COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:		
ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. TO)	CASE NO.
ESTABLISH A NEW TARIFF FOR DATA CENTER)	2025-00140
TARIFF	ĺ	

RESPONSES TO STAFF'S THIRD INFORMATION REQUEST
TO EAST KENTUCKY POWER COOPERATIVE, INC.

DATED AUGUST 20, 2025

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the l	Matter	of:
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ELECTRONIC TARIFF FILING OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. TO)	CASE NO.
ESTABLISH A NEW TARIFF FOR DATA CENTER)	2025-00140
POWER)	

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

David Samford, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's Third Request for Information in the above-referenced case dated August 20, 2025, 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.

David Samford

Subscribed and sworn before me on this 2 day of September, 2025.

KATHY L. MCINTOSH
Notary Public
Commonwealth of Kentucky
Commission Number KYNP96402
My Commission Expires Jan 30, 2029

Notary Public

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

		,	
ŀ	ENTUCKY POWER COOPERATIVE, INC. TO)	CASE NO.
F	STABLISH A NEW TARIFF FOR DATA CENTER)	2025-00140
P	OWER)	

STATE OF KENTUCKY)
COUNTY OF CLARK)

Julia J. Tucker, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's Third Request for Information in the above-referenced case dated August 20, 2025, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

CERTIFICATE

Julia J. Tucker

Subscribed and sworn before me on this <u>28</u> day of August, 2025.

Votary Public

JEANNIE M. JONES

NOTARY PUBLIC

STATE AT LARGE

KENTUCKY

COMMISSION # KYNP41703

MY COMMISSION EXPIRES JANUARY 15, 2026

EAST KENTUCKY POWER COOPERATIVE, INC. CASE NO. 2025-00140

THIRD REQUEST FOR INFORMATION RESPONSE

STAFF'S REQUEST DATED AUGUST 20, 2025

REQUEST 1

RESPONSIBLE PARTY:

David Samford

Refer to EKPC's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1.

- a. Explain why "whether the data center would be owned by the operator or developer" is a factor to determine why an inquiry is serious.
- b. Explain why "owned by a developer, whether the developer has specific data center operators involved in the project" is a factor to determine why an inquiry is serious.
- c. Explain why "the potential customer's experience in this or similar development projects" is a factor to determine whether an inquiry is serious.

Response 1.

a. This data point provides insight as to the likelihood that a data center project will ultimately come to fruition. Everything else being equal, a prospective project that is being developed by a data center operator of many existing facilities is regarded as more likely to become operational than a proposed project where the developer has zero experience with data centers. Of course, there can be significant differences on where various projects may fall upon this spectrum.

No single factor is dispositive of whether a data center project will ultimately be completed and EKPC and its Owner-Members work with all potential data center customers to ascertain their power supply needs.

- b. This data point also provides insight as to the likelihood that a data center project will ultimately come to fruition. Everything else being equal, a developer that is working with actual tenant data centers operators is regarded as more likely to become operational than a proposed developer-led project where the developer has no actual data center tenants in the picture. For instance, developing a generic power supply plan to meet a future hypothetical tenant data center load requires much more speculation with regard to interconnection requirements, capacity and energy requirements and related details. On the other hand, working with a developer who has specific data center tariffs involved in the development is much more likely to result in an operational project that is right-sized and optimized at the outset of the project. Of course, there can be significant differences on where various projects may fall upon this spectrum. No single factor is dispositive of whether a data center project will ultimately be completed and EKPC and its Owner-Members work with all potential data center customers to ascertain their power supply needs.
- c. This data point provides insight as to the likelihood that a data center project will ultimately come to fruition. Everything else being equal, a prospective project that is being developed with actual data center (or similar) experience is regarded as more likely to become operational than a proposed project where the developer has zero relevant experience. Of course, there can be significant differences on where various projects may fall upon this spectrum. No single factor is dispositive of whether a data center project will ultimately be completed and EKPC

PSC Request 1

Page 3 of 3

and its Owner-Members work with all potential data center customers to ascertain their power supply needs.

EAST KENTUCKY POWER COOPERATIVE, INC. CASE NO. 2025-00140 THIRD REQUEST FOR INFORMATION RESPONSE

STAFF'S REQUEST DATED AUGUST 20, 2025

REQUEST 2

RESPONSIBLE PARTIES: Day

David Samford and Julia J. Tucker

Request 2. Refer to EKPC's response to Staff's Second Request, Item 5(c).

- a. Explain whether EKPC is in a reservation queue for a fourth combustion turbine (CT) or other large pieces of generating equipment.
 - b. Explain whether there are a limited number of hours that a CT can operate annually.
- c. In the event that a data center requires dedicated resources and assuming that the data center has a high load factor, explain further why a CT is an optimal generation choice as opposed to a natural gas combined cycle unit.
- d. Explain how a fourth CT, in addition to the third already under contract with Siemens, will be utilized in serving the data center. Include in the answer how the third and fourth CTs will be used to serve as dedicated resources for the data center.

Response 2.

- a. EKPC is not in any purchasing queue for a fourth CT turbine. The reference to a fourth turbine in the prior data request response was hypothetical. EKPC's Board approved the purchase of a third turbine in July 2025 and EKPC expects to file an application for a CPCN for the third turbine within the next few months.
- b. Some of EKPC's existing combustion turbines have limits on the number of hours that they can operate annually based on the air permit for those units. The limits are not due to any limitations with the combustion turbine units but are based on air permit limitations. Those limits are not defined until the final air permit is issued for the specific plant.
- c. The third CT is loosely tied to the threshold for having a "Dedicated Resource" under the tariff. In the event that an EKPC-owned Dedicated Resource was used to serve a data center, the power supply plan would optimize to best fit the power needs of the data center.

A combustion turbine unit can be utilized as a stand-alone turbine or can be configured into a combined cycle plant. Having the combustion turbine available allows for the final determination for the optimal configuration to be made at the appropriate time. One, two, or three combustion turbines can be utilized for a combined cycle facility; the number of turbines needed would be driven by the size of the power supply needed.

d. See response to Item 2.c. above. EKPC is not pursuing a fourth CT turbine at this time.