

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

**In the Matter of:**

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

**SIERRA CLUB’S THIRD REQUESTS FOR INFORMATION TO EAST KENTUCKY  
POWER COOPERATIVE, INC.**

Sierra Club hereby submits this Third Set of Data Requests to East Kentucky Power Cooperative (“EKPC” or the “Cooperative”). Please provide responses to these data requests below to the undersigned counsel.

**GENERAL INSTRUCTIONS**

1) **Definitions:** For the purposes of these data requests, the following definitions shall apply:

- a) The term “EKPC” means and includes East Kentucky Power Cooperative and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.
- b) The term “Cooperative” means and includes East Kentucky Power Cooperative and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.
- c) “Document” means all written, recorded or graphic matters, however produced or reproduced, pertaining in any manner to the subject of this proceeding, whether or not now in existence, without limiting the generality of the foregoing, all originals, copies and drafts of all writings, correspondence, telegrams, notes or sound recordings of any type of personal or telephone communication, or of

meetings or conferences, minutes of directors or committee meetings, memoranda, inter-office communications, studies, analyses, reports, results of investigations, reviews, contracts, agreements, working papers, statistical records, ledgers, books of account, vouchers, bank checks, x-ray prints, photographs, films, videotapes, invoices, receipts, computer printouts or other products of computers, computer files, stenographer's notebooks, desk calendars, appointment books, diaries, or other papers or objects similar to any of the foregoing, however denominated. If a document has been prepared in several copies, or additional copies have been made, and the copies are not identical (or which, by reasons of subsequent modification of a copy by the addition of notations, or other modifications, are no longer identical) each non-identical copy is a separate "document."

- d) "And" or "or" shall be construed conjunctively or disjunctively as necessary to make the requests inclusive rather than exclusive.
- e) The term "you" and "your" refer to "EKPC."
- f) The term "person" means any natural person, corporation, corporate division, partnership, limited liability company, other unincorporated association, trust, government agency, or entity.
- g) The term "regarding" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
- h) The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.
- i) "Identify" or "identifying" or "identification" when used in reference to a person that is a natural person means to state: the full name of the person and any names under which he conducts business; the current employer of the person, the person's job title and classification, the present or last known work address of the person; and, the present or last known telephone number of the person.
- j) "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.
- k) "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:
  - (a) the type of document (e.g., letter, memorandum, etc.);

- (b) the date of the document;
  - (c) the title or label of the document;
  - (d) the Bates stamp number or other identifier used to number the document for use in litigation;
  - (e) the identity of the originator;
  - (f) the identity of each person to whom it was sent;
  - (g) the identity of each person to whom a copy or copies were sent;
  - (h) a summary of the contents of the document;
  - (i) the name and last known address of each person who presently has possession, custody or control of the document; and,
  - (j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.
- l) “Identify” or “identifying” or “identification” when used in reference to communications means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, identify the document(s) containing or referring to the communication.
  - m) “Current” when used in reference to time means in the present time of this data request.
  - n) “Member-Owner Cooperative” means a distribution cooperative that is a member of EKPC that distributes electricity to retail customers
  - o) “Customer” means a person who buys retail electricity on a regular and ongoing basis from a Member-Owner Cooperative.
  - p) “Workpapers” are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas in-tact.

### **OTHER INSTRUCTIONS**

- a) Responses are to be provided in electronic format (e.g., text documents should be in the original word processor file format or PDF, data files should be in Excel).

- b) If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:
- 1) The privilege asserted and its basis;
  - 2) The nature of the information withheld; and,
  - 3) The subject matter of the document, except to the extent that you claim it is privileged.
- c) For any document or set of documents EKPC objects to providing to Sierra Club on the grounds it is burdensome or voluminous, please identify the specific document (see instruction (k) above).
- d) These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
- e) If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
- f) These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.
- g) For each response, identify all persons (see instruction (j)) that were involved in the preparation of the answers to the interrogatories below and/or are responsible for compiling and providing the information contained in each answer.
- h) Identify which witness(es) at the hearing is competent to adopt and/or discuss the response.
- i) Please produce the requested documents in electronic format to the following individuals:

Kristin Henry  
[kristin.henry@sierraclub.org](mailto:kristin.henry@sierraclub.org)

Nathaniel Shoaff  
[nathaniel.shoaff@sierraclub.org](mailto:nathaniel.shoaff@sierraclub.org)

Joaquin Garcia  
[joaquin.garcia@sierraclub.org](mailto:joaquin.garcia@sierraclub.org)

- j) Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to the Sierra Club, 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).
- k) In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.
- l) Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

### **DATA REQUESTS**

- 3-1. Did EKPC perform any modeling (production cost modeling, optimization modeling, capacity expansion modeling, and/or market valuation modeling) to support its decision to build the Liberty Rice Units? If yes:
  - a. Please identify each model that was used or utilized by EKPC or one of its agents to select the Liberty RICE Project.
  - b. Produce in machine-readable, electronic, digital format, as used by EKPC or one of its agents, with protections removed, all input files used in production cost, optimization, capacity expansion, or market valuation modeling for all scenarios or portfolios to support this case.
  - c. To the extent that such input files, as used by EKPC or one of its agents, cannot be produced in a commonly accessible format (i.e., text file, spreadsheet, or Access file), produce input files in a commonly accessible format.
  - d. Please identify any changes to the input files that may be required to reproduce modeling for this case. Please specify why such changes are required.
  - e. Please identify the assumptions, including any supporting documentation, EKPC or its agents used in each base case and sensitivity scenario modeled.
  - f. Produce in machine-readable, electronic, digital format, as used by EKPC or its agents, with protections removed, all output files used in production cost or optimization or capacity expansion or market valuation modeling for all scenarios or portfolios to support this case.
  - g. To the extent that such output files, as used by EKPC or its agents, cannot be

produced in a commonly accessible format (i.e. text file, spreadsheet, or Access file), produce input files in a commonly accessible format.

- h. Produce in machine-readable, electronic, digital format any other files, worksheets, or workpapers used to develop, interpret, or review inputs or outputs of production cost or optimization or capacity expansion or market valuation modeling for all scenarios or portfolios to support this case.
  - i. Produce in machine-readable, electronic, digital format all pre- or post-processing documents of all input or output files as used by EKPC or its agents, with protections removed for all scenarios or portfolios to support this case.
  - j. Please refer to Sierra Club IR 1-3, Sierra Club IR 1-16 and EKPC's Response to those requests. Please explain why modeling files have not been produced to date.
- 3-2. Please refer to the Direct Testimony of Witness Tucker at page 23, line 5 through page 24, line 1, the Response to Mountain Association Request 20(a)(ii) stating that "EKPC modeling indicates that the RICE units will have a 73% capacity factor," and other references identified below.
- a. Please provide the workpapers supporting the calculations provided in the referenced testimony and the modeling supporting the calculation of the 73% capacity factor, with all assumptions and supporting data provided and formulas intact in a working spreadsheet. If the modeling cannot be exported to a spreadsheet, provide the closest possible equivalent response.
  - b. Please confirm that EKPC did not provide the workpapers requested in part (a) in response to PSC IR 1-6, MA IR 1-17, MA IR 2-3, AOG IR 1-1, or SC IR 1-3.
  - c. In its response to PSC IR 2-4, EKPC states that the RICE units will run 6,426 hours per year. In PSC IR 2-8, EKPC states that there is a difference of 3,767 hours per year between RICE and CT units. Please confirm that EKPC's modeling indicates that the CT units would run 2,659 hours per year. If not confirmed, please provide the correct number of operating hours and explain the reason for the discrepancy.
  - d. Please confirm that the number of hours per year for CT units indicated by the response to part (c) is a result of the 2022 IRP. If that is not confirmed, please provide the source including all workpapers, with all assumptions and supporting data provided and formulas intact in a working spreadsheet. If the modeling cannot be exported to a spreadsheet, provide the closest possible equivalent

response.

- e. In AOG IR 1-3(b), EKPC states that a combustion turbine unit typically runs 20 percent of the time, or 1,752 hours / yr. Please explain why EKPC expects that the CT operating hours indicated by its responses to part (c) and part (d) are significantly higher than the typical operating hours for a CT unit.
  - f. Please provide any information in EKPC's possession that identifies any RICE units in North America that have operated at a capacity factor of more than 65% for at least one year.
  - g. Please provide any information from Wartsila in EKPC's possession regarding the frequency and duration of routine maintenance, including the number of hours or kilowatt hours between each recommended maintenance shutdown, the expected duration of each recommended maintenance shutdown, and whether any level of use (e.g., hours per month or capacity factor) is considered to be a higher-than-expected level of use that requires additional inspection and potential maintenance activities above the normal recommended maintenance period.
  - h. If EKPC has not obtained the information requested in part (g) from Wartsila, please explain why this was not evaluated before selecting Wartsila as the supplier for the proposed RICE units.
  - i. Please refer to the response to PSC IR 1-9 and confirm that EKPC will only dispatch the RICE units by offering them into the PJM energy market (except in emergency conditions).
  - j. If the response to part (i) is not "confirmed," please explain how EKPC will dispatch the RICE units and provide details confirming that the dispatch practices are reflected in the economic modeling requested in part (a) of this question.
- 3-3. Please refer to the Direct Testimony of Witness Tucker at page 8, lines 6 – 16 and Response to Sierra Club IR 1-7.
- a. Please provide a breakdown of the large load forecast in the response into (i) the component that is based on owner-member and Economic Development staff input and (ii) the component that is based on EKPC's projection using the regression analysis.

- b. Please break component (i) of part (b) into the amount representing large consumers that have commenced construction activities and those that are not known to have commenced construction activities.
  - c. Please confirm that for each new load, a demand of 1.5 MW is assumed on a per new load basis. If not confirmed, please explain.
  - d. Please provide the basis for the 1.5 MW demand for each new load or as otherwise explained in response to part (d).
  - e. Please provide the basis for the 70 percent load factor.
- 3-4. Please refer to the Response to Sierra Club IR 1-10.
- a. Please confirm that the response to IR 1-10(a) should be interpreted to reflect that the only significant change from EKPC's 2022 IRP that supports the addition or advancement of projects is the change in the reserve margin, as described in the Direct Testimony of Tucker at page 13. If not confirmed, please clarify the response.
  - b. Please reconcile the response to IR 1-10(a) with the response to IR 1-10(c).
  - c. In IR 1-10(d), EKPC was asked to "explain why EKPC is filing an expansion plan, but not an updated IRP." EKPC responded that it "Intends to file an updated IRP on schedule in April of 2025. EKPC referenced EKPC's response to Staff IR-6, but this response does not appear to discuss the decision to not file an updated IRP. Please provide a clear response as to the reason that EKPC has decided that it does not need to file an updated IRP to support the changes to its expansion plan.
- 3-5. Please refer to the Direct Testimony of Witness Tucker, page 11, lines 11-20 and the response to Sierra Club IR 1-14.
- a. Sierra Club IR 1-14(a) asked EKPC to explain "if EKPC has taken any steps to dampen the swing in demand observed in January 2024." EKPC's response is that it has factored winter storms "into its revised LTLF." Please (i) explain how factoring winter storms into the LTLF dampens the swing in demand and (ii) provide any other steps that EKPC has taken to dampen the swing in demand or, as represented in its response to IR 1-14(b) dampen the saturation of the load.



- b. Please provide any analyses performed by EKPC or its members to understand the “saturation of the load within the system due to the cold weather.”
  - c. Please provide all documents that support the responses to subparts a and b.
- 3-6. Please refer to the Direct Testimony of Witness Tucker at pages 15-16, 23 and the response to Sierra Club IR 1-16(a). The response references EKPC response to Staff IR 1-6. That response states the following:

EKPC did not include RICE units in its alternatives in the 2022 IRP. EKPC compared the RICE units to a simple cycle combustion turbine only in its analysis for this application, since the detailed optimization studies for the 2022 IRP were still pertinent with regards to energy needs. However, the timing of the need for the next resource has changed due to the change in peak load expectations.

Witness Tucker references, “run time of over 6,000 hours.”

- a. Please provide the “run time” for the referenced simple cycle combustion turbine in the 2022 IRP.
  - b. Please provide the annual energy forecast for the referenced simple cycle combustion turbine in the 2022 IRP in a workbook format.
  - c. Please provide the annual energy forecast for the RICE units in the “EKPC Capacity Expansion Plan” supporting this application in a workbook format.
- 3-7. Please refer to the Direct Testimony of Witness Tucker at pages 15-16, 23 and the response to Sierra Club IR 1-16(b), which references the response to Staff IR 1-6. Please confirm that EKPC’s response to Staff is intended to state that “all the assumptions (including Environmental Protection Agency (EPA) and PJM related assumptions), and all potential resource (including power purchase agreements (PPAs)) fixed and variable cost data used determine the specific resources selected and the timing of new resource implementation represented in Exhibit JJT-3” in the EKPC Capacity Expansion Plan are identical to the 2022 IRP unless specifically provided in response to Staff IR-6. If not confirmed, please provide a fulsome response to the Sierra Club and Staff information requests as originally requested.
- 3-8. Please refer to the response to Sierra Club IR 1-16(c). Please confirm that the “remaining MWs announced by EKPC” total 321 MW and provide EKPC’s expectation or best current understanding of the PJM ELCC adjusted value for those resources.

- 3-9. Please refer to the response to Sierra Club IR 1-17, which requested annual revenue requirements and present value revenue requirements. The response referenced EKPC's response to Staff IR 1-6, which did not include any reference to annual revenue requirements or present value revenue requirements. Please provide the requested data in workbook format with all formulas and links intact.
- 3-10. Please refer to the response to Sierra Club IR 1-15, which stated that the 7% reserve margin was based on a comparison of the normal load forecast to the extreme weather forecast.
- a. Please explain how the capacity planning reserve margin was calculated in the 2022 IRP and why that method was not used in the expansion plan used in this proceeding.
  - b. Please confirm that EKPC can and does routinely obtain resources from neighboring systems to meet demands that exceed its normal load forecast.
  - c. If the answer to (b) is not "confirmed," please provide data from the most recent ten events in which EKPC's demand exceeded its normal load forecast that supports the answer to part (b).
  - d. Please explain why the availability of resources from neighboring systems was not considered in the calculation of the 7% reserve margin.
  - e. Please provide a list of each transmission interconnection between EKPC and a neighboring system, including but not limited to TVA and LGE/KU.
  - f. Please provide the transfer capability (both directions) at each point listed in the response to part (e).
  - g. Please identify any constraints on EKPC's utilization of the available transfer capability provided in response to part (f) such as firm transmission commitments between other (not EKPC) parties.
- 3-11. Please refer to the response to Sierra Club IR 1-37(e), which requested, "What model or models does the Company use to assess resource adequacy?" EKPC's response referenced its response to Sierra Club IR 1-16 which does not include this information nor is the requested information included in its response to Staff IR 1-6. Please provide a response to the original request.

- 3-12. Please refer to the response to AOG IR 1-3(b) in which EKPC stated that it purchases roughly half of its annual energy needs from the market on an economic basis, to the response to PSC IR 1-8(a) in which EKPC states that the proposed RICE units will not impact the economic dispatch of Cooper Station, and to the response to AOG IR 1-8 in which EKPC states that it “uses the PJM energy market to optimize its Owner-Member’s generation fleet to dispatch units,” but also states that it “only utilizes the PJM market when it is economically prudent and beneficial to its Owner Members ...”
- a. Please identify where EKPC obtains the other half of its annual energy needs.
  - b. If EKPC obtains the other half of its annual energy needs from self-commitment or an equivalent dispatch practices, please provide any analysis in EKPC’s possession that demonstrates that such practices are cost-effective and in the interests of its customers.
  - c. Please provide a clear and complete explanation as to how EKPC’s “Owner-Member’s generation fleet” is dispatched. If the answer is anything other than economic dispatch under the direction or control of PJM (other than in emergency circumstances), then please include supporting data and records to fully illustrate each type of operator or market desk decision that departs from economic dispatch by PJM, including the type of information that would justify a finding that utilizing the PJM market is not “economically prudent and beneficial to its Owner Members.”
  - d. Please explain why the presence of the proposed RICE units on the PJM system would not impact Cooper Station dispatch. In other words, if Cooper Station is economically dispatched, won’t its dispatch be impacted by the availability of new generation on the PJM system, particularly generation located in a transmission-adjacent location such that congestion is a minimal factor in determining economic dispatch?
- 3-13. Please refer to AOG DR-1-3(a) in which EKPC states, “Other components such as the capacity sales in the PJM market, the value of off-system sales, and lower operating costs of the new units versus existing generation or purchases could ultimately result in a savings to the average consumer’s monthly bill.” Please identify where, in its Application, EKPC has provided an estimate of the potential future savings associated with each of these components. If EKPC has not provided such an estimate, please provide one, along with the workpapers that support such calculation.

- 3-14. Please refer to MA IR 1-1(a) in which EKPC expressed “concern over being able to depend on a third party to successfully complete a large [renewable energy resource] project as proposed in their offers.”
- a. Please confirm that EKPC is aware that third parties have successfully completed thousands of renewable energy resource projects and placed them into commercial operation over the past decade and even over the past several years in North America, with a significant portion of them in PJM.
  - b. Please provide any analysis in the possession of EKPC that indicates that the third-party developers were responsible for unsuccessful project outcomes as referenced in its response. If no such documents are available, please explain on what basis EKPC has formed the opinion stated in the referenced response.
  - c. Please explain why it would not be reasonable for third-party developers to assign responsibility for project failure to either EKPC itself or to any Kentucky-specific circumstances that EKPC may be aware of but did not refer to in the referenced response.
- 3-15. Please refer to MA IR 1-1(f) in which EKPC references a competitive bid process between Wartsila and MAN.
- a. Please provide the solicitation (or RFP), responses, and EKPC’s evaluation of the responses.
  - b. Please provide a detailed cost breakdown of the anticipated and known costs of each element of the proposals from MAN and Wartsila for the RICE units, including but not limited to required engineering, procurement expenses, construction, and routine maintenance.
  - c. Please provide the same detailed cost breakdown provided in response to part (b) for the costs that EKPC relied upon when awarding the limited notice to proceed to Warsila as stated in MA IR 1-1(g).
- 3-16. Please refer to PSC IR 1-48, in which EKPC states that it is installing a 69 kV capacitor bank at Cooper Station and that it has previously considered other transmission options. Please describe these other options and provide any analysis that EKPC performed to compare these options on the basis of cost and any other factors that EKPC deemed relevant. If no such analysis is available, please explain why not.

- 3-17. Please refer to the Direct Testimony of Witness Adams (p. 10-11), which describes “a reliability concern in the southern portion of [EKPC’s] system” and further states that this has been a known problem for several years. Please also refer to PSC IR 1-8(b) in which EKPC states, “The addition of the Liberty RICE units will provide real and reactive power support for the southern region of Kentucky when operating,” and discusses voltage support from Kentucky Utilities and TVA.
- a. Please confirm that due to the “support from Kentucky Utilities’ Brown Station and TVA ... to the overall voltage support and load-serving reliability in this region,” the Liberty RICE units should operate on an economic basis except when “other generation and/or transmission facilities ... are not available.” If not confirmed, please explain why the Liberty RICE units will operate on an other-than-economic basis even when the other generation and transmission facilities referenced in PSC IR 1-8(b) are available.
  - b. Please confirm that in MA IR-30, EKPC provided no instances of low-voltage issues in the “southern portion of [EKPC’s] system,” even during periods of high customer demand or when Cooper Station is offline.
  - c. Please provide an explanation as to why the thermal loading violations identified in MA IR-30 would have been mitigated by the work proposed in this application. If EKPC has any analysis or technical reports supporting this explanation, please supply those documents.
  - d. Please provide any analysis or other evidence supporting a determination that the reliability concerns referenced in the cited testimony and information responses require the proposed Liberty RICE units. In other words, if there were no other goals or objectives of the project, could the identified reliability concerns be mitigated by alternative solutions, such as a lesser capacity of RICE units, additional capacitor banks, an e-STATCOM unit, or other transmission system upgrades?
  - e. If in the response to part (d), EKPC agrees that other, potentially lower cost solutions are available for the reliability concerns, please provide any analysis or other supporting information as to the size, cost, and components of other potentially technically feasible mitigation solutions that EKPC may have prepared in evaluating the reliability concern in the southern portion of EKPC’s system over the past several years.

- 3-18. Please refer to MA IR 1-15, in which EKPC states that energy storage options were not considered because EKPC does not have enough solar generation to justify energy storage.
- a. Please confirm that in the PJM energy market, battery energy storage built by EKPC would be charged with market energy, unless the project was a hybrid solar+storage facility. If not confirmed, please explain on what economic or operational basis freestanding battery energy storage projects would be charged by EKPC.
  - b. If the response to (a) is confirmed, please confirm that the quantity of solar generation on EKPC's system is not relevant to the operation of freestanding energy storage projects.
- 3-19. Please refer to the response to MA IR 1-20(c)(iv), in which EKPC states that it did not select CTs because it anticipates a large number of startups or shutdowns.
- a. Please confirm either RICE or CT units will be dispatched based on PJM energy markets.
  - b. Please provide any modeling or analysis that EKPC has in its possession that support EKPC's statement regarding the number of startups and shutdowns assumed in MA IR 1-20.
- 3-20. Please refer to Direct Testimony of Witness Tucker (pg. 15-16) and Attachment JJT-3. Is JJT-3 the entirety of the "Expansion Plan"? If it is not the entirety of the "Expansion Plan," please produce all documents that encompass the "Expansion Plan."
- 3-21. Please refer to Attachment\_BY-3\_optimize, which is EKPC New Generation Project Feasibility Report and Alternatives Analyses."
- a. Is this the only alternative analysis that was performed to support the selection of the Liberty Rice Units?
  - b. If not, please produce each and every document that encompasses the alternative analyses done to support the selection of the Liberty Rice Units.
- 3-22. Please provide all documents that support the heat rates utilized by EKPC for CT and RICE boilers?

3-23. Please provide the variable operation and maintenance costs for the proposed Liberty RICE units, broken down by category, and provide all documents that support, document, or explain that calculation.

Dated: February 6, 2025

Respectfully submitted,

/s/ Joe F. Childers  
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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of Sierra Club's Third Set of Data Requests to East Kentucky Power Cooperative in this action is being electronically transmitted to the Commission on February 6, 2025, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Joe F. Childers  
JOE F. CHILDERS