

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

**In the Matter of:**

<b>THE ELECTRONIC APPLICATION OF</b>	)	
<b>EAST KENTUCKY POWER COOPERATIVE,</b>	)	
<b>INC. FOR 1) A CERTIFICATE OF PUBLIC</b>	)	<b>CASE NO.</b>
<b>CONVENIENCE AND NECESSITY TO</b>	)	<b>2024-00310</b>
<b>CONSTRUCT A NEW GENERATION</b>	)	
<b>RESOURCE; 2) A SITE COMPATIBILITY</b>	)	
<b>CERTIFICATE; AND 3) OTHER GENERAL RELIEF</b>	)	

**RESPONSES TO SIERRA CLUB'S FIRST REQUEST INFORMATION REQUEST**  
**TO EAST KENTUCKY POWER COOPERATIVE, INC.**

**DATED OCTOBER 28, 2024**

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BEFORE THE PUBLIC SERVICE COMMISSION

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EAST KENTUCKY POWER COOPERATIVE, )  
INC. FOR 1) A CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY TO )  
CONSTRUCT A NEW GENERATION )  
RESOURCE; 2) A SITE COMPATIBILITY )  
CERTIFICATE; AND 3) OTHER GENERAL RELIEF )

CASE NO.  
2024-00310

CERTIFICATE

STATE OF KENTUCKY )  
 )  
COUNTY OF CLARK )

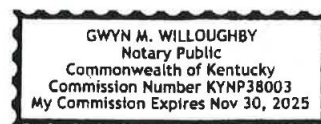
Julia J. Tucker, being duly sworn, states that she has supervised the preparation of the supplemental responses of East Kentucky Power Cooperative, Inc. to the Sierra Club's First Information Request in the above-referenced case dated October 28, 2024, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

*Julia J. Tucker*

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Subscribed and sworn before me on this 31<sup>st</sup> day of December, 2024.

*Gwyn M. Willoughby*  
Notary Public



**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00310**

**FIRST REQUEST FOR INFORMATION RESPONSE**

**SIERRA CLUB'S REQUEST DATED OCTOBER 28, 2024**

**REQUEST 15**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 15.** Please refer to the Direct Testimony of Witness Tucker at page 13, lines 5-23.

a. Please explain how “EKPC quantified this risk by analyzing the 1 in 10 probability of extreme weather events and spreading that risk over the planning horizon, with an extreme weather event occurring every two years for a 48-hour period within each of those two-year periods.”

b. Please provide the supporting workbooks, with all formulas and links intact, used to quantify risk and develop the 7% Reserve Margin.

c. Please explain how the Reserve Margin developed by EKPC differs from the PJM Forecast Pool Requirement.

**Response 15.** a-c. See EKPC response to Staff's First Request for Information, Item 3.

**Supplemental Response:** The capacity planning reserve margin (“reserve margin”) of seven percent was based on the methodology described in the direct testimony of Julia J. Tucker, page 13 line 3 through page 15 line 5. The analysis compares the normal one-in-two peak load forecast (“normal”) from the 2024 LTLF to a one-in-ten extreme weather (“extreme”) event occurring for

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48 hours every other forecast year. The result of that comparison is a seven percent difference between normal and extreme weather peak loads. Refer to the attached excel spreadsheet, “*SC Supplemental DR1-15b – Extreme Event vs. Forecast.xlsx*”.