

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

In the Matter of:

**ELECTRONIC 2025 JOINT INTEGRATED
RESOURCE PLAN OF EAST KENTUCKY
POWER COOPERATIVE, INC.**

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) **Case No. 2025-00087**
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**SIERRA CLUB’S TENDERED INITIAL REQUESTS FOR INFORMATION TO EAST
KENTUCKY POWER COOPERATIVE, INC.**

Sierra Club hereby submits this Tendered First Set of Data Requests to East Kentucky Power Cooperative, Inc. (“EKPC” or the “Cooperative”). Please provide responses to these data requests below to the undersigned counsel.

GENERAL INSTRUCTIONS

- 1) **Definitions:** For the purposes of these data requests, the following definitions shall apply:
- a) The term “EKPC” means and includes East Kentucky Power Cooperative and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.
 - b) The term “Cooperative” means and includes East Kentucky Power Cooperative and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.
 - c) “Document” means all written, recorded or graphic matters, however produced or reproduced, pertaining in any manner to the subject of this proceeding, whether or not now in existence, without limiting the generality of the foregoing, all originals, copies and drafts of all writings, correspondence, telegrams, notes or sound recordings of any type of personal or telephone communication, or of meetings or conferences, minutes of directors or committee meetings, memoranda, inter-office communications, studies, analyses, reports, results of

investigations, reviews, contracts, agreements, working papers, statistical records, ledgers, books of account, vouchers, bank checks, x-ray prints, photographs, films, videotapes, invoices, receipts, computer printouts or other products of computers, computer files, stenographer's notebooks, desk calendars, appointment books, diaries, or other papers or objects similar to any of the foregoing, however denominated. If a document has been prepared in several copies, or additional copies have been made, and the copies are not identical (or which, by reasons of subsequent modification of a copy by the addition of notations, or other modifications, are no longer identical) each non-identical copy is a separate "document."

- d) "And" or "or" shall be construed conjunctively or disjunctively as necessary to make the requests inclusive rather than exclusive.
- e) The term "you" and "your" refer to "EKPC."
- f) The term "person" means any natural person, corporation, corporate division, partnership, limited liability company, other unincorporated association, trust, government agency, or entity.
- g) The term "regarding" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
- h) The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.
- i) "Identify" or "identifying" or "identification" when used in reference to a person that is a natural person means to state: the full name of the person and any names under which he conducts business; the current employer of the person, the person's job title and classification, the present or last known work address of the person; and, the present or last known telephone number of the person.
- j) "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.
- k) "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:
 - (a) the type of document (e.g., letter, memorandum, etc.);
 - (b) the date of the document;

- (c) the title or label of the document;
 - (d) the Bates stamp number or other identifier used to number the document for use in litigation;
 - (e) the identity of the originator;
 - (f) the identity of each person to whom it was sent;
 - (g) the identity of each person to whom a copy or copies were sent;
 - (h) a summary of the contents of the document;
 - (i) the name and last known address of each person who presently has possession, custody or control of the document; and,
 - (j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.
- l) “Identify” or “identifying” or “identification” when used in reference to communications means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, identify the document(s) containing or referring to the communication.
 - m) “Current” when used in reference to time means in the present time of this data request.
 - n) “Member-Owner Cooperative” means a distribution cooperative that is a member of EKPC that distributes electricity to retail customers
 - o) “Customer” means a person who buys retail electricity on a regular and ongoing basis from a Member-Owner Cooperative.
 - p) “Workpapers” are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas in-tact.

OTHER INSTRUCTIONS

- a) Responses are to be provided in electronic format (e.g., text documents should be in the original word processor file format or PDF, data files should be in Excel).
- b) If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:
 - 1) The privilege asserted and its basis;
 - 2) The nature of the information withheld; and,

- 3) The subject matter of the document, except to the extent that you claim it is privileged.
- c) For any document or set of documents EKPC objects to providing to Sierra Club on the grounds it is burdensome or voluminous, please identify the specific document (see instruction (k) above).
- d) These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
- e) If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
- f) These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.
- g) For each response, identify all persons (see instruction (j)) that were involved in the preparation of the answers to the interrogatories below and/or are responsible for compiling and providing the information contained in each answer.
- h) Identify which witness(es) at the hearing is competent to adopt and/or discuss the response.
- i) Please produce the requested documents in electronic format to the following individuals:
- | | |
|------------------------------|---------------------------------|
| Kristin Henry | Nathaniel Shoaff |
| kristin.henry@sierraclub.org | nathaniel.shoaff@sierraclub.org |
- j) Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to the Sierra Club, provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart/table/figure number(s).
- k) In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.
- l) Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

DATA REQUESTS

- 1-1. Please provide supporting workpapers and modeling files, including (not limited to) all input files, output files, and pre- or post-processing of said inputs and outputs for all resource portfolios and for all years modeled, in machine-readable Excel format.
- 1-2. Please provide the underlying data for all figures in the IRP in machine-readable Excel format.
- 1-3. Please provide the underlying data for the load forecast scenarios modeled in the IRP, including original sources and any calculations using those sources prior to the final forecast.
- 1-4. Please provide the annual revenue requirements and PVRR calculation for all portfolios and scenarios modeled in machine-readable Excel format.
- 1-5. Was any capacity expansion modeling used to determine coal retirement and/or conversion dates in EKPC's portfolios?
 - a. If so, please explain what model was used and how coal retirement and/or conversion dates were determined for EKPC's portfolios.
 - b. If not, please explain why the Company did allow the model to select for coal retirement and/or conversion dates in its resource portfolios.
- 1-6. Refer to IRP pages 186-187.
 - a. Please explain how the final plan was developed and provide any documentation or analyses used to determine the final plan.
 - b. Was the final plan modeled itself or was it chosen based on other portfolios that were modeled? Please explain.
- 1-7. Please provide the following for each generating unit (or plant-level if unit-level is unavailable) for all resource portfolios, scenarios, and years modeled, in machine-readable Excel format with formulas intact:
 - a. NO_x emissions
 - b. Particulate matter (PM) emissions
 - c. SO₂ emissions
 - d. CO₂ emissions

- e. Generation
- f. Nameplate capacity
- g. PJM accredited capacity
- h. PJM energy revenue
- i. Variable O&M
- j. Fixed O&M
- k. Fuel cost
- l. Fuel usage (MMBtu)
- m. Forced outage rate
- n. Planned outage rate
- o. Equivalent availability factor
- p. Heat rate
- q. Non-environmental capital spending
- r. Environmental capital spending, including corresponding regulation
- s. Capital revenue requirements/costs to customers, including any supporting calculations

1-8. Please provide the following annual historical data for EKPC's Cooper and Spurlock coal-fired units from 2020 through 2025 year-to-date (or latest available), in machine-readable Excel format with formulas intact:

- a. NOx emissions
- b. Particulate matter (PM) emissions
- c. SO₂ emissions
- d. CO₂ emissions
- e. Generation
- f. Nameplate capacity
- g. PJM accredited capacity
- h. PJM energy revenue
- i. Variable O&M
- j. Fixed O&M
- k. Fuel cost
- l. Fuel usage (MMBtu)
- m. Forced outage rate
- n. Planned outage rate
- o. Equivalent availability factor
- p. Heat rate
- q. Non-environmental capital spending
- r. Environmental capital spending, including corresponding regulation

- 1-9. Please provide the underlying source data of the capital costs and operating characteristics for each supply-side resource type modeled by the Company in machine-readable Excel format, including supporting analyses and/or documents.
- 1-10. Please provide the assumed tax credits applied in the modeling by year and resource.
- 1-11. Please provide the underlying source data of the PPAs modeled by the Company in machine-readable Excel format, including supporting analyses and/or documents.
- 1-12. Please provide any RFPs issued for new supply-side resources in the past two years, including the bids received and any analyses of the bids done by or for the Company.
- 1-13. Please provide forecasts of ELCC values used in modeling in all years, by resource type.
- 1-14. Did the Company consider hybrid resources, such as solar PV plus battery storage, as a supply-side resource option within its IRP modeling? If not, please explain why not.
- 1-15. Did the Company conduct a sensitivity or scenario analysis using high or low capital cost forecasts of new supply-side resources?
 - a. If so, please describe and provide all underlying data and assumptions in machine-readable Excel format.
 - b. If not, please explain why not.
- 1-16. On page 208 of Section 9.0 of the IRP, the Company discusses Section 111(d) compliance options for existing coal-fired units. In particular, the Company estimates that the use of CCS to comply with Section 111 would cost \$10.7 billion at Spurlock. Please provide all the underlying source data used to produce this estimate in machine-readable Excel format, including supporting analyses and/or documents.
- 1-17. Did the Company assess the cost of all Section 111(d) compliance options for each existing coal-fired unit at the Cooper and Spurlock facilities?
 - a. If so, please describe and provide all underlying data and assumptions in machine-readable Excel format.
 - b. If not, please explain why not.

- 1-18. See IRP pages 193-219, please provide all modeling where the Company tested greenhouse gas limit compliance options for gas resources, including all inputs and outputs, in machine-readable Excel format.
- 1-19. Does the Company assume that hydrogen co-firing with natural gas will be employed to achieve carbon emission reductions in the IRP?
- a. If so, please provide the associated costs included in the IRP modeling that account for these retrofits, list the scenarios where they are included, and provide the modeling outputs that include these costs.
- 1-20. Did the Company develop cost estimates for carbon capture and sequestration (CCS) at Cooper and Spurlock?
- a. If so, please provide the capital and operating cost estimates for CCS at each unit or plant.
 - b. If so, please provide the assumed operating characteristics, such as carbon removal rate and whether carbon was assumed to be stored or transported elsewhere.
 - c. If so, please provide any modeling that was performed assuming CCS on any of these units.
 - d. If not, please explain why not.
- 1-21. Did the Company develop cost estimates for gas conversion of Cooper and Spurlock coal-fired units?
- a. If so, please provide the capital (including pipeline costs) and operating cost estimates for the gas conversion at each unit or plant.
 - b. If so, please provide any modeling that was performed assuming gas conversion of any of these units.
 - c. If not, please explain why not.
- 1-22. On page 212 of Section 9.0 of the IRP, the Company states that it is “currently evaluating the new CRL limitations.” Did the Company assess the cost of compliance with the new

CRL limitations set forth in the 2024 ELG Rule at the Cooper and Spurlock facilities?

- a. If so, please describe and provide all underlying data and assumptions in machine-readable Excel format.
- b. If not, please explain why not.

Dated: May 16, 2025

Respectfully submitted,

/s/ Joe F. Childers

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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of Sierra Club's Tendered Initial Requests for Information to East Kentucky Power Cooperative, Inc. in this action is being electronically transmitted to the Commission on May 16, 2025, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Joe F. Childers
JOE F. CHILDERS