

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) CASE NO.
AND NECESSITY TO CONSTRUCT A NEW) 2024-00370
GENERATION RESOURCES; 2) FOR A SITE)
COMPATABILITY CERTIFICATE RELATING TO)
THE SAME; 3) APPROVAL OF DEMAND SIDE)
MANAGEMENT TARIFFS; AND 4) OTHER)
GENERAL RELIEF)

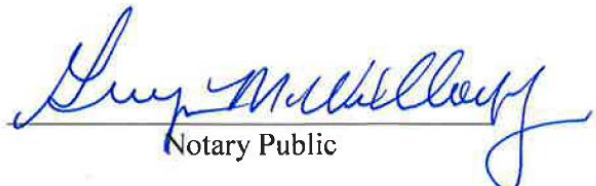
CERTIFICATE

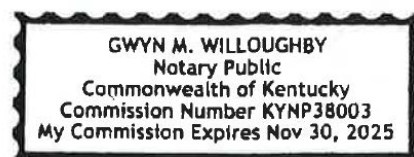
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Brad Young, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to Commission Staff's Post-Hearing Request for Information in the above-referenced case dated April 24, 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 25th day of April, 2025.


Notary Public



EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00370
POST-HEARING REQUEST FOR INFORMATION

JOINT INTERVENOR'S REQUEST DATED APRIL 25, 2025

REQUEST 5

RESPONSIBLE PARTY: Denise Foster-Cronin

Request 5. Please refer to HVT April 21 at 10:18:00 to 10:20:00 and April 22 13:39:40 to 13:48:00, and provide:

- a. any notice, letter, or other documentation from PJM to EKPC regarding the potential for \$50 million in transmission project savings if the interconnection injection rights of Cooper 1 are deactivated or otherwise transferred to the proposed Cooper CCGT project;
- b. an update on the status of EKPC's applications to PJM under the Reliability Resource Initiative (RRI). Please continue to update the response to this request until the docket in this case is closed and removed from the Public Service Commission (PSC)'s docket; and
- c. an itemized accounting of all penalties or payments to and rewards, bonuses, or payments from PJM related to performance assessment intervals (PAIs), and any insurance payments to EKPC related to PAIs.

Response 5.

a. At the April 22, 2024 hearing, Denise Foster Cronin provided explanation for the reference to the \$50 million savings if the Capacity Interconnection Rights of Cooper Unit 1 were to be transferred to the proposed Cooper CCGT project. As stated during the hearing, there is no notice, letter, or document from PJM. PJM explained the process for applying to utilize Cooper Unit 1's Capacity Interconnection Rights for the proposed Cooper CCGT project. Should the proposed Cooper CCGT project be selected to be included in PJM's Reliability Resource Initiative, PJM ultimately will determine what transmission reinforcements will be needed to support the injection and recognizing the benefit of applying the transmission capability PJM reserves for Cooper Unit 1's power injection for the Cooper CCGT project. EKPC's transmission planners estimate that the cost savings would be approximately \$50 million.

b. PJM provided an update to stakeholders at its April 24, 2025 Interconnection Process Subcommittee meeting saying it anticipates completing the review of all applications on or before May 2, 2025. At that time, PJM will notify project applicants whether their project is accepted or withdrawn from the RRI study process.

c. There is only one Performance Assessment Interval (PAI) event impacting EKPC. Operations during the December 2022 Winter Storm Elliott resulted in both penalties for non-performance and bonus payments for overperformance for all types of resources across the PJM region. Since this event, significant changes were made to the "trigger" for a PAI event. Notably, PJM must both be short of operating reserves and have invoked a significant Emergency Procedures action to trigger the assessment of resource performance to determine whether penalties are merited. This change narrowed the risk of future PAI events. PJM also will assess

whether units provided more energy or demand response than their capacity obligation commitment. PJM may only disburse as bonus payments those funds received in collecting penalties. Refer to EKPC's response to Commission Staff's Post-Hearing Request for Information, Item 7 for information regarding EKPC's payment obligation for the PAI events experienced due to Winter Storm Elliott.

May 5, 2025 Update

Please see the Supplemental Response to Commission Staff's Post-Hearing Request for Information, Item 9.

May 9, 2025 Update

Please see Attachment JI PHDR 5(b) for an email regarding the Liberty RICE Projects removal from the Reliability Resource Initiative ("RRI"). PJM informed each project developer who submitted projects if the projects were selected, but PJM did not provide the score it applied to each project. The projects that were accepted are now included in Transition Cycle #2, and the RRI concluded with the selections. PJM applied the below scoring criteria to determine which projects would be selected for Transition Cycle #2. As provided in the May 5, 2025 Update, the Cooper Combined Cycle Project was selected and has now moved to Transition Cycle #2. The Liberty RICE Project was not selected, but it will be studied in PJM's New Cycle Process which will initiate in 2026.

RRI Scoring Formula:

Unforced Capacity (UCAP) (35 points)	In-Service Date Viability (35 points)	Effective Load Carrying Capability (ELCC) (20 points)	Location (10 points)
<ul style="list-style-type: none"> Rank highest to lowest UCAP 	<ul style="list-style-type: none"> Commercial operation date (10 points) Project support (10 points) <ul style="list-style-type: none"> a. Permitting b. EPC c. Equipment d. Financing Uprate (10 points) Headroom (5 points) 	<ul style="list-style-type: none"> ELCC ranking 	<ul style="list-style-type: none"> Adder for locating in a zone that cleared above the rest of the RTO in the 2025/2026 BRA

While PJM has not disclosed the specific reasoning for EKPC's Liberty RICE Project not being selected, it is reasonable to conclude that it received lower scores on the UCAP and ELCC categories than EKPC's Combined Cycle Project. Additionally, projects located in constrained zones could have received up to 10 additional points that were not available to EKPC's projects. More information about the RRI applications and selected projects may be found in the presentation PJM shared with stakeholders on May 6, 2025: [20250506-item-06---reliability-resource-initiative---summary-results.pdf](#)

ATTACHMENT JI PHDR 5(b)

From: [REDACTED]
To: [REDACTED]
Subject: AH1-749 is Withdrawn from PJM Interconnection Process
Date: Friday, May 2, 2025 4:28:22 PM
Attachments: [Wire Verification Form for Refunds.docx](#)

CAUTION: This email originated from outside of EKPC. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Applicant,

This email serves as notice that the AH1-749 (Reference Number 251566M5) project has been withdrawn from the PJM interconnection process due to low ranking in the Reliability Resource Initiative (RRI) review process.

Unused refundable Study Deposits, Readiness Deposits and RRI Deposits will be returned to the Project Developer. Please complete the attached Wire Verification Form for Refunds and email the signed & dated form to SystemPlanning.Admin@pjm.com.

Please reach out to the PJM Project Manager with any questions.

Thank you.