

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

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

**RESPONSES TO STAFF’S POST- HEARING REQUEST**  
**TO EAST KENTUCKY POWER COOPERATIVE, INC.**

**DATED APRIL 24, 2025**

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

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<b>MANAGEMENT TARIFFS; AND 4) OTHER</b>	)	
<b>GENERAL RELIEF</b>	)	

**CERTIFICATE**

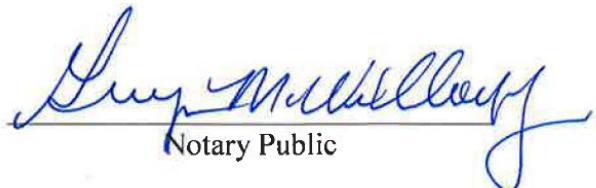
**STATE OF KENTUCKY**    )  
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**COUNTY OF CLARK**     )

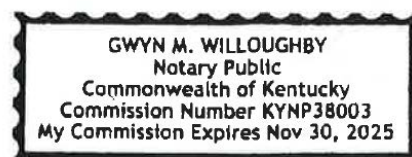
Brad Young, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to Commission Staff's Post-Hearing Request for Information in the above-referenced case dated April 24, 2025, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

*Brad Young*

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Subscribed and sworn before me on this 25th day of April, 2025.

  
Notary Public



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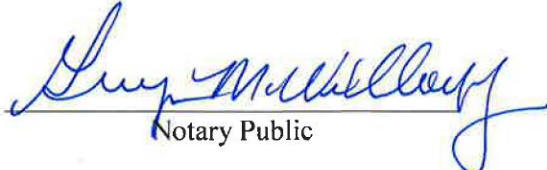
**STATE OF KENTUCKY** )  
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**COUNTY OF CLARK**     )

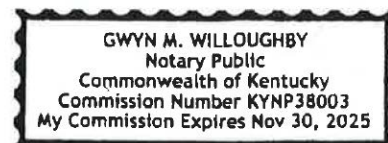
Mark Horn, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to Commission Staff's Post-Hearing Request for Information in the above-referenced case dated April 24, 2025, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

*Mark Horn*

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Subscribed and sworn before me on this 25th day of April, 2025.

  
Notary Public



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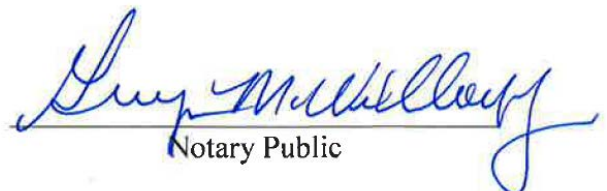
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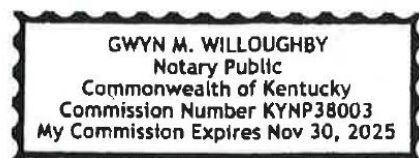
**STATE OF KENTUCKY**    )  
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**COUNTY OF CLARK**     )

Craig Johnson, 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.



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<b>GENERAL RELIEF</b>	)	

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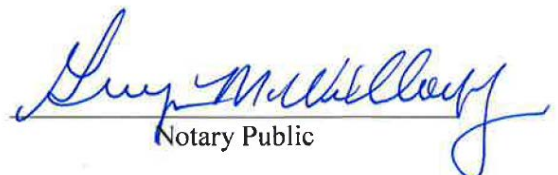
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**COUNTY OF CLARK**     )

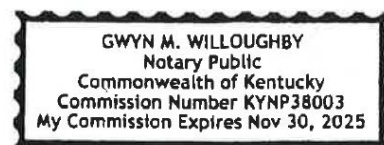
Scott Drake, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to Commission Staff's Post-Hearing Request for Information in the above-referenced case dated April 24, 2025, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

*Scott Drake*

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Subscribed and sworn before me on this 25th day of April, 2025.

  
Notary Public



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<b>GENERAL RELIEF</b>	)	

**CERTIFICATE**

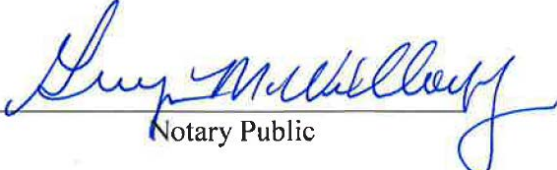
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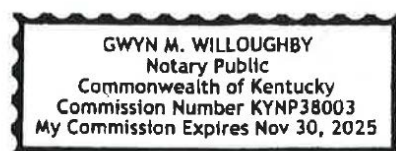
Don Mosier, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to Commission Staff's Post-Hearing Request for Information in the above-referenced case dated April 24, 2025, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

*Don Mosier*

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Subscribed and sworn before me on this 25th day of April, 2025.

  
Notary Public



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<b>GENERAL RELIEF</b>	)	

**CERTIFICATE**

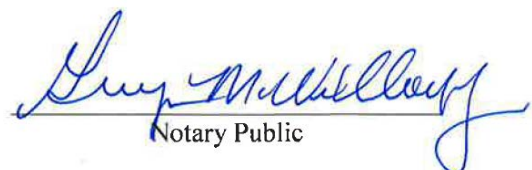
**STATE OF KENTUCKY**    )  
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**COUNTY OF CLARK**     )

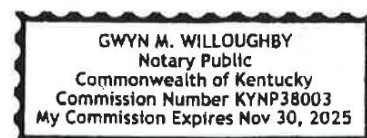
Jerry Purvis, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to Commission Staff's Post-Hearing Request for Information in the above-referenced case dated April 24, 2025, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

*Jerry Purvis*

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Subscribed and sworn before me on this 25th day of April, 2025.

  
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<b>GENERAL RELIEF</b>	)	

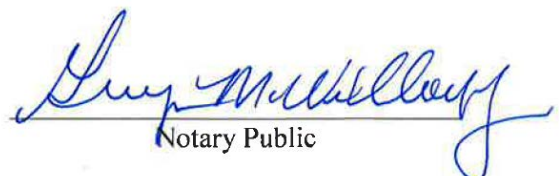
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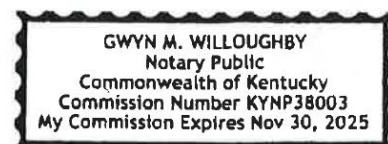
**STATE OF KENTUCKY**    )  
                                      )  
**COUNTY OF CLARK**     )

Julia J. Tucker, being duly sworn, states that she 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 her knowledge, information and belief, formed after reasonable inquiry.

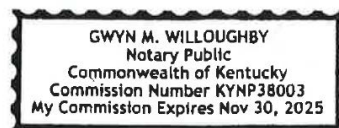
  
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<b>MANAGEMENT TARIFFS; AND 4) OTHER</b>	)	
<b>GENERAL RELIEF</b>	)	

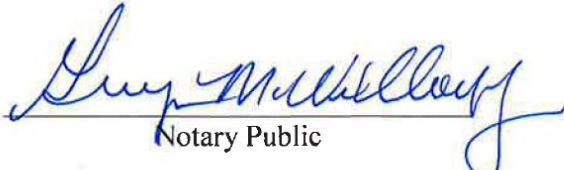
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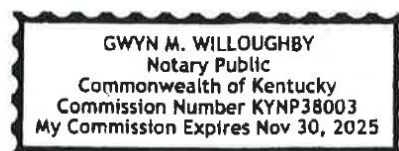
**STATE OF KENTUCKY**    )  
                                      )  
**COUNTY OF CLARK**     )

Darrin Adams, 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.

*Darrin Adams*

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 FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 1**

**RESPONSIBLE PARTY:                Julia J. Tucker**

**Request 1.**                Provide the quantitative analysis for the cost impact of the Corporate Sustainability Plan to reduce carbon emissions by 35 percent.

**Response 1.**                EKPC has not developed a quantitative analysis of the cost impact for the Sustainability Plan. The EKPC Board of Directors approved this goal with the knowledge that all generation projects are driven by economics. The generation plan as shown in PSC Case Nos. 2024-00129, 2024-00310, and in this proceeding, and the possible solar farms that were included in EKPC's New ERA application are the most cost-competitive resources available to meet EKPC's capacity and energy needs.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00370**

**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 2**

**RESPONSIBLE PARTY: Jerry Purvis**

**Request 2.** On May 8, 2024, the United States Environmental Protection Agency (EPA) finalized changes to the regulations for inactive surface impoundments at inactive electric facilities, referred to as Legacy Surface Impoundments (LSIs). Provide a list of the 11 facilities that EKPC owns or operates that may be subject to the Legacy Rule.

a. How many of the facilities proposed to be co-fired are part of that list of 11 facilities?

b. State whether the expense estimates of the projects include expenses related to addressing future compliance with the Legacy Rule.

**Response 2.**

a.

EKPC Facilities	Coal	Natural Gas	Landfill Gas	Co-firing w/ NG	Sun
Spurlock Station	x			x	
Cooper Station	x			x	
Smith Station		x			
Bluegrass Station		x			
Bavarian LFGTE			x		
Glasgow LFGTE			x		
Green Valley LFGTE			x		
Hardin County LFGTE			x		
Pendleton LFGTE			x		
Cooperative Solar One					x

2b. EKPC is underway in accordance with the legacy CCR rule timelines to comply by completing engineering and environmental studies with consultants. Legacy CCR expenses are not included in either Case No. 2024-00310 or this filing. Once EKPC completes its estimates and assessments, EKPC will update the Commission on regulations, impacts, and costs and file the appropriate environmental surcharge application.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00370**

**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 3**

**RESPONSIBLE PARTY: Mark Horn**

**Request 3.** Provide a copy of all contracts related to the proposed natural gas pipeline expansion projects.

**Response 3.** Please see the attached *Confidential-StaffPHDR-3-Amended and Restated Pulaski Project Precedent Agreement.pdf* that applies to Cooper Power Station along with the *Confidential-StaffPHDR-3-Maysville Project Precedent Agreement.pdf* that applies to Spurlock Power Station, which are provided under seal pursuant to a motion for confidential treatment.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00370**

**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 4**

**RESPONSIBLE PARTY: Jerry Purvis**

**Request 4.** Provide any updates to the permitting process regarding the construction of the facilities or any environmental approvals necessary to construct the facilities.

**Response 4.** EKPC submitted an air permit application on January 27, 2025, to the Kentucky Division for Air Quality, which was filed in the record of this proceeding on April 24, 2025. Additionally, EKPC submitted the Rural Utility Service ("RUS") Finding of No Significant Impact for the Liberty RICE projects in Case No. 2024-00310. EKPC is working diligently on the rest of the required permits including the required RUS Environmental Assessment for Cooper and Spurlock co-firing projects. EKPC plans to submit the Environmental Assessment at the end of 2025 for the Cooper Project and early next year for Spurlock to RUS. The balance of permitting will be modification to the KPDES water permit.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00370**

**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 5**

**RESPONSIBLE PARTY: Jerry Purvis**

**Request 5.** Provide updates on the current status of the air and water permitting process for each of the following projects:

- a. Cooper Combine Cycle Gas Turbine (CCGT) project.
- b. Cooper Unit 2 natural gas co-firing project.
- c. Spurlock Units 1–4 natural gas co-firing projects.

**Response 5.**

a. KDAQ received the air permit application on the Cooper Project on January 27, 2025. EKPC has not engaged a consultant to begin the water permit assessment and development of the water permit under the Kentucky Pollution Discharge Elimination System (KPDES) and NPDES EPA program. Should the Commission grant the CPCN in this proceeding, then EKPC would reach out to work with a consultant to assist EKPC in the development of a water permit modification. EKPC has an existing permit shield under the current and existing KPDES permit. EKPC works closely with the Kentucky regulators to ensure compliance before, during, and after construction



and submits the appropriate permit applications pursuant to EPA and state regulations. EKPC will move forward with the Kentucky Division of Water if and when the Commission grants approval of the Application in this proceeding as well as Case No. 2024-00310.

b. Cooper CCGT and Cooper co-firing Unit 2 are considered as one project from an air permit application perspective. Should the Commission provide EKPC with a favorable order in this proceeding, then EKPC's environmental staff will reach out to a consultant to assist with modifications to the existing water permit in the form of a water permit application.

c. EKPC is engaged with the appropriate consultant to prepare and develop the air permit application to co-fire Spurlock Unit 1 – 4 with natural gas in an effort to submit to KDAQ as scheduled for July / August 2025. Additionally, EKPC is engaged with a National Environmental Policy Act (NEPA) consultant to assist us with the appropriate environmental assessment.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00370**

**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 6**

**RESPONSIBLE PARTY: Scott Drake**

**Request 6.** Refer to Scott Drake's April 22, 2025, hearing testimony.

- a. Provide a list of each member cooperative and demand-side management (DSM) program they currently implement.
- b. Provide the EKPC budget for the DSM programs for each of the years 2019-2024.
- c. Provide the amount of incentive payments made to each owner-member cooperative for each year for the years 2019-2024 and 2025 to the present date.

a.

DSM Programs Offered by EKPC's Owner-Member Cooperatives as of April 24, 2025						
	Button-Up Weatherization Program *	Community Assistance Resources for Energy Savings (CARES)	Heat Pump Retrofit Program	Touchstone Energy® Home Program	Direct Load Control Program with BYOT **	Residential Electric Vehicle Off-peak Charging Program
<b>Big Sandy RECC</b>	YES	YES	YES	YES	YES	
<b>Blue Grass Energy Cooperative</b>	YES	YES	YES	YES	YES	YES
<b>Clark Energy Cooperative</b>	YES	YES	YES	YES	YES	YES
<b>Cumberland Valley Electric</b>	YES	YES	YES	YES	YES	YES
<b>Farmers RECC</b>	YES	YES	YES	YES	YES	YES
<b>Fleming-Mason Energy Cooperative</b>	YES	YES	YES	YES	YES	YES
<b>Grayson RECC</b>	YES	YES	YES	YES	YES	YES
<b>Inter-County Energy</b>	YES	YES	YES	YES	YES	YES
<b>Jackson Energy Cooperative</b>		YES			YES	YES
<b>Licking Valley RECC</b>	YES	YES	YES	YES	YES	YES
<b>Nolin RECC</b>	YES	YES	YES	YES	YES	YES
<b>Owen Electric Cooperative</b>	YES	YES	YES	YES	YES	YES
<b>Salt River Electric Cooperative</b>			YES	YES	YES	YES
<b>Shelby Energy Cooperative</b>	YES	YES	YES	YES	YES	YES
<b>South Kentucky RECC</b>	YES	YES	YES	YES	YES	YES
<b>Taylor County RECC</b>	YES		YES	YES	YES	YES

\* Big Sandy RECC, Clark Energy, and Taylor Co RECC offers the Button-Up Weatherization Program, but not the Rebate for HVAC Duct Sealing

\*\* Jackson Energy offers the Direct Load Control Program, but not the Bring Your Own Thermostat (BYOT) option

b.

<b>Annual EKPC DSM Budget 2019-2024</b>	
2019	\$5,582,500
2020	\$4,817,955
2021	\$3,611,976
2022	\$3,611,976
2023	\$3,744,340
2024	\$3,801,000
Does not include EKPC admin	

**C.**

Annual DSM Incentive Payments by Owner-Member							
	2019	2020	2021	2022	2023	2024	2025 (YTD)
Big Sandy RECC	\$10,100	\$8,490	\$5,590	\$9,325	\$8,225	\$12,689	\$750
Blue Grass Energy Cooperative	\$206,632	\$165,780	\$135,670	\$300,940	\$350,030	\$308,548	\$99,270
Clark Energy Cooperative	\$30,336	\$30,980	\$81,380	\$47,670	\$36,025	\$24,040	\$17,960
Cumberland Valley Electric	\$79,726	\$26,410	\$35,350	\$39,790	\$39,300	\$39,840	\$20,635
Farmers RECC	\$40,679	\$18,661	\$21,270	\$21,373	\$12,480	\$17,790	\$4,414
Fleming-Mason Energy Cooperative	\$44,349	\$32,660	\$30,100	\$25,130	\$33,052	\$30,850	\$9,933
Grayson RECC	\$32,669	\$37,360	\$48,600	\$42,287	\$55,776	\$48,309	\$12,744
Inter-County Energy	\$86,052	\$37,151	\$28,417	\$34,187	\$29,316	\$29,313	\$15,828
Jackson Energy Cooperative	\$39,168	\$10,935	\$15,340	\$14,692	\$51,551	\$84,972	\$9,615
Licking Valley RECC	\$30,226	\$31,755	\$15,965	\$12,380	\$20,774	\$10,680	\$330
Nolin RECC	\$101,553	\$82,971	\$56,565	\$50,601	\$67,901	\$85,188	\$29,160
Owen Electric Cooperative	\$107,426	\$97,934	\$100,594	\$90,109	\$116,953	\$190,587	\$48,670
Salt River Electric Cooperative	\$118,866	\$64,401	\$47,470	\$39,780	\$66,200	\$46,420	\$7,410
Shelby Energy Cooperative	\$37,037	\$31,960	\$20,546	\$21,262	\$19,273	\$14,235	\$2,490
South Kentucky RECC	\$223,777	\$105,560	\$109,760	\$123,395	\$114,418	\$85,582	\$28,702
Taylor County RECC	\$27,767	\$18,035	\$21,242	\$14,620	\$12,280	\$13,282	\$1,940
Amounts are incentives (rebates) only and do not include lost revenue or administrative payments to the owner-members.							

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00370**

**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 7**

**RESPONSIBLE PARTY:                Julia J. Tucker**

**Request 7.**                Provide documentation to demonstrate the financial impacts of the storm-related capacity shortfall reflected in EKPC's response to Staff's Third Request for Information (Staff's Third Request), Item 3, referring to the Bluegrass Units 2 and 3, which were off-line for extended periods during the December 2022 Winter Storm Elliott, resulting in a loss of 400 MW of capacity.

**Response 7.**                Refer to EKPC response to Staff's supplemental request for information in PSC Case No. 2024-000137. EKPC was assessed a total initial penalty of \$19,935,547 during Winter Storm Elliott. The penalty total is inclusive of outages on Bluegrass Units 1 and 2 and Spurlock Unit 4 as well as a derate on Cooper 1. The FERC settlement reduced the total penalty to \$13,195,090. Bluegrass Unit 3 did not receive performance penalties during the events as the unit was not obligated to the PJM capacity market during the relevant delivery year.

Below is an excerpt from the discovery response detailing Bluegrass unit forced outage information as described in the FAC case.

- Bluegrass 1 had a forced outage due to the unit tripping on lube oil warm up resulting in an automatic voltage regulator issue. 12/23/2022 09:28 – 18:20
- Bluegrass 1 had a forced outage due to natural gas curtailment by Texas Gas Transmission. After the natural gas curtailment, the unit had a start failure on fuel oil. 12/23/2022 18:20 – 20:08
- Bluegrass 1 had a forced outage due to the emergency shutdown valve opening after Bluegrass 2 was lined up to start. This resulted in a decrease in fuel oil header pressure. 12/23/2022 20:53 – 12/24/2022 13:55
- Bluegrass 1 had a forced outage due to the emergency shutdown valve opening after Bluegrass 2 was lined up to start. This resulted in a decrease in fuel oil header pressure. 12/24/2022 15:05 – 16:16
- Bluegrass 2 had a forced outage due to natural gas curtailment by Texas Gas Transmission. After the natural gas curtailment, the unit had a start failure on fuel oil. 12/23/2022 15:51– 12/24/2022 17:16

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**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 8**

**RESPONSIBLE PARTY: Darrin Adams**

**Request 8.** Provide updated figures for the range of transmission expense previously provided in EKPC's response to Staff's Third Request for Information (Staff's Third Request), Item 1, and later discussed in Darrin Adams' hearing testimony.

**Response 8.** The expected range of costs (\$79,430,000 to \$127,595,000) for the necessary transmission facilities associated with the Cooper CCGT that was originally provided in the Application, Exhibit 6 has not changed. The response to Commission Staff's Third Request for Information, Item 1, was not fully accurate. The response to Item 1 indicated that the \$1.317 billion cost estimate includes assumed transmission costs of \$84.7 million. However, that \$84.7 million did not include two of the necessary transmission projects – the new Cooper CCGT 161 kV switchyard and the EKPC portion of the new Cooper-Alcalde 161 kV line. Since these projects involve new (greenfield) construction as opposed to upgrades to existing facilities, they were included as a separate line-item cost of \$36.1 million within the overall project cost. Therefore, the total transmission cost included in the \$1.317 billion overall project cost estimate is the sum of these two values, which is \$120.8 million. As a result, the assumed total cost of the transmission



projects included in the overall project estimate is near the upper bound of the expected range rather than near the lower bound.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

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**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 9**

**RESPONSIBLE PARTY: Denise Foster-Cronin**

**Request 9.** Refer to Staff's First Request for Information (Staff's First Request), Items 2 and 3, and Staff's Second Request for Information (Staff's Second Request), Item 5. Provide an update on FERC's order approving the PJM Reliability Resource Initiative (RRI) filing (ER25-712) and the status of the Cooper and Spurlock projects as participants in the RRI.

**Response 9.** Refer to the response to Joint Intervenors' Post-Hearing Request for Information, Item 5.

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**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 10**

**RESPONSIBLE PARTY: Denise Foster-Cronin**

**Request 10.** Refer to Staff's Second Request, Item 5. Provide an update on FERC dockets ER25-682 (filed Dec. 9, 2024) and ER25-785 (filed Mar. 6, 2025), where PJM proposed revisions to its Reliability Pricing Model (PRM) and the potential impact of any FERC order accepting these filings on EKPC's CPCN.

**Response 10.** FERC Docket No. ER25-682 revised the PJM Capacity Market Rules to address for two delivery years how resources under reliability must run arrangements ("RMR") are treated in the auctions. The FERC Order in this docket also retained the combustion turbine as the Reference Resource for purposes of establishing the Cost of New Entry ("CONE") instead of moving to the combined cycle as the Reference Resource as previously approved by FERC. Neither of these changes is anticipated to impact EKPC's CPCN application. Ultimately, these changes will not affect how EKPC offers its units into the PJM Capacity Market; EKPC is a self-supply entity that offers all its capacity resources into the auction and buys back all of the load obligation it satisfies for its 16 owner-members.

FERC Docket No. ER25-785 revised the PJM Capacity Market rules (1) to require intermittent, storage, and hybrid capacity resources to offer into the capacity auctions; (2) to allow Capacity Market Sellers to utilize a Market Seller Offer Cap based on the greater of the resource's specific net Avoidable Cost Rate ("ACR") or its specific Capacity Performance Quantifiable Risk ("CPQR"); and (3) to allow Capacity Market Sellers to request resource-specific segmented offer caps. These changes are not anticipated to impact EKPC's CPCN application. As a self-supply entity, EKPC does not offer its resources into the market at the Market Seller Offer Cap.

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**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 11**

**RESPONSIBLE PARTY: Craig Johnson**

**Request 11.** Refer to EKPC's response to Staff's Second Request, Item 14. Confirm that the Spurlock Units could support up to 50 percent natural gas co-fire.

- a. State whether EKPC expects Spurlock Units 1 and 2 to run with natural gas at all hours.
- b. State whether EKPC expects that the co-firing percentage of natural gas being burned relative to coal will vary hour to hour or whether the percentage will remain fairly constant. Also, state whether the natural gas percentage will vary as the units ramp up and down.
- c. State whether EKPC expects that the coal-associated compliance costs are a significant factor in the offer price in the PJM Day Ahead and Realtime energy markets.
- d. Provide whether the relative fuel costs will be a significant factor in EKPC's decision to determine the gas-to-coal burn ratio in the units.
- e. State whether there will be any environmental cost savings if a 50 percent gas-to-coal burn ratio is maintained in the Spurlock units versus burning only coal.

**Response 11.** EKPC confirms that Spurlock Units 1,2,3, and 4 are being designed to operate at a maximum co-fire rate of 50% natural gas.

a. EKPC confirms that the design and natural gas supply will allow the units to operate at all hours up to a 50% co-fire of natural gas. The rules require that a blend of 40% gas is used during the year, it is not specific to each day or hour of operation

b. The design of the natural gas co-firing will allow for operational flexibility in how the co-firing blend between coal and natural gas will be utilized. EKPC anticipates that natural gas will be fired as a steady heat input up to 40 to 50%. Coal will be used to vary the load from minimum load up to full unit output. During times of extended low load conditions, such as seen typically during the nighttime off peak hours, natural gas can be used in Spurlock 1 and 2 solely to keep those units at their minimum design operating condition. Spurlock 3 and 4 will require some percentage of co-firing coal to achieve minimum design operating load. EKPC is certain that co-firing a 50% blend of natural gas is achievable in all the Spurlock units, but the percentage of coal versus natural gas for a composite fuel blend under different load conditions and unit ramping conditions to achieve an optimal operating condition will be based upon actual experience learned after the systems are in place. All Spurlock units will retain the ability to fire 100% coal during times when natural gas is curtailed.

c. The amount of coal and natural gas to be burnt will be forecasted on a daily basis. The amount of coal burnt and the variable amount operation and maintenance cost associated with burning the coal is factored into the unit offers to PJM.

d. The amount of natural gas to be burnt cannot be less than 40% of the total heat input into the unit on an annual basis as required by the greenhouse gas rules. The design allows for a 50% co-firing of natural gas to give operational flexibility and a compliance margin.

e. There will be substantial environmental cost savings in the non-fuel variable operating cost as described in response JR DR1 Q39, Reference Excel Spreadsheet JI1-39.

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**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 12**

**RESPONSIBLE PARTY:                Julia J. Tucker**

**Request 12.**                Refer to EKPC's response to Staff's Second Request, Item 14.

- a. State whether there would be significant cost savings if Cooper Unit 2 were run on a 100 percent natural gas burn ratio.
- b. Provide the co-fire natural gas percentage that EKPC expects to run Cooper Unit 2.
- c. State whether EKPC expects to run Cooper Unit 2 with natural gas during all hours.
- d. State whether limiting the CCGT at the Cooper facility to a 40 percent natural gas burn ratio was considered in EKPC's expansion plan.

**Response 12.**

- a. Yes. Running Cooper Unit 2 on 100 percent natural gas reduces the dispatch fuel price by roughly one-half, which results in the annual capacity factor of the unit increasing by roughly 30%, from a 9.6% average capacity factor for years 2025 through 2029 to 39.9% on average for years 2030 through 2049.
- b. EKPC modeled Cooper Unit 2 on 100 percent natural gas burn ratio for this application.



c. EKPC expects natural gas to be the most economic fuel source based on forward price forecasts. Barring fuel delivery or mechanical failure rendering natural gas unavailable, EKPC expects the unit to run on natural gas when dispatched. However, EKPC intends to maintain the ability to burn coal in the Cooper 2 unit.

d. No, EKPC did not consider the 40 percent natural gas burn ratio in its expansion plan. While this limitation would impact how much energy is available from the Cooper CCGT to serve load on an annual basis, it would not impact the ability for the Cooper CCGT to serve peak demand.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00370**

**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 13**

**RESPONSIBLE PARTY:                Julia J. Tucker**

**Request 13.**                Refer to EKPC's response to the Attorney General's First Request for Information, Item 9. Provide the same chart reflecting the natural gas prices and add a column to reflect the contract price of the natural gas, including the fixed costs associated with the pipeline project.

**Response 13.**                Refer to attached spreadsheet, *Confidential - StaffPHDR-13.xlsx*, subject to motion for confidential treatment.

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**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 14**

**RESPONSIBLE PARTY: Scott Drake**

**Request 14.** Refer to Application, Attachment SD 11, Tariff Sheet 62, redline version. Confirm that "EKPC all also" should have been "EKPC will also." If not confirmed, provide the correct wording.

**Response 14.** Confirmed. Tariff Sheet 62 should read "EKPC will also" instead of "EKPC all also."

**EAST KENTUCKY POWER COOPERATIVE, INC.**

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**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 15**

**RESPONSIBLE PARTY: Scott Drake**

**Request 15.** Refer to the Application, Attachment SD-11, Tariff Sheet 84, redline version. Confirm that the lost revenues and administrative cost reimbursement are in addition to the maximum reimbursement amounts listed of the owner member cooperatives in the tariff. If not confirmed, provide the full amount of maximum reimbursement for the owner member cooperatives.

**Response 15.** Confirmed. For Tariff Sheet 84, the lost revenues and administrative costs provided to the owner-member cooperatives are in addition to the \$3,000 incentive for a heat pump eligible home or the \$1,250 heat pump in-eligible home provided to the Community Action Agency or the Affordable Housing Organization.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

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**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 16**

**RESPONSIBLE PARTY: Mark Horn**

**Request 16.** Refer generally to the Direct Testimony of Mark Horn. Provide the costs of the natural gas pipeline that will be installed to support the Cooper and Spurlock Projects, respectively. Also, include the impact these capital costs will have on the fuel costs over the period of the natural gas contract.

**Response 16.** The Columbia Gulf Transmission ("CGT") Pulaski Project that will support Cooper Power Station has an estimated capital cost of \$370,841,864 and the Maysville Project that will support Spurlock Power Station has an estimated capital cost of \$357,175,667. The cost estimates for both of the extension projects by CGT, which are now the more recent and more accurate Class 3 cost estimates, are actually lower than the initial cost estimates. These capital costs will impact the cost of reserving capacity on the pipeline, not the cost of physically flowing natural gas on the pipeline. The cost of each extension project then has two components. The two components for the extension projects include the cost of reserving capacity (approximately \$0.20/Dth) on the new extension and the cost of recovering CGT's capital expense (approximately

\$0.40/Dth) of building the extension. The capital expense recovery does include interest on capital and return on investment. Through the Facilities Rate Adjustment provision in the Precedent Agreements, if other third-party Shippers connect to the CGT expansion projects, EKPC's rate will be reduced accordingly based on the third-party's volume of gas and time left in the Initial Term. After the Initial Term of 20 years, during which the capital will have been recovered by CGT, the Reservation Charge for the extension projects will reduce to the then current tariff rate for capacity only. Until the capital cost is fully recovered over the Initial Term of 20-years, the impact of these capital costs will be that it adds approximately \$0.40/Dth to the physical delivered price of natural gas. Having the ability to flow natural gas to Spurlock and Cooper will provide fuel diversity, fuel flexibility, fuel security, and overall fuel price competitiveness.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

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**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 17**

**RESPONSIBLE PARTY: Brad Young, and Jerry Purvis**

**Request 17.** Refer to the Direct Testimony of Brad Young (Young Direct Testimony), page 14. The cost of providing co-firing capability at Cooper Unit 2 is estimated at \$73.8 million. If the EPA were to roll back the May 2024 Mercury and Air Toxics Standards (MATS) and Greenhouse Gas (GHG) regulations, state whether EKPC would elect to postpone the co-firing project. If not, state how EKPC would justify the costs of the cofiring project.

**Response 17.** EKPC would move forward with the construction of the co-firing projects at Cooper Unit 2 and Spurlock Units 1 - 4 regardless of whether the EPA were to roll back the associated regulations.

First, the proposed and necessary investments will provide EKPC's Owner Members with additional reliability and economic benefits including fuel diversity, fuel flexibility, fuel security, and overall fuel price competitiveness for both Cooper and Spurlock. On-site coal and natural gas in the pipe provide reliable capacity and energy supply while also lowering the GHG footprint, a stated goal of EKPC's Sustainability Plan. Construction of the natural gas infrastructure for these co-firing projects is not only necessary for the proposed Cooper Combined

Cycle, but is needed for the future potential siting of new or replacement generation at Spurlock. Securing EKPC's long-term strategic transmission injection rights and primary interconnection with PJM at Spurlock are critical for EKPC to reliably and affordably generate and transmit power and to support increased levels of economic development throughout EKPC's Member's service territories.

Current federal laws exist for EPA rules including GHG, MATs, CSAPR, ELG, and legacy CCR, although remanded, remain law at this time and EKPC must comply. Given there is the potential for the current Administration to roll back these rules, these actions could be short lived, leading to potential deferment of compliance for at most a 4–8-year timeframe, only to resume under a new administration. Given EKPC's 20 – 30-year planning horizon, it is a prudent and necessary long-term investment to preserve reliable generation capacity and energy as first priorities given the direction and trajectory of the country's evolving and everchanging energy policies and, importantly, EKPC's need for new generation resources to serve its load.



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**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 18**

**RESPONSIBLE PARTY: Brad Young, and Jerry Purvis**

**Request 18.** Refer to Young Direct Testimony, page 17. The cost of providing co-firing capability at the Spurlock Units 1-4 is estimated at \$186 million. If the EPA were to roll back the May 2024 MATS and GHG regulations, state whether EKPC would elect to postpone the co-firing project. If not, state how EKPC would justify the costs of the cofiring project.

**Response 18.** See Response 17.

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**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 19**

**RESPONSIBLE PARTY: Brad Young**

**Request 19.** Refer to the Project Scoping Report (BY-1), page 7.2. Provide a detailed description of the EKPC Project Management Organization that will manage the Cooper Combined Cycle Project utilizing a multi-prime contracting methodology. Include a description of each Project Management Organization member's specific skill sets and numbers of Full Time Equivalent employees.

**Response 19.** Over the past 15 years, EKPC developed and maintained a consistent approach for the execution of major capital projects. This approach involves the assignment of a lead project manager from within EKPC to oversee the complete execution of the project. The project manager is supported through a host of internal EKPC support services and project stakeholders as well as external engineering and consulting design and construction management support services.

For the execution of the Cooper Combined Cycle project, Patrick Bischoff will act as the lead project manager for EKPC. Mr. Bischoff has 19 years of professional experience, 12 years with EKPC, and is a licensed professional engineer in the Commonwealth of Kentucky and holds

a degree in Civil Engineering from the University of Kentucky. Mr. Bischoff is currently the Manager of Construction and Capital Projects and is responsible for the management, training, and direction of a multi-discipline group of engineers and other technical staff to develop, plan, and execute power delivery and production capital and major maintenance budgets, short- and long-range capital and financial plans, and overall project portfolio performance. Mr. Bischoff's work recently included leading an effort to define and document project lifecycle processes with internal stakeholders throughout EKPC to produce a Project Management Manual. Prior to his current role, Mr. Bischoff served as a project manager within the Capital Construction and Production Engineering groups where he managed a host of projects for EKPC.

Due to the size, complexity, and schedule of the Cooper Combined Cycle project, EKPC committed additional resources. Lucas Spencer, a Senior Engineer in the Project Management Department, will serve as the transmission upgrade and interconnection project manager for the project. Mr. Spencer has over seven years of professional experience, all with EKPC, is a licensed professional engineer in the Commonwealth of Kentucky, and holds a degree in Civil Engineering from the University of Kentucky. Mr. Spencer served as a project manager and a design engineer for transmission capital projects throughout his career at EKPC.

Weston Cline, a Senior Engineer in the Project Management department, will serve as the deputy project manager for the production scope of the project. Mr. Cline has 10 years of professional experience, and three years with EKPC. Mr. Cline is a licensed professional engineer in the Commonwealth of Kentucky and holds a degree in Civil Engineering from the University

of Kentucky. Mr. Cline has served as a project manager for EKPC and led the successful execution of both transmission and production capital projects. EKPC will also assign resources to the project and project team from the Production Engineering department, Cooper Station staff, and other business areas as the project continues to develop and enter the full execution phase.

Consistent with past major projects at EKPC, outside resources are utilized for design and construction management services. These services all report to the EKPC project team identified and discussed above. Major roles that are assigned from the engineering and consulting team include an overall consulting Project Manager, Engineering Manager, Construction Manager, and Site Manager. With the size of the project, multi-prime approach, and number of contracting resources that will be required to execute the construction of the project, EKPC will have to leverage these external engineering and construction resources to successfully implement the project. The consulting Project Manager will lead the efforts for the consulting firm and will be responsible for the successful completion of the project within the specified dates and to establish and maintain a professional and satisfactory relationship with EKPC throughout the execution of the project. The Engineering Manager will be responsible for the project engineering design, the progress of the project, and technical interface with EKPC. The Construction Manager will be responsible for the operations at the plant site, the implementation of the construction plan, and the completion of the work at or before the commercial operation date of the project. And the Site Manager will be responsible for the coordination of field construction, including the safe execution of the project and meeting schedule and design requirements. A staff supporting these major roles will be required to cover the safety, quality, cost, and schedule related components of the project.

The external consulting staff positions will be identified and assigned as the project continues to develop and enters the full execution phase.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00370**

**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 20**

**RESPONSIBLE PARTY: Brad Young**

**Request 20.** Refer to the Project Scoping Report (BY-2), page 7.2. Provide a detailed description of the EKPC Project Management Organization that will manage the Cooper Unit 2 co-firing project utilizing a multi-prime contracting methodology. Include a description of each Project Management Organization member's specific skill sets and numbers of Full Time Equivalent employees.

**Response 20.** Over the past 15 years, EKPC developed and maintained a consistent approach for the execution of major capital projects. This approach involves the assignment of a lead project manager from within EKPC to oversee the complete execution of the project throughout its lifecycle. The project manager is supported through a host of internal EKPC support services and project stakeholders, as well as external engineering and consulting design and construction management support services.

For the execution of the Cooper Unit 2 and Spurlock Units 1-4 co-firing projects, Brian Fatch will act as the lead project manager for EKPC. Mr. Fatch has 15 years of professional experience, 5.5 years with EKPC, 9.5 years with another utility, and is a licensed professional

engineer in the Commonwealth of Kentucky. He holds a Bachelors' degree in Mechanical Engineering from Rose-Hulman Institute of Technology and will finish his Master's Degree in Business Administration from the University of Kentucky. He is currently a senior engineer and project manager within Capital Construction. At EKPC, he has managed many projects in the generation portfolio which include boiler-specific work. At his former employer, he managed many projects and was responsible for the combustion performance of two 540MW coal fired units.

EKPC will also assign resources to the project and project team from the Production Engineering department, Cooper and Spurlock Station staff, and other business areas as the project continues to develop and enter the full execution phase.

Consistent with past major projects at EKPC, outside resources are utilized for design and construction management services. These services all report up through the EKPC project team identified and discussed above. Major roles that are assigned from the engineering and consulting team include an overall consulting Project Manager, Engineering Manager, Construction Manager, and Site Manager. With the size of the project, multi-prime approach, and number of contracting resources that will be required to execute the construction of the project, EKPC will have to leverage these external engineering and construction resources to successfully implement the project. The consulting Project Manager will lead the efforts for the consulting firm and will be responsible for the successful completion of the project within the specified dates, and to establish and maintain a professional and satisfactory relationship with EKPC throughout the execution of the project. The Engineering Manager will be responsible for the project engineering design, the progress of the project, and technical interface with EKPC. The Construction Manager will be

responsible for the operations at the plant site, for the implementation of the construction plan, and for the completion of the work at or before the commercial operation date of the project. And the Site Manager will be responsible for the coordination of field construction, including the safe execution of the project, meeting schedule, and design requirements. A staff supporting these major roles will be required to cover the safety, quality, cost, and schedule related components of the project. The external consulting staff positions will be identified and assigned as the project continues to develop and enters the full execution phase.



**EAST KENTUCKY POWER COOPERATIVE, INC.**

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**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 21**

**RESPONSIBLE PARTY: Brad Young**

**Request 21.** Refer to the Project Scoping Report (BY-3), page 7.2. Provide a detailed description of the EKPC Project Management Organization that will manage the Spurlock Units 1-4 co-firing project utilizing a multi-prime contracting methodology. Include a description of each Project Management Organization member's specific skill sets and numbers of Full Time Equivalent employees.

**Response 21.** Over the past 15 years, EKPC developed and maintained a consistent approach for the execution of major capital projects. This approach involves the assignment of a lead project manager from within EKPC to oversee the complete execution of the project throughout its lifecycle. The project manager is supported through a host of internal EKPC support services and project stakeholders, as well as external engineering and consulting design and construction management support services.

For the execution of the Cooper Unit 2 and Spurlock Units 1-4 co-firing projects, Brian Fatch will act as the lead project manager for EKPC. Please see the response to Item 20 above for Mr. Fatch's qualifications.

EKPC will also assign resources to the project and project team from the Production Engineering department, Cooper and Spurlock Station staff, and other business areas as the project continues to develop and enter the full execution phase.

Consistent with past major projects at EKPC, outside resources are utilized for design and construction management services. These services all report up through the EKPC project team identified and discussed above. Major roles that are assigned from the engineering and consulting team include an overall consulting Project Manager, Engineering Manager, Construction Manager, and Site Manager. With the size of the project, multi-prime approach, and number of contracting resources that will be required to execute the construction of the project, EKPC will have to leverage these external engineering and construction resources to successfully implement the project. The consulting Project Manager will lead the efforts for the consulting firm and will be responsible for the successful completion of the project within the specified dates, and to establish and maintain a professional and satisfactory relationship with EKPC throughout the execution of the project. The Engineering Manager will be responsible for the project engineering design, the progress of the project, and technical interface with EKPC. The Construction Manager will be responsible for the operations at the plant site, for the implementation of the construction plan, and for the completion of the work at or before the commercial operation date of the project. And the Site Manager will be responsible for the coordination of field construction, including the safe execution of the project, meeting schedule and design requirements. A staff supporting these major roles will be required to cover the safety, quality, cost, and schedule related components of the project. The external consulting staff positions will be identified and assigned as the project continues to develop and enters the full execution phase.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

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**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 22**

**RESPONSIBLE PARTY:                Julia J. Tucker**

**Request 22.**                Refer to Julia Tucker's April 22, 2025, hearing testimony in which she stated that the 300 MW hydro PPA is no longer available. Describe how this will impact the EKPC 2024 Expansion Plan.

**Response 22.**                Please see attached *StaffPHDR-22.pdf* for revised Attachment JJT-4 EKPC Capacity Expansion Plan without the 300 MW Hydro PPA. EKPC's demand is forecasted to peak at 3,627 MWs in the 2026/2027 Winter period. EKPC expected to have a total of 3,727 MWs of generation including the 300 MW Hydro PPA to serve this peak. Without the Hydro PPA, EKPC projects just 3,427 MWs of generation to serve this peak, a deficit of 300 MWs. Adding the 7 percent reserve margin increases this deficit to 554 MWs.

EKPC is currently evaluating seasonal PPAs for the 2026/2027 winter period in order to reduce the deficit for the immediate Winter season.

The summer capacity values have not changed as the Hydro PPA was to be an energy-only contract without capacity rights and therefore could not be monetized in the PJM capacity market by EKPC.

**EAST KENTUCKY POWER COOPERATIVE, INC.**  
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**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 23**

**RESPONSIBLE PARTY:**           **Denise Foster-Cronin**

**Request 23.**           Refer to Denise Foster Cronin's April 22, 2025, hearing testimony. Provide a summary of EKPC's PJM Performance Assessment Intervals (PAIs) bonuses and penalties for the period 2019 through 2024, as well as 2025 to present date.

**Response 23.**           Refer to EKPC's response to Item 7. EKPC was assessed PAI penalties once, during Winter Storm Elliott in 2022. There was 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.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00370**

**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 24**

**RESPONSIBLE PARTY: Jerry Purvis**

**Request 24.** Refer to EKPC's response to Staff's Third Request, Item 5. Provide the Owner Engineer's report verifying that the Spurlock Unit 3 Circulating Fluidized Bed (CFB) Case No. 2024-00370 boiler can be modified to meet the EPA's May 2024 MATS regulations. Include the cost estimates of the proposed modifications.

**Response 24.**

<b>Repair Item</b>	<b>Justification</b>	<b>Correction</b>	<b>Cost</b>
Cage Top Replacement	The top ring of the cages throughout the baghouse were severely corroded, and in some instances the bag was supporting the cage.	All cage tops will be replaced during the current unit 3 spring outage.	Material only: \$565,180 <ul style="list-style-type: none"> <li>• Spurlock had several crates of new cage tops on hand that will be used</li> </ul>
Bag Replacement	The existing bags had elongated thread holes at the bottom cuff that allowed ash to pass through.	The new bags for the Unit 3 baghouse have tape installed over the threads. Bags with this modification have been installed in unit 4's baghouse, and have performed successfully	Material: \$660,077.82 Labor to replace: \$315,729.93
Tubesheet replacement	The existing tubesheets are severely corroded, and the seating surface for the bag/tubesheet connection is poor due to pits/corrosion. Almost all existing tubesheets have had a patch installed as a temporary repair due to existing holes.	The baghouse tubesheets will be replaced during the current unit 3 spring outage.	Material: \$50,000 Labor to replace: \$283,140
		Total cost	\$1,874,127.75

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00370**

**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 25**

**RESPONSIBLE PARTY: Brad Young**

**Request 25.** Confirm the contract with Siemens must be acted upon by July 1, 2025. If not confirmed, provide the date by which contract deposits would be lost if not acted upon.

**Response 25.** Execution of the Combustion Turbine contract between EKPC and Siemens is required by July 21, 2025. If not executed by this date, EKPC will lose the Reservation Fee.

**EAST KENTUCKY POWER COOPERATIVE, INC.**

**CASE NO. 2024-00370**

**POST-HEARING FOR INFORMATION RESPONSE**

**STAFF'S REQUEST DATED APRIL 24, 2025**

**REQUEST 26**

**RESPONSIBLE PARTY:                Julia J. Tucker**

**Request 26.**                Refer to the Direct Testimony of Julia Tucker in Case No. 2024-00310 where EKPC states that the RICE units become more economic than CTs when operated for more than 6,000 hours annually, implying a 73 percent capacity factor. Explain how this projected operation aligns with industry data indicating that RICE units typically operate at a 20 percent capacity factor (approximately 1,762 hours annually).

**Response 26.**                There are not currently any RICE units operating within the PJM market, so it is not a direct comparison when looking at how other units are currently committed. If RICE units are installed on a single balancing authority basis, then they are dispatched based on that area's load and economics. That system data will drive the amount of operating hours. The modeling performed for the EKPC units considers PJM pricing based on load and economics. The modeling indicated that the units would be expected to run a significant portion of the time based on pricing and operational flexibility. That analysis also indicated that the expected dispatch value of the RICE units as compared to the Combustion Turbine was significant enough to overcome the difference in the initial capital installation cost. Please See Case No. 2024-00310, EKPC's



response to Commission to Staff's Fourth Request, Item 6, *Attachment to Staff Response 4-6.xlsx*.