

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

In the Matter of:

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)	
)	
ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC.)	Case No. 2024-00310
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)	

**AFFIDAVIT OF KRISTIN A. HENRY IN SUPPORT OF SIERRA CLUB'S
EMERGENCY MOTION FOR LEAVE TO SUBMIT SUPPLEMENTAL REQUESTS
FOR INFORMATION AND THE OPTION TO SUBMIT DIRECT TESTIMONY**

Comes the Affiant, Kristin A. Henry, after being duly sworn, and hereby states as follows:

1. I am an attorney representing Sierra Club in this proceeding.
2. On February 6, 2025, I called Ms. Honaker, counsel for East Kentucky Power Cooperative, and left a voicemail asking Ms. Honaker to call me back.
3. On the evening of February 6, 2025, Ms. Honaker emailed me and stated that she had received my voicemail but was in a board meeting that evening and asked for my availability to talk the following day.
4. On the evening of February 6, 2025, I emailed Ms. Honaker my availability for the following day and we established that we would talk at 10 a.m. on February 7, 2025.
5. Ms. Honaker called me on February 7, 2025, and I asked her to investigate whether EKPC had produced all responsive documents to Sierra Club's discovery requests.

I noted that Sierra Club had requested all modeling files in Information Requests 1-3 and 1-16 but that EKPC had not produced any modeling files to date.

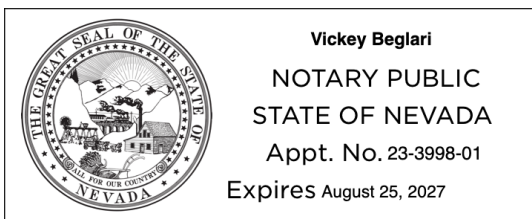
6. I then directed Ms. Honaker to an EKPC response in docket number 2024-00370 in which EKPC stated, “Yes, the modeling included the operation of the Liberty RICE units.” I noted that this response indicated that modeling of the Liberty Rice Units had been performed but no such modeling files had been produced to date.

7. I noted that in our third set of information requests again asked for all modeling but urged Ms. Honaker to produce such files as a supplement (if they existed) rather than wait until responses to the third set were due.

Kristin A. Henry
Kristin A. Henry, Affiant

Subscribed, acknowledged, and sworn to before me by Kristin A. Henry on this the 20 day of February.

My commission expires: 08/25/2027



Vickey Beglari
NOTARY PUBLIC
ID NO.: 23-3998-01
State of Nevada, Clark County

Notarized remotely using audio-video communication technology via Proof.