COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSES TO STAFF ’S THIRD INFORMATION REQUEST

TO EAST KENTUCKY POWER COOPERATIVE, INC.

DATED FEBRUARY 5, 2025

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Darrin Adams, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's Third Request for Information in the above-referenced case dated February 5, 2025, 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.

Darrin Adams

_____

Subscribed and sworn before me on this 18th day of February, 2025.

Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Craig Johnson, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's Third Request for Information in the above-referenced case dated February 5, 2025 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.

Craig Johnson

Subscribed and sworn before me on this 18th day of February, 2025.

Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Jerry Purvis, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's Third Request for Information in the above-referenced case dated February 5, 2025, 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.

Jerry Purvis

_____

Subscribed and sworn before me on this 18th day of February, 2025.

Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF EAST KENTUCKY POWER COOPERATIVE, INC. FOR 1) A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT A NEW GENERATION RESOURCE; 2) A SITE COMPATIBLITY 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 responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's Third Request for Information in the above-referenced case dated February 5, 2025, 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 February, 2025.

Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Brad Young, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's Third Request for Information in the above-referenced case dated February 5, 2025, 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.

Brad Young

_____

Subscribed and sworn before me on this 18th day of February, 2025.

Notary Public

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 1
RESPONSIBLE PARTY: Julia J. Tucker

Request 1. Refer to EKPC's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 2 Attachment Staff_DR2_-_2a.xlsx.

a. Commission Staff frequently sees the Effective Load Carrying Capability (ELCC) applied to installed generation capacity ratings. For Column C in the Attachment, explain how and why ELCC is applied to "Winter Peak Load."

b. Confirm that the "ELCC-Adjusted Summer Capacity after Additions," in Column F refers exclusively to the addition of the reciprocating internal combustion engine (RICE) units to EKPC's existing generation portfolio. If not, explain what other additions are included in the figures.

c. Confirm that the Winter Peak Forecast in Column B is EKPC's most recent long-term load forecast. If these have been previously filed, please identify the specific location in a case before the Commission.

d. As EKPC has historically and is forecasted to continue as a winter peaking utility, explain why it would not be more accurate to calculate its capacity positions using the ELCC adjusted winter capacity ratings of existing generation units plus any additions.

e. Provide an update to the table using winter ELCC capacity ratings to determine EKPC's capacity positions to satisfy its winter peaks.

Response 1.

a. EKPC supplied the winter peak load adjusted for ELCC solely based on Commission Staff's Second Request for Information ("Staff's Second Request"), Item 2a, which asked specifically for this data. EKPC does not use the values presented in column C for any planning purposes. PJM ELCC is only impactful to EKPC in its Summer capacity portfolio, which is based solely on the summer peak load obligation as calculated by PJM. The Winter peak load forecast is not impacted by ELCC and does not modify the demand target for reliability or the economic position of the portfolio during the Winter season.

b. The ELCC adjusted summer capacity values shown in column F include all resources shown in the Direct Testimony of Julia J. Tucker ("Tucker Direct Testimony") Attachment JJT-3, which includes the Liberty RICE project, the Cooper CCGT project, the Hydro Purchased Power Agreement ("PPA"), and the solar additions. The values shown in column F match those shown in Attachment JJT-3.

c. Yes, the winter peak load forecast shown in column B is the most-recent long-term load forecast as provided in Attachment JJT-2.

d. The ELCC adjusted generation capacity as calculated by PJM is impactful only to EKPC's capacity market position. The PJM capacity market is based on the summer peak load obligation as calculated by PJM. As stated correctly by Staff, EKPC is a Winter-peaking utility.

Planning for ELCC-adjusted summer generation capacity value compared against a Winter peak load forecast is not reasonable. ELCC is based both on PJM-wide fleet performance for each generator class as well as individual generator performance. If EKPC were to use ELCC-adjusted winter generation capacity, the capacity values would be grossly understated as compared to their actual installed capacity. This would drive EKPC's Owner-Members to invest unnecessarily in a greater amount of capacity than needed to meet its native load plus planning reserve requirements. EKPC must plan to meet its Winter peak load plus reserve margin to ensure reliability and maintain a prudent economic hedge against market energy prices, while also balancing the overall cost to Owner-Members and end-use retail members.

e. Please refer to the Excel spreadsheet, *PSC3.1e.xlsx*, which shows the ELCC-adjusted winter ratings versus the forecasted winter peak load plus planning reserve requirements as compared to the installed capacity values versus the forecasted winter peak load plus planning reserve requirements. A move to ELCC-adjusted winter capacity would require approximately an additional 1,000 MW of generation capacity to be built or procured.

ATTACHMENT IS AN EXCEL SPREADSHEET AND UPLOADED SEPARATELY

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 2
RESPONSIBLE PARTY: Julia J. Tucker

Request 2. Refer to EKPC's response to Commission Staff's First Request for Information (Staff's First Request), Item 6, pages 2 and 3 of 4. To paraphrase, EKPC's response states that when the price of natural gas is $4.00 per mmbtu, the RICE units must run 6,328 hours per year to overcome their higher capital and fixed Operating & Maintenance (O&M) expenses as compared to combustion turbines (CTs). When natural gas is $3.00 per mmbtu, the RICE units must run 7,350 hours per year and at $5.00 per mmbtu, the RICE units must run 5,560 hours per year to overcome the higher capital and fixed O&M costs.

a. Explain whether the components comprising the natural gas costs used in the calculations represent the commodity cost only or represent a contracted price, which includes the infrastructure expense. If the cost is inclusive of more than the commodity price, provide a list of the factors included in the price.

b. Provide EKPC's forecast for the same period for the natural gas cost if the cost includes more than just the commodity price used to determine the long-term cost-effectiveness of the RICE units.

c. In addition to participating in the PJM capacity and energy markets, explain whether the RICE units will provide revenue from PJM ancillary services and, if so, provide a list of potential services for which EKPC will derive revenues.

d. When the expected revenues from participating in PJM's ancillary markets is considered, explain whether the RICE units' total benefits outweigh that of a CT if natural gas prices remain relatively low. As a part of the response, explain whether the expected ancillary revenues lower the cross-over point when compared to a CT.

Response 2. a. Natural gas prices used for modeling the production cost of the RICE units included commodity cost, the mainline reservation charge, the mainline commodity usage charge, and the park and loan service charge. The combination of all commodity and transmission charges is referred to as the delivered price of natural gas.

b. Refer to the Excel spreadsheet *PSC3.2b.xlsx* provided separately.

c. EKPC anticipates that, in addition to the capacity and energy markets, the Liberty RICE facility will also participate in the synchronous reserve, non-synchronous reserve, secondary reserve, and regulation market

d. EKPC does not forecast ancillary service prices and therefore the production cost model does not supply ancillary service revenues as an output. J.K. Smith Units 9 and 10 received an average revenue of $3.54 per MWh over the years 2023 and 2024. This results in approximately $4.7 million in ancillary service revenue annually when applied to the modeled annual energy from the Liberty RICE facility. The Liberty RICE facility will be expected to operate significantly more

hours than a combustion turbine would because of the better heat rate and flexible operating characteristics of the RICE facility. EKPC has developed a spreadsheet comparing the average annual expected costs and revenues for both facilities. The MW value for both were set to be equivalent for comparison purposes. The comparison demonstrates that the RICE facility is a better economic option while also providing improved operating capabilities. Please see the Excel spreadsheet provided in response to Item 2b.

ATTACHMENT IS AN EXCEL SPREADSHEET AND UPLOADED SEPARATELY

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 3
RESPONSIBLE PARTY: Brad Young

Request 3. Explain whether the RICE units are designed to perform continuously for six thousand or more hours per year and the number of years they typically run. Include any workpapers or supporting documentation.

Response 3. The RICE units can operate continuously for an unlimited number of hours annually, provided they are operated, maintained and repaired according to the manufacturer's specifications. They have a minimum specified design life of 30 years.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 4
RESPONSIBLE PARTY: Brad Young

Request 4. Explain how the useful life is impacted with the hours run each year including whether the run time shortens the useful life. Include any workpapers or supporting documentation.

Response 4. The RICE units have a design life of 30 years which is not impacted by the run time of the engines. The number of starts, stops and trips have minimal impact on the efficiency loss of the RICE units over time and have no impact on the required maintenance schedule. The maintenance schedule is determined strictly on engine run hours.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 5
RESPONSIBLE PARTY: Brad Young

Request 5. If RICE units are utilized for purposes other than electricity generation, provide examples.

Response 5. Besides power generation, a significant application of RICE units, similar to those proposed, is in marine vessels—passenger, merchant, and specialized ships. With over 75 years of marine use, these units are available in diverse configurations and can operate on various gaseous and liquid fuels.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 6
RESPONSIBLE PARTY: Brad Young

Request 6. Refer to the Direct Testimony of Brad Young, Attachment BY 3_optimize.pdf.

a. Provide an updated expanded picture or map similar to those found on pages 22 and 24 for the proposed Liberty site showing the proposed location of all known equipment, the location of the gas pipeline from which natural gas will be provided to the site, the proposed location of the gas pipelines inside the site to the RICE units, the location of the EKPC's existing transmission line that will interconnect with the proposed Liberty site, and the transmission lines extending from the site to EKPC's existing transmission line

Response 6. See attachment *PSC3.6.pdf* provided separately.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 7
RESPONSIBLE PARTY: Brad Young

Request 7. Refer to EKPC's response to Staff's Second Request, confidential response, Item 18. Provide an update to this response.

Response 7. This response is being filed under seal pursuant to a motion for confidential treatment.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 8
RESPONSIBLE PARTY: Julia J. Tucker

Request 8. Explain whether EKPC experienced a new winter peak during winter storm Elliott and whether any large industrial customers were interrupted.

Response 8. EKPC experienced a new winter peak during Winter Storm Elliott of 3,747 MW, which eclipsed its previous winter peak of 3,507 experienced during the Polar Bomb of 2015. PJM refers to load interruptions as Demand Response. EKPC's Demand Response during Winter Storm Elliott is shown in the table below.

EKPC interrupted industrial customers in accordance with the interruptible tariff during Winter Storm Elliott. PJM refers to load interruptions as Demand Response. EKPC's Demand Response during winter storm Elliott is shown in table below this response.

EKPC's peak was again eclipsed during Winter Storm Gerri in January of 2024, for which EKPC set a new all-time system peak of 3,754 MW. The most recent event, Winter Storm Enzo in January of 2025, saw EKPC peak at 3,744 MW, just 10 MW below the all-time peak. A large industrial customer had an electrical outage and was not operating at full load during the peak period, otherwise, EKPC would have set another all time peak load this January.

Demand Response during Winter Storm Elliott

Date	Hour Ending	Demand Response (MW)	Date	Hour Ending	Demand Response (MW)
12/23/2022	1		12/23/2022	1	
12/23/2022	2		12/23/2022	2	
12/23/2022	3		12/23/2022	3	
12/23/2022	4		12/23/2022	4	
12/23/2022	5		12/23/2022	5	
12/23/2022	6		12/23/2022	6	
12/23/2022	7		12/23/2022	7	352
12/23/2022	8		12/23/2022	8	352
12/23/2022	9		12/23/2022	9	352
12/23/2022	10		12/23/2022	10	352
12/23/2022	11		12/23/2022	11	354
12/23/2022	12		12/23/2022	12	356
12/23/2022	13		12/23/2022	13	356
12/23/2022	14		12/23/2022	14	356
12/23/2022	15		12/23/2022	15	356
12/23/2022	16		12/23/2022	16	356
12/23/2022	17		12/23/2022	17	356
12/23/2022	18		12/23/2022	18	353
12/23/2022	19	31	12/23/2022	19	351
12/23/2022	20	57	12/23/2022	20	
12/23/2022	21	57	12/23/2022	21	
12/23/2022	22	57	12/23/2022	22	
12/23/2022	23	55	12/23/2022	23	
12/23/2022	24		12/23/2022	24	

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 9
RESPONSIBLE PARTY: Julia J. Tucker

Request 9. Winter Storm Elliott had multiple days of sustained intense cold. Explain whether EKPC had sufficient capacity including potential interruptible power to avoid blackouts if a new winter peak had been reached and sustained.

Response 9. During Winter Storm Elliot, EKPC had a maximum of 3,392 MW of available generation, and a maximum of 356 MW of load that could be interrupted. EKPC's generation and interruptible loads (Demand Response) is used to offset EKPC's purchases from the PJM energy market. EKPC was able to serve its load requirements as it purchases all energy needs from the PJM energy market and sales all generation and Demand Response into the market, However EKPC was not able to fully hedge its load purchases with generation resources and Demand Response. No blackouts occurred on the EKPC system.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 10
RESPONSIBLE PARTY: Brad Young and Jerry Purvis

Request 10. Provide any permitting updates since the filing of the Application in this case.

Response 10. EKPC submitted the air permit application to the Division for Air Quality. The air application is under their review and there is no new information to provide. EKPC submitted to the Rural Utility Service ("RUS") the environmental assessment ("EA") on February 11, 2025. Please see Joint Intervenors' Supplemental Response, Item 9 for a copy of the EA.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 11
RESPONSIBLE PARTY: Brad Young

Request 11. Provide any transportation studies or analyses related to the Liberty project performed since the filing of the Application.

Response 11. See attachment *PSC3.11.pdf*, provided under seal pursuant to a motion for confidential treatment.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 12
RESPONSIBLE PARTY: Julia J. Tucker

Request 12. Refer to the Direct Testimony of Julia J. Tucker, Attachment JJT-3. Explain the status of the planned 300 MW Hydro Purchase Power Agreement beginning in 2026 as shown in the Exhibit.

Response 12. EKPC is in contract negotiations for the referenced PPA, but no agreement has been finalized to date.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 13
RESPONSIBLE PARTY: Jerry Purvis

Request 13. Refer to EKPC's response to Staff's First Request, Item 18. Provide any NEPA reports, or other studies related to such a report that have been performed since the response.

Response 13. Please see the response to Item 10.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 14
RESPONSIBLE PARTY: Brad Young, Craig Johnson and Darrin Adams

Request 14. Provide an updated estimate of costs including updates to EKPC's response to Staff's First Request, Item 43, Item 44, and Application, Confidential Attachment to BY-1 Appendix R as well as to the schedule provided in Appendix Q.

Response 14. There has been no change to the capital costs, O&M costs and schedules provided in the original application and EKPC's response to the Staff's First Request.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 15
RESPONSIBLE PARTY: Darrin Adams

Request 15. Provide the status of the PJM Interconnection Study.

Response 15. There has been no change in the status of the PJM Interconnection study since the Application was submitted. Currently, the generation-interconnection application EKPC submitted to PJM in August 2024 is still pending PJM review, which is not scheduled to start until the first quarter of 2026. PJM's made filings at the Federal Energy Regulatory Commission ("FERC") in Docket No. ER25-712-000 to modify the PJM Tariff for its Reliability Resource Initiative ("RRI"), there is a potential opportunity to submit the Liberty RICE facility for selection by PJM into this accelerated RRI cluster. FERC approved PJM's proposed tariff revisions for RRI on February 11, 2025. If selected for RRI, the interconnection studies for the Liberty RICE facility could be accelerated by 12-18 months. PJM plans to open an application window for RRI projects on February 28, 2025, and that window will close on March 14, 2025. PJM expects to select the projects that will be included in the RRI sometime in the second quarter of 2025. The selected RRI projects will be incorporated into the Transition Cycle #2 cluster and follow the timeline for that cluster, which is scheduled to end in the fourth quarter of 2026. If not selected for RRI, the

Liberty RICE facility will be part of PJM's Cycle #1 cluster, for which studies are expected to be completed in the fourth quarter of 2027 or the first quarter of 2028.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00310
THIRD REQUEST FOR INFORMATION RESPONSE

STAFF 'S REQUEST DATED FEBRUARY 5, 2025
REQUEST 16
RESPONSIBLE PARTY: Julia J. Tucker

Request 16. Refer to EKPC's response to Attorney General's First Request for Information, Item 5. Confirm that the natural gas prices in the Excel sheet included in the response account for the expense of the infrastructure in the price. If not confirmed, provide a re-calculated Excel sheet with the cost of the infrastructure factored into the price.

Response 16. The natural gas prices provided in response to AG DR1-5 included only the commodity cost of the natural gas, but did not include delivery costs. The natural gas prices provided in the Excel spreadsheet PSC DR-2b include both the commodity and delivery costs (mainline reservation, mainline usage, and park and loan charges), or the total delivered price. The infrastructure costs associated with the natural gas pipeline tap needed to supply Liberty RICE facility are included in those delivery costs. The production cost model was based on the total delivered price.