

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)	

RESPONSES TO JOINT INTERVENOR’S POST HEARING REQUEST
TO EAST KENTUCKY POWER COOPERATIVE, INC.

DATED APRIL 25, 2025

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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CERTIFICATE

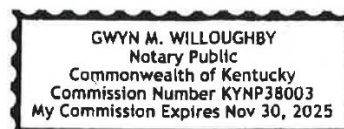
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Thomas J. Stachnik, being duly sworn, states that he has supervised the preparation of the Post-Hearing Responses of East Kentucky Power Cooperative, Inc. to Joint Intervenor's Post-Hearing Request for Information in the above-referenced case dated April 25, 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.

Thomas J. Stachnik

Subscribed and sworn before me on this 29th day of April, 2025.

Gwyn M. Willoughby
Notary Public



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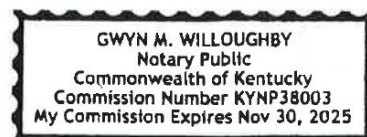
STATE OF KENTUCKY)
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Brad Young, being duly sworn, states that he has supervised the preparation of the Post-Hearing Responses of East Kentucky Power Cooperative, Inc. to Joint Intervenor's Post-Hearing Request for Information in the above-referenced case dated April 25, 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 29th day of April, 2025.

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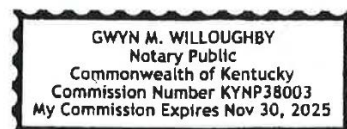
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COUNTY OF CLARK)

Greg Cecil, being duly sworn, states that he has supervised the preparation of the Post-Hearing Responses of East Kentucky Power Cooperative, Inc. to Joint Intervenor's Post-Hearing Request for Information in the above-referenced case dated April 25, 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.

Greg Cecil

Subscribed and sworn before me on this 29th day of April, 2025.

Gwyn M. Willoughby
Notary Public



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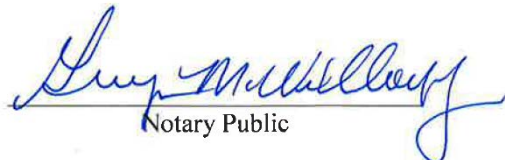
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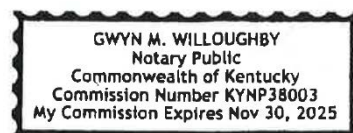
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Denise Foster-Cronin, being duly sworn, states that she has supervised the preparation of the Post-Hearing Responses of East Kentucky Power Cooperative, Inc. to Joint Intervenor's Post-Hearing Request for Information in the above-referenced case dated April 25, 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.

Denise Foster Cronin

Subscribed and sworn before me on this 29th day of April, 2025.


Notary Public



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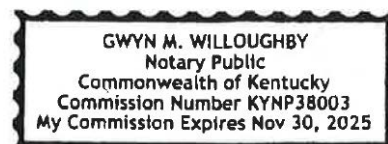
STATE OF KENTUCKY)
COUNTY OF CLARK)

Don Mosier, being duly sworn, states that he has supervised the preparation of the Post-Hearing Responses of East Kentucky Power Cooperative, Inc. to Joint Intervenor's Post-Hearing Request for Information in the above-referenced case dated April 25, 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

Subscribed and sworn before me on this 29th day of April, 2025.

Gwyn M. Willoughby
Notary Public



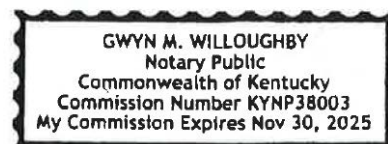
In the Matter of:

CERTIFICATE

Julia J. Tucker, being duly sworn, states that she has supervised the preparation of the Post-Hearing Responses of East Kentucky Power Cooperative, Inc. to Joint Intervenor's Post-Hearing Request for Information in the above-referenced case dated April 25, 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.

Subscribed and sworn before me on this 29th day of April, 2025.

GWYN M. WILLOUGHBY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP38003
My Commission Expires Nov 30, 2025



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

JOINT INTERVENOR'S REQUEST DATED APRIL 25, 2025

REQUEST 1

RESPONSIBLE PARTY: **Thomas J. Stachnik and Brad Young**

Request 1. Please refer to the Hearing Video Transcript (HVT) in this matter on April 21, 2025 at 10:04:30 to 10:13:30, and provide:

a. EKPC's original project plan under the Empowering Rural America (New ERA) program.

b. The notice to EKPC from the United States Department of Agriculture (USDA) Rural Utilities Service (RUS) (or otherwise from the United States Government) notifying it that previously obligated funds under the New ERA were being released, sent or received on or about March 25, 2025.

c. The notice to EKPC from USDA, RUS, or other federal agency notifying EKPC that it had 30 calendar days to "review and voluntarily revise their project plans" under the New ERA program, sent or received on or about March 26, 2025.

d. Documentation of conversations between EKPC and USDA, RUS, or other federal agencies concerning planned changes to EKPC's project plan under the New ERA program, if any.

e. Changes submitted by EKPC to USDA, RUS, or other federal agencies to EKPC's project plan under the New ERA program, including any accompanying documentation, if any. 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.

f. If no changes have been submitted by EKPC to USDA, RUS, or other federal agencies regarding EKPC’s project plan under the New ERA program, please explain why not, and provide the date (if applicable) by which EKPC intends to submit any changes, along with any documentation allowing an extension of the time referenced in subpart b., above

Response 1.

a. Below is a summary of EKPC’s obligated portfolio:

Project Category	# of Projects	Description
Solar	7	New solar construction facilities ranging from 0.5 to 96 MW – totaling 458 MW capacity
Hydro	1	PPA for 300 MW of hydroelectricity
Transmission	41	Transmission and substation upgrades that will deliver average annual impact of 11,338 MWh of energy line losses

Two solar projects – Bluegrass Plains, and Northern Bobwhite – were included in recent Certificate of Public Convenience and Necessity (“CPCN”) Filings to the PSC.¹ The remaining solar projects,

¹ *Electronic Application of East Kentucky Power Cooperative, Inc. for Certificates of Public Convenience and Necessity and Site Compatibility Certificates for the Construction of a 96 MW (Nominal) Solar Facility in Marion County, Kentucky and a 40 MW (Nominal) Solar Facility in Fayette County, Kentucky and Approval of Certain Assumptions of Evidences of Indebtedness Related to the Solar Facilities and Other Relief*, Case No. 2024-00129.

and a small portion of the transmission and substation projects, will be filed in future CPCN filing(s) but are currently not yet ready for public review.

b. The USDA provided a [press release](#) (linked and or see attachment *JII- PR Obligated Funds.pdf*) on Tuesday, March 25, 2025 that announced it would release previously obligated funding under the Rural Energy for America Program (REAP), Empowering Rural America (New ERA), and Powering Affordable Clean Energy (PACE) programs.

c. USDA's Rural Development sent an email message to EKPC CEO Tony Campbell on Wednesday, March 26, 2025 that informed EKPC of opportunity to notify RUS it would like to make changes to portfolio within 30 calendar days. See attachment *JII – Changes to New ERA.pdf*.

d. After reviewing the notification outlined in subpart c above, EKPC scheduled an informal discussion with EKPC's assigned RUS General Field Representative ("GFR") on April 2, 2025. The purpose of this discussion was to obtain additional clarity on USDA's press release and the notification of opportunity to propose changes to awardee's portfolios. EKPC learned the following from this discussion with GFR:

- Submitting a response to RUS indicating EKPC would like to propose changes via online form is best way to "reserve a spot" for further discussion;
- Proposing changes does not put obligated funding at risk; and
- There is a thirty-day deadline to indicate that EKPC will propose changes via online form – further discussions and vetting with RUS do NOT apply to this deadline.

After following this guidance and submitting proposed changes via the online form, EKPC scheduled a separate informal call with RUS Acting Administrator on April 15, 2025. The purpose

of this discussion was to get another viewpoint on allowable changes and to review EKPC's submitted request. Takeaways from this discussion included the following:

- Current situation is dynamic and guidance could change if a new RUS Administrator is appointed; and
- The Acting Administrator suggested new zero emission PPAs and transmission projects as examples of acceptable changes to portfolios based on current guidance and program requirements.

EKPC anticipates more discussions with RUS in the coming weeks and months. Both the GFR and Acting Administrator highlighted that these initial discussions were “informal” and did not kickstart RUS's official review and vetting process of proposed changes.

e. EKPC has not submitted any formal changes regarding the New ERA program, but is continuing discussions with RUS regarding the impact of changes to the expected hydro PPA. EKPC is actively pursuing additional discussions with RUS on these potential changes.

f. EKPC discussed possible changes with RUS, as noted above, but has not submitted any formal changes. The process for changes is ongoing and is not limited to the 30-days as mentioned above. While EKPC hopes to resolve all issues as soon as possible, the main limitation to the program is that funds need to be dispersed by September 30, 2031.

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2024-00370
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JOINT INTERVENOR'S REQUEST DATED APRIL 25, 2025

REQUEST 2

RESPONSIBLE PARTY: **Brad Young**

Request 2. Please refer to HVT April 21 at 10:22:25 to 10:24:50 and 11:36:45 to 11:49:20 and provide any contracts, commitment letters, and other documentation of EKPC's commitment with Siemens regarding the proposed Cooper combined cycle gas turbine (CCGT).

Response 2. EKPC's contract with Siemens contains a confidentiality clause. EKPC notified Siemens of this request and requested permission to provide the requested documents. EKPC is still working with Siemens to determine what information Siemens will give EKPC permission to provide. EKPC will supplement this response as soon as EKPC can determine what information can be provided.

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REQUEST 3

RESPONSIBLE PARTY: **Thomas J. Stachnik**

Request 3. Please refer to HVT April 21 at 15:49:00 to 16:00:30 and produce all additional inputs provided to EKPC's financial analysis team for its 2024 Financial Forecast aside from those produced in response to JI Request 2.8 (including the supplement), and the response to Staff Request 1.24, including but not limited to generation model results, in machine-readable format, or the format used for input into the financial forecast (e.g., actual hourly modeling results as referenced at the hearing, rather than summary results).

Response 3. Generation plan results are loaded into the model on an hourly basis for completeness and then validated to annual RTSIM results provided by Power Supply. The annual RTSIM results were provided in this proceeding. Since they are specifically requested, we are including the hourly files as RTSim data files as *Confidential – JI3 - RTSim.zip*.

EAST KENTUCKY POWER COOPERATIVE, INC.
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REQUEST 4

RESPONSIBLE PARTY: **Gregory Cecil**

Request 4. Please refer to HVT April 21 at 16:41:30 to 16:45:00 and provide unredacted versions of each of EKPC's annual reports regarding its participation in the PJM Interconnection, LLC ("PJM") in Case No. 2012-00169, Application of East Kentucky Power Cooperative, Inc. To Transfer Functional Control of Certain Transmission Facilities to PJM Interconnection, LLC.

Response 4. See attachments listed below.

- *CONFIDENTIAL - JI4 - PJM Annual Report 2013.pdf*
- *CONFIDENTIAL - JI4 - PJM Annual Report 2014.pdf*
- *CONFIDENTIAL - JI4 - PJM Annual Report 2015.pdf*
- *CONFIDENTIAL - JI4 - PJM Annual Report 2016.pdf*
- *CONFIDENTIAL - JI4 - PJM Annual Report 2017.pdf*
- *CONFIDENTIAL - JI4 - PJM Annual Report 2018.pdf*
- *CONFIDENTIAL - JI4 - PJM Annual Report 2019.pdf*
- *CONFIDENTIAL - JI4 - PJM Annual Report 2020.pdf*

- *CONFIDENTIAL - JI4 - PJM Annual Report 2021.pdf*
- *CONFIDENTIAL - JI4 - PJM Annual Report 2022.pdf*
- *CONFIDENTIAL - JI4 - PJM Annual Report 2023.pdf*
- *CONFIDENTIAL - JI4 - PJM Annual Report 2024.pdf*

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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.

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REQUEST 6

RESPONSIBLE PARTY: **Don Mosier**

Request 6. Refer to Nucor's post-hearing data request 2.2, and to EKPC's responses to JI 1-14 and JI 2-10. To the extent that EKPC produces in response to the Nucor request any data, documents, or other information supporting the \$450,000/MWh cost estimate for a 100 MW BESS that was not provided in response to the referenced JI requests, explain why such data, documents, or other information was not previously produced to JIs.

Response 6. Refer to EKPC's response to Nucor's Post-Hearing Request for Information, Item 2. The National Renewable Energy Laboratory ("NREL") is a publicly available source for costs associated with many resource types. The BESS cost as reported by NREL (\$443,000/MWh) closely aligns with the cost reported by NRCO in EKPC's responses to Joint Intervenors' First Request for Information, Item 14 and Joint Intervenors' Supplement Request for Information, Item 10. Also, refer to EKPC's response to Commission Staff's Post-Hearing Request for Information, Item 3. The information from the LG&E/KU case was not publicly available prior to the response due date of January 31, 2025 because LGE&E/KU did not file its application until February 28, 2025.

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REQUEST 7

RESPONSIBLE PARTY: **Thomas J. Stachnik**

Request 7. Refer to Nucor's post-hearing data request 2.1. To the extent that EKPC identifies in its response an average rate increase that would result from the projects that are the subject of this case, identify and produce any modeling input and output files, workpapers, workbooks, data, and assumptions used in calculating such average rate increase.

Response 7. Please see the response to Nucor's Post-Hearing Request for Information, Item 2.

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REQUEST 8

RESPONSIBLE PARTY: **Julia J. Tucker**

Request 8. Refer to HVT April 22 at 15:28:50 to 15:32:48, along with the Rebuttal Testimony of Julia Tucker at p. 6 lines 13-17. Identify the amount of load in the EKPC Zone that is served by American Electric Power or KU/LG&E.

Response 8. See attachment *JI8 – 2020–2025 EKPC Demand on Foreign Transmission.xlsx* for EKPC's monthly peak demand served from foreign transmission.

See confidential attachment *CONFIDENTIAL JI8 – 2020–2025 Foreign Demand on EKPC Transmission.xlsx* for foreign utilities' monthly peak demand served from EKPC transmission.

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REQUEST 9

RESPONSIBLE PARTY: **Brad Young**

Request 9. Please refer to HVT April 21 at 11:58:05 to 12:02:25, along with Application Attachment BY-1 (Appendix P - RISK MATRIX), PDF p. 395, line 026, which reads in relevant part: “estimated values of escalation have been communicated which include 4 to 5% escalation per annum for labor, equipment and materials through execution, assuming project starts today as per the execution schedule.”

a. Identify and produce all communication between Burns & McDonnell and the Company pertaining to Burns & McDonnell’s estimated values of escalation, along with other documentation pertaining to Burns & McDonnell’s estimated values of escalation.

b. Identify and produce any modeling input and output files, workpapers, workbooks, data, and assumptions used in calculating the referenced estimated values of escalation.

Response 9.

a. See attachment *J19 - BMcD Email.pdf*. email communication between Burns & McDonnell and East Kentucky Power Cooperative (EKPC) that included escalation within the

PSR. All other communication regarding the topic was in meetings and over phone calls. EKPC made the decision to base the cost within the PSR without escalation and manage escalation as a risk throughout the project. Leaving escalation in the risk category and managing that risk with tools at EKPC's disposal (schedule, contracts, project contingency, etc.) instead of asking EKPC's Board or the Kentucky Public Service Commission for additional project spending. If the project were to encounter inflation at levels that could not be managed at the current level in the project budget, then EKPC will follow the procedures to ask EKPC's Board and the Commission for approval. This is the path EKPC has chosen for many years on major generation projects before the Commission and has repeatedly delivered projects on cost and to schedule.

b. See attachments *J19 - Escalation.pdf* and *J19 - R4.pdf* the Escalation Analysis performed by Burns & McDonnell calculating potential escalation based on 4% escalation per year on all equipment and materials and 5% escalation per year on all labor.

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REQUEST 10

RESPONSIBLE PARTY: Darrin Adams

Request 10. Please refer to HVT April 21 at 12:02:30 to 12:06:55, along with Application Attachment BY-1 at 7-14, which reads in relevant part: “Owner’s cost contingency of ten percent was included for all Owner’s costs except transmission network upgrade projects, per EKPC’s direction.”

a. Specify the size of the owner’s contingency that was included for transmission network upgrade projects.

b. Identify and produce any modeling input and output files, workpapers, workbooks, data, and assumptions used in calculating the owner’s contingency for transmission network upgrade projects.

c. Identify and produce any modeling input and output files, workpapers, workbooks, data, and assumptions used in calculating the owner’s contingency for Owner’s costs other than transmission network upgrade projects.

Response 10.

a. The total amount of owner's contingency included in the \$120.7 million estimate for transmission upgrade costs included in the overall Cooper CCGT cost estimate is \$24.6 million, which is approximately 20% of the total transmission estimate.

b. The transmission estimates provided at this stage in the project lifecycle for network upgrades include a higher-level of contingency, since the estimates are based on high-level planning estimates developed to be applied generically on a system-wide basis. At this point in the project lifecycle, there are more uncertainties and unknowns regarding the specific scope of work, material costs, labor costs, etc., so more contingency is included in the project costs. There are no work papers to produce. The amount of contingency embedded in the estimates are as follows by type of upgrade:

- 15% for upgrades of EKPC's existing substation facilities;
- 15% for conductor temperature upgrades of EKPC's existing transmission line facilities;
- 20% for rebuilds of EKPC's existing transmission line facilities;
- 20% for EKPC's new substation facilities;
- 20% for expansion of LG&E/KU's existing substation facilities;
- 20% for EKPC's new transmission line facilities; and
- 25% for upgrades/rebuilds of LG&E/KU's existing transmission line facilities.

c. Owner's contingency was calculated at 10% of all Owner's costs excluding the transmission network upgrades. There are no work papers to produce.

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JOINT INTERVENOR’S REQUEST DATED APRIL 25, 2025

REQUEST 11

RESPONSIBLE PARTY: **Brad Young**

Request 11. Please refer to HVT April 21 at 13:40:30 to 13:43:25 and identify the circulating fluidized bed (“CFB”) units where natural gas co-firing has occurred, along with the size in MW of any such units and the percent of gas co-firing at such units.

Response 11. At this time, EKPC is aware of one CFB unit that was converted to natural gas co-firing and one CFB unit that was fully converted to natural gas firing. The co-fire unit is Great River Energy’s (GRE) Spiritwood Station which is a B&W CFB boiler operating at a combined heat and power (CHP) facility. The unit is a 275 MW total (90 MW electric plus process) unit and is capable of firing up to 100% gas.² B&W completed the gas conversion on the unit in 2021 and GRE was able to co-fire the unit as noted in their 2023 IRP submittal referenced above. B&W assisted EKPC in the development of the Spurlock Unit 3 & 4 project by providing estimated equipment configurations and budgetary pricing. The natural gas conversion was performed by

² See <https://greatriverenergy.com/wp-content/uploads/2023/03/2023-IRP-FINAL.pdf>, page 18 (last accessed May 2, 2025).

Zeeco on a CFB capable of producing 550 tph of steam and 100% capacity of the unit was maintained after the conversion to natural gas described in the following presentation:

<https://www.zeeco.com/resources/presentations/retrofit-conversion-from-solid-to-gas-fuel-for-circulating-fluidised-bed-utility-boiler>.

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REQUEST 12

RESPONSIBLE PARTY: Tom Stachnik

Request 12. Please refer to HVT April 21 at 16:00:40 to 16:05:05, along with EKPC's Response to Attorney General Request 1-5.

a. For each of the Spurlock and Cooper gas pipeline expansion projects, identify the total cost per year reflected in EKPC's 2024 Financial Forecast, and state whether those costs were reflected as capital, fuel, O&M, or some other category of cost.

b. Specify the monetary impact that each gas pipeline expansion project will have on the total cost of supplying gas to the Spurlock and Cooper units, and identify and produce all modeling input and output files, workpapers, workbooks, data, and assumptions used in calculating the monetary impacts of the gas pipeline expansion projects.

c. Specify the cost that EKPC members will bear as a result of the pipeline expansion project for Spurlock Station, and identify and produce all modeling input and output files, workpapers, workbooks, data, and assumptions used in calculating that cost.

d. Specify the cost that EKPC members will bear as a result of the pipeline expansion project for Cooper Station, and identify and produce all modeling input and output files, workpapers, workbooks, data, and assumptions used in calculating that cost.

Response 12.

a. See attachment *J112a –Submitted.xlsx*. In addition to the physically delivered cost of the fuel, an additional fixed cost of \$45,056,102 per year for 20 years was assumed for Cooper and Spurlock in the model. This corresponds to the Negotiated Daily Demand Rate as discussed in the response to Commission Staff's Post-Hearing Request for Information, Item 16. This estimate remains a reasonable approximation of those costs (200,000 Dth/day x (0.40/Dth capital recovery + \$0.20/Dth capacity charge) x 365 days). These costs are reflected as fuel costs.

Note that after 20 years the contract price will revert to the then current tariff rate for capacity only. 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.

b through d. Please see the response to subpart a. above.