

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF)	
EAST KENTUCKY POWER COOPERATIVE,)	
INC. FOR 1) CERTIFICATES OF PUBLIC)	CASE NO.
CONVENIENCE AND NECESSITY TO)	2024-00370
CONSTRUCT GENERATION RESOURCES;)	
2) A SITE COMPATIBILITY CERTIFICATE)	
RELATING TO THE SAME; 3) APPROVAL)	
OF DEMAND SIDE MANAGEMENT TARRIFS;)	
AND 4) OTHER GENERAL RELIEF)	

**EAST KENTUCKY POWER COOPERATIVE, INC’S RESPONSE TO THE JOINT
INTERVENORS JUNE 6, 2025 BRIEF**

Comes now East Kentucky Power Cooperative, Inc., (“EKPC” or the “Company”) by and through the undersigned counsel, pursuant to the Kentucky Public Service Commission’s (“Commission”) May 15, 2025 Order setting forth a procedural schedule and deadline for submitting a response brief in response to the Commission’s order requiring disclosure of the Reaction Engineering International Report (“REI Report”) and hereby tenders its response to the brief filed by the Appalachian Citizens’ Law Center, Kentuckians for the Commonwealth, and Mountain Association (collectively “Joint Intervenors”)¹ on June 6, 2025, and respectfully states as follows:

EKPC engaged an engineer to provide a Scoping Report for the co-firing of the Spurlock Station.² As part of that analysis, Reaction Engineering International (“REI”) was consulted

¹ Supplemental Brief Joint Intervenors of Appalachian Citizens Law Center, Kentuckians for the Commonwealth, and Mountain Association Regarding REI Report (“Joint Intervenors REI Brief”) (filed June 6, 2025).

² Application, Exhibit 4, Direct Testimony of Brad Young, Attachment BY-3.

regarding the co-firing project. The REI Report was the product of this analysis, and it determined that it is feasible to co-fire Spurlock Unit 3 and Unit 4.³ The Joint Intervenor's concede the REI Report indicates the co-firing of Spurlock Unit 3 and Unit 4 is feasible.⁴ Additionally, the Joint Intervenor's have never questioned the feasibility of co-firing Spurlock Unit 1 and Unit 2.⁵

The record in this proceeding is substantial. There is extensive testimony, there have been voluminous responses to requests for information, and EKPC fully defended its positions at a Formal Hearing. The record is clear – EKPC has proposed a comprehensive plan to meet its generation needs. All of the projects presented are needed, all projects are feasible, and none will result in wasteful duplication. EKPC needs all of the proposed generation projects to meet its forecasted load and to continue to provide safe and reliable service to its Owner-Members.

WHEREFORE, on the basis of the foregoing, EKPC respectfully requests the Commission grant the CPCN to allow EKPC to construct the Cooper CCGT, grant the CPCN to co-fire Cooper Unit 2, grant the CPCN to co-fire the Spurlock station, issue a Site Compatibility Certificate, and provide any other relief to which EKPC may be entitled.

This the 11th day of June 2025.

³ See EKPC's Supplemental Response to JI 2-27 (filed May 27, 2025) for the REI Report. It is noted in the Response the REI Report is being filed under seal pursuant to a motion for confidential treatment.

⁴ Joint Intervenor's REI Brief at 3.

⁵ See generally Joint Intervenor's REI Brief.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Commission on June 11, 2025, and that there are no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to prior Commission Orders, no paper copies of this filing will be made.

Heather S. Temple

Counsel for East Kentucky Power Cooperative, Inc.