

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF EAST KENTUCKY POWER)	2020-00246
COOPERATIVE, INC. FROM NOVEMBER 1, 2019)	
THROUGH APRIL 30, 2020)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO EAST KENTUCKY POWER COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc. (EKPC), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due within 14 days from the date of this request. The Commission directs EKPC to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085,¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

EKPC shall make timely amendment to any prior response if EKPC obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which EKPC fails or refuses to furnish all or part of the requested information, EKPC shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, EKPC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to EKPC's response to Commission Staff's First Request for Information (Staff's First Request), Item 3, Attachment 1d. Provide for each EKPC generating unit by month the number of hours each unit ran and the number of hours that the unit's cost bid into the PJM energy markets (day ahead and spot) was at or below the PJM Zonal Locational Marginal Price (LMP).

2. Refer to EKPC's response to Staff's First Request, Item 5, page 2 of 2. Provide an update of the Cooper station coal test purchases and the results of those tests. Be sure to include any changes since the April 16, 2019 hearing in Case No. 2019-00003¹ and from Case No. 2020-00005.²

3. Refer to EKPC's response to Staff's First Request, Item 9. Explain whether EKPC conducts any on-site reviews and inspections of mining operations, scales, and sampling systems and whether it has uncovered or corrected any issues with fuel suppliers or transportation providers.

4. Refer to EKPC's response to Staff's First Request, Item 15, page 6 of 56. The chart shows Unit 003 as having three forced outages and a status of Maintenance.

a. Explain the difference between the two classifications and what "Maintenance" means in this instance.

b. Explain how far in advance EKPC must provide notification that maintenance is going to be scheduled.

5. Refer to EKPC's response to Staff's First Request, Item 15, page 17 of 56 and page 18 of 56. Explain the "Transmission Constraints" experienced by Bluegrass Station Unit 001 and Unit 002 that lead to the forced outage in November 2019.

6. Refer to EKPC's response to Staff's First Request, Item 15, page 20 of 56. The Green Valley Landfill generator had a forced outage on November 8, 2019, for approximately 59 hours. In that instance and similar instances with the other landfill

¹ Case No. 2019-00003, *Electronic Examination of the Application of the Fuel Adjustment Clause of East Kentucky Power Cooperative, Inc. from November 1, 2016 through October 31, 2018*, Hearing Video Transcript of the April 16, 2019 Hearing, 09:40:34.

² Case No. 2020-00005, *An Electronic Examination of the Application of the Fuel Adjustment Clause of East Kentucky Power Cooperative, Inc. From May 1, 2019 through October 31, 2019* (filed April 16, 2020), EKPC's response to Commission Staff's Second Request for Information, Item 2.

generators, confirm if EKPC has to purchase energy to make up the small loss, and then, depending on the price, exclude a portion of the price from the fuel adjustment clause.

7. Refer to EKPC's response to Staff's First Request, Item 16. Explain how a generation unit can have a negative capacity factor.

8. Explain whether the Black Lung Disability Trust Fund Excise Tax has affected any existing fuel contracts for EKPC for the period under review through 2020.



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DATED OCT 09 2020

cc: Parties of Record

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