COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2025 INTEGRATED RESOURCE PLAN OF EAST KENTUCKY POWER COOPERATIVE, INC.	**)** **)** **)**	**CASE NO. 2025-00087**

RESPONSES TO STAFF'S FIRST POST-HEARING INFORMATION REQUEST

TO EAST KENTUCKY POWER COOPERATIVE, INC.

DATED MARCH 16, 2026

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2025 INTEGRATED RESOURCE PLAN OF EAST KENTUCKY POWER COOPERATIVE, INC.	))))	**CASE NO. 2025-00087**

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Christopher E. Adams, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's First Post-Hearing Request for Information in the above-referenced case dated March 16, 2026, 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.

Christopher E. Adams

Subscribed and sworn before me on this 23rd day of March, 2026.

JOHN CHRISTIAN EVERLY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP104251
My Commission Expires Aug 27, 2029

Notary Public

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2025 INTEGRATED RESOURCE PLAN OF EAST KENTUCKY POWER COOPERATIVE, INC.	))))	**CASE NO. 2025-00087**

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 the Commission Staff's First Post-Hearing Request for Information in the above-referenced case dated March 16, 2026, 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 23rd day of March, 2026.

JOHN CHRISTIAN EVERLY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP104251
My Commission Expires Aug 27, 2029

Notary Public

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2025 INTEGRATED RESOURCE PLAN OF EAST KENTUCKY POWER COOPERATIVE, INC.	))))	**CASE NO. 2025-00087**

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Jerry Purvis, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's First Post-Hearing Request for Information in the above-referenced case dated March 16, 2026, 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.

Jerry Purvis

Subscribed and sworn before me on this 25th day of March, 2026.

JOHN CHRISTIAN EVERLY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP104251
My Commission Expires Aug 27, 2029

Notary Public

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2025 INTEGRATED RESOURCE PLAN OF EAST KENTUCKY POWER COOPERATIVE, INC.	))))	**CASE NO. 2025-00087**

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 the Commission Staff's First Post-Hearing Request for Information in the above-referenced case dated March 16, 2026, 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 30th day of March, 2026.

JOHN CHRISTIAN EVERLY
Notary Public
Commonwealth of Kentucky
Commission Number KYNP104251
My Commission Expires Aug 27, 2029

Notary Public

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

STAFF'S REQUEST DATED MARCH 16, 2026
REQUEST 1
RESPONSIBLE PARTY: Brad Young

Request 1. Refer to Hearing Testimony of Brad Young and Darrin Adams.[1] Provide a list of planned transmission projects to which New Era funds will be applied.

Response 1. The list of planned transmission projects as part of EKPC's New ERA portfolio is listed below:

- Bass 69kV Substation - Energy Efficiency;
- Campbellsburg Substation - Energy Efficiency;
- Coburg - EKPC Campbellsville New 69kV Line - Renewable Support;
- Coburg Jct 69kV New Breaker Substation – Renewable Support;
- Columbia Substation - Energy Efficiency;
- KU Fawkes - West Berea 69kV Line Renewable Support;
- Madison Co 138-69kV Step Down Substation - Renewable Support;
- Marion Co Industrial Tap - New 161kV Parallel Line - Renewable Support;

[1] Hearing Video Transcript (HVT) of the March 10, 2026 Hearing, Hearing Testimony of Brad Young at 09:39:30–09:40:30; HVT of March 10, 2026 Hearing, Hearing Testimony of Darrin Adams at 10:12:50– 10:13:15.

- Mt. Victory 69kV Substation - Energy Efficiency;
- Murphysville Substation – Energy Efficiency;
- Oakdale Substation - Energy Efficiency;
- Russell Springs #1 69kV - Energy Efficiency;
- Russell Springs #2 Substation - Energy Efficiency;
- Snow – Albany 69kV Line Renewable Support;
- Vertrees Substation - Energy Efficiency;
- Cynthia - Renaker 69kV Line Rebuild - Renewable Support;
- Cooper – Elihu 161kV Rebuild – Renewable Support;
- New Cooper - Alcalde 161kV Double Circuit - Renewable Support;
- Penn – Renaker 69kV Line Rebuild – Renewable Support;
- South Casey County - Liberty Junction 161kV Rebuild - Renewable Support;
- Cub Run New 69kV Dist Substation – Energy Efficiency; and,
- Holloway Tap 69kV Line Rebuild - Energy Efficiency.

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

STAFF'S REQUEST DATED MARCH 16, 2026
REQUEST 2
RESPONSIBLE PARTY: Scott Drake

Request 2. Refer to the Hearing Testimony of Scott Drake (Drake Hearing Testimony)[2] indicating that 15 out of the 16 Owner-Members offer the current demand side management (DSM) portfolio in its entirety. Identify and explain why the remaining Owner-Member does not offer the full DSM portfolio.

Response 2. Jackson Energy Cooperative Corporation ("Jackson Energy") is the only Owner-Member that does not offer all of EKPC's approved DSM programs. Jackson Energy informed EKPC that they recently provided the following to the Commission:

> "Several years ago, Jackson Energy discontinued many of its DSM programs with Commission approval. East Kentucky Power Cooperative ("EKPC") recently filed updates to their DSM programs which were approved in May 2025. Jackson Energy is currently looking into the

[2] HVT of March 10, 2026 Hearing, Hearing Testimony of Scott Drake (Drake Hearing Testimony) at 10:57:39–-10:57:55.

administration of these programs going forward and anticipates filing for approval to reintroduce all existing DSM programs offered by EKPC in mid-2026."[3]

[3] See *Application Of Jackson Energy Cooperative Corporation For An Adjustment Of Rates*, Case No. 2013-00219, Post Case Files, 2025 DSM Annual Report, page 3.

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

STAFF'S REQUEST DATED MARCH 16, 2026
REQUEST 3
RESPONSIBLE PARTY: Scott Drake

Request 3. Refer to Drake Hearing Testimony.[4] Provide the historic DSM load reduction figures for the past three years referenced in the testimony.

Response 3. The following table shows the energy and demand savings per year based on DSM program participation in those years. The yearly totals include all DSM programs including Direct Load Control switches and thermostats, but do not include Interruptible program participation. The year 2025 energy and demand savings totals are not yet verified.

MW and MWh Reduced			
	MWh	**Summer MW**	**Winter MW**
2022	5,773	26.278	7.795
2023	5,162	27.019	7.559
2024	5,242	26.343	6.435

The following table shows the cumulative energy and demand savings applicable since 2013 in the years shown. The yearly totals include all DSM programs including Direct Load Control

[4] HVT of March 10, 2026 Hearing, Drake Hearing Testimony at 11:07:45–11:08:16.

switches and thermostats, but do not include Interruptible program participation. You will note that the energy and demand savings in 2023 is lower than in 2022, even though there was new DSM program participation in 2023. Each DSM measure has a "measure life." The measure life for placing insulation in the attic under the Button-up Weatherization program is 15 years. This means the energy and demand saved from this energy efficiency activity is included in the cumulative savings for 15 years, but not the years 16 and after. Some DSM programs offered in years past (ie Appliance Recycling) have a measure life of 7 years. Thus, for example, the energy and demand saved from an appliance recycled in 2016 is included in the cumulative savings in 2022, but not in any years after. A year over year reduction in energy saved (2022 vs 2023) reflects the fact that more energy from measure life expired in 2023 than new energy was saved from new participation in the year 2023.

Cumulative MW and MWh Reduced			
	MWh	**Summer MW**	**Winter MW**
2022	176,984	51.967	37.877
2023	169,462	51.107	37.779
2024	165,489	49.930	37.340

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

STAFF'S REQUEST DATED MARCH 16, 2026
REQUEST 4
RESPONSIBLE PARTIES: Scott Drake and Jerry Purvis

Request 4. Refer to Drake Hearing Testimony regarding the backup generator control program.[5]

a. Identify and explain all Environmental Protection Agency (EPA) regulations EKPC must comply with when calling upon residential backup generating units.

b. Provide an update on the status of EPA approval for the backup generator control program.

c. Explain whether EKPC intends to inquire with the EPA about the possibility of a commercial or industrial expansion of the backup generator control program and the compliance necessary to run the program.

d. Explain whether EKPC might seek to modify the backup generator control program to comply with EPA regulations or if EKPC might seek to terminate the program from its current DSM portfolio. Include in the response the reasonings behind each of those possible decisions.

[5] HVT of March 10, 2026 Hearing, Drake Hearing Testimony at 11:07:01–11:07:34.

Response 4.

a. On February 4, 2025, U.S. Environmental Protection Agency ("EPA") Administrator Lee Zeldin announced the "Powering the Great American Comeback" initiative, to achieve the Agency's mission while energizing the greatness of the American economy. The Powering the Great American Comeback initiative consists of five pillars to guide the EPA's work. Two of the pillars are relevant to the backup generator control program:

- Pillar 2 – Restore American Energy Dominance, and
- Pillar 4 – Make the United States the Artificial Intelligence Capital of the World.

These pillars prioritize pursuing energy independence and energy dominance to cut energy costs for Americans and ensure the United States becomes the AI capital of the world.

In addition to the Powering the Great American Comeback initiative, Executive Order 14156: Declaring a National Energy Emergency (90 FR 8433; January 29, 2025) states that an affordable and reliable supply of energy and the integrity of the United States' electrical grid are fundamental to the nation's national and economic security.

Significant load growth is expected from increased demand from manufacturing and data centers. Many electric system planners and operators use demand response programs as valuable resource options for balancing electricity supply and demand. Demand response programs can optimize the power on the grid and lower the peak grid demand for energy. The EPA has recognized the importance of using backup generators powered by stationary reciprocating internal combustion

engines ("RICE") as a resource to maintain the reliability of the electric grid; this importance will likely increase in the coming years due to the forecasted significant load growth.

The EPA's emission standards for stationary combustion engines include provisions specifying situations under which emergency engines can be operated for up to 50 hours per year in non-emergency situations to mitigate local transmission and/or distribution limitations to avert the interruption of power supply in a local area, such as voluntary demand-response programs. The regulations containing those provisions are:

- National Emission Standards for Hazardous Air Pollutants ("NESHAP") for Stationary Reciprocating Internal Combustion Engines (40 CFR part 63 subpart ZZZZ);
- Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR part 60 subpart IIII); and
- Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40 CFR part 60 subpart JJJJ).

Furthermore, EPA regulations for residential backup generators focus on emission standards for stationary internal combustion engines, requiring them to be certified by the manufacturer to meet EPA Tier standards. Emergency units are restricted to emergency use and maintenance checks, with a maximum of 50 hours per year allowed for non-emergency situations, as discussed above. The key EPA regulatory requirements for residential backup generators are:

- Emission Standards (NESHAP/NSPS): Stationary engines must comply with 40 C.F.R. Part 60 Subpart JJJJ (spark ignition/natural gas) or Subpart IIII (compression ignition/diesel), which dictate emission limits based on manufacturing date and size.

- 40 CFR part 63 subpart ZZZZ is a NESHAP that applies to emissions of hazardous air pollutants from the engines.
- Emergency vs. Non-Emergency Use: Engines must be operated as "emergency engines," except that they can operate for maintenance and testing (usually 100 hours per year, with limits on specific activities) and emergency demand response (50 hours per year).
- Monitoring & Maintenance: Diesel generators must have operating hours meters. Maintenance includes annual inspection of oil, filters, and air cleaners, or every 500-1,000 hours, depending on engine type. Propane or natural gas generators must comply by following the manufacturer recommended maintenance, frequency, schedule and keeping the records much the same as diesel fired backup generators explained above.
- Fuel Requirements: Diesel generators are generally required to use ultra-low sulfur diesel (ULSD). Pipeline natural gas meets EPAs expectations for low sulfur and emissions, likewise, for the use of propane.
- State/Local Regulations: States may have stricter regulations than the federal EPA requirements. Kentucky Administrative Regulations (KARs) and the KY Statutes prohibit stricter regulation than the federal requirements.

Most residential generators are pre-certified by manufacturers, so compliance often involves adhering to maintenance schedules and limiting non-emergency operations.

b. EPA approval is not required for residential back-up generation voluntary commitment to Owner-Member programs. However, EKPC will seek an "applicability determination" from EPA for the residential whole-home backup generator program to support EKPC's position that the program structure is compliant with the applicable regulations. EKPC is currently preparing the required documents to submit to EPA. The agreement with the participating end-use member requires that their generator be maintained by the participant per the manufacturers' requirements. EKPC will maintain hours of operation resulting from EKPC initiated events to assure compliance to EPA's 50 hours per year operating limit.

This program is a voluntary option for rural residential end-use members to enroll their whole-home backup generator and be a part of the demand response program. Residential generators are pre-certified by manufacturers, so ongoing compliance often involves adhering to maintenance schedules and limiting non-emergency operations, which is explained in Response 4b above. EKPC does not plan to inquire with EPA currently about expanding the program to include larger generators at commercial or industrial end-use members. After obtaining an "applicability determination" from EPA and after successful program operational experience for residential generators, EKPC will then consider program expansion to larger backup generators.

c. EKPC believes the program is compliant with applicable environmental regulations. However, pending the results of EPA's "applicability determination" for the program as currently designed, EKPC could request changes to or even termination of the tariff. If EPA's determination requires changes in the program design or structure, EKPC could request a change

to the tariff to be complaint with EPA's findings. If EPA's determination requires changes in the program design or structure that causes significant program cost to increase and subsequently renders the program to not be cost-effective, for example, EKPC would then request termination of the program.

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

STAFF'S REQUEST DATED MARCH 16, 2026
REQUEST 5
RESPONSIBLE PARTY: Christopher E. Adams

Request 5. Refer to the Hearing Testimony of Chris Adams (Adams Hearing Testimony) and IRP Table 8-3, page 184. Provide an update to the table incorporating nuclear purchase power agreements (PPA) that replaced hydro PPAs and solar projects that have been canceled.[6]

Response 5. Please see attachment *PSC PHDR1 Response 5 - Table 8-3 (Updated).pdf*, for the updated Table 8-3.

[6] HVT of March 10, 2026 Hearing, Hearing Testimony of Christopher Adams (Adams Hearing Testimony) at 02:22:00–02:22:59.

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

STAFF'S REQUEST DATED MARCH 16, 2026
REQUEST 6
RESPONSIBLE PARTY: Christopher E. Adams

Request 6. Refer to Adams Hearing Testimony and IRP at 186-187. Provide total cost outputs for each of the five plans referenced in Table 8-5.[7]

Response 6. Refer to EKPC Response to Commission Staff's Second Request for Information, Item 22.

[7] HVT of March 10, 2026 Hearing, Adams Hearing Testimony at 02:15:45–02:17:40.