

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

**In the Matter of:**

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

**RESPONSES TO STAFF’S FIFTH INFORMATION REQUEST**  
**TO EAST KENTUCKY POWER COOPERATIVE, INC.**

**DATED MARCH 18, 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**

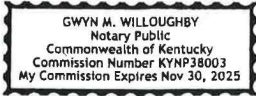
**STATE OF KENTUCKY** )  
  )  
**COUNTY OF CLARK**     )

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 Fifth Request for Information in the above-referenced case dated March 18, 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*  
\_\_\_\_\_

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

  
Notary Public



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

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<b>ELECTRONIC APPLICATION OF EAST</b>	)	
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<b>MANAGEMENT TARIFFS; AND 4) OTHER</b>	)	
<b>GENERAL RELIEF</b>	)	

**CERTIFICATE**

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

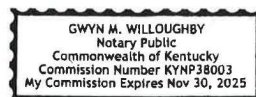
Julia J. Tucker, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to Commission Staff's Fifth Request for Information in the above-referenced case dated March 18, 2025, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

*Julia J. Tucker*

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

*Gwyn M. Willoughby*  
Notary Public



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

**In the Matter of:**

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

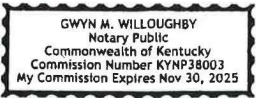
**STATE OF KENTUCKY )  
 )  
 COUNTY OF CLARK )**

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 Fifth Request for Information in the above-referenced case dated March 18, 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 March, 2025.

*Gwyn M. Willoughby*  
 Notary Public



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

STAFF'S REQUEST DATED MARCH 18, 2025

REQUEST 1

RESPONSIBLE PARTY: Scott Drake

**Request 1.** Refer to EKPC's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 9. Explain what factors were taken into consideration when making the decision to not limit the incentives for the Commercial & Industrial Thermostat Program and how these factors impacted the decision.

**Response 1.** EKPC took the following factors into consideration when making the decision not to limit the incentives for any end-use member who participates in the Commercial & Industrial Thermostat Program:

1. The program design;
2. The types of end-use members for whom the program is applicable; and,
3. The typical number of rebates per end use member that qualifies.

The program is designed to serve small commercial and industrial end-use members who have residential type HVAC systems that use thermostats which can be replaced with smart thermostats, such as Ecobee or Nest. These facilities would primarily have 1-3 thermostats. There are very few

exceptions, but even those facilities would have 10-20 thermostats. For these reasons, EKPC decided not to limit the incentives for this program.

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

STAFF'S REQUEST DATED MARCH 18, 2025

REQUEST 2

RESPONSIBLE PARTY: Brad Young

**Request 2.** Provide any updated transportation plans or permitting related to all proposed projects in this case.

**Response 2.** No official transportation plans have been developed for the project. The gas turbine supplier performed a desktop transportation study during their reservation pricing effort that was used to determine if there is a feasible route to the site and to estimate the associated transportation costs. A more detailed transportation study for the gas turbines is planned to be completed in the next few months. All major equipment suppliers or heavy haul contractors will be responsible for obtaining any permits required for the delivery of the equipment to site.

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

STAFF'S REQUEST DATED MARCH 18, 2025

REQUEST 3

RESPONSIBLE PARTY: Brad Young

**Request 3.** State whether all of the costs contained in the transportation plans are included in the total estimated cost of the projects, and if so, explain where and how they are included.

**Response 3.** Estimated transportation costs have been included for all equipment and material required for the project. Budgetary proposals were requested for most of the major equipment required on the project which included estimated shipping/transport costs to the site. Where budgetary proposals were not requested on equipment, recent pricing on similar equipment was utilized that also included shipping/transport costs to the site. These transportation costs were included in the Engineered Equipment portion of the project estimate. Transportation costs for other commodity type material (i.e. piping, steel, cable, etc.) were included as part of the estimated supply costs for these items and were carried under the associated construction area for the project in the estimate.



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

**STAFF'S REQUEST DATED MARCH 18, 2025**

**REQUEST 4**

**RESPONSIBLE PARTY: Brad Young**

**Request 4.** If all of the costs contained in the transportation plans are not included in the total estimated cost of the projects, provide the estimated costs for all transportation of materials and equipment for each of the proposed projects, by project.

**Response 4.** Not applicable, see response to Item No, 3.

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

STAFF'S REQUEST DATED MARCH 18, 2025

REQUEST 5

RESPONSIBLE PARTY:           **Julia J. Tucker**

**Request 5.**           Refer to EKPC's response to Staff's Third Request, Item 4. Provide a status update for the Hydropower Purchase Power Agreement (PPA). If the PPA has been finalized, provide a copy of the contract. Consider both the request for a status update and for the contract an ongoing request.

**Response 5.**           EKPC has not finalized an agreement with the counterparty. Negotiations are not proceeding as expected.

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

**STAFF'S REQUEST DATED MARCH 18, 2025**

**REQUEST 6**

**RESPONSIBLE PARTY: Brad Young**

**Request 6.** Refer to EKPC's response to Staff's Third Request, Item 10, which only addressed the noise portion of the request. Provide the expected impact on traffic during construction of the proposed projects relative to the construction and use of the new school. As part of the response, identify any roads or entrances that will be utilized or shared relative to the school as well as a schedule that compares EKPC's proposed construction to the construction and usage of the school.

**Response 6.** Construction of the new school will be completed and fully operational prior to construction starting on the combined cycle project. During construction, contractor traffic will be divided between the plant access on C Vanhook Rd and "Access Road No. 2," the furthest entrance from the new school. Please refer the Project Scoping Report BY-1, 5.7 Site Access Plan for a visual representation. Shift start and stop times for construction crews will be selected in such a way to minimize impacting traffic at the school as much as possible. All access to parking and material laydown areas have specifically been planned to reduce any potential traffic impacts

to the new school and adjacent primary roadways, along with site access to minimize potential for operational impacts for items such as coal trucks to maintain reliability of the existing units.

Noise related issues at the new school are not expected to be a concern either during construction or once plant operation begins. The new construction site is located approximately three quarters of a mile away from the school with a heavily treed hill in-between. The noise evaluation that was conducted for the project predicts the noise levels at the school to be approximately 40 dBA which is the equivalent of a, “farm field with light breeze, bird calls” after the plant begins operation. It is not anticipated that noise during construction will exceed operating values of the plant.

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

**STAFF'S REQUEST DATED MARCH 18, 2025**

**REQUEST 7**

**RESPONSIBLE PARTY:            Scott Drake**

**Request 7.**            Refer to the Direct Testimony of Scott Drake (Drake Direct Testimony), exhibit SD-8, Commercial & Industrial Thermostat Program. Explain the \$900 fixed annual administrative cost.

**Response 7.**            This administrative cost of \$900 is based on the estimated labor costs to administer this program, based on the modest number of participants expected.

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

**STAFF'S REQUEST DATED MARCH 18, 2025**

**REQUEST 8**

**RESPONSIBLE PARTY: Scott Drake**

**Request 8.** Refer to the Drake Direct Testimony, Exhibit SD-8, Commercial & Industrial Thermostat Program. Explain the assumed savings of 0.000 kW for winter load.

**Response 8.** The savings of 0.000 kW for the winter peak is based on values from the GDS Potential Report. It aligns with EKPC's expectations that most facilities in the target market will use gas for heating during the winter peak. In addition, smart thermostats that are not under the control of the utility but rather are learning from occupant behavior will likely not be lowering the thermostat settings during the early morning occupied hours (when the EKPC system peaks) on the coldest day(s) of the winter.