

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

**In the Matter of:**

**ELECTRONIC APPLICATION OF EAST )  
KENTUCKY POWER COOPERATIVE, INC. FOR )  
A CERTIFICATES OF PUBLIC CONVENIENCE )  
AND NECESSITY AND SITE COMPATIBILITY )  
CERTIFICATES FOR THE CONSTRUCTION OF )  
A 96MW (NOMINAL) SOLAR FACILITY IN )  
MARION COUNTY, KENTUCKY AND A 40MW )  
(NOMINAL) SOLAR FACILITY IN FAYETTE )  
COUNTY, KENTUCKY AND APPROVAL OF )  
CERTAIN ASSUMPTIONS OF EVIDENCE OF )  
INDEBTEDNESS RELATED TO THE SOLAR )  
FACILITIES AND OTHER RELIEF )**

**CASE NO.  
2024-00129**

**RESPONSES TO LFUCG'S SUPPLEMENTAL INFORMATION REQUESTS  
TO EAST KENTUCKY POWER COOPERATIVE, INC.**

**DATED JULY 3, 2024**

**COMMONWEALTH OF KENTUCKY**

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**CERTIFICATE**

**STATE OF KENTUCKY )  
 )  
COUNTY OF CLARK )**

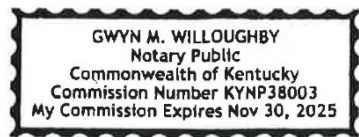
Patrick Bischoff, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to LFUCG's Second Request for Information in the above-referenced case dated July 3, 2024, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

*Patrick Bischoff*

\_\_\_\_\_

Subscribed and sworn before me on this 18th day of July 2024.

*Gwyn M. Willoughby*  
Notary Public



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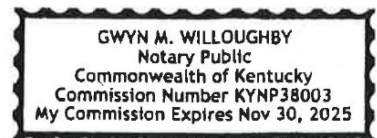
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COUNTY OF CLARK )

Nick Comer, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to LFUCG's Second Request for Information in the above-referenced case dated July 3, 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.

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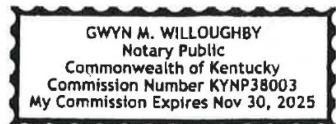
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Julia J. Tucker, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to LFUCG's Second Request for Information in the above-referenced case dated July 3, 2024, and that the matters 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 18th day of July 2024.

*Gwyn M. Willoughby*  
Notary Public



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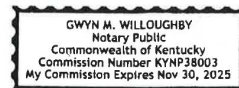
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Tom Stachnik, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to LFUCG’s Second Request for Information in the above-referenced case dated July 3, 2024, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

[Handwritten signature]

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[Handwritten signature]
Notary Public



EAST KENTUCKY POWER COOPERATIVE, INC.  
CASE NO. 2024-00129  
SUPPLEMENTAL REQUESTS FOR INFORMATION RESPONSE

LFUCG'S REQUESTS DATED JULY 3, 2024

REQUEST 1

RESPONSIBLE PARTY: Julia J. Tucker

**Request 1.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 3. With regard to the language "the original developer reviewed various sites and determined that this was a valuable site given its location," provide:

**Request 1a.** The name of the original developer.

**Response 1a.** Savion, LLC

**Request 1b.** The specifics about the other sites, and

**Response 1b.** EKPC has no knowledge of Savion's development of the site, what other sites were considered, or the basis for selecting the BG Plains site. It would be normal course of business for them to have conducted that analysis to determine that the chosen site was their preferred choice. EKPC only has knowledge of the chosen site.

**Request 1c.** The basis for determining that the Bluegrass Plains site should be used instead of the other locations.

**Response 1c.** The PJM Interconnect for transmission deliverability has studied the Bluegrass Plains site. The site has been granted the interconnection capability. For a site to be considered valuable as a generating facility, it must be capable of connecting to the transmission grid so that the energy can be delivered to the Bulk Electric System for distribution to electric consumers. The ability to install the solar panels at the site and interconnect to the transmission grid are the two factors that make this site desirable.

EAST KENTUCKY POWER COOPERATIVE, INC.

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REQUEST 2

RESPONSIBLE PARTY: Julia J. Tucker

**Request 2.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 4. The response was not responsive. What are the tangible, quantifiable benefits of the proposed Bluegrass Plains project?

**Response 2.** The project is expected to generate approximately 84,701 MWh per year at zero cost for energy since all of the costs are considered to be fixed. Energy prices in the period when this project is expected to become operational are projected to be roughly \$55/MWh. Consequently, more than \$4.5 million per year will be avoided in fuel and energy costs for EKPC owner members, with no air emissions impacts. In addition to the financial benefits, this project aligns with EKPC's Strategic Plan objective of investing in more renewable energy sources. It enables EKPC to fulfill contractual obligations with existing customers who have signed Green Power deals. Furthermore, it enhances EKPC's attractiveness to potential new customers in the context of economic development by demonstrating a commitment to sustainability. The project also leverages recent changes in federal law that incentivize rural development, thereby supporting the local economy. Additionally, it positions the Lexington-Fayette Urban County Government (LFUCG) as a desirable location for businesses by showcasing the proximity to a utility-scale solar facility, furthering regional economic growth.



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REQUEST 3

RESPONSIBLE PARTY: Patrick Bischoff

**Request 3.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 8. Where in Attachment PB-2 to Exhibit 3 to the Application does the figure of \$15.97 per kW-yr. appear?

**Request 3a.** In the Company's answer, it refers to Table 1 – Cost and Performance Characteristics of New Generating Technologies.pdf. Confirm this table is for 2022.

**Response 3a.** The referenced table is for 2022.

**Request 3b.** Is there a table for 2023? If so, what is the associated number for the fixed O&M rate?

**Response 3b.** The Cost and Performance Characteristics of New Generating Technologies 2023 table presents a Fixed O&M for Solar PV with tracking of \$17.16 per kW-yr.

**Request 3c.** Is there a table for 2024? If so, what is the associated number for the fixed O&M rate?

**Response 3c.** The US Energy Information Administration stated in a release dated July 26, 2023 that it would not publish an Annual Energy Outlook in 2024. The US EIA did publish a document titled Capital Cost and Performance Characteristics for Utility-Scale Electric Power Generating Technologies, dated January 2024. Table 1-2 in this document titled “Cost & Performance Summary Table” outlines a fixed O&M Cost in \$/kW-year of \$20.23 for Solar PV with single axis tracking.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
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**REQUEST 4**

**RESPONSIBLE PARTY: Patrick Bischoff**

**Request 4.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 9. Does the company have the calculation for the \$15.97 kW - yr. figure noted in Table 1? If yes, please provide it along with all supporting documents, in Excel with all formulae intact.

**Response 4.** The referenced fixed O&M value was developed and calculated by the United States Energy Information Administration. EKPC does not have the supporting information used to develop the fixed O&M cost.

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**REQUEST 5**

**RESPONSIBLE PARTY: Patrick Bischoff**

**Request 5.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 10. Does the \$15.97 kW – yr. include replacement of modules during the 30 year life of the project? If not, why not.

**Response 5.** The US EIA describes fixed costs for operations and maintenance of single axis tracking Solar PV facilities as follows, "Fixed O&M costs include costs directly related to the generation technology and facility design which do not vary with dispatch. These typically include labor, materials, and contract services for routine O&M, general and administrative (G&A) costs. Property taxes and insurance would also typically be considered fixed O&M but are excluded from the estimates." EKPC interprets the US EIA O&M characterization to include replacement of PV modules during the life of the facility as required by damage or operational issues not covered by warranty.

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**REQUEST 6**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 6.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 17b. Please provide a load forecast to demonstrate the company has projected electricity generation capacity versus its projected demand.

**Response 6.** See Response 1a to Staff's Supplemental Requests for Information.

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**REQUEST 7**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 7.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 19. Regarding the studies and RFPs "to determine the best place to construct the solar facilities and the best method of construction", is all that material confidential in the eyes of the Company? If not, what is available?

**Response 7.** All pertinent material has been included in the original Application and marked as confidential as needed.

EAST KENTUCKY POWER COOPERATIVE, INC.  
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REQUEST 8

RESPONSIBLE PARTY: Patrick Bischoff

**Request 8.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 21c, with the following Q & A:

Q. If any of the terms are unsatisfactory to the Company, will the Company execute the agreement regardless?

A. At this time, EKPC does not foresee unsatisfactory terms that would prohibit the execution of the Generation Interconnection Agreement with PJM.

**Request 8a.** What would the company do if the terms are unsatisfactory?

**Response 8a.** Objection to relevancy. This request assumes facts not in the record. This is purely hypothetical and EKPC is uncertain how we would define "unsatisfactory" in this context. Without waiving the objection, EKPC has reviewed the draft Generation Interconnection Agreement and takes no exceptions to the proposed terms. Upon full execution of the GIA, EKPC will provide a copy file for this case.

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REQUEST 9

RESPONSIBLE PARTY: Julia J. Tucker

**Request 9.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 23a-d.

**Request 9a.** In its application, did the Company include new resource alternatives for:

- i. Coal fired generation,
- ii. Natural Gas fired generation, or
- iii. Landfill gas-to-energy generation?

**Response 9a.** i. Construction of new coal fired generation is not a feasible alternative with today's environmental restrictions.

ii. Natural Gas fired generation was considered as an alternative in the 2022 Integrated Resource Plan. Results of the economic analyses indicated that solar energy was the preferred alternative before adding additional gas fired generation.

iii. Landfill gas-to-energy generation is evaluated as sites are found to be available. This can only be an alternative when a landfill with sufficient available methane gas is available and the landfill



operator is willing to work with the utility for the development. EKPC is not currently aware of any available sites for such generation.

**Request 9b.** Is there any publicly available material from the Company that would compare new resource alternatives against one another to determine the best option in the application?

**Response 9b.** EKPC's 2022 Integrated Resource Plan compared multiple alternatives and determined that an economic choice for EKPC would be the addition of several hundred megawatts of solar energy. This project is being pursued as beginning the implementation of that Plan.

**Request 9c.** How do confidential sheets from the Company's 2022 IRP provide any comparison costs as filed in this application? Explain your answer in detail including all mathematical conclusions with supporting documentation.

**Response 9c.** As described in EKPC's 2022 Integrated Resource Plan ("IRP"), all alternatives are modeled and compared against one another in a very detailed production cost model that considers both energy dispatch costs and fixed capital costs to implement each project. There are hundreds of iterations of potential scenarios that are compared, it is not a simplistic mathematical calculation. The methodology utilized for that analysis has been reviewed and commented on by the Kentucky Public Service Commission in its review of the IRP. The preferred plan, based on the detailed analysis, is shown on Table 8-7, page 171, of the IRP. That plan shows

over 400 MW of energy additions that are needed by 2025. This proposed project is one step in meeting that defined need.

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**REQUEST 10**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 10.** Reference the Company's response to LFUCG Initial Request for Information, No. 24. Please provide a list of the state stakeholders.

**Response 10.** EKPC maintains regular contact with all its regulatory bodies, governmental leaders, distribution cooperatives and other interested parties on local, state and federal levels.

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**REQUEST 11**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 11.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 26. Please update EKPC's Projected Capacity Needs as noted in the answer in the Company's reference to Table 8-6, 2022 IRP.

**Response 11.** See Response 1a to Staff's Supplemental Requests for Information.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00129**

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**REQUEST 12**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 12.** What is the expected capacity factor of the Bluegrass Plains project if approved?

**Response 12.** The expected annual capacity factor of the Bluegrass Plains project is roughly 24%.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
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**REQUEST 13**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 13.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 36. Please answer the question by providing the information, which EKPC gave to NRCO to assist it in issuing the RFP.

**Response 13.** Attachment JJT-1, page 2, first paragraph defines what was requested in the RFP. No information was provided to NRCO other than what was being sought from the RFP.

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**REQUES 14**

**RESPONSIBLE PARTY: Patrick Bischoff**

**Request 14.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 42. Confirm the cost for the Tetra Tech study was \$63,500. If you cannot confirm, please provide the amount.

**Response 14.** A purchase order was issued to Tetra Tech for the scope of work to develop the referenced study and report for \$63,500. To date, EKPC has compensated Tetra Tech \$59,122.55 on this purchase order.

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**REQUEST 15**

**RESPONSIBLE PARTY: Tom Stachnik**

**Request 15.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 44. Does the Company commit to providing the update to the outcome for the Rural Utilities New ERA program as expected in July 2024?

**Response 15.** EKPC submitted the New ERA Application as expected in July. Details of the application are confidential, proprietary, and sensitive.



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REQUEST 16

RESPONSIBLE PARTY: Patrick Bischoff

**REQUESTS 16.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 52.

**Request 16a.** If the PSC approves the application, when does the Company contemplate having a storm water runoff analysis and design completed?

**Response 16a.** EKPC anticipates the commencement of detailed design after the award of the Engineering, Procurement, and Construction contract which would occur after the full approval of the project by the Kentucky Public Service Commission and the Rural Utility Service (RUS). Detailed design is tentatively scheduled for completion in the third quarter of 2025. Storm water runoff analysis and design would be components of the detailed design effort.

**Request 16b.** Will the Company be required to seek approval of the storm water runoff impact by any governmental agency? If yes, please explain.

**Response 16b.** Please see the response to LFUCG's first data request, Request 64 and the associated response.

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**REQUEST 17**

**RESPONSIBLE PARTY:           Nick Comer**

**Request 17.**           Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 61. Were the 30 adjacent landowners to the property contacted directly by the Company about the project before the mailing of the packets on April 26, 2024?

**Response 17.**           No.

EAST KENTUCKY POWER COOPERATIVE, INC.  
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REQUESTS 18

RESPONSIBLE PARTY: Julia J. Tucker

**Request 18.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 65, 2024-05-09\_HL\_Fayette Solar OH ad.pdf and 2024-05-14\_HL\_Fayette Solar OH ad.pdf. In those articles, the following language appears. "This 387-acre solar farm will generate 40 megawatts of electricity, enough to serve the annual electricity needs of 4,560 typical Kentucky homes."

**Request 18a.** Provide the calculation in Excel, with all formulae attached, and with all supporting documents, for this assertion.

**Response 18a.** The average Kentucky household uses approximately 1,158 kWh of electricity each month. See Table 3-13 on page 84 of the 2022 Integrated Resource Plan, column labeled "Use Per Customer" for the year 2022. The subject solar project is expected to produce 84,700 MWh per year, based on an annual 24% capacity factor. 1 MWh is equal to 1,000 kWh.  $(84,700 * 1,000) / (1,158 * 12) = 6,095$ . This value is different than that stated in the article. The value in the article utilized a conservative approach and was based on the existing technology

currently in place at Cooperative Solar Farm One. The technology expected to be used at the subject solar farm will produce at a higher annual capacity factor than the existing solar farm and thus actually serve more households than indicated in the article. The calculation was not intended to be a precise point but rather an illustration of the impact of the project.

**Request 18b.** Perform the same exercise above for each of EKPC's generation fleet. Please list each unit separately by name and location

**Response 18b.** EKPC serves more than just residential homes, the requested exercise is taking an illustrative statement to a level of detail that has no meaning. The total amount of energy that EKPC needs to supply to its owner members and their consumers is shown on page 68 of the 2022 Integrated Resource Plan (IRP). The column labeled Net Total Requirements (MWh) is the total amount of energy that EKPC is expected to provide each year based on normal weather assumptions. That total includes all homes, businesses, farms, schools and any other type of consumer on the cooperative system. EKPC must either generate or purchase that energy to transmit it to the 16 owner members, who then distribute the energy to the end use consumers. Table 8-10 on page 174 of the IRP shows how EKPC expects to supply those energy needs by fuel type. Pages 104 through 110 of the IRP show the detail of how each existing unit in the EKPC generation fleet is expected to help serve that energy need.

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**REQUEST 19**

**RESPONSIBLE PARTY: Patrick Bischoff**

**Request 19.** Reference the Company's response to LFUCG Initial REQUESTS for Information, No. 68. Is the Company aware of Lexington's Purchase of Development Rights program, or PDR program?

**Response 19.** EKPC is generally aware of Lexington's Purchase of Development Rights program. The property that EKPC has optioned for purchase does not have an associated conservation easement.

EAST KENTUCKY POWER COOPERATIVE, INC.  
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LFUCG'S REQUESTS DATED JULY 3, 2024

REQUEST 20

RESPONSIBLE PARTY:

**Request 20.** Reference the Company's response to LFUCG Initial requests for Information, No. 71. Does the Company have an independent legal position as to whether it is exempt from LFUCG's zoning requirements?

**Response 20.** Objection. This request calls for a legal conclusion. Legal positions are normally reserved for briefs filed in the case. The discovery process is for fact gathering. Any legal positions of EKPC will be set forth in its brief in this proceeding. Without waiving the objection, KRS 100.324 speaks for itself.

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**REQUEST 21**

**RESPONSIBLE PARTY: Patrick Bischoff**

**Request 21.** Reference the Company's Response to Fayette Alliance Initial requests for Information, No. 1. When does the Company anticipate the EKPC Environmental Affairs' Phase I Environmental Site Assessment for the Bluegrass Plains Solar project will be completed?

**Request 21a.** Will the Company commit to filing it with the Commission when it is available?

**Response 21a.** EKPC anticipates completion of the Phase I Environmental Site Assessment by September 1, 2024 and will commit to file it with the Commission.



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**REQUEST 22**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 22.** Reference the Company's Response to PSC Staff First Request for Information No. 2a. Provide the cost benefit analysis as Requested.

**Response 22.** See Response 5 to Staff's Supplemental Requests for Information.

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**REQUEST 23**

**RESPONSIBLE PARTY: Patrick Bischoff**

**Request 23.** Reference the Company's Response to PSC Staff First REQUESTS for Information No.16. If the Bluegrass Pipeline project is approved, will the Company commit to establishing a complaint resolution process during the construction phase? If not, why not.

**Response 23.** Please refer to the response issued in LFUCG's first data request to Request 59.