

**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 SUPPLEMENTAL REQUEST FOR INFORMATION TO EAST
KENTUCKY POWER COOPERATIVE, INC.**

Sierra Club hereby submits this Supplemental Request for Information 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

- 2-1. Please provide data and supporting calculations for forecasts produced and/or used by EKPC over the past 5 years in machine-readable Excel format for the following:
 - a. Winter peak (MW)
 - b. Summer peak (MW)
 - c. Energy requirements (MWh)
 - d. Sales (MWh) by class (e.g., residential, commercial, industrial)
 - e. Number of customers by class (e.g., residential, commercial, industrial)
- 2-2. Please refer to Table 3-10, where EKPC provides the average growth rates (2025-2039) for consumers and sales by class. Please identify and describe the primary drivers of growth in consumers and sales for each of the following customer classes:
 - a. Residential
 - b. Small Commercial
 - c. Large Commercial & Industrial
- 2-3. Please refer to Tables 3-5 through 3-9, where EKPC provides historical data (2019-2023) on energy sales (MWh), energy requirements (MWh), and peak demand (MW). Please provide the same data for 2024.
- 2-4. Please refer to page 50 of the IRP, which states: “EKPC’s owner-members will add approximately 49,000 residential consumers during the forecast period. This represents an increase of 0.6 percent per year.” Please provide supporting documentation and analysis used by EKPC to develop this projection.
- 2-5. Please identify what (if any) data center projects that EKPC has reviewed in the past two years, including:
 - a. The owner of the data center
 - b. Expected first year of operation
 - c. Projected peak demand by year
 - d. Probability of the data center becoming operational (if not operational already)
 - e. If that data center’s load is included in the IRP modeling
- 2-6. Please refer to pages 117-123 of the IRP, where EKPC describes the load impacts of its DSM programs. Please provide supporting documentation and analysis used to develop these load impacts.
- 2-7. Please refer to Company response attachment “SC_1-8.xlsx.”
 - a. Please identify the units for historical emissions data provided in tabs: A, B, C, and D.
 - b. Please provide a breakdown of the following for each of the Cooper and Spurlock units:
 - i. Fuel cost (\$)
 - ii. Fuel usage (MMbtu)

- iii. Variable O&M (\$)
- iv. Fixed O&M (\$)

2-8. Please refer to “Confidential - SC 1-1 Output 22NOV24.xlsx”.



2-9. Refer to Company response to PSC Request 1.

- a. Please provide all modeling inputs and outputs, including any pre- or post-processing.
- b. Please provide the estimates of the capital costs for new gas CC capacity added.

2-10. Did EKPC evaluate or model full conversion to natural gas (i.e. no potential coal burning in the future) at Spurlock 1 through 4 or Cooper 2?

- a. If so, please provide the estimated capital costs for full gas conversion at each unit (to the extent available).
- b. If so, please provide all modeling inputs and outputs, including any pre- or post-processing of inputs and outputs.
- c. If so, if another type of evaluation was done of full gas conversion, please provide the supporting documentation and analyses.
- d. If not, please explain why full gas conversion was not considered at these units.

2-11. Refer to Company response to Staff 2-23, Table 8-2 (revised)

- a. Please provide the documentation for the capital cost sources listed, including any calculations performed by or for EKPC using this source data.
- b. Please provide all estimates of the capital costs for new gas CC and/or CT's reviewed by EKPC in the past two years.
- c. Please provide any forecasts of capital costs for new gas CC and/or CT's reviewed by EKPC in the past year.
- d. Has EKPC conducted an RFP (or RFPs) for new resources in the past two years?
 - i. If so, please provide these RFPs, the responding bids, and any calculations performed by or for EKPC using the bid response values.
- e. Please explain why battery storage projects were assumed to be 400 MW.
- f. Is the Company aware of any existing or planned battery storage project in PJM of that size or larger? If so, please identify such projects.

2-12. Refer to Company response to AG-1-19. Given the recent rollback of federal clean energy tax credits, does EKPC expect gas turbine costs to increase due to an increase in demand for gas resources? Please explain.

- 2-13. Refer to Case No. 2024-00370.
- a. Please provide all modeling inputs and outputs, including any pre- or post-processing of inputs and outputs.
 - b. If the modeling performed in the CPCN case differed from the IRP in this case, please explain those differences.
 - c. Do the assumed capital costs for the Cooper CCGT assumed in the CPCN case match those modeled in the IRP?
 - i. If not, please explain why not and provide the costs assumed in the CPCN case.
 - e. Do the assumed capital costs for co-firing assumed in the CPCN case match those modeled in the IRP?
 - i. If not, please explain why not and provide the costs assumed in the CPCN case.
 - f. Please provide details on the availability, lead times, and procurement status of the gas turbines needed for the Cooper CCGT project, including supporting documentation.

Dated: August 14, 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 Supplemental Request for Information to East Kentucky Power Cooperative, Inc. in this action is being electronically transmitted to the Commission on August 14, 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