

November 25, 2024

Via Electronic Filing System

Ms. Linda C. Bridwell, P.E.
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

RE: In the Matter of: Electronic Application of East Kentucky Power Cooperative, Inc. for 1) Certificates of Public Convenience and Necessity to Construct New Generation Resources; 2) For a Site Compatibility Certificate Related to Same; 3) Approval of Demand Side Management Tariffs; And 4) Other General Relief - Case No. 2024-00370

Dear Ms. Bridwell:

East Kentucky Power Cooperative Inc., (“EKPC”) received a deficiency letter from the Commission on November 22, 2024 in the above-styled case. The deficiency that was noted in the Commission’s November 22, 2024 letter was as follows:

807 KAR 5:001 15(2)(f) The annual cost of operation after the proposed facilities are placed into service are not provided.

EKPC provided information regarding the Cooper Combined Cycle’s annual cost of operation in Application Exhibit 5, Direct Testimony of Craig Johnson. EKPC believes that the information provided in the Direct Testimony of Craig Johnson was sufficient to meet the minimum filing requirements for the application. In addition, a detailed explanation of the Operations and Maintenance Cost can be found in Brad Youngs Exhibit BY-1, titled EKPC Cooper Combined Cycle Project Scoping Report, in section 7.7 Operations and Maintenance Estimates. An itemized cost with assumptions can be found in this same exhibit in Appendix T. The total fixed operation and maintenance cost is \$5,794,278. The total non-fuel power variable operations and maintenance cost based upon a 75% capacity factor is \$17,515,394. The total combined cycle station cost annual O&M cost is the sum of these two or, \$23,309,672.

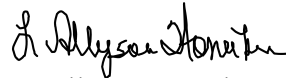
However, EKPC provides the following information regarding the Cooper co-fire project and the Spurlock co-fire project because the information provided in the application dealt with the cost savings since the overall expenses would be reduced.

EKPC provided the reduction in the Operations and Maintenance (“O&M”) costs due to co-firing Cooper 2 and Spurlock because EKPC believes the expense to maintain the natural gas systems is negligible. The metering and regulating station will be maintained by the natural gas supplier. EKPC anticipates that its only costs will be due to inspections of the gas burners which will be done at the same time as the boiler annual inspection. EKPC estimates that this would be \$2,000.00 per boiler per year. EKPC’s anticipated annual cost of operation after the co-firing project is completed for non-fuel O&M at Spurlock Station is approximately \$83 million in 2024 dollars. EKPC’s annual cost of operation after the co-firing project is completed for non-fuel O&M at Cooper Station is approximately \$10 million in 2024 dollars.

Please accept this as EKPC’s response to the Commission’s November 22, 2024 deficiency letter. If you have any questions, please do not hesitate to contact me.

This is to certify that the electronic filing was made on November 25, 2024, and there are no parties the Commission has excused from electronic filing procedures. Pursuant to the Commission’s July 22, 2022 Order in Case No. 2020-00085, no paper copies of filings will be made.

Sincerely,



L. Allyson Honaker