

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE	)	
APPLICATION OF THE FUEL ADJUSTMENT	)	
CLAUSE OF EAST KENTUCKY POWER	)	CASE NO.
COOPERATIVE, INC. FROM NOVEMBER 1,	)	2026-00272
2024 THROUGH APRIL 30, 2025; MAY 1, 2025	)	
THROUGH OCTOBER 31, 2025; AND	)	
NOVEMBER 1, 2025 THROUGH APRIL 30, 2026	)	

RESPONSES TO STAFF’S FIRST INFORMATION REQUEST
TO EAST KENTUCKY POWER COOPERATIVE, INC.
DATED SEPTEMBER 29, 2026

In the Matter of:

CASE NO.
2026-00272

STATE OF KENTUCKY)
)
COUNTY OF CLARK)


Christopher E. Adams

Clinton Emery
Notary Public

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

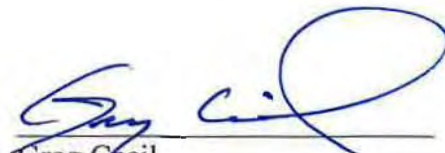
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CERTIFICATE

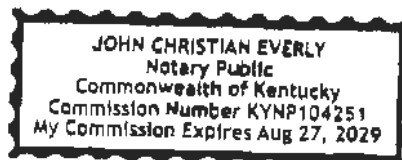
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Greg Cecil, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's First Request for Information in the above-referenced case dated September 29, 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.



Greg Cecil

Subscribed and sworn before me on this 20th day of October, 2026.





Notary Public

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

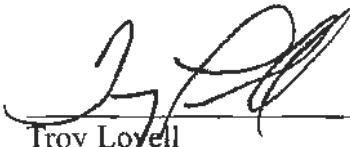
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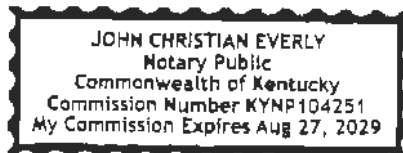
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Troy Lovell, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Commission Staff's First Request for Information in the above-referenced case dated September 29, 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.



Troy Lovell

Subscribed and sworn before me on this 21st day of October, 2026.





Notary Public

Clinton Emby
Notary Public

EAST KENTUCKY POWER COOPERATIVE, INC.
CASE NO. 2026-00272
FIRST REQUEST FOR INFORMATION RESPONSE

STAFF'S REQUEST DATED SEPTEMBER 29, 2026

REQUEST 1

RESPONSIBLE PARTY: Mark Horn

Request 1. For each of the three separate 6-month periods under review (November 1, 2024, through April 30, 2025; May 1, 2025, through October 31, 2025; and November 1, 2025, through April 30, 2026), provide the amount of coal purchased in tons and the percentage of purchases that were spot versus contract, separately.

Response 1. Please see attachment *Staff DRI Response 1 – Coal Purchases.pdf*.

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REQUEST 2

RESPONSIBLE PARTY: Mark Horn

Request 2. For each separate 6-month review period, list separately each coal purchase made under a long-term contract (one year or greater):

- a. Contract or purchase order number;
- b. Supplier's name;
- c. Location(s) of production facilities from which the coal is sourced;
- d. The method of delivery (i.e., barge, truck, rail, other);
- e. The actual quantity received; and
- f. Price paid per ton.

Response 2. Please see attachment *Staff DRI Response 2 – Long Term Coal Purchases.pdf*.

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REQUEST 3

RESPONSIBLE PARTY: Mark Horn

Request 3. As of the last day of each separate 6-month review period:

- a. State the coal inventory level in tons and in number of days' supply. Provide this information by generating station and in the aggregate.
- b. Describe the criteria used to determine number of days' supply.
- c. State the target coal inventory level for each generating station and for the total system.
- d. If actual coal inventory exceeds the target inventory by ten days' supply, state the reasons for the excess inventory.

Response 3.

- a. Please see table below:

Generating Station	4/30/25	10/31/25	4/30/26
Spurlock	490,733.44 Tons; 30 Days	618,318.09 Tons; 38 Days	489,554.61 Tons; 30 Days
Cooper	125,392.37 Tons; 35 Days	110,514.40 Tons; 30 Days	75,389.66 Tons; 21 Days
EKPC Aggregate	616,125.71 Tons; 31 Days	728,832.49 Tons; 37 Days	564,944.27 Tons; 28 Days

b. Number of days' supply is determined by actual tons in inventory divided by the total maximum daily usage for EKPC's generating units. This determines physical coal inventory in terms of days' supply at max burn. EKPC's physical coal inventory is typically stated as max burn. The same methodology applies to each generation station and in the system aggregate.

c. The Cooper Power Station inventory, being at 21 days at max burn, was under its target range of 25-60 days' supply, but was within the Board approved variance of a target range of 10-50 days' supply. The Board Policy has now set the Cooper coal inventory to a target 10-35 days' supply. The Spurlock Power Station was within its target range of 25-60 days' supply. EKPC's aggregate coal inventory for the system, as of April 30, 2026, was within its target range of 25-60 days' supply.

d. EKPC's coal inventory did not exceed its target inventory by ten days as of the last day of each review period.

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REQUEST 4

RESPONSIBLE PARTY: Mark Horn

Request 4. State whether any significant changes in the current coal inventory targets are expected within the next 12 months. If so, state the expected change and the reasons for this change.

Response 4. EKPC does not expect a significant change to any of its coal industry target within the next 12 months. However, as noted in response 3(c), Cooper Power Station's physical stockpile area has been decreased to provide space for construction of Unit No. 3 (new 2x1 Combined Cycle Gas Turbine). The lower limit was temporarily decreased to 10 days at maximum daily usage and the upper limit was temporarily decreased to 50 days at maximum daily usage in December 2025. Now that the actual capacity for the remaining physical stockpile area has been calculated by Engineering & Construction to be approximately 100,000 tons or 27.5 days, the temporary change for Cooper Power Station's target inventory range has been officially changed to 10-35 days in Board Policy No. 405 (Hedging). The physical coal inventories are expected to remain within the target ranges by generation station and in the system aggregate.

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REQUEST 5

RESPONSIBLE PARTY: Mark Horn

Request 5. For each separate 6-month review period, list each written coal supply solicitation issued during the period under review.

a. For each solicitation, provide the date of the solicitation; the type of solicitation (contract or spot); the quantities solicited; a general description of the quality of coal solicited; the period over which deliveries were requested; and the generating unit(s) for which the coal was intended.

b. For each solicitation, state the number of vendors to whom the solicitation was sent, the number of vendors who responded, and the selected vendor. Provide a bid tabulation sheet or corresponding document that ranks the proposals. (This document should identify all vendors who made offers.) State the reasons for each selection. For each lowest-cost bid not selected, explain why the bid was not selected.

Response 5a-b. Please see confidential attachment *Confidential Staff DRI Response 5 - Written Coal Solicitation.pdf* filed under seal pursuant to a motion for confidential treatment.

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REQUEST 6

RESPONSIBLE PARTY: Mark Horn

Request 6. For each separate 6-month review period, list each oral coal supply solicitation issued during the period under review.

a. For each solicitation, provide the date of the solicitation; the type of solicitation (contract or spot); the quantities solicited; a general description of the quality of coal solicited; the period over which deliveries were requested; and the generating unit(s) for which the coal was intended.

b. For each solicitation, state the number of vendors to whom the solicitation was sent, the number of vendors who responded, and the selected vendor. Provide a bid tabulation sheet or corresponding document that ranks the proposals. (This document should identify all vendors who made offers.) State the reasons for each selection. For each lowest-cost bid not selected, explain why the bid was not selected.

Response 6a-b. See confidential attachment *Confidential Staff DRI Response 6 - Oral Coal Solicitation.pdf* filed under seal pursuant to a motion for confidential treatment.

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REQUEST 7

RESPONSIBLE PARTY: Mark Horn

Request 7. For each separate 6-month review period, list each vendor from whom natural gas was purchased for generation and the quantities and the nature of each purchase (i.e., spot or contract).

Response 7. Please see attachment *Staff DRI Response 7 - Natural Gas Purchases.pdf*.

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REQUEST 8

RESPONSIBLE PARTY: Mark Horn

Request 8. For each separate 6-month review period, state whether there were any instances in which a natural gas generating unit could not be operated when it otherwise would have run or was derated due to pipeline constraints or natural gas being unavailable.

Response 8. During the review period of November 1, 2024 through April 30, 2025 and May 1, 2025 through October 31, 2025, there were no instances in which a natural gas unit could not be operated due to pipeline constraints or natural gas being unavailable. However, during the review period of November 1, 2025 through April 30, 2026, on Friday, January 30, 2026, PJM Interconnection LLC ("PJM") requested Bluegrass Generating Station to come online for RT Economics at around 6:50 pm. In cooperation with ACES Power Marketing LLC ("ACES"), natural gas was attempted to be sourced, but was unavailable for purchase during that late evening cycle. Due to large volumes of natural gas being utilized during Winter Storm Fern across the region, capacity during this late evening cycle was unavailable to meet EKPC's required need for this time frame. EKPC complied with its dispatch obligation in PJM by fuel switching and running

on fuel oil. No non-performance penalties were incurred because the contingency plan to utilize the back-up fuel was successful. During all other instances during this review time period, no issues were encountered from a natural gas unit not being able to operate due to pipeline constraints or natural gas being unavailable

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REQUEST 9

RESPONSIBLE PARTY: Mark Horn

Request 9. For each separate 6-month review period, state whether there have been any changes to hedging activities for coal or natural gas purchases used for generation since the most recent previous Fuel Adjustment Clause (FAC) review proceeding. If so, describe the changes in detail.

Response 9. There were no changes to hedging activities for coal or natural gas purchases used for generation since the previous FAC review proceeding. For natural gas, EKPC executed conservative forward physical natural gas hedges during the review periods to mitigate potential natural gas price volatility during winter months of December 2024, January 2025, February 2025, November 2025, December 2025, January 2026, and February 2026 and also the months of March 2025, April 2025, March 2026, and April 2026 to cover the spring outage seasons in PJM.

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REQUEST 10

RESPONSIBLE PARTY: Mark Horn

Request 10. For each separate 6-month review period, state whether EKPC has audited any of its fuel or transportation contracts during the period under review. If so, for each audited contract:

- a. Identify the contract;
- b. Identify the auditor;
- c. State the results of the audit; and
- d. Describe the actions that EKPC took as a result of the audit.

Response 10. No contracts were audited for the period under review.

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REQUEST 11

RESPONSIBLE PARTY: Mark Horn

Request 11. For each separate 6-month review period, state whether EKPC is currently involved in any litigation with its current or former fuel suppliers or transportation vendors.

- a. If so, for each litigation:
 - 1) Identify the supplier or vendor;
 - 2) Identify the contract involved;
 - 3) State the potential liability or recovery to EKPC;
 - 4) List the issues presented; and
 - 5) Provide a copy of the complaint or other legal pleading that initiated the litigation and any answers or counterclaims. If a copy has previously been filed with the Commission, provide the date on which it was filed and the case in which it was filed.
- b. Identify and provide the current status of all litigation with suppliers or vendors.

Response 11a-b. EKPC is not currently involved in any litigation with its current or former fuel suppliers or transportation vendors.

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REQUEST 12

RESPONSIBLE PARTY: Mark Horn

Request 12. For each separate 6-month review period, state whether there have been any changes to EKPC's written policies and procedures regarding its fuel procurement.

a. If yes:

- 1) Describe the changes;
- 2) Provide the written policies and procedures as changed;
- 3) State the date(s) the changes were made; and
- 4) Explain why the changes were made.

b. If no, provide the date EKPC's current fuel procurement policies and procedures were last changed, provide the date when they were last provided to the Commission, and identify the proceeding in which they were provided. If any current fuel procurement policies and procedures have not been provided to the Commission, provide those fuel procurement policies and procedures and explain why they were not previously provided.

Response 12. EKPC updated the Fuel & Emissions Department Procurement Manual ("Manual") and the Fuel & Emissions Department Strategy ("Strategy") on January 7, 2025. The

procedure pertaining to fuel oil within the Manual was updated to reflect title changes, revise the operational gallon capacity for each fuel oil tank, and add clarification on minimum inventory amounts necessary to meet backup fuel oil inventory assurances with PJM. Additionally, the Strategy was updated to align with the Manual revisions as stated above. On January 28, 2025, EKPC updated Administrative Policy No. A031, Internal Delegation of Authority, to reflect a change in the delegation of authority for renewable environmental credits (“RECs”). Effectively replacing the Director, Power Supply Planning with Director, Fuel & Emissions. Board Policy No. 404, Transaction Authority Limits for Energy and Energy Related Commodities and Transportation and Board Policy No. 405, Hedging, were both updated on February 11, 2025. Board Policy No. 404 was revised to increase the per transaction limits for lime and limestone defined in the Lime & Limestone Transaction Authority matrix. Board Policy No. 405 was revised to increase the coal inventory range at Spurlock Power Station. Administrative Policy No. A031 was revised on March 2, 2025, to correlate with the changes to Board Policy No. 404 as stated above, along with updates to bilateral capacity, coal volume, and current market proposals. On November 6, 2025, the Fuel & Emissions Department Manual and Strategy was updated during the department’s annual review. Language was inserted into existing procurement procedures relating to opportunities for improvement and further clarification. Additionally, procedures pertaining to RECs were added to the Manual. Minor grammatical revisions were made to the Strategy, along with clarification pertaining to Natural Gas Hedging. The changes made in the documents mentioned above are shown in confidential attachment *Confidential Staff DRI Response 12 - F&E Procurement Manual Amendment.pdf* under seal pursuant to a motion for confidential treatment.

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REQUEST 13

RESPONSIBLE PARTY: Christopher E. Adams

Request 13. For each separate 6-month review period, list all firm power commitments for (a) purchases and (b) sales. This list shall identify the electric utility, the amount of commitment in megawatts, and the purpose of the commitment (i.e., peaking, emergency).

Response 13.

a. Please see the table below for the purchases made during the review periods:

Utility	Volume	Purpose	Term
SEPA	Up to 170 MW	Energy	07/01/1998 – Indefinite ¹
Brookfield Renewable Trading and Marketing L.P.	Up to 417.5 MW	Energy	12/28/2023 – 12/31/2025
Constellation Energy Generation, LLC	100 MW	Energy	1/1/2026 – 12/31/2026
Constellation Energy Generation, LLC	100 MW	Energy	1/1/2026 – 12/31/2026

b. EKPC did not make any firm power commitment sales during the review periods.

¹ The contract is on-going until one party gives notice three years in advance of the date that it wishes to end the contract. No notices have been filed by either Party.

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REQUEST 14

RESPONSIBLE PARTY: Veronica Norwood

Request 14. For each separate 6-month review period, provide a monthly billing summary of sales to all electric utilities for the period under review.

Response 14. Please see attachment *Staff DRI Response 14 – Nov. 1, 2024 through Apr. 30, 2025.pdf* pages 1 through 48 for sales to EKPC's Owner-Member Cooperatives and pages 49 through 54 for off-system sales for the period of November 1, 2024 through April 30, 2025.

 Please see attachment *Staff DRI Response 14 – May 1, 2025 through Oct. 31, 2025.pdf* pages 1 through 48 for sales to EKPC's Owner-Member Cooperatives and pages 49 through 54 for off-system sales for the period of May 1, 2025 through October 31, 2025.

 Please see attachment *Staff DRI Response 14 – Nov. 1, 2025 through Apr. 30, 2026.pdf* pages 1 through 48 for sales to EKPC's Owner-Member Cooperatives and pages 49 through 54 for off-system sales for the period of November 1, 2025 through April 30, 2026.

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REQUEST 15

RESPONSIBLE PARTY: Christopher E. Adams

Request 15. For each separate 6-month review period, describe the effect on the FAC calculation of line losses related to:

- a. Intersystem sales when using a third-party transmission system; and
- b. Intersystem sales when not using a third-party transmission system.

Response 15.

- a. There is no effect on line loss.
- b. There is no effect on line loss.

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REQUEST 16

RESPONSIBLE PARTY: **Troy Lovell**

Request 16. For each separate 6-month review period, provide a list, in chronological order, showing by unit any scheduled, actual, and forced outages for the period under review.

Response 16. Please see attachment *Staff DRI Response 16 – Outages.pdf*.

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REQUEST 17

RESPONSIBLE PARTY: Veronica Norwood

Request 17. For each separate 6-month review period, provide the monthly supporting peaking unit equivalent calculations in electronic Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible for the forced outage calculations. In addition, provide the corresponding amount, if any, of forced outage purchased power collected through the purchase power adjustment tariff.

Response 17. EKPC does not have a peaking unit equivalent calculation in its FAC and EKPC does not have a purchase power adjustment tariff to recover forced outage purchased power.

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REQUEST 18

RESPONSIBLE PARTY: **Troy Lovell**

Request 18. For each separate 6-month review period, provide the monthly capacity factor at which each generating unit operated.

Response 18. Please see attachment *Staff DRI Response 18 – Capacity Factors.pdf*.

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REQUEST 19

RESPONSIBLE PARTY: Troy Lovell

Request 19. For each separate 6-month review period, explain whether EKPC made any changes to its maintenance and operation practices or completed any specific generation efficiency improvements that affect fuel usage at EKPC's generation facilities. If so, describe the impact of these changes on EKPC's fuel usage.

Response 19. EKPC made no changes to its maintenance and operation practices that affect fuel usage at any of its generation facilities during any of the periods under review.

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REQUEST 20

RESPONSIBLE PARTY: Mark Horn

Request 20. For each separate 6-month review period, state whether EKPC is aware of any violations of its policies and procedures regarding fuel procurement that occurred prior to or during the period under review.

Response 20. EKPC is not aware of any violations of its policies and procedures regarding fuel procurement.

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REQUEST 21

RESPONSIBLE PARTY: Greg Cecil

Request 21. For each separate 6-month review period, state whether EKPC is aware of any violations of 807 KAR 5:056 that occurred prior to or during the period under review.

Response 21. EKPC is not aware of any willful violations of 807 KAR 5:087.

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REQUEST 22

RESPONSIBLE PARTY: Greg Cecil

Request 22. For each separate 6-month review period, confirm that all fuel contracts related to commodity and transportation have been filed with the Commission. If unable to confirm, identify all contracts that have not been filed, explain why they have not been filed, and provide a copy.

Response 22. Confirmed.

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REQUEST 23

RESPONSIBLE PARTY: Veronica Norwood

Request 23. For each separate 6-month review period, identify any customers, either by class of customer or pursuant to special contract, that are not billed a FAC charge.

- a. For each customer that is not billed the FAC charge, explain how the fuel and power costs of serving that customer are recovered.
- b. Explain in detail whether those fuel procurement and purchase power costs of serving those customers are excluded from the expense month FAC calculation.

Response 23. Two Special Industrial Power Agreements with Tennessee Gas Pipeline Company, LLC ("TGP") to serve pipeline compressor stations located in the territories of EKPC Owner-Member Cooperatives are not billed a FAC charge. It should also be noted that a FAC charge is not applied to certain aspects of billed kWh based upon the provisions contained within the below listed rates and industrial power agreements (IPA).

Rates B, C, and G – These rates have monthly minimum energy billing requirements. When energy is billed at the minimum kWh level, the FAC charge is limited to actual kWh usage.

Rate D (Interruptible Service) – As outlined in the associated three-party IPAs approved by the Commission, customers electing to participate in the Rate D, Interruptible Service Rider, have the opportunity to purchase or “buy-through” power during economic interruptions and pay for such energy at the PJM EKPC zone price during the interruption hours.

a. TGP – The pricing structure within these contracts enables the costs of energy purchases and fuel used to serve the pumping stations to be recovered directly from TGP. Accordingly, no FAC is charged on their respective Bills.

Rates B, C and G – The additional kWh billed to meet minimum requirements is not charged the FAC given no fuel or purchased power was used.

Rate D (Interruptible Service) – The costs of the buy-through power is recovered directly, as stipulated in the IPA. FAC is not applied to buy through energy as the energy and fuel costs associated with the energy purchases, is recovered directly.

b. TGP – All fuel procurement and purchase power costs serving the two special contracts with TGP have been excluded from the expense month FAC calculation.

Rates B, C, and G – Minimum billed energy is excluded from the expense month FAC calculation.

Rate D (Interruptible Service) – Buy-through power is excluded from EKPC’s FAC calculation.

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REQUEST 24

RESPONSIBLE PARTY: Veronica Norwood

Request 24. For each separate 6-month review period, if any customer class or special contract has or is not being charged a FAC, state the date when the FAC ceased being charged.

Response 24. The provisions of the Special Industrial Agreements Rates, and Industrial Power Agreements as described in Response 23 have been long-standing at EKPC. While it is difficult to determine when the provisions were first enacted, they have been in place for over 10 years. In fact, the Special Industrial Agreements have been in effect since September 2000.