

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF EAST	)	
KENTUCKY POWER COOPERATIVE, INC. AND	)	
ITS MEMBER DISTRIBUTION COOPERATIVES	)	CASE NO.
FOR REVISIONS TO THE RESIDENTIAL	)	2026-00163
ELECTRIC VEHICLE OFF-PEAK CHARGING	)	
PROGRAM	)	

RESPONSES TO STAFF’S FIRST INFORMATION REQUEST
TO EAST KENTUCKY POWER COOPERATIVE, INC.
DATED JULY 13, 2026

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CERTIFICATE

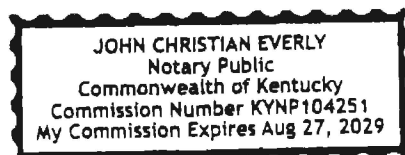
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

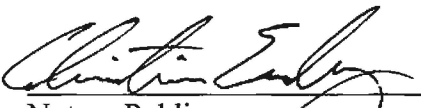
Scott Drake, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to Staff's First Request for Information in the above-referenced case dated July 13, 2026, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.



Scott Drake

Subscribed and sworn before me on this 27th day of July, 2026.





Notary Public

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2026-00163
FIRST REQUEST FOR INFORMATION RESPONSE

STAFF'S REQUEST DATED JULY 13, 2026

REQUEST 1

RESPONSIBLE PARTY: Scott Drake

Request 1. Refer to EKPC's response to Commission Staff's First Request for Information (Staff's First Request) in Case No. 2022-00439,¹ Item 5d.

- a. Provide a justification analysis that outlines the calculation of the \$0.02 per kWh incentive.
- b. Confirm whether EKPC has performed additional analysis on the \$0.02 per kWh incentive since the referenced response was filed. If confirmed, provide any additional analysis including all work papers related to the analysis.
- c. Explain whether the \$0.02 per kWh incentive is still reasonable given recent changes in the per kWh energy charge per Owner-Member.
- d. Explain whether an incentive calculated based on avoided energy and avoided capacity costs aligned with off-peak charging would incentivize participating customers more effectively.

¹ Case No. 2022-00439, *Electronic Tariff Filing of East Kentucky Power Cooperative, Inc. to Implement a Residential Electric Vehicle Off-Peak Charging Pilot Program* (filed Mar. 1, 2023), EKPC's Response to Commission Staff's First Request for Information.

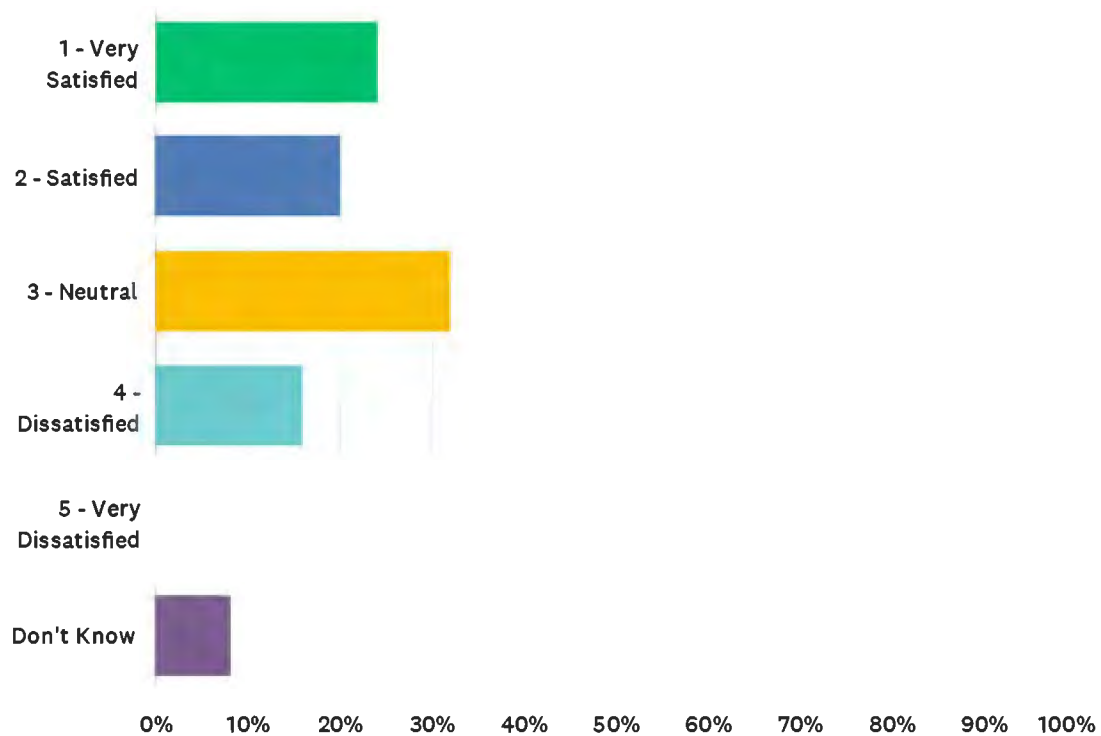
Response 1.

a. A detailed utility cost analysis to determine the incentive amount was not performed. Incentive amounts are not set based on a rigorous utility cost analysis. They are set based on the potential participant's perceived value received from the incentive versus the participant's cost or perceived personal impact to participate in the program. Thus, EKPC determined that a 20% credit for the kWhs during off-peak charging was an incentive amount that most EV owners might consider worthwhile. While other electric utilities in Kentucky generally do not offer an EV incentive, Kentucky Utilities and Louisville Gas & Electric offer \$5 per month for their EV program incentive. EKPC wanted to test a more granular approach by providing an incentive based on actual kWhs charging the EV during off-peak hours. Therefore, the 20% incentive translated to \$0.02/kWh when assuming the energy rate is \$0.10/kWh.

b. In fall of 2025, EKPC surveyed the EV Pilot participants about their experience with the EV pilot program. Question 3 asked participants to gauge their satisfaction with the amount of the bill credit (incentive) they received for participating. 44% of participants were "very satisfied" or "satisfied" with the amount of the incentive they received from the pilot versus only 16% responding as dissatisfied. Since this was the case, EKPC and its Owner-Member cooperatives agreed that the incentive level was adequate for a promotional rate as requested in this filing. As mentioned above, DSM program incentive levels are based on the participant's perceived value, not a rigorous utility cost study. Below are the responses of their perceived value:

Q3 The amount of bill credits I receive for participating

Answered: 25 Skipped: 0



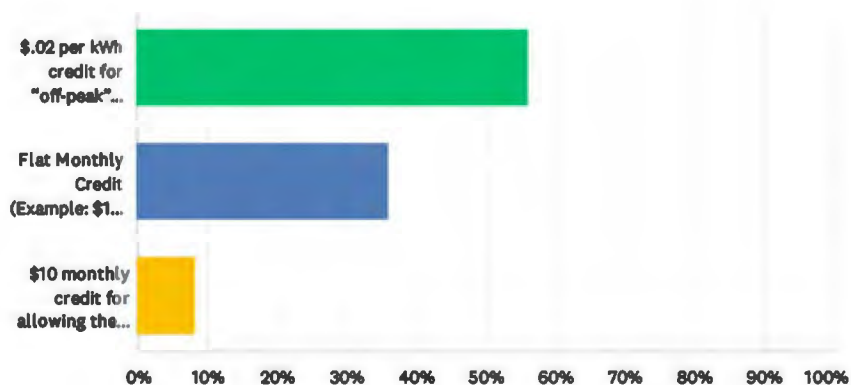
c. EKPC believes that the \$0.02 per kWh incentive is still appropriate to retain participants and to attract participants who are new EV owners. EKPC views the Rate EV incentive as a method to stay engaged with EV drivers in EKPC's Owner-Member's service territories. Staying engaged allows EKPC the opportunity to continue analyzing EV energy usage and demand patterns.

d. EKPC considered this style of EV program and as a result, EKPC built in a survey question as part of the fall 2025 participant survey. The question was “Q7: Out of the 3 following typical utility EV Program types, which style would you prefer (please only select one option)”

The response options and results can be seen in the image below. The third response option is the most similar in program design to a program managed based on avoided energy and avoided capacity costs aligned with off-peak charging. Out of the 3 proposed options, this style of program was rated the least favorable. Since this method of EV incentive seemed unpopular with participants, EKPC abandoned its consideration.

Q7 Out of the 3 following typical utility EV Program types, which style would you prefer (please only select one option)

Answered: 25 Skipped: 0



ANSWER CHOICES

RESPONSES

\$.02 per kWh credit for "off-peak" charging during night-time hours 10PM-6AM. (This is the current design of the EV Pilot in which you are participating.)

56.00% 14

Flat Monthly Credit (Example: \$10 monthly credit as long as the majority of EV charging at home during the month occurs during "off-peak" night-time hours 10 p.m.-6 a.m.).

36.00% 9

\$10 monthly credit for allowing the cooperative to actively manage when you can charge your EV during "peak" energy use times (6 a.m.-10 p.m.), which will occur just a few times each month. Active management would slow down the rate of charge to minimize impact on the electric grid during constrained periods.

8.00% 2

Total Respondents: 25

EAST KENTUCKY POWER COOPERATIVE, INC.
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REQUEST 2

RESPONSIBLE PARTY: Scott Drake

Request 2. Refer to the proposed Rate REV tariff. Refer also to the current effective tariff, Tariff Sheet No. 35, Second Revised Sheet No. 55 and 56, DSM Pilot. Under the program incentive section, the current tariff states that EKPC will provide \$0.01 per kWh credit in addition to the Owner-Member's \$0.01 per kWh credit, totaling \$0.02 per kWh incentive. The proposed tariff states that EKPC will provide the \$0.02 per kWh incentive to be passed through the Owner-Member to the end-use customer.

- a. Explain the logic and reasoning behind EKPC providing the entirety of the incentive.
- b. Explain any possible administrative impacts to EKPC and its Owner Members caused by EKPC providing the entirety of the incentive.
- c. Explain how the Owner-Member's will notify EKPC of the amount of per kWh incentives necessary to credit back participating customers in line with the billing cycle.

Response 2.

a. In Case No. 2022-00439, the rigorous California Standards cost-effectiveness tests for DSM programs showed the EV pilot to be cost-effective overall based on the program assumptions at that time. EKPC is paying the annual cost of the third-party software platform that integrates with all types of EVs to measure hourly charging. With EKPC paying all of the \$0.02/kWh incentive in addition to the annual software cost, EKPC would be paying all of the program cost. The rigor of the California Tests Rate Impact Measure (RIM) highlighted the cost imbalance of EKPC versus the Owner-Members when EKPC paid all of the \$0.02/kWh incentive. As a result, EKPC's Owner-Members agreed to split the incentive cost to alleviate some of the cost imbalance. EKPC believes that some of the best promoters of EVs are the EV owners themselves. EKPC and its Owner-Members would like to continue promoting EVs by continuing to provide the \$0.02 per kWh incentive, which is believed to be a cost-effective promotion versus purchasing advertisements. EKPC agreed to support its Owner-Members by providing the full \$0.02 promotional cost since the RIM DSM test isn't applicable to a non-DSM program. If EKPC and its Owner-Members were to develop traditional promotional or advertisements for EVs, those would probably be developed by EKPC and fully funded by EKPC's budget. This change will cause no administrative changes for EKPC or its Owner-Members.

b. EKPC and its Owner-Members are utilizing a third-party data vendor platform for the current EV pilot program and for the proposed Rate EV. The data vendor connects to all participant EV's and collects hourly usage data. The data vendor then imports a monthly off-peak usage file into EKPC's incentive management platform. The incentive management platform communicates each monthly incentive to the owner-member cooperative to be placed on the participant's electric bill.

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REQUEST 3

RESPONSIBLE PARTY: Scott Drake

Request 3. Provide historical participant data for each Owner-Member that outlines the amount of credit to customers' bills on a monthly basis from the implementation of the program until the filing of the proposed tariff in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

Response 3. Please see attachments:

- *Staff DR1 Response 3 – 2023 Credits.xlsx*
- *Staff DR1 Response 3 – 2024 Credits.xlsx*
- *Staff DR1 Response 3 – 2025 Credits.xlsx*
- *Staff DR1 Response 3 – 2026 YTD Credits.xlsx*

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REQUEST 4

RESPONSIBLE PARTY: Scott Drake

Request 4. Refer to the proposed Rate REV tariff. Refer also to the current effective tariff, Tariff Sheet No. 35, Second Revised Sheet No. 55 and 56, DSM Pilot. Explain why EKPC proposed to shift the Residential Electric Vehicle Off-Peak Charging Program from a Demand-Side Management Program to a rate Adjustment Clause or Rider.

Response 4. In winter of 2026, EKPC used data collected in the pilot to conduct the California Standards Total Resource Cost (TRC) cost-effectiveness study for a permanent EV DSM program. The cost-effectiveness study resulted in a TRC of 0.28. The Commission has historically discontinued DSM programs that result in TRC scores less than 1.0 considering they are not cost-effective. As a result, EKPC could not propose moving forward with the EV program as a DSM program. Instead, EKPC proposed moving the program from DSM to an adjustment clause or rider considering the Commission has looked favorable upon DSM programs that have a potential to reduce power usage and reduce overall generation load while being a benefit to its customers. The EV industry will continue to grow and EKPC needs to continue to study the impacts of EV and its impacts on loads. EKPC could rely on industry studies to determine future

steps as EV usage grows and changes. However, EV charging habits and load shapes are different in a rural setting. Most of the EV studies and data available today are from urban settings. Thus, EKPC viewed keeping this program as an adjustment clause or rider as a very low-cost opportunity to continue its analysis and monitoring of EV home charging trends in EKPC's specific territory.