

**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 MOUNTAIN ASSOCIATION AND KENTUCKIANS FOR THE**  
**COMMONWEALTH'S FIRST REQUEST INFORMATION REQUEST**  
**TO EAST KENTUCKY POWER COOPERATIVE, INC.**

**DATED OCTOBER 28, 2024**

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

**In the Matter of:**

**THE ELECTRONIC APPLICATION OF )**  
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**CERTIFICATE; AND 3 )**  
**OTHER GENERAL RELIEF )**  
**CERTIFICATE**

**CASE NO.**  
**2024-00310**

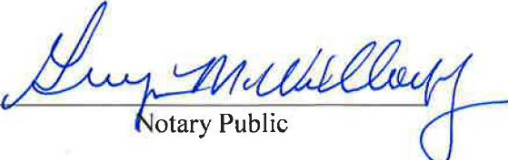
**STATE OF KENTUCKY )**  
**)**  
**COUNTY OF CLARK )**

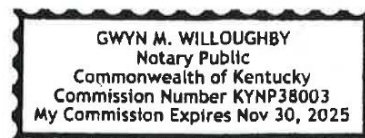
Darrin Adams, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Joint Intervenor's Request for Information in the above-referenced case dated October 28, 2024, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information, and belief, formed after reasonable inquiry.

*Darrin Adams*

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Subscribed and sworn before me on this 6th day of December, 2024.

  
Notary Public



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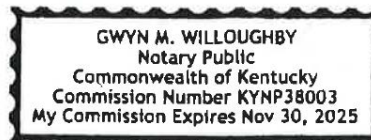
Craig Johnson, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Joint Intervenor's First Request for Information in the above-referenced case dated October 28, 2024, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information, and belief, formed after reasonable inquiry.

*Craig Johnson*

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Subscribed and sworn before me on this 6th Day of December, 2024.

*Gwyn M. Willoughby*  
Notary Public



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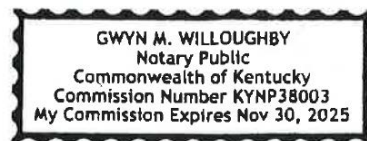
Jerry Purvis, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Joint Intervenor's First Request for Information in the above-referenced case dated October 28, 2024, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information, and belief, formed after reasonable inquiry.

*Jerry Purvis*

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Subscribed and sworn before me on this 6th day of December, 2024.

*Gwyn M. Willoughby*  
Notary Public



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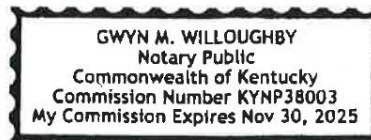
**STATE OF KENTUCKY )**  
**)**  
**COUNTY OF CLARK )**

Thomas J. Stachnik, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Joint Intervenor's First Request for Information 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 his knowledge, information, and belief, formed after reasonable inquiry.

*Thomas J. Stachnik*

Subscribed and sworn before me on this 6th day of December, 2024.

*Gwyn M. Willoughby*  
Notary Public



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CERTIFICATE

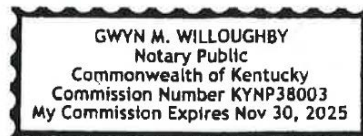
STATE OF KENTUCKY )  
 )  
COUNTY OF CLARK )

Julia J. Tucker, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Joint Intervenor's First Request for Information 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*

Subscribed and sworn before me on this 6th day of December, 2024.

*Gwyn M. Willoughby*  
Notary Public



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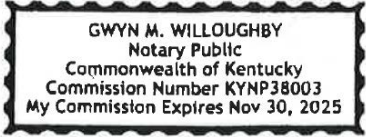
Brad Young, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Joint Intervenor's Request for Information in the above-referenced case dated October 28, 2024, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information, and belief, formed after reasonable inquiry.

*Brad Young*

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Subscribed and sworn before me on this 6th day of December, 2024.

*Gwyn M. Willoughby*  
Notary Public



**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00310**

**FIRST REQUEST FOR INFORMATION RESPONSE**

**MOUNTAIN ASSOCIATION AND KENTUCKIANS FOR THE COMMONWEALTH'S  
REQUEST DATED OCTOBER 28, 2024**

**REQUEST 1**

**RESPONSIBLE PARTY:                Julia J. Tucker and Brad Young**

**Request 1.**                Please refer to Exhibit 2, Direct Testimony of Don Mosier at page 5 line 5 to page 6 line 14; and Exhibit 3, Direct Testimony of Julia Tucker Section III (pages 20-25) generally; and Exhibit 4, Direct Testimony of Brad Young at page 11-12 and answer the following requests:

- a. Was a request for proposals or “RFP” or other competitive or bidding process conducted by EKPC or its agents, including its Owner’s Engineer, to solicit possible resources prior to selection of the Liberty RICE?
- b. If the answer to a. above is yes, please provide any solicitation or RFP, as well as all responses and evaluation.
- c. If the answer to a. above is no, why not?
- d. Who will construct the facilities?
- e. Were options other than self-build considered?
- f. How were the specific Wartsila gensets selected as compared to other RICE?
- g. Please provide all contracts for the reciprocating engines, generator step-up transformers, and other equipment contracted for related to this application.



h. Please provide a detailed cost breakdown of the anticipated and known costs of each element of the applied-for facilities, including engineering, procurement, and construction.

**Response 1.**

a. EKPC has conducted multiple RFPs for renewable energy resources in the past few years. The experience during those solicitations has created concern over being able to depend on a third party to successfully complete a large project as proposed in their offers. Increased regulation, along with supply chain limitations, has not provided a conducive environment for third party development. EKPC has evaluated and chosen two different solar developers to negotiate with in good faith to reach an agreement to construct utility scale solar projects. Neither of these endeavors have resulted in successful completion of contracts to move forward with constructable projects. EKPC's system reliability and dispatchability will be impacted with the proposed Liberty RICE project. EKPC could not risk spending months, or years, in evaluations and negotiations to only determine at the end of the process that the developer could not deliver on its proposal, as has happened with the two solar developers.

b. Please see Case No. 2024-00129, Application Exhibit 2 Direct Testimony of Julia J. Tucker, Attachment JJT-1 Solar RFP Responses and Evaluations.

c. See Response 1a.

d. EKPC will utilize a multiple prime contracting approach to execute this project. All procurement and subcontracts will be on EKPC's paper with support from the Owner's Engineer (Burns & McDonnell) for engineering, procurement and construction staff. Please reference Table 5-1 of the Project Scoping Report which lists all anticipated contracts for the project per two major

categories; construction contracts and equipment contracts. Under this approach, engineered equipment will be procured directly by EKPC and assigned to the appropriate installation contractors. This multiple prime contracting approach provides the following benefits:

- Cost savings to EKPC in return for manageable increased owner's risk.
- Facilitates early award of major equipment procurements to allow detailed design engineering to proceed expeditiously to meet the project schedule.
- Offers the greatest flexibility for EKPC to be involved in key decisions regarding design.

At this time, limited notices to proceed have been awarded on only (2) contracts:

- Owner's Engineer (Burns & McDonnell)
  - Reciprocating Engines (Wartsila)
- e. See Response 1a.
- f. EKPC managed a competitive bid process between Wartsila and MAN. Wartsila was selected from this competitive bid process.
- g. Please reference Table 5-1 of the Project Scoping Report which lists all anticipated contracts for the project per two major categories; construction contracts and equipment contracts. At this time, a limited notice to proceed for the reciprocating engines has been awarded to Wartsila and represents the only equipment contract award to date for this project.

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

**MOUNTAIN ASSOCIATION AND KENTUCKIANS FOR THE COMMONWEALTH'S  
REQUEST DATED OCTOBER 28, 2024**

**REQUEST 2**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 2.** Please refer to Exhibit 2, Direct Testimony of Don Mosier at page 6 lines 18-19; and Exhibit 3, Direct Testimony of Julia Tucker at page 4 line 22 to page 5 line 2, and page 7 line 1 to page 8 line 3, and identify each place in EKPC's most recent IRP where planning or need for this project is referenced.

**Response 2.** EKPC has not proposed a reciprocating internal combustion engine ("RICE") facility in any other case filed to date. However, EKPC did cite the need for additional capacity resources in the winter 2032 period as shown in Table 8-3 on page 166 in EKPC's 2022 IRP. This need was identified based on the EKPC 2020 long term load forecast ("LTLF") which has since been updated with the 2024 LTLF. Refer to the Direct Testimony of Julia J. Tucker beginning at page 11 line 7 to page 12 line 10 within the Application for details regarding the comparison between the 2020 and 2024 LTLF, which pulls the need for new generation forward.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00310**

**FIRST REQUEST FOR INFORMATION RESPONSE**

**MOUNTAIN ASSOCIATION AND KENTUCKIANS FOR THE COMMONWEALTH'S  
REQUEST DATED OCTOBER 28, 2024**

**REQUEST 3**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 3.** Please refer to Exhibit 2, Direct Testimony of Don Mosier at page 6 lines 3-10; and Exhibit 3, Direct Testimony of Julia Tucker at page 3 lines 6-9, page 14 generally, and page 21 lines 14-18, and answer the following questions:

- a. Does EKPC participate in PJM under the Fixed Resource Requirement (FRR) option or as a full participant in the PJM Interconnection LLC (PJM) Reliability Pricing Model (RPM) Base Residual Auction (BRA) and Incremental Auction (IA)?
- b. Please compare penetration of solar production on EKPC, Kentucky, and PJM's systems to penetration in California.

**Response 3.**

- a. EKPC is a full participant in the RPM BRA and IAs.
- b. EKPC does not produce state-wide solar penetration numbers. Solar penetration on the EKPC system includes the 8.5 MW Cooperative Solar Farm 1 project at its headquarters in Winchester, KY and a 0.5 MW solar farm at Star Hill Farms. EKPC has no knowledge of the solar penetration in California.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
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REQUEST DATED OCTOBER 28, 2024**

**REQUEST 4**

**RESPONSIBLE PARTY:            Julia J. Tucker**

**Request 4.**            Please refer to Exhibit 2, Direct Testimony of Don Mosier at page 7 lines 4-5; as well as Exhibit 3, Direct Testimony of Julia Tucker at page 4 line 22 to page 6 line 11, and provide the most recent copies of the EKPC Board's Sustainability Plan and its overall Strategic Plan.

**Response 4.**            See Direct Testimony of Julia Tucker, Attachment JJT-1.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
**CASE NO. 2024-00310**  
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REQUEST DATED OCTOBER 28, 2024**

**REQUEST 5**

**RESPONSIBLE PARTY:            Julia J. Tucker**

**Request 5.**            Please refer to Exhibit 2, Direct Testimony of Don Mosier at page 7 lines 11 to 13, and identify each engine of this type or natural gas fired combustion turbine engine evaluated, along with the capacity, pricing, and construction timeline for each.

**Response 5.**            Alternatives that were evaluated are discussed in the Direct Testimony of Julia J. Tucker. The quote referenced is specifically related to why EKPC was moving forward with the RICE project at this time.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
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**MOUNTAIN ASSOCIATION AND KENTUCKIANS FOR THE COMMONWEALTH'S**  
**REQUEST DATED OCTOBER 28, 2024**  
**REQUEST 6**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 6.** Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 6 lines 5-9 and detail the referred to:

- a. Legal pressures to decarbonize,
- b. Regulatory pressures to decarbonize, and
- c. Industry pressures to decarbonize the fleet.

**Response 6.** a-b. Green House Gas Rules are legal and regulatory pressures to decarbonize.

c. Industrial sustainability plans call for manufacturing that relies upon less carbon-intensive energy resources.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
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REQUEST DATED OCTOBER 28, 2024**

**REQUEST 7**

**RESPONSIBLE PARTY:            Julia J. Tucker**

**Request 7.**            Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 8 lines 5-16, and provide a copy of EKPC's 2024 Long Term Load Forecast, along with any supporting documentation and workpapers.

**Response 7.**            See response to Commission Staff's First Request for Information, Item 1.



**EAST KENTUCKY POWER COOPERATIVE, INC.  
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FIRST REQUEST FOR INFORMATION RESPONSE**

**MOUNTAIN ASSOCIATION AND KENTUCKIANS FOR THE COMMONWEALTH'S  
REQUEST DATED OCTOBER 28, 2024**

**REQUEST 8**

**RESPONSIBLE PARTY: Response: Julia J. Tucker**

**Objection: Legal**

**Request 8.** Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 8 line 17 to page 10 line 1, and answer the following questions:

- a. With regard to “The impact of those plans” referenced at page 9 line 2, explain
  - i. What plans are being referenced,
  - ii. How the referenced plans were incorporated into the load forecast, and
  - iii. How the forecast was modified downward;
- b. Please provide the “extensive review of DSM/EE programs” referenced at page 9 line 8, and any report, market analysis or potential study along with supporting documentation and workpapers;
- c. Does EKPC intend to file an update to its approved DSM/EE plan with the Public Service Commission?
- d. Why was

e. For what plant, equipment, property, or facility for furnishing service to the public is the “CPCN filing that EKPC anticipates filing at the Commission later this fall,” referenced at page 9 lines 11-12?

**Response 8.** a.i. The referenced plans are those demand side management programs which are now cost-effective having included the tax incentives, which were not cost-effective prior to the incentives.

a.ii. Refer to the Direct Testimony of Julia J. Tucker, beginning on page 9 line 5 and ending on page 10 line 1 for the impact of the DSM/EE plans on the 2024 LTLF.

a.iii. Refer to response a.ii., above.

b. EKPC will submit the DSM plan to the Commission in the near future.

c. Yes.

d. The request appears to be cut-off.

e. **Objection.** EKPC is evaluating multiple strategies to plan for its future generation needs. This information is highly confidential and EKPC is not required to disclose its business strategy before plans have been finalized.

**EAST KENTUCKY POWER COOPERATIVE, INC.  
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REQUEST DATED OCTOBER 28, 2024**

**REQUEST 9**

**RESPONSIBLE PARTY:            Julia J. Tucker**

**Request 9.**            Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 10 line 20 to page 11 line 4 and provide any report or analysis from the referenced consultant retained to “forecast EV growth and energy requirements,” along with any supporting workpapers.

**Response 9.**            Please see attached GDS EV Forecast Description, GDS’s modeling is proprietary. Results are included in the EV Stock and Energy spreadsheet. EKPC adjusted the base case energy projections for leap year, added average distribution and transmission losses, and incorporated the results in the EKPC long term load forecast.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
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REQUEST DATED OCTOBER 28, 2024**

**REQUEST 10**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 10.** Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 13 to page 14, and respond to the following requests:

- a. Provide the ELCC applicable to each of EKPC's generating facilities.
- b. Provide any documentation and supporting workpapers for how the current Reserve Margin of 7% was developed.

**Response 10a.**

a.

Unit	25/26 ELCC Class Rating
Spurlock 1	0.84
Spurlock 2	0.84
Spurlock 3	0.84
Spurlock 4	0.84
Cooper 1	0.84
Cooper 2	0.84
Smith 1	0.79
Smith 2	0.79
Smith 3	0.79
Smith 4	0.79
Smith 5	0.79
Smith 6	0.79
Smith 7	0.79

Unit	25/26 ELCC Class Rating
Smith 9	0.62
Smith 10	0.62
Bluegrass 1	0.79
Bluegrass 2	0.79
Bluegrass 3	0.79

- b. See EKPC response to Commission Staff's First Request for Information, Item 3.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00310**

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**MOUNTAIN ASSOCIATION AND KENTUCKIANS FOR THE COMMONWEALTH'S  
REQUEST DATED OCTOBER 28, 2024**

**REQUEST 11**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 11.** Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 15 to page 18, and provide the underlying workpapers in machine-readable format for Figures 2 and 3.

**Response 11.** See excel sheet uploaded separately in the electronic filing system "MA - DR1-11 - JJT-3 EKPC Capacity Expansion Plan.xlsm".

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
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**REQUEST 12**

**RESPONSIBLE PARTY: Jerry Purvis**

**Request 12.** Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 18 line 1 to page 19 line 2; and Exhibit 7, Direct Testimony of Jerry Purvis at page 4 lines 5-10, and respond to the following requests:

a. Is EKPC aware of the EPA non-regulatory docket, Reducing Greenhouse Gas Emissions from New and Existing Fossil Fuel-Fired Stationary Combustion Turbines, Docket ID EPA-HQ-OAR-2024-0135?

i. Has EKPC considered the possibility of EPA adding RICE to the source category list for this potential rulemaking?

ii. If yes, what would the method and cost of compliance be?

iii. If no, has EKPC considered the possibility of additional EPA rulemaking requiring control of greenhouse gas emissions from RICE?

**Response 12.** A. Yes.

- i. EKPC considers EPA proposed and final rules when performing prudent environmental planning but resists speculation. EPA has indicated that it plans to regulate RICE under the GHG Rule in the future, but it is unknown when this will occur or what the regulations may require. It does not appear to be a priority of the incoming administration.
- ii. EKPC does not participate in speculating on rules not written. Any speculation would be just that and likely incorrect.
- iii. EKPC awaits further action by EPA with regard to GHG and specifically, reviews the publication of EPA's Unified Agenda. EPA has indicated that it plans to regulate RICE under the GHG Rule in the future, but it is unknown whether this will occur, when this will occur, or what the regulations may require.



**EAST KENTUCKY POWER COOPERATIVE, INC.**

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**REQUEST 13**

**RESPONSIBLE PARTY:            Julia J. Tucker**

**Request 13.**            Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 20 lines 1-10, and provide a list of economic development project inquiries regarding carbon intensity.

**Response 13.**            Economic development inquiries are generally confidential in nature. The quote referenced is a general statement regarding companies' continued requests for lower carbon energy.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
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**REQUEST 14**

**RESPONSIBLE PARTY:            Julia J. Tucker**

**Request 14.**            In selecting the RICE generating option proposed through the instant application, did EKPC incorporate into the planning process any assessment of risk of early retirement? If yes, how was the risk assessment developed and incorporated? If no, please explain why not.

**Response 14.**            The request in this application is for a new generation resource to meet EKPC's continued load growth. There is no request for early retirement.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
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**REQUEST 15**

**RESPONSIBLE PARTY:            Julia J. Tucker**

**Request 15.**            Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 20 lines 17-20, and respond to the following requests:

- a. What demand response options were evaluated, and how?
- b. What intermittent resources were evaluated, and how?
- c. Were any energy storage options considered?

**Response 15.**            a. Demand response options were limited to those discussed in the Application and included in the 2024 LTLF.

b.        Solar resources were evaluated for their capacity and energy contributions. Solar resource output is not coincident with EKPC's forecasted peak load hour, which occurs during the winter, therefore cannot be included in the portfolio as a firm capacity resource. Solar resources do, however, provide benefit from a total energy standpoint, as discussed in Case No. 2024-00129, *Electronic Application Of East Kentucky Power Cooperative, Inc. For A Certificates Of Public*

*Convenience And Necessity And Site Compatibility Certificates For The Construction Of A 96 Mw (Nominal) Solar Facility In Marion County, Kentucky And A 40 Mw (Nominal) Solar Facility In Fayette County, Kentucky And Approval Of Certain Assumptions Of Evidences Of Indebtedness Related To The Solar Facilities And Other Relief.*

c. No, energy storage resources would be paired with renewable energy resources to ensure that energy is available when most needed. EKPC is in the beginning stages of building solar facilities and does not currently have enough solar generation to justify energy storage to compliment that resource.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
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**FIRST REQUEST FOR INFORMATION RESPONSE**

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REQUEST DATED OCTOBER 28, 2024**

**REQUEST 16**

**RESPONSIBLE PARTY: Thomas Stachnik**

**Request 16.** Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 23 lines 8-10, and provide the current financing rate available to EKPC through RUS?

**Response 16.** EKPC can finance projects through RUS at a rate of 1/8 of 1% over the US Treasury rate for the maturity of the loan requested. Currently that would be in the range of 4.5%-4.75%

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**REQUEST 17**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 17.** Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 23 lines 5-21 and answer the following requests:

- a. Provide any supporting documentation or workpapers for the narrative economic operations calculations.
- b. What is the expected lifetime of an "F" class CT?
- c. What is the expected lifetime of the Liberty RICE?

**Response 17.** a. 10.8% carrying charge rate was assumed in the calculations (4.5% Interest; 3.3% Depreciation; 1.5% Taxes & Insurance; 1.5% Debt Service Coverage).

$$0.108/\text{yr} * \$1,329/\text{kW} * 1,000 \text{ kW}/\text{MW} = \$143,532/\text{MW-yr. (rounded to } \$143,500)$$

$$0.108/\text{yr} * \$1,995/\text{kW} * 1,000 \text{ kW}/\text{MW} = \$215,460/\text{MW-yr (rounded to } \$215,500)$$

Energy Costs:

$$9,717 \text{ btu}/\text{kWh} * \$4.00/\text{MMBtu} / 1,000,000 \text{ btu}/\text{mmbtu} * 1,000 \text{ kWh}/\text{MWh} = \$38.87/\text{MWh}$$

$8,381 \text{ btu/kWh} * \$4.00/\text{MMbtu} / 1,000,000 \text{ btu/MMbtu} * 1,000 \text{ kWh/MWh} = \$33.52/\text{MWh}$

O&M data can be found in the Direct Testimony of Craig Johnson, page 10, lines 21-22.

- b. The assumed lifetime of the F class CT for this analysis was 30 years.
- c. The assumed lifetime of the Liberty RICE plant for this analysis was 30 years.

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**REQUEST 18**

**RESPONSIBLE PARTY:            Julia J. Tucker**

**Request 18.**            Please compare Exhibit 3, Direct Testimony of Julia Tucker at page 23 lines 10-13, which states “The capital cost for the proposed RICE engine is \$500 million including network transmission expenses. Without network transmission expenses, it averages \$1,995/kW, which equates to annual fixed charges of approximately \$215,500/MW-year;” with Exhibit 6, Direct Testimony of Darrin Adams at Attachment DA-1 pages 6-7 (Table 2.1), 10-12 (Tables 4.1 and 4.2), detailing “Identified Transmission Network Upgrades and Estimated Costs;” and answer the following requests:

- a. Which of the network transmission expenses detailed in Mr. Adams’ supporting documentation (Attachment DA-1) are the network transmission expenses discussed in Ms. Tucker’s testimony?
- b. Please confirm that each of the expenses detailed in Attachment DA-1 Tables 2.1, 4.1, and 4.2 would be cumulative, not alternative options. If anything other than confirmed, please explain.
- c. According to the Application the net output of the proposed RICE would be 214 MW. Please confirm that at \$1,995/kW this means the anticipated cost without network transmission expenses would be \$426,930,000. If anything but confirmed please explain.
- d. If confirmed,



- i. Detail the network transmission expenses that make up the the net difference of \$73,070,000 implied in Ms. Tucker’s testimony; and
- ii. Reconcile that amount with the amounts listed in Attachment DA-1.

**Response 18.** Total transmission expenses assumed in Ms. Tucker’s testimony is \$65.8 million, so the net cost of the RICE plant without any transmission expenses is \$434.2 million. The full capacity value of the plant 217.6 MW was used as the divisor, not the net output of 214 MW. The resulting average cost (\$434.2 million / 217.6 MW) is \$1,995/kW. The transmission expense assumption was based on \$42.5 million of network upgrades + \$13.4 million Switchyard and transmission line construction + \$5.3 million Construction Management + \$2.5 million Engineering + 10% Contingency (not including the network upgrades).

$(\$13.4 + 5.3 + 2.5) * 1.10 + 42.5 = \$65.8$  million

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**REQUEST 19**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 19.** Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 23 lines 16-19 and provide the full load heat rate of the proposed RICE engine.

**Response 19.** See Application Exhibit 5 Direct Testimony Craig Johnson page 9 line 2 average annual net plant heat rate of 8,381 btu/kWh (HHV).

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**REQUEST 20**

**RESPONSIBLE PARTY: Jerry Purvis**

**Request 20.** Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 23 line 22 through page 24 line 3 and answer the following questions:

- a. How many hours is the proposed RICE anticipated to operate annually?
- b. How many starts and stops are anticipated for the proposed RICE each year?
- c. Please refer to the statement on page 24 lines 2-3 that "CTs are typically limited in their air permits to a much lower number of run hours and / or starts per year."
  - i. How many hours of operation are anticipated to be allowed in the Liberty RICE air permit?
  - ii. How many starts are anticipated to be allowed in the Liberty RICE air permit?
  - iii. What regulations limit the number of run hours of a CT?
  - iv. How many hours of operation and starts would be anticipated to be allowed in an air permit for a similarly-sized CT?
  - v. What limitations on hours of operation or starts are currently imposed on:
    1. J. K. Smith Station;
    2. Bluegrass Generating Station; and

3. EKPC's landfill gas-to-energy facilities in Boone County, Greenup County, Hardin County, Pendleton County and Barren County?

**Response 20.** a. On September 20, 2024, EKPC submitted an air application to the Division for Air Quality. In the application EKPC requested for proposal 8760 hours (about 12 months) of operation and provided the potential to emit (PTE) calculations and modeling files for their review and determination.

b. EKPC anticipates up to 5 startups and shutdowns per day.

c.

i. EKPC requested 8760 hours of operation per engine per year.

ii. 5 startups and shutdowns per day per engine.

iii. EPA regulates electric generating utility sources under the National Ambient Air Quality Standards (NAAQs), National Emission Standards for Hazardous Air Pollutants (NESHAP), New Source Performance Standards (NSPS) and the Clean Air Act Title V / Prevention of Significant Deterioration (PSD) program. EKPC submits modeling that passes the requirements, in our technical opinion, EPA NAAQS, NESHAPS and NSPS for the KY Division for Air Quality to review and make determinations under title V and PSD to either accept or reject the proposed number of startups, shutdowns, and operational durations to achieve compliance under those four EPA delegated programs. The application is pending.

iv. Combustion turbines (CT's) are not capable of this type of dispatchable energy load or demand, or the number of startups and shutdowns associated with this type of operation. This is why CT technology were not selected.

v. Copies of the Title V air permits for the existing facilities at J.K. Smith and Bluegrass Stations are attached.

1. Please see J.K. Smith Title V / PSD air permit, Attachment JP-JKS-1

2. Please see Bluegrass Title V / PSD air permit, Attachment JP-BG-2

3. Please see the attached Title V's for the Landfill gas to energy title V's for EKPC fleet of renewables, and attachments respectively, Green Valley, JP-GV-3, Bavarian landfill, JP-BV-4, Pendleton County landfill, JP-PC-5, Hardin County landfill, JP-HC-6, and Glasgow Landfill, JP-GG-7.

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REQUEST 21

RESPONSIBLE PARTY: Julia J. Tucker

**Request 21.** Please refer to Exhibit 3, Direct Testimony of Julia Tucker at page 25 lines 20-23, and provide the expected annual operation rate in MWh for the Liberty RICE to operate on natural gas, and the expected MWh to be produced relying on diesel.

**Response 21.** The RICE units are expected to operate on natural gas for all regular operation of the facility, other than maintenance, testing, and emergency operations. The expected annual operating rate in MWh for Liberty RICE is 1,351,637 MWh annually on average from 2029 through 2039.

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**REQUEST 22**

**RESPONSIBLE PARTY: Brad Young**

**Request 22.** Please refer to Exhibit 4, Direct Testimony of Brad Young at page 4 lines 2-4 and respond to the following questions:

- a. What regulatory approvals does EKPC anticipate needing for the “separate project” consisting of the new natural gas supply pipeline, dew point heater, and metering and regulating station to require?
- b. Does EKPC anticipate filing a separate CPCN for any of the equipment described? If yes, when? If not, why not?

**Response 22.** a. It is the responsibility of the pipeline operator to obtain all required regulatory approvals for this separate project.

- b. No. EKPC will not own or operate the pipeline.

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**REQUEST 23**

**RESPONSIBLE PARTY: Brad Young**

**Request 23.** Please refer to Exhibit 4, Direct Testimony of Brad Young at page 10 and page 12 line 17 through page 13 line 4 and respond to the following requests:

- a. Regarding the “property value impact study” referenced, and included at Appendix B to Attachment BY-2, Site Assessment Report, provide the size in MW of each similar facility studied as the abscess for the property valuation assessment.
- b. Was the frequency of malfunctions at similar facilities documented, investigated, or otherwise considered? If so, please provide any study, report, or other documentation of such evaluation. If not, why not?
- c. Provide diagrams or maps of all locations trees are intended to be planted, including size and species of trees to be planted.
- d. Provide information on the “noise attenuation provisions” to be purchased and installed with the diesel engines, including model, design, quantity, and price information.
- e. What is the anticipated cost of purchasing additional adjacent residential property? How many parcels are anticipated to be purchased?
- f. What is the intent of the recommended USEPA and ANSI S12.9 guidelines?



- g. How would the project be “consistent with the intent” of those guidelines if exceeding them?
- h. Please provide a detailed description of the implementation and cost of each of the sound mitigation measures mentioned.

**Response 23.**

a.

	Facility	Location	Size (MW)
1	Stillwater Energy Center	E. Airport Road, Stillwater, OK	56
2	Denton Energy Center	8161 Jim Christal Road, Denton, TX	220
3	A.J. Mihm Generating Station	16017 Sarya Roak, Pelkie, MI	54.9
4	Weston Energy Center	2499 Old Highway 51, Kronenwetter, WI	132
5	Marquette Board of Light & Power	2200 Wright Street, Marquette, MI	50
6	Shakopee Energy Park	3030 Vierling Drive East, Shakopee, MN	46
7	DG Hunter Power Plant	1011 N 3rd Street, Alexandria, LA	64
8	Avrah B. Hopkins Generating Station	1125 Geddie Road, Tallahassee, FL	75
9	Genndale Generating Station	133 Clark-Mizelle Road, Benndale, MS	22
10	LCEC Generation LLC	2023 Power Plant Lane, Lovington, NM	40
11	Greenville Municipal Power Station	4201 Power Lane, Greenville, TX	25
12	Pearsall Power Plant	2393 County Road 1005, Pearsall, TX	203
13	Red Gate Power Plant	23501 FM 490, Edinburg, TX	224
14	Goodman Energy Center	1713 230th Ave, Hays, KS	102

b. Information with regards to availability and forced outage rates were reviewed through the NERC Generating Availability Data Systems (GADS), comparing the RICE engines with other power generating technologies such as turbine simple cycle technologies and combined cycle technologies. No formal report was developed for this effort as the information typically shows that between the three options, availability and forced outage rates are similar. Cost, number of generating assets, and speed of assets to provide full load generation were all considered. With 12 engines, one or two engines off line do not largely impact generation capacity as each engine

provides a smaller capacity. Turbine failure or inability of a turbine unit to operate would impact generation ability on a larger scale as turbines typically produce higher output per unit than RICE engines.

c. c. Vegetation and trees to be included at the completion of this project have not been through detailed design at this time. It is anticipated that coniferous type trees and shrubs such as arborvitae, spruce, laurel will be planted in key areas to help provide visual aesthetics and noise absorption in key locations. Native species of vegetation and trees will be utilized as much as possible. Please see Drawing 157785\_12x18MW-GA120-B- With Landscaping Comments for preliminary landscaping plans. Full detailed landscaping plans will be completed during detailed design.

d. As part of the project's acoustical design, the engines will be housed inside a high-performance transmission loss building, including silencers on the intake ducts and the rooftop ridge vents. The exhaust ducts will be wrapped with insulation and will include a resonator silencer and a high-performance exhaust silencer. The radiator fans have also been upgraded to "noise level 4", which is the supplier's "ultra-low" noise radiator option. All of these upgrades are beyond the base-package offerings for the proposed equipment. Additional mitigation options would be limited, as all the equipment already includes significant noise mitigation. Noise barriers may be limited in use due to the significant height requirement of the barriers to provide any notable decrease in the overall dBA/dBC sound levels, which would potentially cause performance issues with the project equipment. Detailed model information is currently not available from the Engine OEM and price information was included in the overall engine contract costs and not available as a breakout price.

e. EKPC currently has five tracts under an option to purchase. An additional three tracts are currently being negotiated for an additional cost of approximately \$1,640,000.

f. The USEPA and ANSI S12.9 guidelines are recommended target sound levels for overall A-weighted frequencies and low-frequency sound levels. USEPA provides guidance on residential dBA limits and ANSI S12.9 provides guidance on low frequency sound levels, which we have equated to an overall C-weighted (dBC) sound level for easier comparison. The USEPA target is listed as a 55 dBA day-night level, which is equivalent to a continuously (24-hour) operational sound level of 48.6 dBA. The ANSI target is a recommended limit of 65 dB in the 16-Hz, 31.5-Hz, and 63-Hz octave bands, which is equivalent to approximately 68 dBC for sources with strong low frequency content. The intent of these two guidelines is to provide a target value for noise mitigation measures in absence of any local regulatory noise limits (i.e., local noise ordinance). USEPA notes that these recommended sound levels are not to be construed as regulatory limits as they do not account for costs or feasibility associated with meeting these target sound levels.

g. The intent of the USEPA and ANSI S12.9 guidelines are to provide target sound levels for new projects to consider noise impacts on surrounding communities when there are no state or local noise ordinances applicable to the project. In this project's case, while there were no local noise limits, the original base-package equipment was predicted to be well above the USEPA and ANSI S12.9 guidelines at the nearest receptor, and therefore, significant noise mitigation was added to the project's acoustical design to reduce sound levels closer to the USEPA and ANSI targets. It should be noted, that the USEPA and ANSI guidelines are recommended sound levels on an annual

basis, whereas the noise model predictions are for a conservative case where the plant is operating at full load (i.e., all engines at 100%), all receptors are “downwind” from the noise sources, and temperature/humidity/ground absorption/foilage settings are set to a conservative case for noise propagation. The predicted values should be considered conservative compared to actual field measured results, and on an annual basis, sound levels from the project would be expected to be much lower than what is currently predicted.

h. As part of the project’s acoustical design, there are significant low-noise upgrades to the equipment as mentioned in response “d”.

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**REQUEST 24**

**RESPONSIBLE PARTY: Brad Young**

**Request 24.** Please refer to Exhibit 4, Direct Testimony of Brad Young at page 11 lines 18-20, and respond to the following questions.

- a. When and how was Burns & McDonnell chosen as EKPC's Owner's Engineer?
- b. Please provide a copy of the most recent contract for EKPC's Owner's Engineer, and describe the scope of responsibility of the Owner's Engineer.

**Response 24.** A. EKPC authorized Burns & McDonnell in April 2022 to conduct siting studies and development of a preliminary project outline for a new reciprocating engine resource in Kentucky. Burns & McDonnell was chosen due to multiple criteria: previous market and EKPC direct experience on both gas generation (in particular, reciprocating engines) and transmission projects, scalability of their available resources to meet assigned deliverables and schedule, and competitive market pricing on hourly rates as well as percentage of overall project costs.

1b. Please refer to the attached RUS 211 service contract for design and construction with Burns & McDonnell which outlines the responsibilities of the Owner's Engineer.

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**REQUEST 25**

**RESPONSIBLE PARTY: Brad Young**

**Request 25.** Please refer to Exhibit 5, Direct Testimony of Craig Johnson at page 5, lines 11-13. Did the Company study the impact of the rejected heat from the outdoor radiators on neighboring properties or surrounding vegetation?

- a. If so, please provide any documentation or analysis.
- b. If not, why not?

**Response 25.** A formal heat rejection study was not performed for this project. Engine OEM performs preliminary calculations to determine distance requirements from the engine hall to prevent potential inlet temperature increase or inlet airflow impacts to the project. Setbacks from other equipment, tree lines, buildings, etc., are typically preferred to prevent airflow impacts into the radiator banks. Previous projects have installed radiator banks within 100' of vegetation and 230' of existing homes with no identified impacts. Liberty RICE radiator banks will be over 100' from existing vegetation and 1000' from the nearest residence and therefore, no thermal impacts are expected.

Facility	Distance to Vegetation/Structures
Greenville Municipal Power Station	100'/230'
Marquette Board of Power & Light	35'/NA
Shakopee Energy Park	25'/NA
Benndale Generating Station	200'/NA
Liberty RICE (Estimated)	100'+/1000'+

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**REQUEST 26**

**RESPONSIBLE PARTY: Julia J. Tucker**

**Request 26.** Please refer to Exhibit 5, Direct Testimony of Craig Johnson at pages 7-8 and respond to the following requests:

- a. Explain whether the “proposed facility” referred to at page 7 line 4 is the totality of the Liberty RICE facility, or the pipeline needed to serve the Liberty RICE facility, or some other portion of the applied for project.
- b. Confirm it is “standard procurement practice” for all facilities to be procured by EKPC to include issuance of a written RFP, and the evaluation process described at page 7 lines 4-10. If anything other than confirmed please explain.
- c. Provide a copy of each bid received through the referenced RFP, as well as any evaluation, and/or summary by EKPC.
- d. Provide the model referenced at page 7 lines 10-11.
- e. Did the RFP include construction and operation of a pipeline to the Liberty RICE facility?
- f. Provide any site assessment, map, or diagram of the mainline proposed by CGT.
- g. Regarding the statement at page 8 lines 1-3 that “[t]he mainline operating pressures for CGT meet or exceed the needs of the proposed Liberty RICE Facility, which means that additional



compression is not needed,” did EKPC consider the possibility of a failure of the pressure on the pipeline?

h. Is EKPC familiar with the FERC, NERC and Regional Entity Staff Report from October 2023, Inquiry into Bulk-Power System Operations During December 2022 Winter Storm Elliott (available at <https://www.ferc.gov/media/winter-storm-elliott-report-inquiry-bulk-power-system-operations-during-december-2022>)?

i. Is EKPC familiar with the Commission’s Investigation in Case No. 2023-00422, Electronic Investigation of Louisville Gas & Electric Company and Kentucky Utilities Company Service Related to Winter Storm Elliott?

**Response 26.** a. The “proposed facility” refers to the totality of the Liberty RICE facility, but in context of the question is only addressing how the need for gas pipeline capacity was secured for the proposed Liberty RICE facility. For the Liberty RICE facility, which is located adjacent to a natural gas mainline, only mainline capacity is needed. The written Request For Proposal (“RFP”) described in the Direct Testimony did not relate to the need of the proposed generating facility.

b. No, it is not for the procurement of all facilities. The standard procurement process for EKPC’s Fuel & Emissions department (“Fuels”) as detailed in the answer to the specific question is only for fuel or fuel-related commodities and related services. This written RFP issued by Fuels was not for procurement of any generation facilities or natural gas facilities. The Transporter will own and operate their natural gas facilities, not EKPC.

- c. The bids, evaluation, and/or summary for securing natural gas pipeline capacity for the Liberty RICE facility is highly confidential and EKPC is not required to disclose information that could provide another party a competitive advantage as negotiations are not complete.
- d. The model referenced is the proprietary property of Burns & McDonnell, the engineering consultant for EKPC throughout this process. The model itself contains confidential proposal information provided by the bidders who had accepted to the RFP Conditions and executed a Confidentiality and Non-Disclosure Agreement.
- e. The RFP was for a direct interconnection to a mainline or a lateral to be constructed to serve the generation facility, if needed. Operation of the applicable natural gas mainline and lateral would remain the responsibility of the Transporter. The site at Liberty does not require a lateral to be constructed.
- f. There is no proposed mainline for the Liberty RICE facility. Therefore, EKPC does not have a site assessment or diagram of a proposed mainline to provide. Maps of the existing natural gas mainline near Liberty, KY are publicly available.
- g. Yes. The mainline operating pressures of over 600 psi are about three (3) times the needs of the generating units at the proposed Liberty RICE facility. A Metering and Regulating Station (“M&R Station) that is owned and operated by the Transporter will be located at the Liberty RICE facility to reduce the mainline pressure to the pressure needed for the RICE units, which is approximately 200 psi. Historically, the lowest pressures experienced by the pipeline operator for this project, occurred during Winter Storm Elliot. During that rare, widespread, and extremely cold weather event, the mainline operating pressure did not fail but did come down

to approximately 400 psi for a brief period of time. This is still approximately two (2) times the requirement for the RICE units to operate at full capacity.

- h. EKPC is aware of the FERC, NERC, and Regional Entity Staff Report
- i. EKPC is aware of Case No. 2023-00422.

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**REQUEST 27**

**RESPONSIBLE PARTY:            Julia J. Tucker**

**Request 27.**            Please refer to Exhibit 5, Direct Testimony of Craig Johnson at page 8 line 22 to page 9 line 1, as well as Exhibit 3, Direct Testimony of Julia Tucker at page 14 and provide the ELCC applicable to the proposed Liberty RICE.

**Response 27.**            Refer to EKPC's response to Staff's First Request for Information, Item 9(a).

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**REQUEST 28**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 28.** Please refer to Exhibit 6, Direct Testimony of Darrin Adams at page 5 line 23, and provide the referenced basic engineering analysis and preliminary design work.

**Response 28.** Refer to the Application, Exhibit 4, Direct Testimony of Brad Young, Attachment BY-1, Appendix E for information regarding the scoping of the project. Specific preliminary electrical drawings related to the physical interconnection requirements in that document are GA120, EE0001A, CAMP-04-1, and CAMP-03-1, also, refer to MA-KFTC-Attachment DR-28-1, which is EKPC's latest Facility Connection Requirements document. This document details specific requirements to connect generation facilities (as well as transmission and end-user facilities) to the EKPC transmission system.

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**REQUEST 29**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 29.** Please refer to Exhibit 6, Direct Testimony of Darrin Adams at page 10 lines 19-22, and indicate each place in EKPC's last IRP where the reliability concerns discussed were identified or information was provided.

**Response 29.** The reliability concerns discussed at the referenced location in the Application were not included in EKPC's 2022 Integrated Resource Plan filed with the Commission. However, the issues were covered in Case No. 2022-00098 in detail through data request responses, during the Commission's public hearing, and in EKPC's post-hearing filed comments.

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**REQUEST 30**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 30.** Please refer to Exhibit 6, Direct Testimony of Darrin Adams attachment DA-1, page 5, and list each instance of thermal loading or low-voltage issues in the area.

**Response 30.**

<b><u>Table 30-1: PJM Issued PCLLRW for Thermal Loading Violations in the Southern Portion of EKPC’s System</u></b>				
<b>Transmission Facility</b>	<b>PJM PCLLRW ID</b>	<b>Start Date/ Time</b>	<b>Stop Date/ Time</b>	<b>Total Duration of PCLLRW (hours)</b>
Cooper 161-69 kV Transformer	103759	12/23/2022 @ 03:39	12/23/2022 @ 05:16	1.6
Cooper-Elihu 161 kV Line	103761	12/23/2022 @ 05:33	12/26/2022 @ 01:40	68.1
Ferguson South-Somerset 69 kV Line	103772	12/23/2022 @ 08:26	12/26/2022 @ 01:38	65.2
Ferguson South-Somerset 69 kV Line	104128	1/16/2024 @ 21:13	1/17/2024 @ 18:30	21.3
Cooper 161-69 kV Transformer	104141	1/20/2024 @ 06:23	1/22/2024 @ 10:02	51.7
Ferguson South-Somerset 69 kV Line	104159	3/22/2024 @ 08:44	3/22/2024 @ 16:54	8.2

See the response to Commission Staff's First Request for Information, Item 46 for an explanation of PJM's Post-Contingency Local Load Relief Warning ("PCLLRW") process and a listing of each instance of low-voltage issues in the area for a two-year period from 10/1/2022 through 9/30/2024. Table 30-1 below provides a listing of each instance of thermal-loading issues in the area for the same period.



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**REQUEST 31**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 31.** Please refer to Exhibit 6, Direct Testimony of Darrin Adams attachment DA-1, page 7, with regard to the “120 generation projects”

- a. Would be in the southern portion of the EKPC system?
- b. For each project, what portion of related needed transmission system upgrades with the project owner be responsible for?

**Response 31.** a. Assuming the data request is asking which of the approximately 120 projects in the PJM queue in EKPC’s footprint is in the southern portion of the EKPC system, see Table 31-1 below:

**Table 31-1 – Current PJM Queue Projects in Southern Kentucky Area**

PJM Queue ID	County Where Point of Interconnection Located	Maximum Facility Output (MW)
AE1-143	Marion	80
AF1-038	Russell	60
AG1-405	Pulaski	57
AG1-406	Pulaski	22
AF1-116	Marion	120
AG1-471	Wayne	60
AG2-676	Russell	150
AG2-677	Russell	150
AH1-239	Clinton	80
AH1-240	Wayne	200
AH1-330	Jackson	100
AH1-409	Rockcastle	58
AH1-427	Lincoln	100
AH1-428	Lincoln	40
AH1-532	Marion	37.8
AH2-263	Marion	25.8
AI1-019	Pulaski	50
AI1-180	Casey	100
AI2-066	Marion	16.4
AI2-371	Pulaski	17.8

b. The portion of the related transmission-system upgrades that each project owner will be responsible for will be determined via PJM's methodology for determining cost allocation of network upgrades associated with generator-interconnection projects. This process involves determining the relative impact of each generation facility on the power flows across overloaded transmission facilities using a distribution factors ("DFAX") engineering analysis. EKPC does not have sufficient information to determine how those costs might be allocated among the projects in the PJM queue.

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

**MOUNTAIN ASSOCIATION AND KENTUCKIANS FOR THE COMMONWEALTH'S  
REQUEST DATED OCTOBER 28, 2024**

**REQUEST 32**

**RESPONSIBLE PARTY: Jerry Purvis**

**Request 32.** Please refer to Exhibit 7, Direct Testimony of Jerry Purvis at page 4-6, and Attachment JP-1, and provide copies of applications or other requests for approval for the Liberty RICE related to any of the environmental permits or approvals listed.

**Response 32.** The PSD/Title V application has been filed with the Kentucky Division for Air Quality and is a public record. The other applications as required are in process and have not yet been submitted.