

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2025-00087
FIRST REQUEST FOR INFORMATION RESPONSE

ATTORNEY GENERAL'S REQUEST DATED MAY 15, 2025

REQUEST 25

RESPONSIBLE PARTY: **Christopher E. Adams**

Request 25. Refer to the 2025 IRP, Section 4.0 Existing and Committed Capacity Resources Summary, Coal Fired Units, pages 82 – 83.

- a. Explain why EKPC's coal-fired generating units are critically important to maintain electricity reliability 24 hours a day, 7 days a week, 365 days a year.
- b. Explain in detail whether EKPC plans to retire the Cooper Station 1, which is a 116 MW coal fired generating unit. If so, provide the retirement date and the reason for retirement.
- c. Provide the estimated remaining life of Cooper Station 1.
- d. Provide a general overview of all projects/upgrades that need to be completed on Cooper Station 1 in the next ten years.
- e. Explain in detail whether EKPC plans to retire the Cooper Station 2, which is a 225 MW coal fired generating unit. If so, provide the retirement date and the reason for retirement.
- f. Provide the estimated remaining life of Cooper Station 2. g. EKPC states that a pollution control system was added to Cooper Station 2 unit and began commercial operation in summer of 2012. EKPC further asserts that a duct reroute project, which routes the flue gas from unit one into the unit two pollution control system, was completed on Cooper Station 2 in 2016. Provide a

general overview of all other projects/upgrades that need to be completed on Cooper Station 2 in the next ten years.

h. Explain in detail whether EKPC plans to retire Spurlock Station Unit 1, which is a 300 MW coal fired generating unit. If so, provide the retirement date and the reason for retirement.

i. Provide the estimate remaining life of Spurlock Station Unit 1.

j. EKPC asserts that Spurlock Station Unit 1 has had extensive modification and enhancements to comply with coal combustion residuals and effluent limitation guidelines. Provide a general overview of all projects/upgrades that need to be completed on Spurlock Station Unit 1 in the next ten years.

k. Explain in detail whether EKPC has any plans to retire the Spurlock Station Unit 2, which is a 510 MW coal fired generating unit. If so, provide the retirement date and the reason for retirement.

l. Provide the estimated remaining life of Spurlock Station Unit 2.

m. EKPC asserts that Spurlock Station Unit 2 has had extensive modification and enhancements to comply with coal combustion residuals and effluent limitation guidelines. Provide a general overview of all projects/upgrades that need to be completed on Spurlock Station Unit 2 in the next ten years.

n. Explain in detail whether EKPC plans to retire the Spurlock Station Unit 3, which is a 268 MW coal fired generating unit. If so, provide the retirement date and the reason for retirement.

o. Provide the estimated remaining life of Spurlock Station Unit 3.

p. Provide a general overview of all projects/upgrades that need to be completed on Spurlock Station Unit 3 the next ten years.

q. Explain in detail whether EKPC has any plans to retire the Spurlock Station Unit 4, which is a 268 MW coal fired generating unit. If so, provide the retirement date and the reason for retirement.

r. Provide the estimated remaining life of Spurlock Station Unit 4.

s. Provide a general overview of all projects/upgrades that need to be completed on Spurlock Station Unit 4 in the next ten years.

t. Explain whether EKPC has had, or foresees, any difficulties in obtaining coal for its coal generating units.

u. EKPC asserts that International Paper has a corrugated paper recycling facility adjacent to EKPC's Spurlock Station. EKPC further states that the steam needed for International Paper is supplied by Spurlock Unit 2, but it can also be supplied from Spurlock Unit 1 when needed. Explain what is meant when EKPC states that, "[o]n average, International Paper operates 99 percent of the time and Spurlock 2 operates at an average of 510 MW."

Response 25.

a. Refer to EKPC's response to Item 15d, above.

b. EKPC has no plans to retire Cooper Unit 1 at this time, however considered Cooper Unit 1 to be in "mothball" status. Cooper 1 is removed from the base case modeling beginning January 2032., EKPC has stated in Case No. 2024-00310 and Case No. 2024-00370 that the Cooper CCGT is considered an eventual replacement for Cooper Unit 1.

c. The financial end life of Cooper Unit 1 is December 2030.

d. Please reference Table 7.2 of the original IRP submission. For years 6-10 the same types of projects would be undertaken based on the units run time and to ensure safe and reliable operation of the unit. EKPC has a CPCN to co-Fire the unit which if approved would be the only project planned to upgrade Cooper 1.

e. EKPC has no plans to retire Cooper Station Unit 2.

f. The financial end life of Cooper Station 1 is December 2038.

g. Please reference Table 7.2 of the original IRP submission. For years 6-10 the same types of projects would be undertaken based on the units run time and to ensure safe and reliable operation of the unit. EKPC has a CPCN to co-Fire the unit which if approved would be the only project planned to upgrade Cooper 2.

h. EKPC has no plans to retire Spurlock Station Unit 1.

i. The financial end life for Spurlock Station Unit 1 is December 2042.

j. Please reference Table 7.2 of the original IRP submission. For years 6-10 the same types of projects would be undertaken based on the units run time and to ensure safe and reliable operation of the unit. EKPC has a CPCN to co-Fire the unit which if approved would be the only project planned to upgrade Spurlock 1.

k. EKPC has no plans to retire Spurlock Station Unit 2.

l. The financial end life for Spurlock Station Unit 2 is December 2042.

m. Please reference Table 7.2 of the original IRP submission. For years 6-10 the same types of projects would be undertaken based on the units run time and to ensure safe and reliable operation of the unit. EKPC has a CPCN to co-Fire the unit which if approved would be the only project planned to upgrade Spurlock 2.

n. EKPC has no plans to retire Spurlock Station Unit 3.

o. The financial end life for Spurlock Station Unit 3 is December 2049.

p. Please reference Table 7.2 of the original IRP submission. For years 6-10 the same types of projects would be undertaken based on the units run time and to ensure safe and reliable operation of the unit. EKPC has a CPCN to co-Fire the unit which if approved would be the only project planned to upgrade Spurlock 3.

q. EKPC has no plans to retire Spurlock Station Unit 4.

r. The financial end life for Spurlock Station Unit 4 is December 2049.

s. Please reference Table 7.2 of the original IRP submission. For years 6-10 the same types of projects would be undertaken based on the units run time and to ensure safe and reliable operation of the unit. EKPC has a CPCN to co-Fire the unit which if approved would be the only project planned to upgrade Spurlock 4.

t. Merger, acquisitions, and bankruptcies over the past several years have caused contraction within the domestic thermal coal market. A large Illinois Basis coal supplier experienced a Force Majeure event in the fall of 2021, which was followed by a February 2022 geopolitical event in Europe and Asia that caused the U.S. coal market to become nearly illiquid for a brief period of time. Decreased supply and increased demand continued to put upward pressure on pricing of some coal supply agreements through 2024. These past difficulties of obtaining coal for EKPC's Spurlock and Cooper Station have been remedied. Due to the limited number of suppliers and the quality of coal required, it would be challenging to get a large quantity of coal to Cooper Station in a short period of time. Subject to change in a period of volatile market dynamics, but EKPC does not currently foresee any difficulties in obtaining coal for its coal-fired

generating units based on the current projected burns and current market conditions.

u. International Paper requires high reliability in supplying steam. The capability of supplying steam from the primary source which is Spurlock 2 and the backup source which is Spurlock 1 results in a greater than 99% reliability.

SUPPLEMENTAL RESPONSE

d. Please reference Table 7.2 of the original IRP submission. For years 6-10 the same types of projects would be undertaken based on the units run time and to ensure safe and reliable operation of the unit.