

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

**COMMISSION STAFF'S REQUEST DATED FEBRUARY 19, 2025**

**REQUEST 12**

**RESPONSIBLE PARTY:**           **Julia J. Tucker and Craig Johnson**

**SUPPLEMENTAL RESPONSE:** **Don Mosier**

**Request 12.** Refer to the Direct Testimony of Don Mosier, page 16.

- a. Quantify the financial impact of the retirement of the Cooper Unit 1 facility. Include the impact on energy sales, capacity payments, and ancillary services and provide all work papers.
- b. Provide the impact of the retirement on operating and maintenance costs and provide all work papers.

**Response 12.**

a. EKPC has not performed a detailed retirement analysis of Cooper Unit 1 since no retirement has been set for Cooper Unit 1. However, the following represent good faith estimates if Cooper Unit 1 were to be retired by December 31, 2031 (no retirement date has been set for Cooper Unit 1). Cooper Unit 1 had an average net market value of \$471,331 and capacity factor of 4% from 2025 through 2030, as shown in the confidential modeling output provided in the record. Cooper Unit 1 could receive \$16 million annually in capacity payments on average when assuming 106 MW of available unforced capacity ("UCAP") sold at the capacity price forecast supplied in EKPC's response to Joint Intervenors Second Request for information, Item 18. Cooper Unit 1 received just \$19,000 on average between 2023 through 2025 in ancillary service revenues.

Its relatively low-capacity factor and limited operation flexibility inhibits its participation in the ancillary markets.

b. EKPC has not performed a detailed analysis of the operation and maintenance cost impact of retiring Cooper 1. EKPC did a review of the 2025 budget and made a good faith effort in identifying the non-fuel operating and maintenance cost reduction associated with retiring Cooper 1. The following table lists the maintenance accounts where spend would be reduced. The total estimated reduction is approximately \$2.5 million.

Cooper 1 – Maintenance Spend		
<b>Project</b>	<b>Descr</b>	<b>2025 Budget</b>
03200	Rtn Boiler Plant Maintenance	993,592
03230	Boiler Feed System	139,730
03290	Regenerative Air System	15,928
03310	Primary Air System	9,860
03330	Electrostatic Precipitator	144,653
03385	Pulverizers	342,860
03395	Coal Feeder system	40,164
03510	Rtn Misc Ash System	194,756
03700	Rtn Misc Turbine Maintenance	123,564
03703	Valves	372
03705	Generator	7,500
03711	Circulating Water system	507,063
		<b>2,520,042</b>

There would be no savings in the maintenance of the common systems such as the scrubber. There could be a small reduction in the lime cost for the scrubber, but EKPC does not have a good way to identify that cost reduction. The other major identifiable operating cost saving is associated with coal combustion residuals (CCR) produced and landfilled. The budgeted cost for CCR disposal in 2025 for Cooper 1 is \$177,000. The reduction in Full Time Equivalents for maintenance personnel are imbedded into the cost shown for the maintenance reductions. There would not be a reduction in operating personnel with the retirement of Cooper 1. Through prudent operation and maintenance of the Cooper 1 Unit over its 60+ year history of operations, EKPC anticipates being in a position for the eventual retirement of the unit to have little meaningful financial impact to EKPC.

**Supplemental Response:**

a. EKPC is attaching a letter that was submitted to PJM regarding the injection rights of Cooper Unit 1. This action is procedural in nature and it does not reflect a definitive decision as to when Cooper Unit 1 will be retired. Such action would require review by the EPIC board, approval by EKPC's Board of Directors and approval by the Commission. The attached letter is necessary to preserve the ability for EKPC to save a considerable amount in interconnection costs associated with the combined cycle unit.



April 3, 2025

PJM Interconnection, L.L.C.  
2750 Monroe Boulevard  
Audubon, PA 19403  
Via Email: [generatordeactivation@pjm.com](mailto:generatordeactivation@pjm.com)

PJM Office of the Interconnection,

Pursuant to PJM Interconnection, L.L.C ("PJM") FERC Electric Tariff, Part V, Section 113 and PJM Manual 14D: Generator Operational Requirements, Revision 62, Section 9, East Kentucky Power Cooperative, Inc. ("EKPC") hereby officially provides notice to PJM of EKPC's intent to deactivate through retirement John Sherman Cooper Station's ("Cooper Station") Unit #1, effective on or about December 31, 2030. Cooper Unit 1 is a 116-megawatt, coal-fired generating plant located in Burnside, Kentucky.

This deactivation notice is contingent upon EKPC receiving all necessary approvals, the processes for which are currently underway, to construct its planned 745 megawatt combined cycle gas turbine generating facility at the same location and achieving commercial operation of this new facility on or about December 31, 2030.

All communications regarding this Notice and the intended retirement of these units should be directed to Denise Foster Cronin at (610)220-6382 or [denise.cronin@ekpc.coop](mailto:denise.cronin@ekpc.coop).

Regards,

A handwritten signature in blue ink that reads "Anthony S. Campbell".

Anthony S. Campbell  
President & CEO

cc: Mr. Michael Bryson  
Mr. Jason Connell  
Mr. Manu Asthana  
Dr. Joseph Bowring

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