

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**ATTORNEY GENERAL’S SECOND REQUEST FOR INFORMATION TO
EAST KENTUCKY POWER COOPERATIVE, INC.**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“Attorney General”), and submits the Second Request for Information to East Kentucky Power Cooperative, Inc. (hereinafter “EKPC” or the “Company”) to be answered by August 28, 2025, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person’s knowledge, information, and

belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout, which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words “document” or “documents” are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and

transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed

or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

RUSSELL COLEMAN
ATTORNEY GENERAL



ANGELA M. GOAD
J. MICHAEL WEST
LAWRENCE W. COOK
T. TOLAND LACY
JOHN G. HORNE II
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE, SUITE 200
FRANKFORT, KY 40601
PHONE: (502) 696-5421
FAX: (502) 564-2698
Angela.Goad@ky.gov
Michael.West@ky.gov
Larry.Cook@ky.gov
Thomas.Lacy@ky.gov
John.Horne@ky.gov

Certificate of Service and Filing

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that the foregoing electronic filing was transmitted to the Commission on August 14, 2025, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 14th day of August, 2025,



Assistant Attorney General

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

1. Refer to EKPC's response to the Attorney General's First Request for Information ("Attorney General's First Request"), Items 1 (a) – (b).
 - a. Based upon the North American Electric Reliability Corporation's ("NERC") 2025 Summer Reliability Assessment, what specific states in New England, parts of the Midwest, and the Southwest Power Pool are at risk for electricity supply shortfalls during periods of more extreme summer weather?
 - b. In the response, EKPC states that PJM issued a Summer 2025 outlook indicating that it is preparing to call on contracted demand response resources to reduce electricity use under extreme scenarios, and then EKPC provided a link to the summer 2025 outlook. This link does not work. Provide an active/working link to PJM's Summer 2025 outlook.
 - c. In the response, EKPC asserts that the Federal Energy Regulatory Commission ("FERC") issued a press release referencing both NERC's and PJM's assessments, and the FERC Chairman emphasized that PJM's announcement is significant in that it is the first time PJM expects to rely upon demand response to manage summer operations. EKPC provided a link to the FERC release, but the link does not work. Provide an active/working link to the FERC release.
 - i. Does EKPC believe it is possible for PJM to rely upon demand response to manage summer operations? Explain the response in detail.
 - ii. Does EKPC believe the best approach is for PJM to rely upon demand response to manage operations, or does EKPC believe the best

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

approach would be to have enough reliable thermal generation to manage the summer operations. Explain the response in detail.

- d. Provide a copy and or active link to PJM's Vice President of Market Design and Economics, Adam Keech's pre-filed testimony to FERC that is referenced in this response.
 - e. As a PJM member, expound upon how PJM will facilitate the development of new resources.
 - f. As a PJM member, expound upon how PJM will enhance the Effective Load Carrying Capability ("ELCC") model to accurately account for supply during the hours of highest risk.
 - g. As a PJM member, expound upon how PJM will explore opportunities to increase the participation of demand resources.
 - h. As a PJM member, expound upon what Mr. Keech means when he states that PJM intends to also engage with stakeholders, regulators, and state policymakers on the larger issues outlined in Manu's testimony.
 - i. Provide a copy and/or active link to CEO Manu's testimony as referenced in (h).
2. Refer to EKPC's response to the Attorney General's First Request, Items 1 (c) – (d).
 - a. EKPC asserts that coal and natural-gas fired generation resources along with nuclear generation are assets that provide reliable and necessary capacity during peak periods as evidenced by Winter Storms Elliott, Gerri, and Enzo. Expound upon how these resources provided reliable and necessary capacity during Winter Storms Elliott, Gerri, and Enzo.

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

- b. EKPC asserts that coal and natural-gas fired generation and nuclear are fuel-secure and dispatchable, with the ability to fill the gap left by intermittent renewable resources when the sun does not shine or the wind does not blow.
 - i. Explain how important it is to have dispatchable, thermal generation to the electric grid.
 - ii. Explain how dispatchable, thermal generation provides customers with 24 hours a day/7 days a week electricity, versus the intermittent nature of solar and wind energy.
 - iii. Explain whether it is currently feasible (from a cost perspective as well as providing continuous electricity to customers) for an electric grid to exclusively rely upon intermittent renewable resources.
 - iv. Explain whether it is currently feasible (from a cost perspective as well as providing continuous electricity to customers) for an electric grid to predominately rely upon intermittent renewable resources.
 - v. If the electric grid were exclusively dependent on intermittent renewable resources, without battery storage, explain whether there would be brownouts/blackouts when the sun does not shine or wind does not blow.
- 3. Refer to EKPC's response to the Attorney General's First Request, Item 2(a). EKPC asserts that it has filed for the addition of two solar generation plants (Case No. 2024-00129), a 214 MW Reciprocating Internal Combustion Engine ("RICE") facility (Case No. 2024-

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

00310), a 745 MW Natural Gas Combined Cycle (“NGCC”) generator, and the natural gas co-fire conversion of five of its current coal-fired generators (Case No. 2024-00370).

- a. Explain in detail whether EKPC has changed any of its aforementioned plans for generation based upon any or all of President Trump’s Executive Orders as cited to in the below footnote,¹ including but not limited to, the new July 7, 2025 Executive Order entitled Ending Market Distorting Subsidies for Unreliable, Foreign Controlled Energy Sources. This July 7, 2025 Executive Order asserts in part that: It is the policy of the United States to (a) rapidly eliminate the market distortions and costs on taxpayers by so-called “green” energy subsidies; (b) build upon and strengthen the repeal of, and modifications to, wind, solar, and other “green” energy tax credits in the One Big Beautiful Bill Act; and (c) end taxpayer support for unaffordable and unreliable “green” energy sources and supply chains built in, and controlled by, foreign adversaries. If not, explain why not.
- b. Explain in detail whether EKPC has changed any of its aforementioned plans for generation based upon the new legislation signed into law on July 4, 2025, entitled the One Big Beautiful Bill Act.² If not, explain why not.

¹<https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-american-energy/>; <https://www.whitehouse.gov/presidential-actions/2025/02/establishing-the-national-energy-dominance-council/>; <https://www.whitehouse.gov/presidential-actions/2025/04/reinvigorating-americas-beautiful-clean-coal-industry-and-amending-executive-order-14241/>; <https://www.whitehouse.gov/presidential-actions/2025/04/protecting-american-energy-from-state-overreach/>; <https://www.whitehouse.gov/presidential-actions/2025/04/rregulatory-relief-for-certain-stationary-sources-to-promote-american-energy/>; <https://www.whitehouse.gov/presidential-actions/2025/04/strengthening-the-reliability-and-security-of-the-united-states-electric-grid/>; <https://www.whitehouse.gov/presidential-actions/2025/04/directing-the-repeal-of-unlawful-regulations/>; <https://www.whitehouse.gov/presidential-actions/2025/04/zero-based-regulatory-budgeting-to-unleash-american-energy/>; <https://www.whitehouse.gov/presidential-actions/2025/07/ending-market-distorting-subsidies-for-unreliable-foreign%e2%80%91controlled-energy-sources/>.

² See <https://www.congress.gov/bill/119th-congress/house-bill/1/text>.

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

- c. EKPC asserts that it filed to build two solar generation plants in Case No. 2024-00129. Pursuant to that case docket the Commission granted this request on December 26, 2024. Explain whether EKPC still plans to proceed with the two solar generation plants in light of the aforementioned President Trump Executive Orders and the passage of the One Big Beautiful Bill Act into law. If EKPC still plans to proceed with the two solar generation plants, explain in detail why and how this is beneficial to customers.
 - d. Explain why EKPC finds it a reasonable expenditure of funds, which the customers will have to pay for, to add two solar generation plants to its electric grid, even though the no electricity will be provided when the sun does not shine.
4. Refer to EKPC's response to the Attorney General's First Request, Item 2(b).
- a. EKPC states that renewable generation, specifically solar, provides cost-effective energy which is anticipated to offset economic energy purchases from the PJM energy market. Explain whether solar provides cost-effective energy without any cost subsidies included in the calculation.
 - b. EKPC asserts that solar energy will not provide capacity during winter peak; however, it is anticipated to provide some summer capacity according to PJM ELCC capacity accreditation.
 - i. Provide a copy of PJM's ELCC capacity accreditations.
 - ii. Provide the capacity that solar will provide based upon PJM's ELCC capacity accreditation.

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

- iii. Provide the capacity that EKPC's natural gas plants will provide based upon PJM's ELCC capacity accreditation.
 - iv. Provide the capacity that EKPC's coal plants will provide based upon PJM's ELCC capacity accreditation.
 - c. EKPC asserts that demand-side management and energy efficiency provide energy and capacity reductions. Explain which customer classes participate in EKPC's demand-side management and energy efficiency programs.
5. Refer to EKPC's response to the Attorney General's First Request, Item 2(c). Expound on the statement that battery energy storage systems ("BESS") were not chosen as a resource in any of the top five plans by the Resource Optimizer due to overall cost. Be sure to provide the overall cost of the BESS, and how much electricity and how many hours of electricity it would contribute to the electric grid.
6. Refer to EKPC's response to the Attorney General's First Request, Item 3(a). In this question the Attorney General asked why EKPC did not state that a strategic objective is to ensure affordable electric service as it did in the Company's 2022 IRP. EKPC asserts in its response that, "[t]he EKPC Board of Directors voted in 2024 to change the company's mission statement to replace affordable with competitive," but it does not change the philosophy of least-cost planning.
- a. Explain in detail why EKPC's Board of Directors voted to change the Company's mission statement to replace affordable with competitive.
 - b. Does EKPC's Board of Directors believe that its ratepayers want and need affordable electric rates? If not, explain why not.

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

- c. Does EKPC believe that its ratepayers want and need affordable electric rates? If not, explain why not.
 - d. If the answer to (b) and (c) are in the affirmative, explain why EKPC would not still have the word “affordable” as part of the mission statement.
- 7. Refer to EKPC’s response to the Attorney General’s First Request, Item 3(b). EKPC asserts that the proposed solar projects provide economic value to retail members by providing low-cost energy to offset market purchases throughout the study period.
 - a. Explain whether the solar power is actually low-cost when all subsidies are removed.
 - b. Explain whether EKPC has recalculated the proposed solar project costs without subsidies from the federal government. If so, provide the updated calculations. If not, explain why not.
 - c. Explain whether EKPC still anticipates subsidies to be provided by the federal government for the proposed solar projects, and if so, provide the specific subsidy amounts and the funding source.
 - d. Explain whether the solar power is the least-cost generation resource once all subsidies are removed.
- 8. Refer to EKPC’s response to the Attorney General’s First Request, Item 3(e). The Attorney General requested for EKPC to provide a list of the specific entities pressuring EKPC to decarbonize. EKPC listed the Environmental Protection Agency (“EPA”) and consumer preference for lower-carbon-emitting resources.

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

- a. Explain in detail how the EPA, under the current presidential administration, is pressuring EKPC to decarbonize. Provide documentation of the same.
 - b. Explain in detail how the consumers are advising EKPC that their preference is for lower-carbon-emitting resources. Provide documentation of the same.
 - c. Confirm that by adding lower-carbon emitting resources to the grid, depending on the resource, it can negatively affect the electric grid stability as well as increase customer rates. If not confirmed, explain in detail why not.
9. Refer to EKPC's response to the Attorney General's First Request, Item 3(f). EKPC asserts that even if federal and state law does not require it to decarbonize, "EKPC intends to continue with its plan to thoughtfully increase fuel diversity within its generation portfolio. This is the best strategy to both meet its capacity and energy needs while also hedging against future environmental rules and regulations."
 - a. Confirm that by attempting to hedge against unknown, future environmental rules and regulations, customer rates will be increased. If not confirmed, explain in detail why not.
 - b. Explain in detail why EKPC would attempt to hedge against unknown, "future environmental rules and regulations."
10. Refer to EKPC's response to the Attorney General's First Request, Item 5(a).
 - a. EKPC discusses six rules that have previously been implemented by the EPA that are impacting its fossil-fuel generation sources. Explain whether the current presidential administration is attempting to withdraw/modify these regulations.

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

- b. Refer to the EPA's July 29, 2025 proposal to rescind the 2009 Greenhouse Gas Endangerment Finding, which qualifies greenhouse gases as pollutants, and led to the Clean Air Act prescribing standards for greenhouse gas emissions.³ If this proposed rescission is finalized, explain how it will affect EKPC as well as the Company's customers (i.e. lower regulatory costs, lower natural gas rates, lower electric rates, etc.).
 - c. Explain in detail how EKPC is currently working with state and federal regulators, "seeking practicable, doable languages [sic] changes and dates to the rules to ease the industry pressure in our best attempt to remain affordable, competitive, reliable and sustainable."
11. Refer to EKPC's response to the Attorney General's First Request, Item 8(a). As originally requested, provide the referenced annual report in the Attorney General's First Request, Item 8(a), as the report should be filed into the pending case record, instead of EKPC directing the Attorney General to pull the report from a separate case record.
12. Refer to EKPC's response to the Attorney General's First Request, Item 8(b). Provide a breakdown of the net savings that EKPC realized from its PJM membership through May 31, 2024, by trade benefits, capacity market benefits, and avoided point-to-point transmission charges.
13. Refer to EKPC's response to the Attorney General's First Request, Item 8(e). The Attorney General is requesting actual monetary costs that EKPC's ratepayers are paying for due to

³<https://www.epa.gov/regulations-emissions-vehicles-and-engines/proposed-rule-reconsideration-2009-endangerment-finding#rule-summary>.

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

the membership in PJM, and not general assertions as to how the expenses are recovered from the ratepayers. As originally requested, provide all costs from EKPC's membership in PJM that are borne by the customers.

14. Refer to EKPC's response to the Attorney General's First Request, Item 8.

- a. Explain whether EKPC has analyzed the costs/expenses versus revenues/savings from being a member of PJM. If so, provide a copy of the analysis. If not, explain why EKPC is not analyzing whether it is cost beneficial to the customers for EKPC to be a member of PJM.
- b. Explain in detail all scenarios in which EKPC being a member of PJM would no longer be beneficial to EKPC and its customers.
- c. Is EKPC concerned with the recent PJM auction in which the capacity prices hit a record-high \$329.17/MW-day price cap, which is up 22% from a year ago for most of PJM? If not, explain why not.
- d. How does the recent PJM auction in which capacity prices hit a record-high affect EKPC and its customers. Explain the response in detail.
- e. Is EKPC concerned that if not for the price cap, the capacity price for the recent PJM auction is estimated to have been approximately \$389/MW-day? Explain the answer in detail.
- f. If not for the price cap established, explain how the \$389/MW-day capacity price would have affected EKPC and its customers.

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

- g. It is estimated that the record-high capacity prices within PJM could increase customer bills by 1.5% - 5% for some ratepayers. Will this increase affect EKPC's customers? Explain in detail why or why not.
 - h. Explain how the recent changes in the PJM Board of Managers will affect EKPC, and the Company's long-term interests in PJM, if at all. In the response, ensure to discuss EKPC's thoughts on the two prior incumbent Board Nominees who did not receive enough votes for reelection, the multiple governors expressing serious concern over the process that PJM is undertaking to fill the two vacant seats, and the request by the Pennsylvania and Virginia Governor to nominate a former FERC Chairman and Commissioner.
 - i. Explain how PJM CEO's announcement that he is leaving by the end of the year will affect PJM and EKPC.
15. Refer to EKPC's response to the Attorney General's First Request, Item 9. Provide all updates that the current presidential administration has taken to assist in lowering the cost and increasing the reliability of American's energy supply, which will directly affect EKPC and its customers.
16. Refer to EKPC's response to the Attorney General's First Request, Items 10(a) and (b). Provide a response to the original questions (a) and (b). The requested information should be filed into the pending case record, instead of EKPC directing the Attorney General to review a response in a separate case record.
17. Refer to EKPC's response to the Attorney General's First Request, Item 11.

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

- a. Explain in detail why the type of situation described would lead to an unreasonable increased risk of load shedding for entities like EKPC who endeavor to match energy supplies with forecasted load needs.
 - b. Provide a copy and or active link to the pre-filed testimony of Denise Foster Cronin filed into the FERC Docket No. AD25-17.
18. Refer to EKPC's response to the Attorney General's First Request, Item 13.
- a. Explain in detail whether EKPC purchased Northern Bobwhite Solar LLC.
 - b. If so, explain in detail whether the Commission granted permission for EKPC to make this purchase, and the case number in which the permission was granted. If not, explain why no permission was necessary.
 - c. Explain whether the purchase of Northern Bobwhite Solar LLC represented the least-cost option. If not, explain why EKPC purchased the solar project.
19. Refer to EKPC's response to the Attorney General's First Request, Item 14.
- a. Explain in detail whether the proposed solar projects that EKPC intends to build represent the least-cost generation option.
 - b. Explain whether EKPC has recalculated the solar project costs without federal subsidies? If not, explain why not. If so, provided the updated calculated costs for the solar projects.
20. Refer to EKPC's response to the Attorney General's First Request, Item 15(a). Provide a response to the original question posed. The requested information should be filed into the pending case record, instead of EKPC directing the Attorney General to review a response in a separate case record.

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

21. Refer to EKPC's response to the Attorney General's First Request, Item 15(c). For each of the years 2013 – 2025, with the most updated information, provide the costs/expenses of PJM versus the revenues/savings of PJM. Ensure to include in the costs/expenses all penalty payments.
22. Refer to EKPC's response to the Attorney General's First Request, Item 16. Provide all applicable updates to this response and how the current presidential administration's Executive Orders are/will affect EKPC, as well as its customers.
23. Refer to EKPC's response to the Attorney General's First Request, Item 19.
 - a. Now that the Inflation Reduction Act's ("IRA") renewable energy subsidies have been repealed or have early phaseouts, explain whether EKPC will update its cost-effectiveness calculations for the IRP.
 - b. Now that the IRA's renewable energy subsidies have been repealed or have early phaseouts, explain how it will affect EKPC's decisions to pursue large amounts of solar energy. Explain the response in detail.
 - c. Provide updated calculations for each of the proposed solar projects that EKPC included in the pending IRP, without the IRA subsidies. Ensure to discuss whether each proposed solar project still represents a least-cost resource.
 - d. EKPC asserted in response to Item 19(b), that it would reassess economics on a project-by-project basis and make a recommendation to its Board of Directors on whether to move forward with the solar project. Provide all updates to this response. Include in the update whether the reassessment has occurred, and what

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

recommendations have been made to the Board of Directors. If there are no updates or reassessments then explain in detail why not.

24. Refer to EKPC's response to the Attorney General's First Request, Item 22. Provide an update to Tab 3-5 with the most current information.

25. Refer to EKPC's response to the Attorney General's First Request, Item 25(b). The Company states, "EKPC has no plans to retire Cooper Unit 1 at this time; however considered Cooper Unit 1 to be in 'mothball' status."

a. Explain whether words are missing from this response.

b. Explain why EKPC has no plans to retire Cooper Unit 1 if Cooper Unit 1 is considered in mothball status?

26. Refer to EKPC's response to the Attorney General's First Request, Item 25(c). Explain whether it is economically feasible for Cooper Unit 1 to continue providing electricity to the benefit of customers past December 2030. If so, does EKPC plan on operating Cooper Unit 1 past the financial end life of December 2030? Explain the response in detail.

27. Refer to EKPC's response to the Attorney General's First Request, Item 25(f).

a. Explain if EKPC intended to state that the financial end life of Cooper Station 2 is December 2038, instead of stating that it was for Cooper Station 1. If not, explain why not.

b. Explain whether it is economically feasible for Cooper Station Unit 2 to continue providing electricity to the benefit of customers past December 2038. If so, does EKPC plan on operating Cooper Station Unit 2 past the financial end life of December 2038? Explain the response in detail.

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

28. Refer to EKPC's response to the Attorney General's First Request, Item 25(i). Explain whether it is economically feasible for Spurlock Station Unit 1 to continue providing electricity to the benefit of customers past December 2042. If so, does EKPC plan on operating Spurlock Station Unit 1 past the financial end life of December 2042? Explain the response in detail.
29. Refer to EKPC's response to the Attorney General's First Request, Item 25(l). Explain whether it is economically feasible for Spurlock Station Unit 2 to continue providing electricity to the benefit of customers past December 2042. If so, does EKPC plan on operating Spurlock Station Unit 2 past the financial end life of December 2042? Explain the response in detail.
30. Refer to EKPC's response to the Attorney General's First Request, Item 25(o). Explain whether it is economically feasible for Spurlock Station Unit 3 to continue providing electricity to the benefit of customers past December 2049. If so, does EKPC plan on operating Spurlock Station Unit 3 past the financial end life of December 2049? Explain the response in detail.
31. Refer to EKPC's response to the Attorney General's First Request, Item 25(o). Explain whether it is economically feasible for Spurlock Station Unit 4 to continue providing electricity to the benefit of customers past December 2049. If so, does EKPC plan to operate Spurlock Station Unit 4 past the financial end life of December 2049? Explain the response in detail.
32. Refer to EKPC's response to the Attorney General's First Request, Item 26(b). For each natural gas/fuel oil generating unit listed, explain whether it is economically feasible for

Electronic 2025 Integrated Resource Plan of
East Kentucky Power Cooperative, Inc.
Attorney General's Second Request for Information
Case No. 2025-00087

each generating unit to continue providing electricity to the benefit of customers past the financial end of life date provided in the response. If so, explain whether EKPC plans to operate each unit past the financial end life. Explain the response in detail.

33. Refer to EKPC's response to the Attorney General's First Request, Item 29(j). Elaborate on the numerous inverter tripping at EKPC's solar farms, and how it affected the electric grid as well as the customers.
34. Refer to EKPC's response to the Attorney General's First Request, Item 29(k). Elaborate on EKPC's concerns with the inverter-based resources' ("IBR") impact on power supply during times when the IBR lacks a fuel source (no sun, no wind, etc.)
35. Refer to EKPC's response to the Attorney General's First Request, Item 31(b). Provide an update to this response.
36. Refer to EKPC's response to the Attorney General's First Request, Item 31(c). The response is nonresponsive. Provide an answer to the question as originally posed.
37. Refer to EKPC's response to the Attorney General's First Request, Item 36(b). Provide the capacity factor for each of EKPC's generating units.
38. Refer to EKPC's response to the Attorney General's First Request, Items 39 (a) and (b). Provide all updates to this original request.
39. Refer to EKPC's response to the Attorney General's First Request, Items 40 (a) – (c). Provide all updates to this original request.
40. Refer to EKPC's response to the Attorney General's First Request, Item 41(a). Expound upon the three major challenges impacting natural gas unit availability that PJM highlights.