

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF EAST)
KENTUCKY POWER COOPERATIVE,)
INC. FOR 1) CERTIFICATES OF PUBLIC)
CONVENIENCE AND NECESSITY)
TO CONSTRUCT GENERATION)
RESOURCES; 2) FOR A SITE COMPATIBILITY)
CERTIFICATE RELATING TO THE SAME;)
3) APPROVAL OF DEMAND SIDE MANAGEMENT)
TARIFFS; AND 4) OTHER GENERAL RELIEF)**

**CASE NO.
2024-00370**

**SUPPLEMENTAL RESPONSES TO JOINT INTERVENORS' SUPPLEMENTAL
REQUESTS FOR INFORMATION TO EAST KENTUCKY POWER COOPERATIVE,
INC. DATED JANUARY 17, 2025**

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00370
SUPPLEMENTAL REQUEST FOR INFORMATION RESPONSE

JOINT INTERVENORS' REQUEST DATED JANUARY 17, 2025

REQUEST 47

RESPONSIBLE PARTY: **Jerry Purvis**

Request 47. Please refer to your response to JI 1-43. With regards to the feasibility of gas co-firing at the Spurlock 3 and 4 CFB units:

a. Confirm that your responses to subpart JI 1-43(a) and (b) should have referenced Attachment BY-3 to the application, rather than Attachment BY-1. If not confirmed, identify where in Attachment BY-1 the feasibility of gas co-firing at the Spurlock 3 and 4 CFB units is addressed.

b. Confirm that the Burns McDonnell Project Scoping Report provided in Attachment BY-3 identifies as risks that “conversion of the Unit 3 and Unit 4 CFB’s for co-firing natural gas requires novel design solutions that are unproven” and that the proposed co-firing modifications for the Unit 3 and Unit 4 CFB boilers “have not been executed to BMcD’s knowledge.”

c. Referring to p. 7-2 of Attachment BY-3, identify and produce any report or other documentation of the Reaction Engineering, Inc. model results that “show that co-firing the units on 50% gas at full load appears technically feasible.”

d. Explain in detail any other engineering studies or research that Burns McDonnell or EKPC carried out or reviewed to determine if conversion of Spurlock Units 3 and 4 for co-

firing natural gas is “feasible, doable and practicable.” Identify and produce any documentation of such studies and research.

Response 47.

- a. Confirmed.
- b. Confirmed. Burns & McDonnell's Project Scoping Report (PSR) provided in Attachment BY-3 does identify the novel and unproven design solutions associated with converting the Spurlock Unit 3 and 4 CFB's and the lack of known execution experience converting similar commercial CFB units as potential project risks. It should be noted that the available and anticipated gas-firing technology associated with converting the Spurlock Units 3 & 4 CFB's to co-fire on gas is well established and proven for startup (the technology is not unproven or novel in and of itself). However, its application in co-firing gas in a CFB boiler is limited in practice and experience. Therefore, this was identified as a potential project risk.
- c. See attachment *Confidential-JI2.47c.pdf* for documentation supporting that statement filed under seal.
- d. No additional engineering studies or research was performed outside of the CFD modeling referenced in 2.47.c, above, as part of the PSR.

Supplemental Response. All modeling files, assumptions, and resource selection explanations have been provided within this case. In addition, EKPC is filing a confidential summary of the REI Report under seal pursuant to a motion for confidential treatment. The actual REI Report is protected under attorney work product privilege.

Second Supplemental Response. EKPC is filing a the REI Report under seal pursuant to a motion for confidential treatment.

Third Supplemental Response. EKPC is filing a confidential version of the REI Report with information redacted from that confidential filing to provide to each of the parties, under seal pursuant to a motion for confidential treatment. The full unredacted confidential REI Report is still available for review by the parties pursuant to a motion for confidential treatment previously filed with the Second Supplemental Response on May 19, 2025. EKPC is filing the May 19, 2025 Motion with this response since EKPC is still requesting confidential treatment for the entirety of the document being filed with this response.