

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 SECOND INFORMATION REQUEST
TO EAST KENTUCKY POWER COOPERATIVE, INC.

DATED AUGUST 11, 2026

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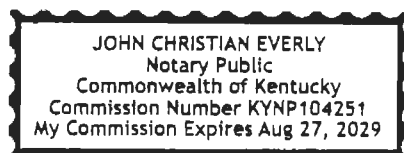
CERTIFICATE

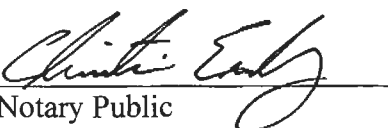
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Scott Drake, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to Staff's Second Request for Information in the above-referenced case dated August 11, 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 19th day of August, 2026.




Notary Public

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

STAFF'S REQUEST DATED AUGUST 11, 2026

REQUEST 1

RESPONSIBLE PARTY: Scott Drake

Request 1. Refer to EKPC's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1b. Provide the survey EKPC sent to the pilot participants. Also provide a summary of all response data, including the number of participants versus the number of respondents.

Response 1. The EV Pilot Program Evaluation was sent to 352 participants on October 27th, 2025. EKPC received 25 responses to the survey. Survey questions and responses are provided in attachment *Staff DR2 Response 1 – EV Pilot Program Evaluation*.

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STAFF'S REQUEST DATED AUGUST 11, 2026

REQUEST 2

RESPONSIBLE PARTY: Scott Drake

Request 2. Refer to EKPC's response to Staff's Second Request, Item 1d.

- a. Explain how the third option is most similar to an incentive calculated based on avoided energy and avoided capacity costs.
- b. Calculate and provide the incentive amount using 2025 calendar year program data utilizing a methodology similar to an avoided capacity and avoided energy based credit.

Response 2.

- a. In an active utility-managed charging style program, the utility typically has control over EV home charging and chooses when to allow charging (or limit) based on real-time avoided energy and capacity costs. This program style most effectively aligns with Question 7 Response 3 on the EV Program Pilot Evaluation. As noted in the survey results, the utility controlling when the EV is charged is very unpopular to EV owners.
- b. EKPC's avoided energy value of moving EV kWh consumption from on-peak hours to off-peak hours is best identified by using the on-peak versus off-peak energy rates of the EKPC Rate E Option 2 (E2), wholesale rate. The on-peak E2 energy rate is \$0.064644/kWh while

the off-peak E2 energy rate is \$0.055641/kWh. Thus, the avoided energy value is \$0.009003/kWh. EKPC's avoided demand value is best estimated from the PJM Base Residual Auction (BRA) value. The current year BRA is \$329.17/MW-day. The EV pilot program Measurement & Verification Study determined that the average demand shift from the PJM peak hour to off-peak is 0.231kW. That translates into a \$27.75 avoided demand value per EV per year. When that value is expressed in a per kWh value based on the annual average of 3,427kWh off-peak charging per EV, the avoided demand value is \$0.008098/kWh. Thus, the total avoided demand plus energy values is \$0.017101/kWh, which is similar to the \$0.02/kWh incentive.

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REQUEST 3

RESPONSIBLE PARTY: Scott Drake

Request 3. Refer to EKPC's response to Staff's Second Request, Item 3. The attachments appear to have not been entered into the record. Provide the responsive Excel attachments.

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 EKPC's response to Staff's Second Request, Item 2b. Identify the third-party data vendor platform that EKPC and its Owner-Members utilize for the current EV pilot program and briefly describe its operation.

Response 4. EKPC and its Owner-Member cooperatives are utilizing ev.energy as it's third-party data vendor platform for connecting to participating EVs. After receiving consent from participating EV owners, ev.energy connects to and gathers the EV's charging data coming from the vehicle itself. Ev.energy has proprietary calculations that they utilize to convert the vehicle charging data to kWh. At the end of each month, ev.energy provides a file of off-peak charging kWh for all participating vehicles that is uploaded into EKPC's energy efficiency collaborative platform (EECP). EKPC utilizes EECP to track and pay credits. EECP generates accounting reports for EKPC accounting and for each participating Owner-Member cooperative's accounting personnel. Those reports are provided to the Owner-Member cooperatives and then uploaded into their billing systems placing the credit on the EV participant's monthly bill.

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REQUEST 5

RESPONSIBLE PARTY: Scott Drake

Request 5. Refer to EKPC's response to Staff's Second Request, Item 2c. EKPC does not appear to have responded to this request. 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 5. EKPC has centralized the operation of the EV program and it gathers all charging data that is received from the third-party data vender. Off-peak charging data comes to EKPC first and then EKPC produces reporting that signals to the Owner-Member billing system to generate the EV bill credit on participant's monthly bill. Please reference response 4 (above) for a detailed overview of the process. The kWh data comes from the vehicles directly to EKPC and not from the revenue meter of the home.