

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

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

**NUCOR STEEL GALLATIN's POST-HEARING DATA REQUESTS
TO EAST KENTUCKY POWER COOPERATIVE, INC.**

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**COUNSEL FOR NUCOR STEEL
GALLATIN**

Dated: April 24, 2025

DEFINITIONS

1. “Document(s)” is used in its customary broad sense and includes electronic mail and all written, typed, printed, electronic, computerized, recorded or graphic statements, memoranda, reports, communications or other matter, however produced or reproduced, and whether or not now in existence, or in your possession.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion whether preliminary or final.
3. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, including the type of document, its date, the date or approximate date it was lost, discarded or destroyed, the identity of the person (s) who last had possession of the document and the identity of all persons having knowledge of the contents thereof.
4. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
5. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
6. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company’s possession or subject to its control, state what disposition was made of it.
7. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
8. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
9. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
10. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
11. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
12. “EKPC” means East Kentucky Power Cooperative Inc. and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Nucor Steel Gallatin. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

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EAST KENTUCKY POWER COOPERATIVE INC.
Docket No. 2024-00370**

- Q.2-1. Please refer to Nucor Ex. 3 (EKPC Response to JI Request 8). Please provide the average rate increase over the next 20 years only for the projects that are the subject of this case, excluding RICE and New ERA renewables.
- Q.2-2. Please refer to the Direct Testimony of Don Mosier at page 13 line 11. Please provide all back-up calculations and documents for the statement that the cost for a 100 MW BESS is \$450,000/MWh.
- Q.2-3. At the hearing Mr. Mosier testified that LG&E's proposed 400 MW BESS would cost \$484,000/MWh (Tr. 50:27/7:51:30). Please provide all back-up calculations and documents that support this statement.

Respectfully submitted,

/s/ Michael L. Kurtz

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