

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**THE ELECTRONIC APPLICATION OF EAST)
KENTUCKY POWER COOPERATIVE, INC.)
FOR A GENERAL ADJUSTMENT OF RATES,)
APPROVAL OF DEPRECIATION STUDY,)
AMORTIZATION OF CERTAIN REGULATORY)
ASSETS AND OTHER GENERAL RELIEF)**

Case No.
2025-00208

RESPONSES TO ATTORNEY GENERAL AND NUCOR'S
FIRST POST-HEARING INFORMATION REQUEST
TO EAST KENTUCKY POWER COOPERATIVE, INC.
DATED DECEMBER 11, 2025

EAST KENTUCKY POWER COOPERATIVE, INC.

CASE NO. 2025-00208

FIRST POST-HEARING REQUEST FOR INFORMATION RESPONSE

ATTORNEY GENERAL AND NUCOR'S REQUEST DATED DECEMBER 11, 2025

REQUEST 1

RESPONSIBLE PARTY: Jacob R. Watson

Request 1. Please provide the total amount of interruptible capacity (in MW) currently under contract on EKPC's system.

Response 1. EKPC estimates interruptible capacity at 274 MW. Interruptible contracts do not specify the amount of load that is interruptible, but they do specify the firm MWs that are not interruptible. Actual demand over the contracted firm demand is interruptible.

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REQUEST 2

RESPONSIBLE PARTY: Jacob R. Watson

Request 2. Please provide detail supporting EKPC's statement on page 36 of its 2025 Integrated Resource Plan filed in Case No. 2025-00087 that the winter load drop capability of EKPC's interruptible load "is close to 10% of EKPC's generation fleet."

Response 2. The IRP stated a total winter capacity of 3,265 MW. EKPC uses an estimate of 274 MW as the amount of load that could be interrupted. See Response 1 above for what this value is estimated. The interruptible estimate of 274 MW is 8.3% of EKPC stated winter capacity of 3,265 MW.

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REQUEST 3

RESPONSIBLE PARTY: **Jacob R. Watson**

Request 3. For the most recent twelve-month period, please provide all emergency and economic curtailments called for EKPC's interruptible load. Please provide the time and duration of each curtailment.

Response 3. See attachment *AG-Nucor PHDR1 Request 3 – Interruption History.xlsx*.

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REQUEST 4

RESPONSIBLE PARTY: Jacob R. Watson

Request 4. For the most recent twelve-month period, please provide EKPC's energy savings resulting from interruptible customers "buying-through" economic curtailment events.

Response 4. When EKPC calls for an economic interruption, the interruptible customer can opt to remain online and pay the real-time Locational Marginal Price ("LMP"). During the 12 months ending November 30, 2025, there was a total of 54,801 MWH that interruptible customers bought at LMP. This equates to \$4,349,743 savings for EKPC during this period.

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REQUEST 5

RESPONSIBLE PARTY: Objection – Legal, Response - Jacob R. Watson

Request 5. Please provide the amount of forecasted power sales revenues associated with EKPC's interruptible load included within EKPC's 2026 budget.

Response 5. Objection. EKPC's rates are based on a historic test year in this proceeding. Forecasted budgeted numbers are not relevant to this proceeding. This is a renewed objection. See EKPC's responses to AG-Nucor's First Request for Information, Request 121.

Without waiving said objection, EKPC buys its entire load obligation out of the PJM market. EKPC also sells its interruptible capacity back into the PJM market. The interruptible capacity is adjusted by PJM's Effective Load Carrying Capabilities ("ELCC") rate. It is important to note that EKPC is buying more load obligation out of the market for each interruptible than it is receiving revenue for by selling the interruptible component. While there is revenue in the budget for the interruptible load that is sold into PJM, the expense to buy the load obligation is greater. The true value of interruptible load is the avoided cost of a peaking unit.