

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

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF EAST</b>	)	
<b>KENTUCKY POWER COOPERATIVE INC. FOR</b>	)	
<b>CERTIFICATES OF PUBLIC CONVENIENCE</b>	)	<b>CASE NO.</b>
<b>AND NECESSITY FOR CONSTRUCTION</b>	)	<b>2024-00108</b>
<b>PROJECTS IN MARION COUNTY, KENTUCKY</b>	)	
<b>AND OTHER GENERAL RELIEF</b>	)	

**RESPONSES TO STAFF’S FIRST REQUEST INFORMATION REQUEST**  
**TO EAST KENTUCKY POWER COOPERATIVE, INC.**

**DATED JUNE 18, 2024**

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

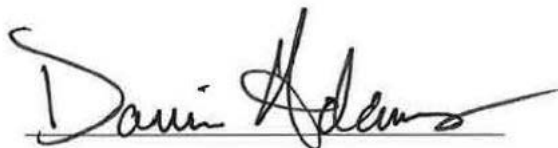
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CERTIFICATES OF PUBLIC CONVENIENCE ) CASE NO.  
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CERTIFICATE

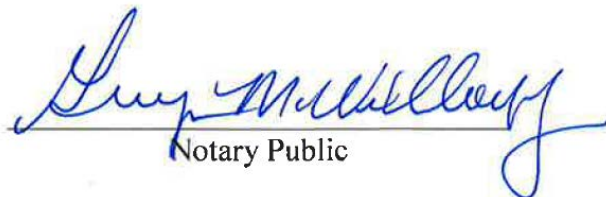
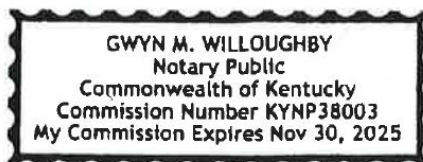
STATE OF KENTUCKY )  
  )  
COUNTY OF CLARK )

Darrin Adams, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff Data Requests in the above-referenced case dated June 18, 2024, 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.



Darrin Adams

Subscribed and sworn before me on this 26th day of June 2024.

  
Notary Public

COMMONWEALTH OF KENTUCKY

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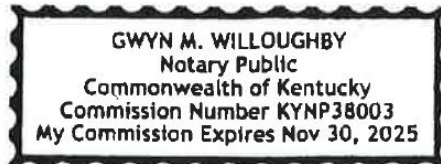
STATE OF KENTUCKY )  
 )  
 COUNTY OF CLARK )

Lucas Spencer, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff Data Requests in the above-referenced case dated June 18, 2024, 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.

Lucas Spencer  
 Lucas Spencer

Subscribed and sworn before me on this 26th day of June 2024.

Gwyn M. Willoughby  
 Notary Public



EAST KENTUCKY POWER COOPERATIVE, INC.  
CASE NO. 2024-00108  
FIRST REQUEST FOR INFORMATION RESPONSE

STAFF'S REQUEST DATED JUNE 18, 2024

REQUEST 1

RESPONSIBLE PARTY: Darrin Adams

**Request 1.** Refer to Application, page 4, paragraph 8.

**Request 1a.** State how EKPC decided on 161 kV transmission lines.

**Response 1a.** Refer to the map included as Attachment *DR1A-1.pdf*. The Green County – Marion County 161 kV transmission line is the nearest EKPC-owned transmission line to the geographic area of need. The next closest EKPC networked transmission line operated at a voltage other than 161 kV is 6.4 miles from the proposed Metts Drive substation location. This was not considered a viable option due to the length of transmission line and overall cost that would be necessary. The 161 kV projects in this proceeding were determined to be the most efficient and cost-effective solution that will provide significant benefits to the system's ability to serve Inter-County customers in this area.

**Request 1b.** State whether EKPC considered other transmission line voltage options and why those options were rejected.

**Response 1b.** Please refer to Application, Exhibit 23, Adams Direct Testimony, Attachment *DA-1.pdf* (Lebanon Area Planning Analysis Report), pages 9-10.

EKPC did consider other transmission-line voltage options; specifically Alternatives 4 and 5 in the referenced report, and considered the utilization of the Louisville Gas & Electric Company and Kentucky Utilities Company (“LG&E/KU”) 69 kV transmission system facilities located in this area. The Green County-Marion County 161 kV transmission line is the nearest EKPC-owned transmission line to this geographic area of need. EKPC has no networked transmission lines operated at another voltage level located within a reasonable distance from this area. The alternatives EKPC considered that would utilize the LG&E/KU 69 kV transmission system were not selected because they are not the most efficient and cost-effective solution to address the EKPC and Inter-County Energy Cooperative Corporation (“Inter-County”) projected overloads. Included in the cost of utilizing the LG&E/KU 69 kV line is the ongoing operational expense of Network Integration Transmission Service (“NITS”) paid to LG&E/KU for the Lebanon substation (or the equivalent replacement substation at Metts Drive). These NITS payments result in the overall 30-year net present value costs for these alternatives being \$5 million to \$6.8 million higher than that of the proposed projects in this proceeding.

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REQUEST 2

RESPONSIBLE PARTY: Lucas Spencer

**Request 2.** Refer to Application, pages 5-6, paragraph 16 and Exhibit 21 at unnumbered 171.

**Request 2a.** Provide a copy of any maps or other documents used to ascertain whether the right-of-way crossed listed property owners' property.

**Response 2a.** See Exhibit(s) *DRI-2ALS1.pdf* and *DRI-2ALS2.pdf*. The property boundaries are based on PVA data, which also contains needed property owner information.

**Request 2b.** Explain whether there are property owners whose property boundary is near or adjacent to the new proposed transmission lines or to the new proposed substation, but not crossed, who were not notified of the proposed projects. If so, provide the names, addresses, and a map showing the property locations/boundaries in relation to the proposed projects.

**Response 2b.** See exhibit(s) *DR1-2BLS1.pdf and DR1-2BLS2.pdf*. These maps were utilized to identify the property owners within 150' of the centerline of the proposed routes.

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**REQUEST 3**

**RESPONSIBLE PARTY:** Lucas Spencer

**Request 3.** For either of the transmission projects or the substation project, explain whether any sort of environmental assessment is required. If so, provide a copy of the assessment.

**Response 3.** EKPC plans to apply for project financing assistance from the U.S. Department of Agriculture, Rural Utilities Service (“RUS”), therefore the project constitutes a federal action subject to Nation Environmental Policy Act (“NEPA”) review. Site-specific surveys have been completed and reports are being prepared for various state and federal review: these include; State Historic Preservation Office - Section 106 National Historic Preservation Act, U.S. Fish and Wildlife Service – Section 7 Endangered Species Act. There is also ongoing evaluations of potential project impacts to floodplain, air and water quality, prime farmland, and stream and wetlands. All other permitting will commence upon determination by the Commission and the final design.



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REQUEST 4

RESPONSIBLE PARTIES: Darrin Adams and Lucas Spencer

**Request 4.** Refer to Application, Exhibit 2, Direct Testimony of Lucas Spencer (Spencer Direct Testimony) at 5.

**Request 4a.** State whether any alternative designs (other than location) or materials were considered for the Marion County Industrial Tap Line Loop-In transmission line and why those options were rejected.

**Response 4a.** EKPC utilizes galvanized steel pole material as standard practice. Galvanized steel poles are more reliable and durable for long-term maintenance than alternative pole materials such as Corten (i.e. weathering steel), concrete or wood. EKPC uses galvanized steel poles instead of steel lattice towers because of reduced cost. Lattice steel towers are utilized when excess design loading dictates the need for the engineering strength that comes from a steel lattice tower.

**Request 4b.** State why the Marion County Industrial 161 kV Tap Line Loop-In will not result in any duplication of service with the existing Marion County Industrial Tap.

**Response 4b.** The Marion County Industrial 161 kV Tap Line Loop-In's purpose is to provide reliability improvement to the two existing (Marion County Industrial Park and South Marion County Industrial Park) and one planned (Metts Drive) distribution substations served from the existing Marion County Industrial Tap line. As discussed in the Application, Exhibit 23, Direct Testimony of Darrin Adams, Attachment *DA-1.ppt*, Section 3.3 (page 5), EKPC generally considers a radial transmission line supplying distribution substations to have acceptable reliability if the tap load-exposure index ("TE") does not exceed 100 MW-miles. When this 100 MW-mile threshold is exceeded, multiple-source supply for these substations is recommended. The TE value for the existing Marion County Industrial 161 kV radial tap line is 85.5 MW-miles, and when the new Metts Drive substation is added to this tap line, the TE value becomes 144.6 MW-miles. Due to exceeding the 100 MW-mile threshold, multiple-source supply is warranted for these substations to provide an adequate reliability level, which will be provided by the Marion County Industrial 161 kV Tap Line Loop-In Project.

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REQUEST 5

RESPONSIBLE PARTY: Lucas Spencer

**Request 5.** Refer to Application, Exhibit 19 (Metts Drive Route Selection Report) at 57- 58 and Exhibit 20 (Marion County Industrial 161 kV Tap Line Loop-In Route Selection Report) at 59-60.

**Request 5a.** Explain how the estimated costs per mile and acre were determined and provide any documents supporting these estimates.

**Response 5a.** Estimated costs per mile are based on generic cost estimating templates. These costs ensure that all projects are compared based on the same cost estimating principles.

**Request 5b.** State whether EKPC plans to self-build these projects or solicit bids. Provide any Requests for Proposals (RFPs).

**Response 5b.** EKPC will solicit labor bids for these projects and not self-build. Labor and material procurement occurs once full design has been completed. At this time, final design has

not been completed. EKPC will develop the Request for Proposals and procure materials upon completion of design and in accordance with the project schedule, pending approval of the CPCN Application.

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**REQUEST 6**

**RESPONSIBLE PARTY:** Lucas Spencer

**Request 6.** Refer to Application, Exhibit 19 at 57-58. State whether any of the evaluated transmission line routes contained additional estimated costs beyond per mile or per acre costs. Identify and explain any such extra estimated costs, including the “Cost adder” entries in Table 12 on page 58.

**Response 6.** The alternative routes 1, 2, 4, 5 and 6 in Exhibit 19 to the Application have additional costs beyond the per mile estimates. These identified cost adders could impact project costs outside of normal project constraints. On Table 12, the bottom 6 rows have data that summarizes all additional costs outside of the per mile costs. The last row summarizes the five cost adder rows that proceed it in Table 12. The other five rows can be defined as follows:

- Eng DE Structure – This is an engineered dead-end transmission pole structure. This would be used if a route has a unique circumstance that requires an engineer to utilize a deadend structure that cannot use guy wires and must be constructed with a concrete foundation supporting the pole. A dead-end transmission structure is one that is designed to hold the

tension of the conductors that are attached to it and is designed to handle loads to prevent a cascading failure.

- Eng DE Structure is PI – This is functionally the same as “Eng DE Structure” described above but is for circumstances where there is insufficient room to install guy wires on the structure, and it is located on a PI of the route also referred to as an “Deadend Angle” structure.
- Stub Pole – The stub pole cost adder would be used if the engineer designs a transmission structure for guy wires that cross a roadway. For the alternative Mett’s routes, these would be Angle structures that are along Industrial Drive and have insufficient room to install guy wires on the side of the road/driveway that the structure has been placed; this requires the installation of a stub pole on the opposite side of the road/driveway. The stub pole has a typical above ground height of 30 feet, and guy wires are installed from a transmission structure to the top of the stub pole. The stub pole would then have guy wires installed on it. This provides adequate clearances for vehicles to continue utilizing roadways / drive paths.
- Eng Ang Structure - This is an engineered angle transmission pole structure. This would be used if a route has a unique circumstance that requires an engineer to utilize an angle structure that cannot use guy wires and must be constructed with a concrete foundation supporting the pole. An angle transmission structure is used when the engineer has to have an angle structure but does not see a need for a deadend structure. An important item worth noting is that this was not utilized on any of the alternative routes on Metts.

- Overbuild – This is a cost adder utilized for routes that were routed on or near a distribution line. This cost adder is intended to cover the additional costs for poles that would be needed to allow adequate clearances between the distribution and transmission circuits.

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**REQUEST 7**

**RESPONSIBLE PARTY:** Lucas Spencer

**Request 7.** Refer to Application, Exhibit 19 at 68. Confirm that the lack of medium or high impact route selection factors or other identified factors not present in the model means that no such factors made any of the evaluated routes prohibitive.

**Response 7.** Application, Exhibit 19, Table 21 is an example table of expert judgement factors that could be used on projects when the utility feels there are factors that the EPRI-KY routing model does not consider that are impactful to the route determination, these factors are intended to compliment the EPRI-KY routing model. Expert judgement factors are intended to be project specific. Table 21 demonstrates the EPRI-KY model adequately captured the necessary factors that impact these alternative routes, thus not requiring use of expert judgement factors.



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REQUEST 8

RESPONSIBLE PARTY: Lucas Spencer

**Request 8.** Refer to Application, Exhibit 20 at 60. State whether any of the evaluated transmission line routes contained additional estimated costs beyond per mile or per acre costs. Identify and explain any such extra estimated costs, including the "Cost adder" entries in Table 13 on page 60.

**Response 8.** For the Marion County Industrial 161kV Tap Line Loop-In, Routes 1,2, 4 and 5 required the use cost adders. The cost adder options were the same as those in **Response 6.** The cost adders that were needed were the Engineered DE Structure and the Eng Angle Structure. This is largely driven by the agricultural land that these routes traverse as compared to the industrial/commercial land use that the Metts routes cross.

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**REQUEST 9**

**RESPONSIBLE PARTY:** Darrin Adams

**Request 9.** Refer to the Application, Exhibit 23, Direct Testimony of Darrin Adams (Adams Direct Testimony), page 4, lines 21-23 and page 5, lines 1-12.

**Request 9a.** Explain whether the Lebanon Substation's primary purpose was to serve residential customers prior to the Inter-County load shift.

**Response 9a.** The Lebanon Substation's primary purpose was to serve residential customers prior to the referenced load shift, and this is still the primary purpose of the substation, even with the additional industrial customers that were shifted from the Marion County Industrial Park substation.

**Request 9b.** Explain whether the residential customers served out of the Marion County Industrial Substation were subjected to power-quality issues due to the non-linear nature of

industrial electrical equipment prior to the load shift. If not, explain why the load shift introduced the power-quality issues.

**Response 9b.** The residential customers served from the Marion County Industrial Substation were subjected to power-quality issues prior to the load shift. This load shift from the Lebanon Substation to the Marion County Industrial Substation subjects approximately 1,000 more residential customers to power-quality issues. Inter-County prefers to restrict the number of residential customers served from industrial feeders to limit the occurrence of power-quality issues experienced by those customers. In addition, Inter-County strives to limit line exposure on industrial feeders to limit the number of momentary or sustained outages that those industrial customers could experience. The load shift from the Lebanon substation to the Marion County Industrial substation introduces approximately 60 miles of additional line exposure to Marion County Industrial customers served by that feeder, including a number of industrial customers. This line exposure subjects these industrial customers to more disturbances during faults on the distribution lines serving the additional residential customers.

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**REQUEST 10**

**RESPONSIBLE PARTY:** Darrin Adams

**Request 10.** Refer to Application, Exhibit 23, Adams Direct Testimony pages 4-5.

**Request 10a.** Provide any documents related to Inter-County Energy Cooperative Corporation's report of potential thermal overload, including but not limited to, correspondence, reports, work orders, studies, and diagrams.

**Response 10a.** Refer to the map included as Attachment *DR10A-1.pdf*.

In the report (Attachment *DR10A-1.pdf*) Inter-County's engineering analysis indicates a projected overload on the Lebanon 234 feeder sections PC-441093 thru PC-441098 at 114% of its capacity. This report represents forecasted loading modeled for the existing system in Inter-County's 2022-2025 Construction Work Plan as submitted to RUS.

Refer to Application, Exhibit 23, Adams Direct Testimony, Attachment *DA-1.pdf* (Lebanon Area Planning Analysis Report), page 7. The portion of the distribution feeder circled in Figure 4.1 is projected to overload at 114% of its capacity, based on this report.

**Request 10b.** Provide any documents related to load forecasts identified in the testimony, including but not limited to, correspondence, reports, studies, and diagrams.

**Response 10b.** The EKPC 2022 non-coincident peak 1-in-10 load forecast for Inter-County can be found in Attachment *DR10B-1.pdf*. This is the latest forecast developed by EKPC for the Inter-County Energy distribution substations. Bi-annually EKPC develops a system-wide 20-year substation forecast that is based in part on historical loads for the preceding 10 years. The load forecast is based in part on input from Inter-County regarding changes across their system, such as new loads and expected load shifts between substations. Attachment *DR10B-1.pdf* provides the forecast data for the Inter-County distribution substations as it was developed based on these inputs.

During the 2022 development of the load forecast for the Inter-County system, Inter-County described a temporary mitigation plan that had been implemented for the Lebanon 234 feeder overload which involved shifting load from the Lebanon 234 feeder to the Marion County Industrial 204 feeder. The estimated load shifts during the winter peaks from 2020/2021 through present are:

Winter	MW
2020/21	5.62
2021/22	6.11
2022/23	7.82
2023/24	7.20

The actual substation peak loads shown in DR10B-1 during the winter seasons 2020/21 and 2021/22 are at lower levels than expected due to the load shifts implemented by Inter-County

to prevent real-time overloads. Based on the load shift amounts shown in the above table, the power flows through the Lebanon substation transformer would have exceeded its winter rating in three of the past four winter-peak periods had the system been configured in its normal (desired) configuration. Likewise, the forecasted substation loads in DR10B-1 for future winter periods are under-forecasted because the values are based on the reduced actual loads for those periods that were the key inputs into the forecast development process.

**Request 10c.** State whether the proposed transmission line projects will completely eliminate the transmission fees paid to Louisville Gas and Electric (LG&E) and Kentucky Utilities (KU) (jointly, LG&E/KU) for service to the Lebanon Substation. If not, provide estimated fees through 2029 based on expected reduction of fees due to the proposed projects.

**Response 10c.** The proposed transmission line projects will completely eliminate the transmission fees paid to LG&E/KU for service to the Lebanon Substation.

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**REQUEST 11**

**RESPONSIBLE PARTY:** Darrin Adams

**Request 11.** Refer to the Application, Exhibit 23, Adams Direct Testimony, page 6, lines 6-9. Confirm that the Lebanon Substation is connected to LG&E/KU's transmission lines only and not to EKPC's transmission lines.

**Response 11.** This is confirmed. The Lebanon Substation is connected solely to LG&E/KU transmission lines.

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**REQUEST 12**

**RESPONSIBLE PARTY:** Darrin Adams

**Request 12.** Refer to the Application, Exhibit 23, Adams Direct Testimony, page 6, lines 9-11. Aside from the potential transformer overload at the Lebanon Substation, explain any additional reliability issues including increasing maintenance, equipment failures, power quality, etc.

**Response 12.** The Lebanon substation was constructed in 1955 and is showing signs of degradation consistent with EKPC substations of similar vintage. The high-voltage and low-voltage substation structures are those originally installed in 1955. The substation fence does not meet current EKPC standards. The design of the substation bus also does not meet EKPC's current standard for distribution substations. Finally, the substation transformer has elevated dissolved gas levels, and is of a design/vintage that has experienced numerous failures on the EKPC system.

In addition to the substation-condition concerns, the reliability of the LG&E/KU 69 kV line serving this substation has been problematic. Since 2016, the Lebanon substation has experienced seven (7) sustained outages (i.e., not including momentary blinks) due to unplanned outages of the LG&E/KU Lebanon-Taylor County 69 kV line. These seven outages resulted in



**of** approximately 9,056 consumer-hours unserved.

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**REQUEST 13**

**RESPONSIBLE PARTY:** Darrin Adams

**Request 13.** Refer to the Application, Exhibit 23, Adams Direct Testimony, page 6, lines 12-14. Absent the Inter-County distribution feeder loading concerns, explain whether the Lebanon Substation loading concerns would warrant the two projects in the current proceeding.

**Response 13.** The alternatives considered would have been evaluated similarly absent Inter-County distribution feeder loading concerns. The two selected projects address the projected overload of the Lebanon substation transformer as well as the Lebanon substation's condition and reliability concerns. These projects would still be the recommended projects to address these issues due to their cost-effectiveness and the additional benefits for the electrical system and consumers in this area.

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**REQUEST 14**

**RESPONSIBLE PARTY:** Darrin Adams

**Request 14.** Refer to the Application, Exhibit 23, Adams Direct Testimony, page 8, lines 7-10. Explain whether EKPC and or Inter-County has been notified of a commercial or industrial load planning to locate in the industrial park or adjacent area.

**Response 14.** EKPC is aware of a potential expansion at an existing customer facility located in the Marion County Industrial Park. Inter-County has also received proposals for connections to the portion of the Lebanon 234 feeder that is currently shifted to the Marion County Industrial Substation. These proposals include a 300 kW commercial load and a 32-lot residential subdivision.

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**REQUEST 15**

**RESPONSIBLE PARTY:** Darrin Adams

**Request 15.** Refer to the Application, Exhibit 23, Adams Direct Testimony, page 9, lines 10-11. Once completed, provide a copy of PJM's do-no-harm study results.

**Response 15.** At this time, PJM has not completed its do-no-harm studies for these Projects. EKPC will provide a copy of PJM's study results in this proceeding when available.

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**REQUEST 16**

**RESPONSIBLE PARTY:** Darrin Adams

**Request 16.** Refer to the Application, Exhibit 23, Adams Direct Testimony, page 9, lines 20-23 and page 10, lines 1-3. Explain whether the PJM do-no-harm study is addressing the two transmission line projects together or separately.

**Response 16.** EKPC presented the two projects as a single plan to address the EKPC needs in this area. Therefore, PJM's do-no-harm analysis is considering the two projects together.

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**REQUEST 17**

**RESPONSIBLE PARTY:** Darrin Adams

**Request 17.** Refer to the Application, Exhibit 23, Adams Direct Testimony, Attachment DA-1, pages 9-10. For Alternatives 1 and 6, in addition to the cessation of the Network Interconnection Transmission Service (NITS) payments, explain whether the Lebanon Substation retirement cost was included in each Alternative cost estimate.

**Response 17.** Alternatives 1 and 6 do include estimated costs for retirement of both the Lebanon substation and the 0.1-mile 69 kV transmission tap line for the substation. These retirement costs are estimated to be \$144,000.

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REQUEST 18

RESPONSIBLE PARTY: Darrin Adams

**Request 18.** Refer to the Application, Exhibit 2, Spencer Direct Testimony, page 5, lines 13-22 and page 10 lines 1-15, and Exhibit 23, Adams Direct Testimony, Attachment *DA1.pdf*, Table 5.1, page 10.

**Request 18a.** For the new 2.3 mile 161 kV line section connecting to the existing Marion County-Green County 161 kV line, explain whether EKPC will include a breaker at the Tap interconnection point. If not, explain how the loop being created avoids a N-1 or N-2 contingency affecting the EKPC Marion County-Green County 161 kV line.

**Response 18a.** The new 2.3 mile 161 kV line section looping in the existing Marion County – Green County 161 kV line into Marion County Industrial will not include a circuit breaker at the tap interconnection point. This does not change the current N-1 or N-2 contingencies affecting the Marion County-Green County 161 kV line. The N-1 contingency of this line does not result in any planning-criteria violations on the EKPC system. Similarly, N-2 contingencies that include this 161 kV line as one of the elements taken out of service do not result in any

planning-criteria violations. Therefore, the need to install a circuit breaker at this location does not exist.

**Request 18b.** Provide the results of any PJM transmission studies related to the project.

**Response 18b.** As stated in the response to Item 15 above, PJM has not yet completed its do-no-harm analysis for the Projects. This is the only study PJM will conduct related to the Projects. Once that analysis is completed, EKPC will submit the results into the record of this proceeding.



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**REQUEST 19**

**RESPONSIBLE PARTY:** Lucas Spencer

**Request 19.** Refer to the Application, Exhibit 23, Adams Direct Testimony, Attachment DA-1, Table 5.1, page 11. Once the Lebanon Substation has been retired, explain what will happen to the substation property and whether EKPC will relinquish the transmission ROW to the existing property owners.

**Response 19.** Once the Lebanon substation has been retired, the substation will be demolished and the site will be sold. Any existing EKPC ROW utilized for the Lebanon Tap will be released to existing landowners.