during the last six months of the period under review.

a. For each solicitation, provide the date of the solicitation, the type of solicitation (contract or spot), the quantities solicited, a general description of the quality of coal solicited, the period over which deliveries were requested, and the generating unit(s) for which the coal was intended.

b. For each solicitation, state the number of vendors to whom the solicitation was sent, the number of vendors who responded, and the selected vendor(s). Provide the bid tabulation sheet or corresponding document that ranks the proposals. (This document shall identify all vendors who made offers.) State the reasons for each selection. For each lowest-cost bid not selected, explain why the bid was not selected.

Response 4. Please see pages 2 through 10 of this response.

Confidential protection of the bid tabulation sheets or corresponding documents that ranked the proposals has been requested in the form of a motion for confidential treatment.

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC FUEL ADJUSTMENT CLAUSE CASE NO. 2023-00009

RESPONSE TO PSC ORDER DATED 09/06/2023

Unit	Date	Contract/Spot	Quantity (Tons)	Quality	Time Period	Number of Vendors Sent	Number of Vendors Respond	Tabulation Sheet
Cooper	05/13/22	Spot	140,000	3.3# SO_2/MMBtu <12% Ash >11,500 Btu	06/01/22—12/31/22	49	5	Page 3
Spurlock 1&2	05/13/22	Spot	150,000	7.2# SO_2/MMBtu <15% Ash >11,000 Btu	06/01/22—12/31/22	54	3	Page 4
Spurlock 1&2	05/13/22	Spot	395,000	7.2# SO_2/MMBtu <15% Ash >11,000 Btu	01/01/23—12/31/23	54	2	Page 5
Spurlock 1&2	06/21/22	Spot	150,000	7.2# SO_2/MMBtu <15% Ash >11,000 Btu	07/01/22—09/30/22	54	3	Page 6
Spurlock 1&2	06/21/22	Spot	485,000	4# SO_2/MMBtu <15% Ash >11,000 Btu	01/01/23—12/31/23	54	4	Pages 7-8
Spurlock 3&4	06/21/22	Spot	250,000	10# SO_2/MMBtu <30% Ash >9,000 Btu	01/01/23—12/31/23	54	4	Page 9
Spurlock 3&4	06/21/22	Contract	240,000	10# SO_2/MMBtu <30% Ash >9,000 Btu	01/01/23—12/31/24	54	7	Page 10

FUEL EVALUATION FOR COOPER POWER STATION

JUNE—DECEMBER 2022 SPOT

Date:	6/9/2022
Event Nbr:	317
Bid End Date:	05/25/2022

Coal Supplier	Quality Btu Number	% Sulfur % Ash	Tons	Term	Delivery Cost $ Ton	Delivery Cost $ MMBtu	Severance Tax	Evaluated Cost $ Ton	Evaluated Cost $ MMBtu	Reason for Recommendation
[redacted]										

EKPC Fuel Evaluation System

FUEL EVALUATION FOR SPURLOCK UNIT NOS. 1 & 2

JUNE—DECEMBER 2022 SPOT

Date: 05/25/2022
Event Nbr: 318
Bid End Date: 05/25/2022

Coal Supplier	Quality Btu / % Sulfur / % Ash / Number	Tons	Term	Delivery Cost $ Ton	Delivery Cost $ MMBtu	Severance Tax	Evaluated Cost $ Ton	Evaluated Cost $ MMBtu	Reason for Recommendation
[redacted]									

Page 1 of 1

EKPC Fuel Evaluation System

REDACTED

PSC Request 4
Page 4 of 10

FUEL EVALUATION FOR SPURLOCK UNIT NOS. 1 & 2

2023 SPOT COAL

Date: 06/07/2022
Event Nbr: 319
Bid End Date: 05/25/2022

Coal Supplier	Quality Btu / % Sulfur Number	% Ash	Tons	Term	Delivery Cost $ Ton	Delivery Cost $ MMBtu	Severance Tax	Evaluated Cost $ Ton	Evaluated Cost $ MMBtu	Reason for Recommendation
[redacted]										

EKPC Fuel Evaluation System

REDACTED

FUEL EVALUATION FOR SPURLOCK UNIT NOS. 1 & 2

3RD QUARTER 2022

Date: 06/29/2022
Event Nbr: 320
Bid End Date: 06/29/2022

Coal Supplier	Quality Btu / % Sulfur / Number	% Ash	Tons	Term	Delivery Cost $ Ton	Delivery Cost $ MMBtu	Severance Tax	Evaluated Cost $ Ton	Evaluated Cost $ MMBtu	Reason for Recommendation
[redacted]										

EKPC Fuel Evaluation System

REDACTED

FUEL EVALUATION FOR SPURLOCK UNIT NOS. 1 & 2

2023 SPOT COAL

Date: 07/14/2022
Event Nbr: 321
Bid End Date: 07/06/2022

Coal Supplier	Number	Quality Btu / % Sulfur / % Ash	Tons	Term	Delivery Cost $ Ton	Delivery Cost $ MMBtu	Severance Tax	Evaluated Cost $ Ton	Evaluated Cost $ MMBtu	Reason for Recommendation
[redacted]										
					[redacted]					

Page 1 of 1

EKPC Fuel Evaluation System

REDACTED

PSC Request 4
Page 7 of 10

FUEL EVALUATION FOR SPURLOCK UNIT NOS. 1 & 2

2023 SPOT COAL

Date: 07/27/2022
Event Nbr: 324
Bid End Date: 07/06/2022

Coal Supplier	Number	Quality Btu / % Sulfur / % Ash	Tons	Term	Delivery Cost $ Ton	Delivery Cost $ MMBtu	Severance Tax	Evaluated Cost $ Ton	Evaluated Cost $ MMBtu	Reason for Recommendation
[redacted]										

EKPC Fuel Evaluation System

REDACTED

FUEL EVALUATION FOR UNIT NOS. 3 & 4 AT SPURLOCK

2023 SPOT COAL

Date:	07/14/2022
Event Nbr:	322
Bid End Date:	07/06/2022

Coal Supplier	Number	Quality Btu / % Sulfur / % Ash	Tons	Term	Delivery Cost $ Ton	Delivery Cost $ MMBtu	Severance Tax	Evaluated Cost $ Ton	Evaluated Cost $ MMBtu	Reason for Recommendation
[redacted]										

Delivery cost considers the impact of the $2/ton Kentucky clean coal tax credit

EKPC Fuel Evaluation System

REDACTED

PSC Request 4
Page 9 of 10

FUEL EVALUATION FOR UNIT NOS. 3 & 4 AT SPURLOCK

B & N CONTRACT NO. 840 REOPENER

Date:	07/27/2022
Event Nbr:	323
Bid End Date:	07/06/2022

Coal Supplier	Number	Quality Btu / % Sulfur / % Ash	Tons	Term	Delivery Cost $ Ton	Delivery Cost $ MMBtu	Severance Tax	Evaluated Cost $ Ton	Evaluated Cost $ MMBtu	Reason for Recommendation
[redacted]										

Delivery cost considers the impact of the $2/ton Kentucky clean coal tax credit

EKPC Fuel Evaluation System

REDACTED

PSC Request 4
Page 10 of 10

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 5
RESPONSIBLE PARTY: Mark Horn

Request 5. List each oral coal-supply solicitation issued during the last six months of the period under review.

a. For each solicitation, state why the solicitation was not written, the date(s) of the solicitation, the quantities solicited, a general description of the quality of coal solicited, the period over which deliveries were requested, and the generating unit(s) for which the coal was intended.

b. For each solicitation, identify all vendors solicited and the vendor(s) selected. Provide the bid tabulation sheet or other document that ranks the proposals. (This document shall identify all vendors who made offers.) State the reasons for each selection. For each lowest-cost bid not selected, explain why the bid was not selected.

Response 5. Please see page 2 of this response.

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC FUEL ADJUSTMENT CLAUSE CASE NO. 2023-00009

RESPONSE TO PSC ORDER DATED 09/06/2023

Unit	Date	Reason	Quantity (Tons)	Quality	Time Period	Number of Vendors Contacted	Tabulation Sheet
Spurlock 1&2	06/09/22	Immediate Response Required	105,000	7.2# SO_2/MMBtu <15% Ash >11,000 Btu	06/13/22—01/07/23	1	Emergency Purchase No Tabulation
Spurlock 3&4	06/09/22	Immediate Response Required	12,712	10# SO_2/MMBtu <30% Ash >9,000 Btu	06/08/22—07/07/22	1	Emergency Purchase No Tabulation
Cooper	08/18/22	Immediate Response Required	5,000	3.3# SO_2/MMBtu <12% Ash >11,500 Btu	08/22/22—09/30/22	1	Test Purchase No Tabulation
Cooper	09/07/22	Immediate Response Required	60,000	3.3# SO_2/MMBtu <12% Ash >11,500 Btu	11/01/22—04/30/23	1	Emergency Purchase No Tabulation
Cooper	10/04/22	Immediate Response Required	11,000	3.3# SO_2/MMBtu <12% Ash >11,500 Btu	10/05/22—12/31/22	2	Emergency & Test Purchases No Tabulation

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 6
RESPONSIBLE PARTY: Mark Horn

Request 6. For the last six months of the period under review, list each vendor from whom natural gas was purchased for generation and the quantities and the nature of each purchase (i.e., spot or contract). Provide the percentage of purchases that were spot versus contract.

Response 6. Please refer to the table below.

Vendor	Quantity (MMBtu)	Type of Purchase
Eco Energy	1,542,498	Spot
Sequent	55,000	Spot
Southwest	476,963	Spot
Tenaska	3,094,236	Spot
United Energy	2,735,500	Spot
TGP*	(44,194)	Spot
TGT*	(134,152)	Spot

Please note that NAESB contracts with the above vendors have been filed with the Commission. For the period under review in total (six-month period ending October 31, 2022) East Kentucky's gas purchases were 100% spot.
*TGP is one of the pipeline transportation companies for Smith Power Station, and TGT is the pipeline transportation company for Bluegrass Generating Station. Quantity shown is monthly balancing on the pipeline.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 7
RESPONSIBLE PARTY: Mark Horn

Request 7. For the last six months of the period under review, state whether there were any instances in which a natural gas generating unit could not be operated when it otherwise would have run due to pipeline constraints or natural gas being unavailable.

Response 7. During the period under review, there were no instances in which a natural gas unit could not be operated due to pipeline constraints or natural gas being unavailable.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 8
RESPONSIBLE PARTY: Mark Horn

Request 8. For the last six months of the period under review, state whether there have been any changes to hedging activities for coal or natural gas purchases used for generation since the previous Fuel Adjustment Clause (FAC) review proceeding. If so, describe the changes in detail.

Response 8. During the time frame from May 1, 2022, through October 31, 2022, EKPC executed a total of four (4) physical natural gas hedges during the months of July, August, and September. These conservative physical natural gas hedges consisted of three (3) spot positions and one (1) forward position. A spot purchase typically has a defined term of seven (7) days or less, and a forward purchase typically has a defined term of one (1) year or less. EKPC reviewed historical natural gas usage over the past years to provide a plan and strategy to effectively mitigate extreme price volatility while maintaining operational flexibility. The return of natural gas market volatility, the forecasts of extreme heat, and the potential for a rail strike that could disrupt rail service of coal to utilities were all drivers for the initial periods that natural gas was purchased as a physical hedge. These small, short-term physical natural gas hedge transactions provided

experience for managing a potentially volatile natural gas market in the upcoming winter months. The market volatility could have great amplitude, frequency, and velocity.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 9
RESPONSIBLE PARTY: Mark Horn

Request 9. a. State whether EKPC has audited any of its fuel or transportation contracts during the last six months of the period under review.

b. If so, for each audited contract:

(1) Identify the contract;

(2) Identify the auditor; and

(3) State the results of the audit and describe the actions that EKPC took as a result of the audit.

Response 9. No contracts were audited for the period under review.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 10
RESPONSIBLE PARTY: Mark Horn

Request 10. a. State whether EKPC is currently involved in any litigation with its current or former fuel suppliers or transportation vendors.

b. If yes, for each litigation:

(1) Identify the supplier or vendor;

(2) Identify the contract involved;

(3) State the potential liability or recovery to EKPC;

(4) List the issues presented; and

(5) Provide a copy of the complaint or other legal pleading that initiated the litigation and any answers or counterclaims. If a copy has previously been filed with the Commission, provide the date on which it was filed and the case in which it was filed.

c. State the current status of all litigation with suppliers or vendors.

Response 10. EKPC is not currently involved in any litigation with its current or former fuel suppliers or transportation vendors.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 11
RESPONSIBLE PARTY: Mark Horn

Request 11. a. For the last six months of the period under review, state whether there have been any changes to EKPC's written policies and procedures regarding its fuel procurement.

b. If yes:

(1) Describe the changes;

(2) Provide the written policies and procedures as changed;

(3) State the date(s) the changes were made; and

(4) Explain why the changes were made. c. If no, provide the date EKPC's current fuel procurement policies and procedures were last changed, when they were last provided to the Commission, and identify the proceeding in which they were provided.

Response 11. East Kentucky updated its Fuel, Emissions, Limestone, and Lime Strategy ("Strategy") on September 10, 2022. The Strategy was updated for clarification pertaining to physical Natural Gas Hedging. Pursuant to the Commission's March 24, 2020, Order in Case No. 2020-00085, EKPC is submitting the confidential material to the Commission in a PDF via an

e-mail to PSCED@ky.gov, which is filed under seal and subject to a motion for confidential treatment. The revised copy is on pages 4 through 12, and the redline copy is on pages 13 through 21. Confidential treatment was granted for the previous version of the Strategy as tendered in Case No. 2022-00264.

On July 12, 2022, the East Kentucky Board of Directors updated Policy No. 404, Transaction Authority Limits for Energy and Energy Related Commodities and Transportation, to revise the Per Transaction Limits to add the Coaldesk, LLC Index for Coal and Alternative Fuels for transactions and remove the dollar/ton limits; revise the Per Transaction Limits to add the CSAPR NOx Ozone Season Group 3 Trading Program Index to the Federal NOx Emission Allowances and remove the dollar/ton limits; increase the Per Transaction Limits to $250/ton for Lime and remove the $225/ton limit; revise the Per Transaction Limits to add the Ferticon Index (listed with the existing Tampa Index) for Anhydrous and Aqueous Ammonia; add Pass-Through Renewable Energy Credits ("REC") approval limits to the REC matrix as well as define limits for both Pass-Through RECs Spot Transactions and RECs Forward with verbiage explaining Mark to Market calculations; and add language specifying annual reporting for deals not captured in a timely manner. A revised copy of the policy is included, in the previously referenced PDF, on pages 22 through 39, and the redline copy is on pages 40 through 57. Confidential treatment was granted for the previous version of this document as tendered in Case No. 2022-00037.

In addition, Administrative Policy No. A031, Internal Delegation of Authority, was revised on August 4, 2022, to correlate with the changes to Policy No. 404 as stated above. A revised copy of the policy is provided in the previously referenced the PDF on pages 58 through 86, and

the redline copy is on pages 87 through 115. Confidential treatment was granted for the previous version of this document as tendered in Case No. 2022-00037.

No other policies or procedures were updated during the period under review. Written policies and procedures previously filed with the Commission are East Kentucky's Fuel and Emissions Department Procurement Manual, revised November 23, 2021, and filed on September 13, 2022, in Case No. 2022-00264 and Board Policy No. 405, filed on September 1, 2021, in Case No. 2021-00293.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 12
RESPONSIBLE PARTY: Julia J. Tucker

Request 12. For the last six months of the period under review and for the years 2021 and 2022, list all firm power commitments for EKPC for (a) purchases and (b) sales. This list shall identify the electric utility, the amount of commitment in MW, and the purpose of the commitment (i.e., peaking, emergency, etc.).

Response 12.

SEPA	Up to 170 MW	Energy	07/01/1998 – Indefinite
Shell Energy North America	75 MW	Energy	10/18/2021 – 10/23/2021
Shell Energy North America	75 MW	Energy	10/25/2021 – 10/30/2021
Exelon Generation Company, LLC	74 MW	Capacity	11/6/2021 – 5/31/2022
Shell Energy North America	50 MW	Energy	11/1/2021 – 11/30/2021
Shell Energy North America	50 MW	Energy	12/1/2021 – 12/31/2021
Shell Energy North America	100MW	Energy	1/1/2022 – 2/28/2022
Dynegy Marketing and	73.1 MW	Capacity	6/1/2022 – 7/31/2022

Trade, LLC			
Dynegy Marketing and Trade, LLC	60 MW	Capacity	6/1/2022 – 12/31/2022

Response 12b.

None

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 13
RESPONSIBLE PARTY: Michelle K. Carpenter

Request 13. Provide a monthly billing summary of sales to all electric utilities for the last six months of the period under review.

Response 13. Please see attachment *FAC_DR1_Response 13.*

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 14
RESPONSIBLE PARTY: Craig A. Johnson

Request 14. Provide a list, in chronological order, showing by unit, any scheduled, actual, and forced outages between for the last six months of the period under review. Provide a key for any information that is abbreviated.

Response 14. Please see attachment *FAC_DR1_Request 14.*

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 15
RESPONSIBLE PARTY: Craig A. Johnson

Request 15. For the last six months of the period under review, provide the monthly capacity factor at which each generating unit operated.

Response 15. Please see pages 2 through 7 of this response.

Unit	Year	Month	Net Cap Ftr (NCF)
Bluegrass Unit 1	2022	5	3.20%
Bluegrass Unit 1	2022	6	13.06%
Bluegrass Unit 1	2022	7	27.78%
Bluegrass Unit 1	2022	8	12.16%
Bluegrass Unit 1	2022	9	5.43%
Bluegrass Unit 1	2022	10	0.17%
Bluegrass Unit 2	2022	5	3.02%
Bluegrass Unit 2	2022	6	14.29%
Bluegrass Unit 2	2022	7	26.23%
Bluegrass Unit 2	2022	8	10.72%
Bluegrass Unit 2	2022	9	4.67%
Bluegrass Unit 2	2022	10	0.41%
Bluegrass Unit 3	2022	5	0.76%
Bluegrass Unit 3	2022	6	2.55%
Bluegrass Unit 3	2022	7	0.00%
Bluegrass Unit 3	2022	8	1.18%
Bluegrass Unit 3	2022	9	0.00%
Bluegrass Unit 3	2022	10	0.10%
Cooper Unit 1	2022	5	1.28%
Cooper Unit 1	2022	6	12.79%
Cooper Unit 1	2022	7	23.06%
Cooper Unit 1	2022	8	6.89%
Cooper Unit 1	2022	9	26.05%
Cooper Unit 1	2022	10	7.13%
Cooper Unit 2	2022	5	13.01%
Cooper Unit 2	2022	6	47.73%
Cooper Unit 2	2022	7	50.21%
Cooper Unit 2	2022	8	32.09%
Cooper Unit 2	2022	9	17.70%
Cooper Unit 2	2022	10	-0.68%
JK Smith Unit 1	2022	5	8.26%
JK Smith Unit 1	2022	6	19.41%
JK Smith Unit 1	2022	7	28.87%
JK Smith Unit 1	2022	8	18.71%
JK Smith Unit 1	2022	9	4.40%
JK Smith Unit 1	2022	10	5.97%
JK Smith Unit 2	2022	5	8.29%
JK Smith Unit 2	2022	6	19.09%

JK Smith Unit 2	2022	7	28.09%
JK Smith Unit 2	2022	8	16.93%
JK Smith Unit 2	2022	9	1.38%
JK Smith Unit 2	2022	10	3.57%
JK Smith Unit 3	2022	5	8.67%
JK Smith Unit 3	2022	6	19.60%
JK Smith Unit 3	2022	7	28.71%
JK Smith Unit 3	2022	8	16.99%
JK Smith Unit 3	2022	9	2.03%
JK Smith Unit 3	2022	10	1.34%
JK Smith Unit 4	2022	5	11.83%
JK Smith Unit 4	2022	6	23.81%
JK Smith Unit 4	2022	7	25.44%
JK Smith Unit 4	2022	8	12.31%
JK Smith Unit 4	2022	9	6.57%
JK Smith Unit 4	2022	10	1.33%
JK Smith Unit 5	2022	5	12.07%
JK Smith Unit 5	2022	6	23.69%
JK Smith Unit 5	2022	7	26.02%
JK Smith Unit 5	2022	8	12.70%
JK Smith Unit 5	2022	9	7.75%
JK Smith Unit 5	2022	10	1.36%
JK Smith Unit 6	2022	5	12.14%
JK Smith Unit 6	2022	6	26.54%
JK Smith Unit 6	2022	7	27.50%
JK Smith Unit 6	2022	8	12.93%
JK Smith Unit 6	2022	9	6.38%
JK Smith Unit 6	2022	10	1.51%
JK Smith Unit 7	2022	5	12.12%
JK Smith Unit 7	2022	6	25.55%
JK Smith Unit 7	2022	7	26.16%
JK Smith Unit 7	2022	8	12.28%
JK Smith Unit 7	2022	9	4.47%
JK Smith Unit 7	2022	10	1.41%
JK Smith Unit 9	2022	5	-0.17%
JK Smith Unit 9	2022	6	-0.21%
JK Smith Unit 9	2022	7	-0.22%
JK Smith Unit 9	2022	8	7.00%
JK Smith Unit 9	2022	9	14.63%

JK Smith Unit 9	2022	10	12.41%
JK Smith Unit 10	2022	5	31.95%
JK Smith Unit 10	2022	6	41.30%
JK Smith Unit 10	2022	7	10.24%
JK Smith Unit 10	2022	8	11.27%
JK Smith Unit 10	2022	9	7.13%
JK Smith Unit 10	2022	10	0.09%
Spurlock Unit 1	2022	5	86.86%
Spurlock Unit 1	2022	6	69.64%
Spurlock Unit 1	2022	7	75.04%
Spurlock Unit 1	2022	8	82.02%
Spurlock Unit 1	2022	9	54.59%
Spurlock Unit 1	2022	10	53.24%
Spurlock Unit 2	2022	5	84.46%
Spurlock Unit 2	2022	6	52.10%
Spurlock Unit 2	2022	7	84.54%
Spurlock Unit 2	2022	8	86.45%
Spurlock Unit 2	2022	9	58.07%
Spurlock Unit 2	2022	10	63.57%
Spurlock Unit 3	2022	5	27.42%
Spurlock Unit 3	2022	6	63.68%
Spurlock Unit 3	2022	7	81.64%
Spurlock Unit 3	2022	8	85.41%
Spurlock Unit 3	2022	9	74.61%
Spurlock Unit 3	2022	10	67.16%
Spurlock Unit 4	2022	5	95.83%
Spurlock Unit 4	2022	6	82.38%
Spurlock Unit 4	2022	7	80.29%
Spurlock Unit 4	2022	8	88.26%
Spurlock Unit 4	2022	9	80.95%
Spurlock Unit 4	2022	10	50.65%
Bavarian County Landfill Unit 1	2022	5	94.00%
Bavarian County Landfill Unit 1	2022	6	80.02%
Bavarian County Landfill Unit 1	2022	7	83.35%
Bavarian County Landfill Unit 1	2022	8	96.67%
Bavarian County Landfill Unit 1	2022	9	82.42%
Bavarian County Landfill Unit 1	2022	10	88.22%
Bavarian County Landfill Unit 2	2022	5	97.65%

Bavarian County Landfill Unit 2	2022	6	87.00%
Bavarian County Landfill Unit 2	2022	7	80.50%
Bavarian County Landfill Unit 2	2022	8	102.61%
Bavarian County Landfill Unit 2	2022	9	84.06%
Bavarian County Landfill Unit 2	2022	10	95.90%
Bavarian County Landfill Unit 3	2022	5	85.37%
Bavarian County Landfill Unit 3	2022	6	83.74%
Bavarian County Landfill Unit 3	2022	7	71.32%
Bavarian County Landfill Unit 3	2022	8	103.34%
Bavarian County Landfill Unit 3	2022	9	83.62%
Bavarian County Landfill Unit 3	2022	10	86.58%
Bavarian County Landfill Unit 4	2022	5	49.55%
Bavarian County Landfill Unit 4	2022	6	79.35%
Bavarian County Landfill Unit 4	2022	7	70.99%
Bavarian County Landfill Unit 4	2022	8	37.50%
Bavarian County Landfill Unit 4	2022	9	-1.69%
Bavarian County Landfill Unit 4	2022	10	-1.97%
Bavarian County Landfill Unit 5	2022	5	80.89%
Bavarian County Landfill Unit 5	2022	6	71.53%
Bavarian County Landfill Unit 5	2022	7	69.64%
Bavarian County Landfill Unit 5	2022	8	82.79%
Bavarian County Landfill Unit 5	2022	9	48.66%
Bavarian County Landfill Unit 5	2022	10	80.66%
Glasgow County Landfill Unit 1	2022	5	49.76%
Glasgow County Landfill Unit 1	2022	6	60.32%
Glasgow County Landfill Unit 1	2022	7	64.69%
Glasgow County Landfill Unit 1	2022	8	73.68%
Glasgow County Landfill Unit 1	2022	9	63.65%
Glasgow County Landfill Unit 1	2022	10	64.83%
Green Valley Landfill Unit 1	2022	5	98.38%
Green Valley Landfill Unit 1	2022	6	87.56%
Green Valley Landfill Unit 1	2022	7	92.87%
Green Valley Landfill Unit 1	2022	8	96.57%
Green Valley Landfill Unit 1	2022	9	81.13%
Green Valley Landfill Unit 1	2022	10	91.49%
Green Valley Landfill Unit 2	2022	5	99.14%
Green Valley Landfill Unit 2	2022	6	83.56%
Green Valley Landfill Unit 2	2022	7	86.33%
Green Valley Landfill Unit 2	2022	8	88.32%

Green Valley Landfill Unit 2	2022	9	72.35%
Green Valley Landfill Unit 2	2022	10	28.58%
Green Valley Landfill Unit 3	2022	5	83.36%
Green Valley Landfill Unit 3	2022	6	87.15%
Green Valley Landfill Unit 3	2022	7	91.05%
Green Valley Landfill Unit 3	2022	8	87.10%
Green Valley Landfill Unit 3	2022	9	81.88%
Green Valley Landfill Unit 3	2022	10	98.89%
Hardin County Landfill Unit 1	2022	5	51.50%
Hardin County Landfill Unit 1	2022	6	56.41%
Hardin County Landfill Unit 1	2022	7	95.29%
Hardin County Landfill Unit 1	2022	8	33.27%
Hardin County Landfill Unit 1	2022	9	91.71%
Hardin County Landfill Unit 1	2022	10	50.86%
Hardin County Landfill Unit 2	2022	5	29.36%
Hardin County Landfill Unit 2	2022	6	60.26%
Hardin County Landfill Unit 2	2022	7	34.73%
Hardin County Landfill Unit 2	2022	8	94.33%
Hardin County Landfill Unit 2	2022	9	12.75%
Hardin County Landfill Unit 2	2022	10	15.67%
Hardin County Landfill Unit 3	2022	5	82.16%
Hardin County Landfill Unit 3	2022	6	59.97%
Hardin County Landfill Unit 3	2022	7	51.94%
Hardin County Landfill Unit 3	2022	8	81.51%
Hardin County Landfill Unit 3	2022	9	75.64%
Hardin County Landfill Unit 3	2022	10	72.02%
Laurel Ridge Landfill Unit 1	2022	5	54.52%
Laurel Ridge Landfill Unit 1	2022	6	29.33%
Laurel Ridge Landfill Unit 1	2022	7	67.70%
Laurel Ridge Landfill Unit 1	2022	8	41.34%
Laurel Ridge Landfill Unit 1	2022	9	60.07%
Laurel Ridge Landfill Unit 1	2022	10	7.49%
Laurel Ridge Landfill Unit 2	2022	5	66.14%
Laurel Ridge Landfill Unit 2	2022	6	65.79%
Laurel Ridge Landfill Unit 2	2022	7	27.12%
Laurel Ridge Landfill Unit 2	2022	8	75.94%
Laurel Ridge Landfill Unit 2	2022	9	25.32%
Laurel Ridge Landfill Unit 2	2022	10	29.83%

Laurel Ridge Landfill Unit 3	2022	5	55.17%
Laurel Ridge Landfill Unit 3	2022	6	18.61%
Laurel Ridge Landfill Unit 3	2022	7	0.84%
Laurel Ridge Landfill Unit 3	2022	8	27.85%
Laurel Ridge Landfill Unit 3	2022	9	53.64%
Laurel Ridge Landfill Unit 3	2022	10	-2.45%
Laurel Ridge Landfill Unit 4	2022	5	65.30%
Laurel Ridge Landfill Unit 4	2022	6	35.36%
Laurel Ridge Landfill Unit 4	2022	7	65.22%
Laurel Ridge Landfill Unit 4	2022	8	48.23%
Laurel Ridge Landfill Unit 4	2022	9	-2.17%
Laurel Ridge Landfill Unit 4	2022	10	52.23%
Pendleton County Landfill Unit 1	2022	5	90.95%
Pendleton County Landfill Unit 1	2022	6	33.83%
Pendleton County Landfill Unit 1	2022	7	90.75%
Pendleton County Landfill Unit 1	2022	8	104.40%
Pendleton County Landfill Unit 1	2022	9	85.40%
Pendleton County Landfill Unit 1	2022	10	85.99%
Pendleton County Landfill Unit 2	2022	5	103.82%
Pendleton County Landfill Unit 2	2022	6	35.37%
Pendleton County Landfill Unit 2	2022	7	86.20%
Pendleton County Landfill Unit 2	2022	8	98.84%
Pendleton County Landfill Unit 2	2022	9	76.50%
Pendleton County Landfill Unit 2	2022	10	80.37%
Pendleton County Landfill Unit 3	2022	5	94.44%
Pendleton County Landfill Unit 3	2022	6	35.42%
Pendleton County Landfill Unit 3	2022	7	7.22%
Pendleton County Landfill Unit 3	2022	8	-4.08%
Pendleton County Landfill Unit 3	2022	9	-3.69%
Pendleton County Landfill Unit 3	2022	10	68.62%
Pendleton County Landfill Unit 4	2022	5	84.32%
Pendleton County Landfill Unit 4	2022	6	28.68%
Pendleton County Landfill Unit 4	2022	7	81.23%
Pendleton County Landfill Unit 4	2022	8	85.00%
Pendleton County Landfill Unit 4	2022	9	85.44%
Pendleton County Landfill Unit 4	2022	10	93.93%

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 16
RESPONSIBLE PARTY: Craig A. Johnson

Request 16. a. For the last six months of the period under review, explain whether EKPC made any changes to its maintenance and operation practices or completed any specific generation efficiency improvements that affect fuel usage at EKPC's generation facilities.

b. Describe the impact of these changes on EKPC's fuel usage.

Response 16. EKPC made no changes to its maintenance and operation practices that affect fuel usage at any of its generation facilities during the last six months of the period under review.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 17
RESPONSIBLE PARTY: Julia J. Tucker

Request 17. For the last six months of the period under review provide the hour by hour availability of each generating unit availability, how the unit had been bid into the day ahead market, whether the unit was operating, and if operating the minimum (economic or operational) and maximum capacity of the unit.

Response 17. Please see excel spreadsheet, CONFIDENTIAL - F*AC 2-yr Review Response 17.xlsx*, subject to motion for confidential treatment.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 18
RESPONSIBLE PARTY: Mark Horn

Request 18. State whether EKPC is aware of any violations of its policies and procedures regarding fuel procurement that occurred prior to or during the last six months of the period under review.

Response 18. EKPC is not aware of any violations of its policies and procedures regarding fuel procurement.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 19
RESPONSIBLE PARTY: Michelle K. Carpenter

Request 19. State whether EKPC is aware of any violations of 807 KAR 5:056 that occurred prior to or during the last six months of the period under review.

Response 19. EKPC is not aware of any violations of 807 KAR 5:056 occurring prior to or during the period under review.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 20
RESPONSIBLE PARTY: Julia J. Tucker

Request 20. Describe the effect on the FAC calculation of line losses related to:

a. Intersystem sales when using a third-party transmission system; and

b. Intersystem sales when not using a third-party transmission system.

Response 20a. None

Response 20b. None

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 21
RESPONSIBLE PARTY: Mark Horn

Request 21. State whether all fuel contracts related to commodity and transportation have been filed with the Commission. If any contracts have not been filed, explain why they have not been filed and provide a copy.

Response 21. All fuel contracts related to commodity and transportation have been filed with the Commission.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 22
RESPONSIBLE PARTY: Mark Horn

Request 22. For each generating station, state the methods of coal delivery currently available.

Response 22. Truck and rail transportation are currently available at Cooper Power Station. Barge and rail transportation are available at Spurlock Power Station.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 23
RESPONSIBLE PARTY: Isaac S. Scott

Request 23. If a change in the base fuel cost is proposed, state the month to be used as the base period (b). If the base period results in a fuel cost other than one representative of current costs as prescribed by 807 KAR 5:056, Section 1(2), explain why this base period was selected. If no change is proposed, include an explanation of the reason(s) EKPC believes the current base period fuel cost should remain unchanged.

Response 23. After review of the past, current, and projected fuel costs, EKPC proposes that the October 2021 fuel cost of $0.03749/kWh be used as the base fuel cost over the next two years. This represents a $0.01125/kWh increase from the current base fuel cost of $0.02624/kWh. The current two-year review period covers the months of November 2020 through October 2022. Based upon a review of those months, EKPC's total fuel cost ranged from a low of $0.01917/kWh in April 2021 to a high of $0.04752/kWh in September 2022. The average total fuel cost for the 24-month period under review was $0.03150/kWh.

In determining a representative month for the base fuel cost, EKPC followed the same essentially mathematical approach it employed for the three previous two-year FAC review proceedings.

EKPC believes this approach overall is objective and a reasonable way to determine the representative month. Using this approach, EKPC considered the expected costs for coal, natural gas, and market purchases for 2023 and 2024 and compared those estimates to the levels of costs experienced during the current two-year review period. These expected costs were prepared in conjunction with the development of EKPC's budgets for 2023 and 2024.

Coal costs were expected to be significantly higher in 2023 and 2024 for both the Cooper and the Spurlock generating units compared to the average of actual coal prices for the review period. When compared to the average of actual coal prices for 2021, coal costs were expected to be significantly higher for both Cooper and Spurlock. When compared to the 10-month average of actual coal prices for 2022, coal costs were expected to be slightly higher for Cooper but significantly higher overall for Spurlock. Natural gas cost in 2023 and 2024 for both the Smith and Bluegrass combustion turbines were expected to be higher when compared to the average of actual natural gas prices for 2021. When compared to the 10-month average of actual natural gas prices for 2022, natural gas costs were expected to be lower for both Smith and Bluegrass. Finally, the price of market purchases were expected to be lower in 2023 and 2024 than were experienced during the last half of the review period.

Given the significantly higher expected coal costs for Spurlock over 2022 levels, and the lower natural gas and market purchase prices over 2022 levels, it did not appear that the expected increases in coal prices would be totally offset by the expected decreases in natural gas and market purchase prices. After considering these expected costs, it did not appear to be reasonable that the representative month would be one where the actual monthly fuel cost is below the average total fuel cost for the 24-month period. This conclusion results in the elimination of 11 of the 24 months

from consideration as a representative month. EKPC also eliminated from consideration as the representative month the month with the highest actual monthly fuel cost, as it appeared to be an outlier.

For the remaining 12 months, the total actual fuel costs ranged from a low of $0.03331/kWh in April 2022 to a high of $0.04593/kWh in August 2022. The average of the total actual fuel costs for the remaining 12 months was $0.03846/kWh. The average of the actual resource mixes for these 12 months was 72.38% generation and 27.62% purchased.

In addition, EKPC considered the resource and generation mixes expected for 2023 and 2024 when determining a representative month for base fuel costs. A comparison of the budgeted resource and generation mixes for 2023 and 2024 with the 12 months is shown below.

Actual Fuel Costs ($ / kWh)	Resource Mix		
	Expense Month	Generation	Purchases
$0.03410	December 2021	49.94%	50.09%
$0.04384	November 2021	52.05%	47.95%
$0.03749	October 2021	62.08%	37.92%
	2024 Budget	**65.06%**	**34.94%**
$0.03367	March 2022	65.29%	34.71%
$0.03618	January 2022	66.05%	33.95%
	2023 Budget	**67.01%**	**32.99%**
$0.04145	October 2022	67.51%	32.49%
$0.03625	February 2022	69.57%	30.43%
$0.04272	June 2022	78.87%	21.13%
$0.03331	April 2022	87.27%	12.74%
$0.04593	August 2022	87.62%	12.38%
$0.04110	July 2022	89.39%	10.61%
$0.03542	May 2022	89.99%	10.00%

Generation Mix						
Expense Month	Cooper	Spurlock 1	Spurlock 2	Gilbert	Spurlock 4	CT & Landfills
2023 Budget	**0.00%**	**16.13%**	**31.39%**	**17.62%**	**18.25%**	**16.60%**
2024 Budget	**0.09%**	**18.75%**	**32.39%**	**16.33%**	**17.22%**	**15.21%**
December 2021	0.25%	29.10%	3.96%	28.78%	32.36%	5.43%
November 2021	-0.30%	33.53%	-0.24%	33.50%	15.62%	17.75%
October 2021	3.09%	33.88%	-0.20%	34.20%	16.29%	12.57%
March 2022	-0.26%	2.31%	44.77%	23.27%	24.51%	5.24%
January 2022	14.40%	16.41%	31.62%	15.65%	13.19%	8.68%
October 2022	0.77%	19.04%	39.89%	20.57%	15.51%	4.02%
February 2022	8.09%	18.34%	33.37%	18.27%	19.10%	2.74%
June 2022	9.84%	17.41%	22.56%	13.74%	17.78%	18.52%
April 2022	-0.19%	20.12%	39.30%	16.11%	19.55%	4.98%
August 2022	5.64%	17.31%	32.81%	16.10%	16.63%	11.36%
July 2022	9.06%	14.60%	29.52%	14.18%	13.95%	18.60%
May 2022	2.54%	21.50%	37.74%	6.06%	21.18%	10.85%

Only two of the 12 months under consideration as the representative month fell within the range of the budgeted resource mix for 2023 and 2024. However, there were no good matches when comparing the actual generation mixes with the budgeted generation mixes for 2023 and 2024. As the final step in determining the representative month, EKPC took the expected changes in the cost of coal, natural gas, and market purchases and estimated average fuel costs using the budgeted resource and generation mixes for 2023 and 2024.

Estimated Average Fuel Costs ($ / kWh)			
Period	Low	High	Midpoint
2023 Budget	$0.04111	$0.06119	$0.05115
2024 Budget	$0.04171	$0.06194	$0.05183

These estimated average fuel costs were then compared to the actual fuel costs experienced in the 12 months under consideration as the representative month. EKPC eliminated four months from

consideration because a) the resource mix did not fit well with the budget expectations, b) the generation mix did not align well with the budget expectations, and c) the actual fuel costs were lower than the range of estimated average fuel costs: December 2021, April 2022, May 2022, and February 2022. While the resource mix did fit well with the budget expectations, EKPC eliminated March 2022 and January 2022 from consideration because the generation mix did not align well with the budget expectations and the actual fuel costs were lower than the range of estimated average fuel costs. Lastly, while the actual fuel costs were within the range of estimated average fuel costs, EKPC eliminated November 2021 and August 2022 from consideration because the resource mix did not fit well with the budget expectations and the generation mix did not align well with the budget expectations.

The evaluation to determine a representative month so far followed the mathematical approach that EKPC has previously utilized in its three previous FAC two-year review proceedings. In the evaluation of the remaining four months under consideration as a representative month, EKPC believes it is necessary to include a subjective perspective to the analysis. In the ten months between the end of the review period and the Commission's opening of the current proceeding, the costs for coal, natural gas, and market purchases have all moderated from the levels seen during 2022. Applying this perspective to the mathematical approach would support looking at months with actual fuel costs near the lower end of the estimated average fuel costs. This step would eliminate June 2022 from consideration, because not only were its actual fuel costs high, but the resource mix did not fit well with the budget expectations and the generation mix did not align well with the budget expectations. While the actual fuel costs for July 2022 were slightly below

the estimated average fuel costs lower range, EKPC believe this month should be eliminated from consideration as that month has the same problems with resource and generation mix as June 2022. This leaves two months remaining for consideration as the representative month – October 2022 and October 2021. Both are close, but outside of the budget expectation range for the resource mix. If EKPC were to make its recommendation from just the mathematic approach, it would be recommending the month of October 2022, even though the generation mix does not align well with the budget expectations. However, recommending October 2022 as the representative month would not sufficiently take into consideration the moderation in costs that have been observed in the ten months since the end of the review period. EKPC believes that including the subjective perspective in the evaluation supports the selection of October 2021 as the representative month. EKPC prepared the following table comparing the nine FAC filings it has made between the end of the review period and the Commission's opening of this proceeding.

Comparison of FAC Filings and October 2021 Fuel Costs as the New Base Fuel Cost			
FAC Expense Month	Actual Fuel Costs	FAC at Current Base Fuel of $0.02624/kWh	FAC at October 2021 Fuel Cost of $0.03749/kWh
November 2022	$0.04158	$0.01534	$0.00409
December 2022	$0.04879	$0.02255	$0.01130
January 2023	$0.03773	$0.01149	$0.00024
February 2023	$0.03517	$0.00893	($0.00232)
March 2023	$0.03580	$0.00956	($0.00169)
April 2023	$0.03743	$0.01119	($0.00006)
May 2023	$0.03082	$0.00458	($0.00667)
June 2023	$0.03308	$0.00684	($0.00441)
July 2023	$0.03741	$0.01117	($0.00008)
Mathematic Averages	$0.03753	$0.01129	$0.00004

While the monthly fuel costs fluctuate from month to month, EKPC believes the average of the actual fuel costs and the average of the restated FAC support the reasonableness of selecting October 2021 as the representative month. In addition, the total Spurlock portion of the generation mix for October 2021 is within the range of the budget expectations. After considering all the factors, EKPC determined that the October 2021 fuel costs reflect the most representative level of fuel costs going forward. EKPC recommends that the October 2021 fuel cost of $0.03749/kWh be used as the base fuel cost over the next two years.

EKPC is providing the analysis utilized to determine the recommended representative month, the Excel spreadsheet filename *PSC DR1 Response 23 CONFIDENTIAL.xlsx*, subject to a motion for confidential treatment. The spreadsheet includes 2023 and 2024 estimated prices for coal, natural gas, and market purchases and expected generation and power purchase data in MWh for 2023 and 2024.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 24
RESPONSIBLE PARTY: Isaac S. Scott

Request 24. Provide a calculation of the fossil fuel costs F(b) that EKPC proposes to use to calculate the base period fuel cost. This calculation shall show each component of F(b) as defined by 807 KAR 5:056. Explain why the fuel cost in the selected base period is representative of the level of fuel cost currently being experienced by EKPC.

Response 24. Please see pages 2 through 5 of this response for the October 2021 information. As discussed in the response to Request 23, EKPC reasonably expects the cost for coal to be higher during the next two years than the average cost levels experienced during the current two-year review period. This increase will be partially offset by expected reductions in the cost for natural gas and market purchases. Consequently, the fuel costs currently being experienced by EKPC should not be considered representative. After considering the effects of the expected changes in coal, natural gas, and market purchases prices, the expected resource and generation mixes, and the actual fuel costs experienced between the end of the review period and the Commission's opening of the current review proceeding, EKPC believes the October 2021 fuel costs are representative of the fuel costs that can be expected for the next two years.

Company EAST KENTUCKY POWER COOPERATIVE

FUEL ADJUSTMENT CLAUSE SCHEDULE

Month Ended OCTOBER 2021

					FAC Factor*
Fuel Fm (Fuel Cost Schedule)		34,011,637			
----------	=	----------	=	(+)	$0.03749
Sales Sm (Sales Schedule)		907,218,130			
Fuel (Fb)		$27,132,349			
----------	=	----------	=	(-)	$0.02624
Sales (Sb)		1,034,022,558			----------
					$0.01125

Effective Date for Billing DECEMBER 2021

Submitted by Michelle K. Carpenter

(Signature) MICHELLE K. CARPENTER, CPA

Title CONTROLLER

Date Submitted NOVEMBER 19, 2021

* (Five decimal places in dollars or three decimal places in cents - normal rounding)

Company EAST KENTUCKY POWER COOPERATIVE

FUEL COST SCHEDULE

Month Ended OCTOBER 2021

(A) Company Generation		
Coal and TDF Burned	(+)	9,769,152
Oil Burned	(+)	204,004
Gas Burned	(+)	3,811,317
PJM Day Ahead and Balancing	(+)	404,004
Fuel (Assigned Cost during F.O.)	(+)	0
Fuel (Substitute for F.O.)	(-)	0
		14,188,477
(B) Purchases		
Net Energy Cost - Economy Purchases	(+)	19,894,632
Identifiable Fuel Cost - Other Purchases	(+)	-
Identifiable Fuel Cost - (Substitute for F.O.)	(-)	0
		19,894,632
Subtotal		34,083,109
(C) Inter-System Sales		
Fuel Costs		37,896
		-
		37,896
(D) Over or (Under) Recovery from Page 4		33,576
Total Fuel Cost (A + B - C - D)		34,011,637

* Note: Included in the Coal Burned is the Physical Inv Adj. for Coal of ($94,437).
Included in Oil Burned is the Physical Inv Adj. for Oil of $133,747.

F.O. = Forced Outage

Company EAST KENTUCKY POWER COOPERATIVE

SALES SCHEDULE

Month Ended OCTOBER 2021

(A)				
Generation (Net)			(+)	570,266,567
Purchases			(+)	348,373,323
Inadvertent Interchange		In	(+)	0
				918,639,890
(B)				
Pumped Storage Energy			(+)	0
Inter-System Sales Including Interchange Out			(+)	721,000
Inadvertent Interchange		Out	(+)	0
System Losses			(+)	10,700,760
				11,421,760
(C)				
Total Sales	(A - B - C)			907,218,130

Company EAST KENTUCKY POWER COOPERATIVE

OVER OR (UNDER)-RECOVERY SCHEDULE

Month Ended OCTOBER 2021

1. Last FAC Rate Billed			($0.00090)
	(1)		
2. KWH Billed at Above Rate			907,218,130
3. FAC Revenue/(Refund) (L1 x L2)		**	($816,496)
	(1)		
4. KWH Used to Determine Last FAC Rate			944,524,950
5. Non-Jurisdictional KWH (Included in L4)			0
	(1)		
6. Kentucky Jurisdictional KWH (Included in L4) (L4 - L5)			944,524,950
7. Recoverable FAC Revenue/(Refund) (L1 x L6)			($850,072)
8. Over or (Under) Recovery (L3 - L7)			$33,576
	(1)		
9. Total Sales (Page 3)			907,218,130
	(1)		
10. Kentucky Jurisdictional Sales			907,218,130
11. Ratio of Total Sales to Kentucky Jurisdictional Sales (L9 \ L10)			1
12. Total Company Over (Under) Recovery (L8 x L11) (Page 2, Line D)			$33,576

**FAC Revenue/(Refund) on Line 3 reflects actual amount of charge or credit due

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 25
RESPONSIBLE PARTY: Isaac S. Scott

Request 25. Provide a schedule showing each component of sales as defined by 807 KAR 5:056 in the selected base period (b). Explain why EKPC believes that the sales in the selected base period (b) are representative of the level of kWh sales that EKPC will derive from the level of fuel cost incurred during the selected base period (b). a. Separately provide the amounts of power purchases used in the calculation of sales provided. b. Separately provide the amounts of intersystem power sales used in the calculation of sales provided.

Response 25. Each component of sales is given below and shown in the response to Request 24, page 4 of 5.

Owner-Member Sales 907,218,130 kWh

Inter-System Sales 721,000 kWh

The annualized kwh sales to owner-members for the October 2021 base period total 10,886,617,560 kWh. This sales volume is lower than the projected sales to owner-members for 2023 of 13,970,074,127 kWh and for 2024 of 15,210,918,165 kWh as shown in the response to

Request 33. October generally is what is known as a "shoulder" month, where sales are normally lower than what would be expected in the peak winter months. When annualizing the sales for the month, it would not be surprising that the annualized total would be lower than the overall expected sales for the year. Taking these factors into consideration, EKPC believes that October 2021 is still representative.

The annualized inter-system sales for the base period would be 8,652,000 kWh. Projected inter-system sales for 2023 are 318,431,000 kWh and for 2024 are 301,816,000 kWh. Inter-system sales generally represent a small percentage of EKPC's total sales. During the November 2020 to October 2022 period, inter-system sales represented approximately 2.5 percent of total sales. While the inter-system sales for the base period represent a lower percentage of total sales than the average for the review period, EKPC still believes that October 2021 is still representative.

Response 25a. Please see the power purchases information below.

Purchased from	kWh Purchased
Cox Interior	213,425
Lock 7 Generator	992,399
National Guard Armory	1,592
PJM	347,278,000
Southeast Power	19,137,000
Shell Energy	12,000,000
TGP Purchases – excluded from FAC	(31,249,093)
Total	348,373,323

Response 25b. The 721,000 kWh in inter-system sales reported for October 2021, as shown in the response to Request 24, were to PJM.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 26
RESPONSIBLE PARTY: Isaac S. Scott

Request 26. Provide a schedule showing the calculation of EKPC's proposed increase or decrease in its base fuel cost per kWh to be incorporated into its base rate.

Response 26. Please see the schedule below.

Item	$ / kWh
Proposed Base Fuel Cost – October 2021 Month	$0.03749
Current Base Fuel Cost – Case No. 2019-00003 – February 2018 Month	$0.02624
Proposed Increase	$0.01125

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 27
RESPONSIBLE PARTY: Isaac S. Scott

Request 27. Provide a schedule of the present and proposed rates that EKPC seeks to change pursuant to 807 KAR 5:056, shown in comparative form.

Response 27. Please see the schedule below for the present and proposed rates. EKPC also requests that the proposed rates become effective for service rendered on the first day of the month after the date of the Commission's Order in this review case.

Energy Charge	Present Rates	Proposed Rates
Rate B	$0.039884/kWh	$0.051134/kWh
Rate C	$0.039884/kWh	$0.051134/kWh
Rate E		
Option 1 – On-Peak	$0.042591/kWh	$0.053841/kWh
Option 1 – Off-Peak	$0.042013/kWh	$0.053263/kWh
Option 2 – On-Peak	$0.051399/kWh	$0.062649/kWh
Option 2 – Off-Peak	$0.042674/kWh	$0.053924/kWh
Rate G	$0.037780/kWh	$0.049030/kWh
Special Contracts		
Nucor Steel Gallatin On-Peak	$0.039567/kWh	$0.050817/kWh
Nucor Steel Gallatin Off-Peak	$0.036139/kWh	$0.047389/kWh
International Paper Steam Service	$4.266/MMBtu	$5.391/MMBtu
FAC Base Fuel Cost	$0.02624/kWh	$0.03749/kWh

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 28
RESPONSIBLE PARTY: Isaac S. Scott

Request 28. Provide a copy of the current tariff showing by cross-outs and inserts all proposed changes in rates.

Response 28. Please see pages 2 through 8 of this response.

EAST KENTUCKY POWER COOPERATIVE, INC FOR ALL COUNTIES SERVED

P.S.C. No. 35, ~~First~~ *Second* Revised Sheet No. 5
Canceling P.S.C. No. 35, ~~Original~~ *First Revised* Sheet No. 5

Rate B

Applicability

In all territories of owner-member cooperatives ("owner-members") of East Kentucky Power Cooperative, Inc. ("EKPC"). T T

Availability

Available to owner-members and end-use retail members ("retail members") willing to execute EKPC-approved contracts for demands of 500 kW or greater and a monthly minimum energy usage equal to or greater than 400 hours per kW of contract demand. Wholesale monthly contract demand shall be agreed between the owner-member and EKPC. The electric power and energy furnished hereunder shall be separately metered for each point of delivery. T

Monthly Rate

Demand Charge per kW of Contract Demand	$7.49	T I
Demand Charge per kW of Billing Demand in Excess of Contract Demand	$9.98	T
Energy Charge per kWh	$ ~~.039884~~ *.051134*	I

Billing Demand

The billing demand shall be the contract demand plus any excess demand. Excess demand occurs when the retail member's highest demand during the current month, coincident with EKPC's system peak (coincident peak), exceeds the contract demand. EKPC's system peak demand is the highest average rate at which energy is used during any fifteen(15)-minute interval in the below listed hours for each month and adjusted for power factor as provided herein: T T

Months	Hours Applicable for Demand Billing - EPT
October through April	7:00 a.m. to 12:00 noon
	5:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

Minimum Monthly Charge

The minimum monthly charge shall not be less than the sum of (a) and (b) below: T

a. The product of the contract demand multiplied by the demand charge, plus
b. The product of the contract demand multiplied by 400 hours and the energy charge per kWh minus the fuel base per kWh as established in the Fuel Adjustment Clause.

DATE OF ISSUE: ~~April 1, 2021~~ *September 22, 2023*

DATE EFFECTIVE: Service rendered on and after ~~October 1, 2021~~

ISSUED BY: _____
Anthony S. Campbell,
President and Chief Executive Officer

Issued by authority of an Order of the Public Service Commission of Kentucky in Case No. ~~2021-00103~~ *2023-00009* dated ~~September 30, 2021~~.

EAST KENTUCKY POWER COOPERATIVE, INC FOR ALL COUNTIES SERVED

P.S.C. No. 35, ~~First~~ *Second* Revised Sheet No. 7
Canceling P.S.C. No. 35, ~~Original~~ *First Revised* Sheet No. 7

Rate C

Applicability

In all territories of owner-member of EKPC. T

Availability

Available to owner-members and retail members willing to execute EKPC-approved contracts for demands of 500 kW or greater and a monthly minimum energy usage equal to or greater than 400 hours per kW of billing demand. The electric power and energy furnished hereunder shall be separately metered for each point of delivery. T

Monthly Rate

Demand Charge per kW of Billing Demand	$7.49	I
Energy Charge per kWh	~~$.039884~~ *.051134*	I

Billing Demand

The billing demand shall be the greater of (a) or (b) listed below: T

a. The contract demand; or T
b. The retail member's highest demand during the current month or preceding eleven months coincident with EKPC's system peak demand. EKPC's system peak demand is the highest average rate at which energy is used during any fifteen (15)-minute interval in the below listed hours for each month and adjusted for power factor as provided herein:

Months	Hours Applicable for Demand Billing - EPT
October through April	7:00 a.m. to 12:00 noon
	5:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

Minimum Monthly Charge

The minimum monthly charge shall not be less than the sum of (a) and (b) below:

a. The product of the billing demand multiplied by the demand charge, plus
b. The product of the billing demand multiplied by 400 hours and the energy charge per kWh minus the fuel base per kWh as established in the Fuel Adjustment Clause. T

DATE OF ISSUE: ~~April 1, 2021~~ *September 22, 2023*

DATE EFFECTIVE: Service rendered on and after ~~October 1, 2021~~

ISSUED BY: _____
Anthony S. Campbell,
President and Chief Executive Officer

Issued by authority of an Order of the Public Service Commission of Kentucky in Case No. ~~2021-00103~~ *2023-00009* dated ~~September 30, 2021~~.

EAST KENTUCKY POWER COOPERATIVE, INC **FOR ALL COUNTIES SERVED**

P.S.C. No. 35, ~~First~~ *Second* Revised Sheet No. 9
Canceling P.S.C. No. 35, ~~Original~~ *First Revised* Sheet No. 9

Rate E

Applicability

In all territories of owner-member of EKPC. T

Availability

Available to all owner-members of EKPC for all power usage at the load center not subject to the provisions of Rate B, Rate C, or Rate G of this tariff and special contract participants. The electric power and energy furnished hereunder shall be separately metered for each point of delivery. T T

Monthly Rate - Per Load Center

An owner-member may select either Option 1 or Option 2 of this section of the tariff to apply to all load centers. The owner-member must remain on a selected option for at least one (1) year and may change options, no more often than every twelve (12) months, after giving a minimum notice of two (2) months advance notice of an election to change options. T

	Option 1	Option 2	
Demand Charge per kW of Billing Demand	$8.49	$6.52	I
Energy Charge per kWh			
On-Peak kWh	$ ~~.042591~~ *.053841*	$ ~~.051399~~ *.062649*	I
Off-Peak kWh	$ ~~.042013~~ *.053263*	$ ~~.042674~~ *.053924*	I

On-peak and off-peak hours are provided below:

Months	On-Peak Hours - EPT	Off-Peak Hours – EPT
October through April	7:00 a.m. to 12:00 noon	12:00 noon to 5:00 p.m.
	5:00 p.m. to 10:00 p.m.	10:00 p.m. to 7:00 a.m.
May through September	10:00 a.m. to 10:00 p.m.	10:00 p.m. to 10:00 a.m.

DATE OF ISSUE: ~~April 1, 2021~~ *September 22, 2023*

DATE EFFECTIVE: Service rendered on and after ~~October 1, 2021~~

ISSUED BY: _____
Anthony S. Campbell,
President and Chief Executive Officer

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. ~~2021-00103~~ *2023-00009* dated ~~September 30, 2021~~.

P.S.C. No. 35, ~~First~~ *Second* Revised Sheet No. 12
Canceling P.S.C. No. 35, ~~Original~~ *First Revised* Sheet No. 12

Rate G

SPECIAL ELECTRIC CONTRACT RATE

Applicability N

In all territories of owner-member of EKPC.

Availability

Available to all owner-members and retail members willing to execute EKPC-approved contracts. The electric power and energy furnished hereunder shall be separately metered for each point of delivery.

Character of Service

Three-phase 60 Hertz alternating current as specified in the special contract for purchased power. T

Monthly Rate

Demand Charge per kW of Billing Demand	$7.30	T I
Energy Charge per kWh	$ ~~.037780~~ *.049030*	T I

Determination of Billing Demand

The billing demand shall be the greater of (a) or (b) listed below: T

a. The contract demand; or T

b. The retail member's highest demand during the current month or preceding eleven months coincident with EKPC's system peak demand. EKPC's system peak demand is the highest average rate at which energy is used during any fifteen (15)-minute interval in the below listed hours for each month and adjusted for power factor as provided herein:

Months	Hours Applicable for Demand Billing – EPT
October through April	7:00 a.m. to 12:00 noon
	5:00 p.m. to 10:00 p.m.
May through September	10:00 a.m. to 10:00 p.m.

DATE OF ISSUE: ~~April 1, 2021~~ *September 22, 2023*

DATE EFFECTIVE: Service rendered on and after ~~October 1, 2021~~

ISSUED BY: _____
Anthony S. Campbell,
President and Chief Executive Officer

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. ~~2021-00103~~ *2023-00009* dated ~~September 30, 2021~~.

EAST KENTUCKY POWER COOPERATIVE, INC **FOR ALL COUNTIES SERVED**

P.S.C. No. 35, ~~Third~~ *Fourth* Revised Sheet No. 17
Canceling P.S.C. No. 35, ~~Second~~ *Third* Revised Sheet No. 17

Fuel Adjustment

Applicability

In all territories of owner-members of EKPC.

Availability

This rate schedule shall apply to Rate B, Rate C, Rate E, and Rate G and all special contracts with rates subject to adjustment upon the approval of the Commission.

1. The fuel clause shall provide for periodic adjustment per kWh of sales when the unit cost of fuel [F(m) / S(m)] is above or below the base unit cost of ~~$.02624~~ *$.03749* per kWh [F(b) / S(b)]. The current monthly charges shall be increased or decreased by the product of the kWh furnished during the current month and the fuel adjustment rate for the preceding month where the fuel adjustment rate is defined below:

$$\text{Fuel Adjustment Rate} = \frac{F(m)}{S(m)} - \frac{F(b)}{S(b)}$$

Where F is the expense of fossil fuel in the base (b) and current (m) periods; and S is sales in the base (b) and current (m) periods, all as established in paragraphs (2) through (6) below: T

2. Fuel cost (F) shall be the most recent actual monthly cost, based on weighted average inventory costing, of: T T

   a. Fossil fuel consumed in the utility's own plants, and the utility's share of fossil and nuclear fuel consumed in jointly owned or leased plants, plus the cost of fuel which would have been used in plants suffering forced generation or transmission outages, but less the cost of fuel related to substitute generation, plus T

   b. The actual identifiable fossil and nuclear fuel costs associated with energy purchased for reasons other than identified in paragraph (c) below, but excluding the cost of fuel related to purchases to substitute the forced outages, plus

   c. The net energy cost of energy purchases, exclusive of capacity or demand charges (irrespective of the designation assigned to such transaction) if the energy is purchased on an economic dispatch basis. Costs, such as the charges for economy energy purchases, the charges as a result of scheduled outages, and other charges for energy being purchased by the buyer to substitute for its own higher cost energy, may be included; and less T

DATE OF ISSUE: ~~April 11, 2022~~ *September 22, 2023*

DATE EFFECTIVE: Service rendered on and after ~~March 24, 2022~~

ISSUED BY: _____
Anthony S. Campbell,
President and Chief Executive Officer

Issued by authority of an Order of the Public Service Commission
of Kentucky in Case No. ~~2021-00293~~ *2023-00009* dated ~~March 24, 2022~~.

Increase in Steam Service

Effective for Service Rendered on and after ~~October 1, 2021~~ _____ T
Pursuant to KPSC Order dated ~~September 30, 2021~~ _____ in Case No. T
~~2021-00103~~ *2023-00009*

Rates

Description	Prior Contract Rate	Current Approved Rate	
Demand Charge	$604.75/mmbtu/month	$604.75/mmbtu/month	I
Energy Rate	$4.266 /mmbtu	$~~4.266~~ *5.391*/mmbtu	I

Increase in Contract

Effective for Service Rendered on and after ~~October 1, 2021~~ _____ T
Pursuant to KPSC Order dated ~~September 30, 2021~~ _____ in Case No. T
~~2021-00103~~ *2023-00009*

Rates

Description	Feb. 1, 2020 Contract Rate	Current Approved Rate	
Demand Charge – Billing Demand at or below 180 MW In On-Peak Periods [Paragraph 3(b)]	$ 6.92/kW/month	$ 7.15/kW/month	I
Interruptible Credit – 10 Minute Interruptible Demand Service [Paragraph 4(a)]	$ 6.22/kW/month	$ 6.22/kW/month	
Interruptible Credit – 90 Minute Interruptible Demand Service [Paragraph 4(b)]	$ 4.20/kW/month	$ 4.20/kW/month	
Energy Rate – Off-Peak [Paragraph 12]	$0.035477/kWh	$0.~~036139~~*.047389*/kWh	I
Energy Rate – On-Peak [Paragraph 12]	$0.038905/kWh	$0~~.039567~~*.050817*/kWh	I

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 29
RESPONSIBLE PARTY: Julia J. Tucker

Request 29. For the years ending October 31, 2021, and October 31, 2022, provide:

a. Maximum annual system demand; and

b. Average annual demand.

Response 29.

11/01/2020 – 10/31/2021 maximum annual system demand was 2862.0 MW

11/01/2021 – 10/31/2022 maximum annual system demand was 3016.8 MW

Response 29b.

11/01/2020 – 10/31/2021 average annual system demand was 1527.0 MW

11/01/2021 – 10/31/2022 average annual system demand was 1565.9 MW

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 30
RESPONSIBLE PARTY: Isaac S. Scott

Request 30. a. Provide a schedule of the calculation of the 12-month average line loss by month for November 2020 through October 2022.

b. Describe the actions that EKPC has taken to reduce line loss during this period.

Response 30. Please see the following table for the average line loss calculations.

12 Months Ending	12-Month Total Member Sales Plus Off-System Sales (MWh)	12-Month Line Loss (MWh)	12-Month Line Losses as a Percentage of Total Sales
November 2020	1,053,765	21,650	2.05%
December 2020	1,067,532	22,275	2.09%
January 2021	1,080,689	22,942	2.12%
February 2021	1,088,298	23,458	2.16%
March 2021	1,091,378	23,483	2.15%
April 2021	1,102,453	23,683	2.15%
May 2021	1,105,371	23,617	2.14%
June 2021	1,111,420	24,017	2.16%
July 2021	1,105,587	23,754	2.15%
August 2021	1,117,587	23,858	2.13%
September 2021	1,120,917	23,768	2.12%
October 2021	1,123,996	23,702	2.11%
November 2021	1,133,266	24,150	2.13%
December 2021	1,108,236	23,325	2.10%

January 2022	1,116,889	23,841	2.13%
February 2022	1,106,461	23,466	2.12%
March 2022	1,109,666	23,650	2.13%
April 2022	1,109,649	23,916	2.16%
May 2022	1,118,052	24,550	2.20%
June 2022	1,124,171	24,150	2.15%
July 2022	1,130,999	24,234	2.14%
August 2022	1,126,880	24,121	2.14%
September 2022	1,126,982	23,995	2.13%
October 2022	1,130,356	24,020	2.12%

Response 30b. Although EKPC has not taken any specific actions driven primarily by reduction of system losses, many transmission and distribution substation projects undertaken by EKPC during the subject period provide an ancillary benefit of energy loss reductions. For example, EKPC established two new free-flowing transmission interconnections with neighboring utilities that provide an overall reduction in energy losses on the EKPC system. Also, EKPC completed rebuilds of more than 65 miles of 69 kV transmission line during this period. Replacement of older higher-impedance (i.e., less efficient) conductor with lower-impedance conductor was an integral part of these rebuild projects. As a result, energy losses were reduced on these line sections. EKPC also upgraded the main power transformer at thirteen existing distribution substations during the subject period. The newer distribution substation transformers installed are typically more efficient than the older transformers installed in EKPC substations, which results in a slight reduction in energy losses incurred by delivery of power through the substation transformer.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 31
RESPONSIBLE PARTY: Julia J. Tucker

Request 31. Describe in detail any hedging or hedging related activities that EKPC uses in relation to power purchases. Include an explanation as to whether the Commission approved the hedging activities or the utility implemented hedging pursuant to internal company policies. If the hedging was pursuant to internal policies, provide a copy of the policy and an explanation of how long the hedging activity has been ongoing.

Response 31. Regarding Hedging Plans and Strategy for Market Prices for Capacity and Energy, EKPC's strategy is to fully hedge its capacity price exposure in PJM's Reliability Pricing Model ("RPM") capacity auctions based on its load requirements, and to sell all excess capacity for additional revenues. EKPC must purchase capacity based on its Net System Peak Load ("NSPL"). NSPL is based on EKPC's native load requirements coincident with the PJM summer peak load. EKPC will generally pay the same amount for its NSPL requirements on a $/MW-Day basis as it sells its capacity. Thus, EKPC's price exposure is hedged in the capacity market as long as its generation available to sell is equal to or greater than its NSPL. EKPC realizes additional value from the capacity auction by having excess capacity to sell.

EKPC's strategy for hedging its energy prices is to actively manage its expected cost to serve and minimize its risk exposure to price spikes. EKPC models and reviews its energy price exposure on a monthly basis, looking forward three years. EKPC utilizes a production cost model (RTSim – the same model used for its Integrated Resource Plan analysis) to estimate its energy price exposure within the PJM market. The model considers the expected fuel and operations costs for the EKPC generation fleet and compares those to expected market prices. This comparison determines if EKPC's generation is economic to operate, provides an estimation of how much the EKPC generation fleet will run, and defines how much EKPC can expect to pay for its load requirements. Based on the model results, EKPC identifies potential forward purchases or sales that could lower its expected risk profile of its energy costs. This data also provides a view for EKPC's fuel procurement process, which then determines how much fuel should be purchased to ensure adequate and cost effective supplies.

Additionally, EKPC's Market Operations Center follows load and energy market trends daily and identifies opportunities to lower its net operating costs during the Day Ahead and Balancing markets.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 32
RESPONSIBLE PARTY: Mark Horn

Request 32. Provide the most recent projected fuel requirements for the years 2023 and 2024 in tons for coal, MMBtu for natural gas, and dollars.

Response 32.

2023 and 2024 Budget Quantities and Costs

		2023 Quantity	2023 Dollars	2024 Quantity	2024 Dollars
Cooper		271,896	34,888,207	136,756	12,012,300
Spurlock	Units 1 & 2	2,542,503	224,151,871	2,252,047	174,289,716
Spurlock	Units 3 & 4	1,727,314	120,669,865	1,408,561	94,435,797
Smith	Natural Gas	10,675,944	73,917,327	9,404,445	38,234,812
Bluegrass	Natural Gas	1,609,637	13,518,722	2,697,186	12,585,615

Coal quantity is in tons for Cooper and Spurlock Power Stations. Natural gas is in MMBtu for Smith Power Station and Bluegrass Generating Station.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 33
RESPONSIBLE PARTY: Julia J. Tucker

Request 33. Provide the most recent sales projections for the years 2023 and 2024 in kWh and dollars.

Response 33.

Budget Year	kwh	Revenue
2023 Estimate – Member Sales	13,970,074,127	$613,685,731
2023 Estimate – Off System Sales	318,431,000	$13,656,064
2024 – Member Sales	15,210,918,165	$675,477,256
2024 – Off System Sales	301,816,000	$28,532,084

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 34
RESPONSIBLE PARTY: Craig A. Johnson

Request 34. Provide the planned maintenance schedule for each of the generating units for the years 2023 and 2024.

Response 34.

Outage Type	Unit	Start Date	End Date	MW Reduction	Cause
Planned	COOPER 2	9/10/2022	1/10/2023	225	General Maintenance
Planned	SMITH CT 10	10/8/2022	6/12/2023	76	General Maintenance
Unplanned	BLUEGRASS CT 3	12/24/2022	4/27/2023	165	Other
Maintenance	SPURLOCK 1	1/3/2023	1/3/2023	300	General Maintenance
Maintenance	SMITH CT 9	1/6/2023	1/9/2023	76	Emissions
Maintenance	COOPER 2	1/15/2023	1/20/2023	225	General Maintenance
Unplanned	COOPER 2	1/24/2023	1/24/2023	225	Other
Unplanned	COOPER 1	2/2/2023	2/3/2023	116	Unknown
Unplanned	SMITH CT 3	2/2/2023	2/2/2023	106	Other
Unplanned	COOPER 2	2/3/2023	2/3/2023	225	Unknown
Unplanned	COOPER 2	2/4/2023	2/4/2023	225	Unknown
Maintenance	SMITH CT 5	2/7/2023	2/7/2023	71	Fuel System
Maintenance	SPURLOCK 4	2/11/2023	2/20/2023	268	General Maintenance
Maintenance	SPURLOCK 1	2/24/2023	2/28/2023	300	Fan Work
Maintenance	COOPER 2	3/1/2023	3/1/2023	225	Other
Planned	SMITH CT 9	3/5/2023	3/17/2023	76	General Maintenance
Unplanned	SPURLOCK 1	3/10/2023	3/10/2023	300	Other
Unplanned	SMITH CT 2	3/15/2023	3/19/2023	105	Fuel System

Unplanned	SMITH CT 3	3/15/2023	3/15/2023	106	Other
Unplanned	COOPER 2	3/16/2023	3/16/2023	225	Unit Trip
Planned	SPURLOCK 3	3/18/2023	4/17/2023	268	General Maintenance
Planned	SMITH CT 1	3/19/2023	4/14/2023	110	General Maintenance
Planned	SMITH CT 2	3/19/2023	4/14/2023	105	General Maintenance
Planned	SMITH CT 3	3/19/2023	4/14/2023	106	General Maintenance
Maintenance	SPURLOCK 4	3/26/2023	3/26/2023	268	Electrical
Maintenance	SPURLOCK 1	3/29/2023	4/1/2023	300	Tube Leak
Unplanned	SPURLOCK 2	4/2/2023	4/6/2023	510	Tube Leak
Unplanned	SMITH CT 9	4/5/2023	4/5/2023	76	Other
Unplanned	SPURLOCK 2	4/8/2023	4/10/2023	510	Tube Leak
Planned	SMITH CT 4	4/12/2023	4/12/2023	71	Black Start Testing
Planned	SMITH CT 5	4/12/2023	4/12/2023	71	Black Start Testing
Planned	SMITH CT 6	4/12/2023	4/12/2023	69	Black Start Testing
Planned	SMITH CT 7	4/12/2023	4/12/2023	69	Black Start Testing
Maintenance	SPURLOCK 2	4/12/2023	4/16/2023	510	Boiler Work
Unplanned	COOPER 1	4/13/2023	4/13/2023	116	Other
Planned	SMITH CT 4	4/13/2023	4/13/2023	71	Black Start Testing
Planned	SMITH CT 5	4/13/2023	4/13/2023	71	Black Start Testing
Planned	SMITH CT 6	4/13/2023	4/13/2023	69	Black Start Testing
Planned	SMITH CT 7	4/13/2023	4/13/2023	69	Black Start Testing
Planned	BLUEGRASS CT 1	4/15/2023	4/30/2023	165	General Maintenance
Unplanned	SMITH CT 9	4/15/2023	4/15/2023	76	Other
Planned	SMITH CT 4	4/16/2023	4/21/2023	71	General Maintenance
Maintenance	SPURLOCK 4	4/18/2023	4/18/2023	268	General Maintenance
Planned	BLUEGRASS CT 2	4/22/2023	5/7/2023	165	General Maintenance
Planned	SMITH CT 7	4/23/2023	4/28/2023	69	General Maintenance
Maintenance	SPURLOCK 1	4/23/2023	4/29/2023	300	General Maintenance
Unplanned	SMITH CT 2	4/24/2023	4/24/2023	105	Start Failure
Planned	BLUEGRASS CT 3	4/27/2023	5/7/2023	165	General Maintenance
Planned	SMITH CT 6	4/30/2023	5/5/2023	69	General Maintenance
Planned	COOPER 1	5/1/2023	5/11/2023	116	General Maintenance
Planned	COOPER 2	5/1/2023	5/11/2023	225	General Maintenance
Unplanned	SPURLOCK 4	5/2/2023	5/2/2023	268	Unknown
Unplanned	SPURLOCK 1	5/4/2023	5/4/2023	300	Other
Unplanned	SPURLOCK 1	5/5/2023	5/6/2023	300	Condenser System
Unplanned	BLUEGRASS CT 3	5/7/2023	6/2/2023	165	Other
Planned	SMITH CT 5	5/7/2023	5/12/2023	71	General Maintenance
Planned	SPURLOCK 2	5/8/2023	6/12/2023	510	General Maintenance
Maintenance	SPURLOCK 3	5/13/2023	5/25/2023	268	Other
Maintenance	SMITH CT 6	5/22/2023	5/22/2023	69	Other

Unplanned	BLUEGRASS CT 2	6/1/2023	6/2/2023	165	Other
Unplanned	COOPER 1	6/1/2023	7/10/2023	116	Other
Unplanned	BLUEGRASS CT 2	6/2/2023	6/29/2023	165	Other
Unplanned	BLUEGRASS CT 3	6/2/2023	7/13/2023	165	Other
Maintenance	SMITH CT 10	6/12/2023	7/18/2023	76	Turbine Repair
Maintenance	SPURLOCK 2	6/12/2023	6/17/2023	510	General Maintenance
Maintenance	SPURLOCK 2	6/17/2023	6/24/2023	510	Electrical
Maintenance	SPURLOCK 2	6/24/2023	6/28/2023	510	Turbine Repair
Maintenance	BLUEGRASS CT 1	6/27/2023	6/27/2023	165	Other
Maintenance	SMITH CT 9	6/27/2023	6/27/2023	76	Inspections
Unplanned	BLUEGRASS CT 2	6/29/2023	7/28/2023	165	Other
Unplanned	SMITH CT 3	7/5/2023	7/5/2023	106	Start Failure
Unplanned	SMITH CT 9	7/11/2023	7/11/2023	76	Other
Unplanned	BLUEGRASS CT 3	7/13/2023	7/14/2023	165	Other
Unplanned	BLUEGRASS CT 3	7/14/2023	7/26/2023	165	Other
Unplanned	SMITH CT 1	7/20/2023	7/20/2023	110	Other
Unplanned	SMITH CT 2	7/20/2023	7/21/2023	105	Other
Unplanned	SMITH CT 4	7/20/2023	7/20/2023	71	Other
Unplanned	SMITH CT 5	7/20/2023	7/20/2023	71	Other
Unplanned	COOPER 1	7/21/2023	7/24/2023	116	Other
Unplanned	COOPER 1	7/24/2023	7/24/2023	116	Other
Unplanned	SMITH CT 10	7/25/2023	1/1/2024	76	Engine Work
Unplanned	BLUEGRASS CT 3	7/26/2023	7/27/2023	165	Other
Unplanned	BLUEGRASS CT 3	7/27/2023	8/18/2023	165	Other
Unplanned	SPURLOCK 4	7/28/2023	7/29/2023	268	Unit Trip
Maintenance	SMITH CT 9	8/3/2023	8/3/2023	76	Turbine Repair
Maintenance	SPURLOCK 4	8/10/2023	8/12/2023	268	Air Heater
Unplanned	SMITH CT 3	8/11/2023	8/11/2023	106	Fuel System
Unplanned	SMITH CT 9	8/25/2023	8/25/2023	76	Unit Trip
Unplanned	SMITH CT 9	9/5/2023	9/5/2023	76	Other
Maintenance	COOPER 2	9/11/2023	9/16/2023	225	Air Heater
Planned	BLUEGRASS CT 2	9/16/2023	10/1/2023	165	General Maintenance
Planned	BLUEGRASS CT 1	9/20/2023	11/13/2023	165	General Maintenance
Planned	BLUEGRASS CT 3	9/20/2023	10/4/2023	165	General Maintenance
Planned	SPURLOCK 1	9/23/2023	11/20/2023	300	General Maintenance
Planned	SMITH CT 9	9/24/2023	10/9/2023	76	General Maintenance
Planned	SMITH CT 1	10/1/2023	10/21/2023	110	General Maintenance
Planned	SMITH CT 2	10/1/2023	10/21/2023	105	General Maintenance
Planned	SMITH CT 3	10/1/2023	10/21/2023	106	General Maintenance
Forecasted Planned	SPURLOCK 4	10/7/2023	11/6/2023	268	General Maintenance
Forecasted Planned	SMITH CT 6	10/15/2023	11/4/2023	69	Electrical

Forecasted Planned	COOPER 1	10/21/2023	12/12/2023	116	General Maintenance
Forecasted Planned	SMITH CT 1	10/26/2023	10/29/2023	110	Electrical
Forecasted Planned	SMITH CT 4	10/26/2023	10/29/2023	71	Electrical
Forecasted Planned	SMITH CT 7	10/29/2023	11/4/2023	69	General Maintenance
Forecasted Planned	SMITH CT 5	11/5/2023	11/11/2023	71	General Maintenance
Forecasted Planned	SMITH CT 2	11/6/2023	11/9/2023	105	Electrical
Forecasted Planned	SMITH CT 7	11/6/2023	11/9/2023	69	Electrical
Forecasted Planned	COOPER 2	11/11/2023	12/11/2023	225	General Maintenance
Forecasted Planned	SMITH CT 4	11/12/2023	11/18/2023	71	General Maintenance
Forecasted Planned	SPURLOCK 2	11/25/2023	12/10/2023	510	General Maintenance
Forecasted Planned	COOPER 1	3/2/2024	4/15/2024	116	General Maintenance
Forecasted Planned	COOPER 2	3/2/2024	4/15/2024	225	General Maintenance
Forecasted Planned	SMITH CT 9	3/3/2024	3/18/2024	76	General Maintenance
Forecasted Planned	SMITH CT 1	3/3/2024	3/11/2024	110	General Maintenance
Forecasted Planned	SPURLOCK 3	3/9/2024	4/8/2024	268	General Maintenance
Forecasted Planned	SMITH CT 10	3/10/2024	3/18/2024	76	General Maintenance
Forecasted Planned	SMITH CT 2	3/17/2024	3/25/2024	105	General Maintenance
Forecasted Planned	SMITH CT 3	3/24/2024	4/1/2024	106	General Maintenance
Forecasted Planned	BLUEGRASS 1	3/30/2024	4/15/2024	165	General Maintenance
Forecasted Planned	SMITH CT 4	3/31/2024	4/8/2024	71	General Maintenance
Forecasted Planned	SMITH CT 7	4/7/2024	4/15/2024	69	General Maintenance
Forecasted Planned	BLUEGRASS 3	4/7/2024	4/21/2024	165	General Maintenance
Forecasted Planned	BLUEGRASS 2	4/12/2024	4/26/2024	165	General Maintenance
Forecasted Planned	SMITH CT 6	4/14/2024	4/22/2024	69	General Maintenance
Forecasted Planned	SPURLOCK 1	4/20/2024	4/29/2024	300	General Maintenance
Forecasted Planned	SMITH CT 5	4/21/2024	4/29/2024	71	General Maintenance
Forecasted Planned	SPURLOCK 2	5/4/2024	6/3/2024	510	General Maintenance
Forecasted Planned	SPURLOCK 1	5/4/2024	6/3/2024	50	Other
Forecasted Planned	SPURLOCK 1	9/7/2024	10/7/2024	300	General Maintenance
Forecasted Planned	SMITH CT 10	9/8/2024	9/23/2024	76	General Maintenance
Forecasted Planned	SMITH CT 9	9/15/2024	9/23/2024	76	General Maintenance
Forecasted Planned	SMITH CT 1	9/22/2024	9/30/2024	110	General Maintenance
Forecasted Planned	SMITH CT 2	9/29/2024	10/7/2024	105	General Maintenance
Forecasted Planned	BLUEGRASS 3	10/5/2024	11/25/2024	165	General Maintenance
Forecasted Planned	SMITH CT 3	10/6/2024	10/14/2024	106	General Maintenance
Forecasted Planned	SPURLOCK 2	10/12/2024	10/21/2024	510	General Maintenance
Forecasted Planned	SPURLOCK 1	10/12/2024	10/21/2024	50	Other
Forecasted Planned	BLUEGRASS 1	10/12/2024	11/4/2024	165	General Maintenance
Forecasted Planned	SMITH CT 7	10/13/2024	10/21/2024	69	General Maintenance
Forecasted Planned	SMITH CT 5	10/20/2024	10/28/2024	71	General Maintenance
Forecasted Planned	SPURLOCK 4	10/26/2024	11/25/2024	268	General Maintenance

Forecasted Planned	BLUEGRASS 2	10/26/2024	11/11/2024	165	General Maintenance
Forecasted Planned	SMITH CT 6	10/27/2024	11/4/2024	69	General Maintenance
Forecasted Planned	SMITH CT 4	11/3/2024	11/11/2024	71	General Maintenance

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 35

RESPONSIBLE PARTY: Mark Horn and Michelle K. Carpenter

Request 35. Identify any issues that could affect fuel costs for the two-year period that remain unresolved or unsettled. Include in the response any issues related to billings from a regional transmission operator. Consider this a continuing request to inform the Commission if EKPC becomes aware of any issues during the course of this proceeding.

Response 35. Currently there are no known issues related to fuel procurement that could affect fuel costs for the two-year period under review (November 1, 2020 through October 31, 2022) that remain unresolved or unsettled. Further, there are no outstanding disputes of amounts billed by PJM related to the two-year review period. However, the Commission should be aware that EKPC is routinely billed by PJM for prior period adjustments to billing codes that are includable in the FAC. At times, these adjustments may be related to months that fall outside of a two-year review period, but have historically been immaterial in nature. These charges and credits, when they occur, are included within the total of the PJM Day Ahead and Balancing reported on the respective monthly FAC filings. EKPC has no control over PJM's adjustment process and such adjustments are typically not associated with amounts disputed during EKPC's weekly settlement process. Generally, such adjustments are not known by EKPC until billed and are considered part

of the normal course of business for Regional Transmission Organizations. EKPC believes that such adjustments represent the most recent actual fuel cost to the Company and are therefore, included in the FAC when invoiced by PJM.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 36
RESPONSIBLE PARTY: Mark Horn

Request 36. Provide the number of EKPC's coal purchase contracts that included transportation costs and those that did not from November 1, 2020, through October 31, 2022.

a. Explain how it is determined whether transportation costs will be included in the coal purchase contract.

b. When transportation is contracted for separately from the coal contract, explain whether EKPC issues requests for proposals (RFP) for this service.

(1) If yes, state how often this occurs, how many vendors are included in the RFP, and how is it determined which vendors will receive the RFP.

(2) State whether EKPC uses or contracts with any related parties far transportation of its coal purchases. If yes, provide the name of the related party and nature of the relationship, the period it has contracted with the party, and copies of any contracts with the related party if not previously filed with the Commission.

c. Explain in detail EKPC's policies and procedures for entering into transportation contracts.

Response 36. The coal purchase contracts for Cooper Power Station during the period under review, which was two supply contracts, include all transportation costs from the Acquisition Point to the Unloading Point of Cooper Power Station. The Cooper Power Station coal contracts exclusively utilize truck transportation with the supplier responsible for the logistics because rail deliveries to Cooper Power Station are not least-cost options. If EKPC exercised the option to deliver coal to Spurlock Power Station, which was initially procured for Cooper Power Station, the coal would be transported by railcar, and the trucking rate would be excluded from the FOB railcar price. EKPC would then pay the applicable transportation costs directly to the railroad. The coal purchase contracts for Spurlock Power Station during the review period, which was 13 supply contracts, include applicable costs for getting the coal to the Acquisition Point/Delivery Point such as a dock or terminal, but do not include transportation costs from the Acquisition Point to the Unloading Point of Spurlock Power Station. The Spurlock Power Station coal contracts currently utilize barge transportation exclusively because rail and truck deliveries to Spurlock Power Station are not the least-cost options. Furthermore, daily truck deliveries of coal to Spurlock Power Station simply could not keep up with the typical daily burn of coal. The Spurlock Power Station supply contracts are bid FOB barge or railcar, and ultimately, EKPC must procure separate barge or rail transportation contracts. The decision to procure coal is based on the lowest evaluated delivered cost of the coal that meets EKPC's needs. Regardless of transportation method, the carrier assumes all risk of loss of the coal until delivered to the Unloading Point.

Request 36a. Explain how it is determined whether transportation costs will be included in the coal purchase contract.

Response 36a. Whether transportation costs will be included in the coal purchase contract is typically based on the distance the coal will travel, the volume of coal to be moved, transportation methods possible, availability of equipment, and the most economical means of transporting the coal to its final destination. The industry standard of coal that can be delivered by truck is typically procured on a delivered basis. Truck transportation is usually limited to relatively small quantities moving fairly short distances on established coal haul roads. Coal companies may own their own fleet of trucks or have access to a pool of trucks through common carriers where multiple round trips could be made in a single day. Coal suppliers who deliver coal by truck simply may not have economical access to either a rail loadout or a dock. The industry standard of coal that can be delivered by barge or rail is typically procured from a specific point such as a dock or loadout, and the utility is responsible for the transportation. Barge or rail deliveries are typically large quantities that may be in transit for multiple days and from multiple coal basins. Coal companies that own or lease barge and/or rail power and equipment use it in their daily operations such as moving coal to their own processing or trans-load facilities but not to deliver to their customers. The barge and/or rail transportation costs for Spurlock Power Station are separate transportation contracts from the coal purchase contracts.

Request 36b. When transportation is contracted for separately from the coal contract, explain whether EKPC issues requests for proposals (RFP) for this service. (1) If yes, state how often this occurs, how many vendors are included in the RFP, and how is it determined which vendors will receive the RFP. (2) State whether EKPC uses or contracts with any related parties

for transportation of its coal purchases. If yes, provide the name of the related party and nature of the relationship, the period it has contracted with the party and copies of any contracts with the related party if not previously filed with the Commission.

Response 36b. Yes, EKPC issues written RFPs for barge transportation, but it does not issue RFPs for rail transportation because Spurlock Power Station is only served by one railroad (sole source), CSX Transportation. Currently, Spurlock Power Station receives all coal by barge, which is the most economical method for EKPC. EKPC is now on a cycle of issuing written RFPs for barge transportation every four years. When EKPC sought transparency in the market with a written RFP in 2017 and changed barge carriers in 2018, it resulted in significant savings for the end user. The written RFP in 2021 also yielded favorable results for the term of 2022 through 2025. EKPC has identified five barge companies that can serve Spurlock Power Station. All five barge companies are on the Barge Bidders List, and every carrier on the Barge Bidders List receives the written RFPs. EKPC does not use or contract with any related parties for the transportation of its coal purchases.

Request 36c. Explain in detail EKPC's policies and procedures for entering into transportation contracts.

Response 36c. EKPC has policies in place, such as Board Policy No. 404 (Transaction Authority Limits) and Administrative Policy No. AO31 (Delegation of Authority), that outline transaction limits and define fuel-related transportation transactions for product, term, lead time,

volume, and cost with controls around the "per transaction" limits and "aggregate" limits. EKPC's Fuel & Emissions department has a Procedure for the Procurement of Transportation that outlines the procurement, confirmation, and payment of transportation commodities for use at EKPC's power stations. The procedures define responsibilities for each party in the procurement process, RFP process, bid opening process, evaluation process, field evaluation report, due diligence, approval process, execution of the transportation contract(s), and monitoring transportation company performance. This detailed procedure is from a global perspective and involves Fuel & Emissions, Power Supply, Power Production, Environmental Affairs, Finance, and Legal.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 37
RESPONSIBLE PARTY: Michelle K. Carpenter

Request 37. Explain how purchase power costs are accounted for in the calculation of the FAC when EKPC experiences a planned generation outage and purchases power to meet load (i.e., whether the entire amount of the purchase power recorded in the calculation, or there is a limit as to the amount recorded). If there is a limit, explain the basis for the limitation and how it is calculated. If there is no limit, explain the basis for including 100 percent of the purchase power costs.

Response 37. Power purchases to meet load during a planned outage are included in the monthly FAC calculation to the extent that such purchases do not exceed EKPC's highest cost unit available, pursuant to Case No. 2000-00496-B. The highest cost unit available is determined each month by taking the heat rate at the minimum load level of each generating unit multiplied by the cost of fuel to run the unit. The highest resulting cost is then compared to the hourly purchases to determine the amount of purchases to exclude from the FAC calculation.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 38
RESPONSIBLE PARTY: Michelle K. Carpenter

Request 38. Explain how purchase power costs are accounted for in the calculation of the FAC when EKPC is not experiencing a generation outage but must purchase power in order to meet demand (i.e., whether the entire amount of the purchase power recorded in the calculation, or there is a limit as to the amount recorded). If there is a limit, explain the basis for the limitation and how it is calculated. If there is no limit, explain the basis for including 100 percent of the purchase power costs.

Response 38. Power purchased in order to meet demand is limited for FAC recovery to EKPC's highest cost unit available, as described in response 37.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 39
RESPONSIBLE PARTY: Michelle K. Carpenter

Request 39. Provide the amount, by month, of costs excluded from recovery from the FAC related to non-economy purchases.

a. State whether EKPC otherwise recovers the excluded costs.

b. If EKPC does recover the excluded costs, explain in detail how those costs are recovered.

c. Provide the amount excluded from recovery during the review period that, if applicable, will otherwise recovered.

Response 39. Please refer to the schedule below for a summary of non-economy purchases excluded from FAC recovery as a result of the highest unit cost calculations described in responses 37 and 38, along with disallowed forced outage costs, for the period under review.

Month	Highest Costs Exclusion	Forced Outage Costs Disallowed	Total
Nov-20	$ -	$ 10,631	$ 10,631
Dec-20	2,586	-	2,586
Jan-21	2,456	-	2,456
Feb-21	-	580,294	580,294
Mar-21	1,321	-	1,321
Apr-21	15,419	94,770	110,189
May-21	45,504	-	45,504
Jun-21	11,967	-	11,967
Jul-21	4,526	-	4,526
Aug-21	9,679	60,957	70,636
Sep-21	87,313	475,096	562,409
Oct-21	11,108	-	11,108
Nov-21	155,759	-	155,759
Dec-21	400,088	51,890	451,978
Jan-22	762,387	-	762,387
Feb-22	29,385	137,930	167,315
Mar-22	83,830	-	83,830
Apr-22	27,864	346,595	374,459
May-22	10,755	-	10,755
Jun-22	-	367,240	367,240
Jul-22	31,260	174,317	205,577
Aug-22	37,216	107,630	144,846
Sep-22	13,513	308,855	322,368
Oct-22	151,295	329,657	480,952
Total	$1,895,231	$3,045,862	$4,941,093

EKPC has no separate mechanism established to recover these excluded costs. However, as discussed by Mr. Scott in his response to Request 41, EKPC proposed an adjustment to Test Year Other Power Supply Expense in Case No. 2021-00103 to include a component for highest cost unit exclusions and FAC disallowed forced outages, based upon a historic five-year average. This adjustment was ultimately included in the rates approved by the Commission, effective with service rendered on and after October 1, 2021. Accordingly, exclusions incurred from October 2021 through October 2022 totaling $3,538,574 are in essence, considered to be recovered in base rates.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 40
RESPONSIBLE PARTY: Isaac S. Scott

Request 40. Provide the amount of current FAC fuel procurement or purchase power costs that is included in EKPC's base rates.

Response 40. The FAC mechanism allows for the recovery of actual costs of fuel and eligible purchased power expenses. As the Commission is aware, when determining base rates in the general rate case proceeding, the expenses recovered through the FAC and the associated revenues need to be excluded from the test year. During its last general rate case, Case No. 2021-00103, EKPC made such an adjustment to its test year. Please see EKPC's Application in Case No. 2021-00103, Exhibit 13, the Direct Testimony of Isaac S. Scott, Exhibit ISS-1, Schedule 1.00, page 2 of 47 and Schedule 1.01, pages 10 and 11 of 47.

Consequently, EKPC's current energy rates reflect the cost recovery of test year non-fuel related variable expenses determined in Case No. 2021-00103 and the base fuel cost established in its FAC mechanism. Thus, the fuel procurement and purchase power costs included in EKPC's base rates are the actual fuel costs from February 2018. Please see pages 2 through 5 of this response for the February 2018 information.

Company EAST KENTUCKY POWER COOPERATIVE

FUEL ADJUSTMENT CLAUSE SCHEDULE

Month Ended FEBRUARY 2018

				FAC Factor*
Fuel Fm (Fuel Cost Schedule) / Sales Sm (Sales Schedule)	= 27,132,349 / 1,034,022,558	=	(+)	$0.02624
Fuel (Fb) / Sales (Sb)	= $25,538,552 / 919,982,171	=	(-)	$0.02776
				($0.00152)

Effective Date for Billing APRIL 2018

Submitted by Michelle K. Carpenter

(Signature) MICHELLE K. CARPENTER, CPA

Title CONTROLLER

Date Submitted MARCH 20, 2018

* (Five decimal places in dollars or three decimal places in cents - normal rounding)

Company EAST KENTUCKY POWER COOPERATIVE

FUEL COST SCHEDULE

Month Ended FEBRUARY 2018

(A) Company Generation		
Coal and TDF Burned	(+)	14,702,057
Oil Burned	(+)	96,963
Gas Burned	(+)	169,844
PJM Day Ahead and Balancing	(+)	(38,466)
Fuel (Assigned Cost during F.O.)	(+)	0
Fuel (Substitute for F.O.)	(-)	0
* Note: Included in the Coal Burned is the Physical Inv Adj. for Coal of $338,513 and TDF of $22,985.		
		14,930,398
(B) Purchases		
Net Energy Cost - Economy Purchases	(+)	9,796,681
Identifiable Fuel Cost - Other Purchases	(+)	-
Identifiable Fuel Cost - (Substitute for F.O.)	(-)	0
		9,796,681
Subtotal		24,727,079
(C) Inter-System Sales		
Fuel Costs		-
		-
		-
(D) Over or (Under) Recovery from Page 4		(2,405,270)
Total Fuel Cost (A + B - C - D)		27,132,349

F.O. = Forced Outage

Company EAST KENTUCKY POWER COOPERATIVE

SALES SCHEDULE

Month Ended FEBRUARY 2018

(A)			
Generation (Net)		(+)	648,432,224
Purchases		(+)	393,226,559
Inadvertent Interchange	In	(+)	0
			1,041,658,783
(B)			
Pumped Storage Energy		(+)	0
Inter-System Sales Including Interchange Out		(+)	0
Inadvertent Interchange	Out	(+)	0
System Losses		(+)	7,636,225
			7,636,225
(C)			
Total Sales	(A - B - C)		1,034,022,558

Company EAST KENTUCKY POWER COOPERATIVE

OVER OR (UNDER)-RECOVERY SCHEDULE

Month Ended FEBRUARY 2018

1. Last FAC Rate Billed	(1)	$0.00518
2. KWH Billed at Above Rate		1,034,022,558
3. FAC Revenue/(Refund) (L1 x L2)	(1)	** $5,356,237
4. KWH Used to Determine Last FAC Rate		1,498,360,460
5. Non-Jurisdictional KWH (Included in L4)	(1)	0
6. Kentucky Jurisdictional KWH (Included in L4) (L4 - L5)		1,498,360,460
7. Recoverable FAC Revenue/(Refund) (L1 x L6)		$7,761,507
8. Over or (Under) Recovery (L3 - L7)	(1)	($2,405,270)
9. Total Sales (Page 3)	(1)	1,034,022,558
10. Kentucky Jurisdictional Sales		1,034,022,558
11. Ratio of Total Sales to Kentucky Jurisdictional Sales (L9 \ L10)		1
12. Total Company Over (Under) Recovery (L8 x L11) (Page 2, Line D)		($2,405,270)

**FAC Revenue/(Refund) on Line 3 reflects actual amount of charge or credit due

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2023-00009
FIRST REQUEST FOR INFORMATION RESPONSE

PSC'S REQUEST DATED SEPTEMBER 6, 2023
REQUEST 41
RESPONSIBLE PARTY: Isaac S. Scott

Request 41. Provide the amount of non-FAC fuel procurement or purchase power costs that are otherwise recovered in EKPC's base rates.

Response 41. In Case No. 2021-00103, EKPC proposed an adjustment that reflected two types of purchased power costs that were not recoverable through its FAC mechanism. The first was purchased power costs in excess of EKPC's highest cost generating unit available to be dispatched to serve native load during a reporting period. The second was purchased power costs associated with forced outages. The total amount for each of these purchased power costs included in base rates was determined from a five-year average of these costs experienced during the period 2015 through 2019. The five-year average of purchased power costs in excess of EKPC's highest cost generating unit available totaled $3,215,034. The five-year average of purchased power costs associated with forced outages totaled $1,958,444. Thus, the total of non-FAC purchase power costs recovered in EKPC's base rates is $5,173,478. Please see EKPC's Application in Case No. 2021-00103, Exhibit 13, the Direct Testimony of Isaac S. Scott, Exhibit ISS-1, Schedule 1.23, page 40 of 47 for the supporting calculations.