

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

In the Matter of:

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

**POSTHEARING REQUESTS FOR INFORMATION OF
KENTUCKIANS FOR THE COMMONWEALTH AND MOUNTAIN
ASSOCIATION TO EAST KENTUCKY POWER COOPERATIVE, INC.**

Byron L. Gary
Tom FitzGerald
Ashley Wilmes
Kentucky Resources Council
P.O. Box 1070
Frankfort, Kentucky 40602
(502) 875-2428
Byron@kyrc.org
FitzKRC@aol.com
Ashley@kyrc.org

*Counsel for Joint Intervenors
Kentuckians for the Commonwealth and
Mountain Association*

Dated: March 21, 2025

DEFINITIONS

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

employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

11. "Company", "East Kentucky Power Cooperative", or "EKPC", means East Kentucky Power Cooperative, Inc., its parents or subsidiaries, and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
12. "Joint Intervenors," or "Joint Movants" means Kentuckians for the Commonwealth and Mountain Association who have moved for the status of full intervention as joint intervenors in this matter.
13. "ELCC" means effective load carrying capacity.
14. "HAP" means hazardous air pollutant, as defined by the Clean Air act in Section 112(b)(1) (42 U.S.C. § 7412(b)(1)), and modified by regulation at 40 C.F.R. Part 63, Subpart C.
15. "IRIS" means EPA's Integrated Risk Information System.
16. "IRM" means installed reserve margin.
17. "IRP" means integrated resource plan.
18. "LTLF" means long term load forecast.
19. "NDA" means non-disclosure agreement.
20. "PJM" means PJM Interconnection LLC.
21. "RUS" means the United States Department of Agriculture's Rural Utilities Service.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts, or depositions are requested, each witness should respond individually to the information request.
7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).
8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenors or the Commission to evaluate

the validity of the claim. With respect to documents for which a privilege is claimed, please produce a "privilege log" that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Intervenors or the Commission to evaluate the validity of such claims.

9. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.
10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**POSTHEARING REQUESTS FOR INFORMATION OF KENTUCKIANS
FOR THE COMMONWEALTH AND MOUNTAIN ASSOCIATION TO
EAST KENTUCKY POWER COOPERATIVE, INC.**

Joint Intervenors hereby tender the following posthearing requests for information to the Company:

- 4.1. Please refer to the testimony of Company Witness Brad Young on March 17 from 11:32 a.m. to 11:35 a.m. during cross-examination by Commissioner Stacy at the hearing held in this matter, and produce any evaluations or discussion of how Candidate Site Evaluation Criteria were established and evaluated not already disclosed.
- 4.2. Please refer to the testimony of Company Witness Jerry Purvis on March 17 from 2:46 p.m. to 2:47 p.m. at the hearing held in this matter, and provide:
 - a. Any analysis conducted by the Company on the effects of emissions on concentrations of hazardous air pollutants (HAPs) in the area surrounding the proposed facility, for example using air dispersion modeling or screening methods.
 - b. Is the Company aware of the US EPA's Integrated Risk Information System (IRIS) (<https://www.epa.gov/iris>)?
 - c. Did the Company assess the health effects of emissions or concentrations of HAPs in the area? If yes, please produce any such assessment, including assumptions, calculations, inputs and outputs.
 - d. Did the Company assess the impacts of emissions or concentrations of HAPs on ground and water pollution, soils, vegetation, or livestock in the area? If yes, please produce any such assessment, including assumptions, calculations, inputs and outputs.
- 4.3. Please refer to the testimony of Company Witness Julia Tucker on March 18 from 9:18 a.m. to 9:19 a.m. at the hearing held in this matter, and produce the hourly load experienced by EKPC for each of the past 5 years.
- 4.4. Please refer to the testimony of Company Witness Julia Tucker on March 18 from 9:21 a.m. to 9:42 a.m. at the hearing held in this matter, and produce or identify:
 - a. The diagram discussed by Ms. Tucker regarding the load served by the EKPC PJM zone, other Kentucky PJM zones, and other Kentucky utilities.
 - b. As a load serving entity, EKPC's PJM daily unforced capacity obligation and obligation peak load for each of the past 5 delivery years;
 - c. As a load serving entity, EKPC's forecasted PJM daily unforced capacity obligation and obligation peak load for each of the next 5 delivery years;
 - d. For each of the delivery years in subpart a., and b., above, and by month, please provide the amount of the Company's unforced capacity obligation and obligation peak load serving other utilities' customers (in Kentucky or otherwise), broken down by utility.

- e. For each of the delivery years in subpart a., and b., above, and by month, please provide the amount of EKPC customer demand served by another utility's transmission system, broken down by utility.
- 4.5. Please state whether each of the following statements is accurate. If a statement is inaccurate, or warrants clarification, please explain.
- a. As a full member of PJM and a load serving entity, EKPC purchases every kilowatt hour of energy needed to serve its customers through participation in PJM energy markets.
 - b. Energy is delivered to some of the retail customers served by EKPC using the transmission systems of Louisville Gas & Electric, Kentucky Utilities, AEP, and/or Duke Energy Ohio.
 - c. When energy is delivered to a retail customer served by EKPC using the transmission system of another utility, EKPC still purchased every kilowatt hour of that energy through PJM energy markets.
 - d. When another utility delivers energy to its retail customer using EKPC's transmission system, that utility pays EKPC for that service.
 - e. When another utility delivers energy to its retail customers using EKPC's transmission system, those kilowatt hours do contribute to peak load in PJM's EKPC Zone.
 - f. When another utility delivers energy to its retail customers using EKPC's transmission system, those kilowatt hours are not incorporated into the calculation of EKPC's unforced capacity obligation.
- 4.6. Please refer to the testimony of Company Witness Julia Tucker on March 18 from 2:08 p.m. to 2:09 p.m. at the hearing held in this matter and state whether the EKPC 2024 Long Term Load Forecast has been approved by the Rural Utilities Service (RUS).
- a. If yes, please provide documentation of this approval.
 - b. If no, please provide an update on the status of review, including potential timeline for approval.
 - c. Please provide any correspondence between the Company and RUS regarding the LTLF.
- 4.7. Please refer to the Company's supplemental response to JI 1-6, attaching a March 3, 2025 article, "Reciprocating Engine Technology Supports Grid Flexibility and Renewables Integration" by Aaron Larson, and answer the following questions:
- a. What publications does the Company rely on in determining resources to pursue? Please list.
 - b. Did the Company evaluate the following articles from the same author, published in Power Magazine in 2025 while determining what resource to choose:
 - i. "How Virtual Power Plants Enhance Grid Operations and Resilience," (Mar. 19, 2025), *available at* <https://www.powermag.com/how-virtual-power-plants-enhance-grid-operations-and-resilience/>;

- ii. "Geothermal Energy Storage: The Clean Power Solution You Haven't Heard Of," (Feb. 24, 2025), *available at* <https://www.powermag.com/geothermal-energy-storage-the-clean-power-solution-you-havent-heard-of/>;
 - iii. "A New Paradigm for Power Grid Operation," (Feb. 10, 2025); *available at* <https://www.powermag.com/a-new-paradigm-for-power-grid-operation/>;
- c. Has the Company evaluated the possibility of implementing a virtual power plant, geothermal energy, or a combination of wind turbines, battery storage systems, and advanced control systems to replicate the stabilizing effects traditionally provided by conventional power plants?
- i. If yes, please provide any such evaluation and documentation of the process for evaluating.
 - ii. If no, why not?

Respectfully Submitted,



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Tom FitzGerald
Ashley Wilmes
Kentucky Resources Council
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FitzKRC@aol.com
Ashley@kyrc.org

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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on March 21, 2025; that the documents in this electronic filing are a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron L. Gary