

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. OF AN)	
AMENDMENT TO AN INDUSTRIAL POWER)	
AGREEMENT WITH INTERRUPTIBLE SERVICE)	CASE NO.
BETWEEN EAST KENTUCKY POWER)	2020-00317
COOPERATIVE, INC., OWEN ELECTRIC)	
CORPORATION, INC. AND NUCOR STEEL)	
GALLATIN, LLC F/K/A GALLATIN STEEL)	
COMPANY)	

ORDER

On July 14, 2020, East Kentucky Power Cooperative, Inc. (EKPC) filed, through the Commission's electronic Tariff Filing System, the Third Amendment to the Industrial Power Agreement with Interruptible Service (Amendment) between EKPC, Owen Electric Cooperative, Inc. (Owen Electric), and Nucor Gallatin Steel, LLC f/k/a Gallatin Steel Company (Nucor). EKPC proposed an effective date of October 1, 2020. EKPC responded to one request for information on August 7, 2020. That response is attached to this Order as the Attachment, and it will be included in the evidentiary record on this matter.¹

KRS 278.030 provides that a utility may collect fair, just, and reasonable rates and that the service it provides must be adequate, efficient, and reasonable. Also, 807 KAR 5:011, Section 13, requires a utility to file with the Commission a copy of any special

¹ EKPC's response contained two Excel spreadsheets. The worksheets of the Excel spreadsheet relating to Item 2 of Staff's Request for Information (Staff's Request) are included in the Attachment to this Order. The Excel spreadsheet relating to Item 4 of Staff's Request was filed under a request for confidential treatment and no public version was filed.

contracts containing rates, charges, or conditions of service not set forth in its tariff. Having considered the proposed Amendment and being otherwise sufficiently advised, the Commission finds that an investigation will be necessary to determine the reasonableness of the proposed Amendment and that such an investigation cannot be completed by October 1, 2020. Pursuant to KRS 278.190, the Commission will, therefore, suspend the effective date of the proposed Amendment for five months, up to and including February 28, 2021.

The Commission finds that within seven days of the date of entry of this Order, EKPC should have its counsel enter an appearance into this proceeding that contains the name, address, telephone number, fax number, and electronic mail address of counsel.

The Commission further finds that within seven days of the date of entry of this Order, EKPC should file a public version of the Excel spreadsheet filed in response to Item 4 of Staff's Request.

As 807 KAR 5:001, Section 8, permits the Commission to direct the use of electronic filing procedures for proceedings that we initiate on our own motion, we find that electronic filing procedures should be used. As such, EKPC should follow the procedures set forth in 807 KAR 5:001, Section 8, when filing any document or paper in this matter. The Commission directs EKPC to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085² regarding filings with the Commission.

² 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.

The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency.

The Commission further finds that a procedural schedule should be established to review the reasonableness of the Amendment. The procedural schedule is attached hereto as an Appendix to this Order and is incorporated herein.

IT IS THEREFORE ORDERED that:

1. This proceeding is established to investigate the reasonableness of the proposed Amendment.

2. EKPC's proposed Amendment is suspended for five months from October 1, 2020, up to and including February 28, 2021.

3. Any interested party may, by counsel, file a motion to intervene no later than October 12, 2020.

4. EKPC shall, by counsel, enter an appearance in this proceeding within seven days of the date of entry of this Order. The entry of appearance shall include the name, address, telephone number, fax number, and electronic mail address of counsel.

5. EKPC shall, within seven days of the date of entry of this Order, file a public version of the Excel spreadsheet filed in response to Item 4 of Staff's Request.

6. Unless otherwise ordered by the Commission, the procedures set forth in 807 KAR 5:001, Section 8, related to service and electronic filing of papers shall be followed in this proceeding.

7. Pursuant to 807 KAR 5:011, Section 8(9), within seven days of entry of this Order, EKPC shall file by electronic means a written statement that it waives any right to service of Commission orders by United States mail and that it or its authorized agents

possesses the facilities to receive electronic submissions. The paper original shall be filed within 30 days of the ending of the current state of emergency caused by COVID-19.

8. Unless a party granted leave to intervene states its objection to the use of electronic filing procedures in a motion for intervention, the party shall:

a. Be deemed to have consented to the use of electronic filing procedures and the service of all papers, including Orders of the Commission, by electronic means; and

b. Within seven days of the date of entry of an Order of the Commission, granting intervention, file with the Commission a written statement that:

(1) It, or its authorized agent possesses the facilities to receive electronic transmissions; and

(2) Sets forth the electronic mail address to which all electronic notices and messages related to this proceeding should be served.

9. If a party objects to the use of electronic filing procedures and the Commission determines that good cause exists to excuse that party from the use of electronic filing procedures, service of documents on that party and by that party shall be made in accordance with 807 KAR 5:001, Section 4(8).

10. The procedural schedule set forth in the Appendix to this Order shall be followed.

11. a. Responses to requests for information 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.

The paper original shall be filed within 30 days of the ending of the current state of emergency caused by COVID-19.

b. Each response shall include the name of the witness responsible for responding to the questions related to the information provided and shall be answered under oath or, for representatives of a public or private corporation or a partnership or an association or a governmental agency, be accompanied by a signed certification of the preparer or 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.

c. A party shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect.

d. For any request to which a party fails or refuses to furnish all or part of the requested information, that party shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

e. Careful attention should 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.

f. Any party filing a paper containing personal information shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that the personal information cannot be read.

12. As set forth in 807 KAR 5:001, Section 4(11)(a), a person requesting permissive intervention in a Commission proceeding is required to demonstrate either (1) a special interest in the proceeding which is not adequately represented in the case, or (2) that the person requesting permissive intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. Further, KRS 278.040(2) requires that a person seeking intervention must have an interest in the rates or service of a utility, as those are the only matters that are subject to the Commission's jurisdiction. Therefore, any person requesting to intervene in a Commission proceeding must state with specificity the person's special interest that is not otherwise adequately represented, or the issues and facts that the person will present that will assist the Commission in fully considering the matter. A mere recitation of the quantity of utility service consumed by the movant or a general statement regarding the potential impact of possible modification of rates will not be deemed sufficient to establish a special interest. In addition, any motion to intervene after the date established in the procedural schedule shall also show good cause for being untimely. If the untimely motion is granted, the movant shall accept and abide by the existing procedural schedule.

13. EKPC shall give notice of the hearing in accordance with the provisions set forth in 807 KAR 5:001, Section 9(2). In addition, the notice of the hearing shall include the following statements: "This hearing will be streamed live and may be viewed on the PSC website, psc.ky.gov" and "Public comments may be made at the beginning of the hearing. Those wishing to make oral public comments may do so by following the

instructions listed on the PSC website, psc.ky.gov.” At the time publication is requested, EKPC shall forward a duplicate of the notice and request to the Commission.

14. At any public hearing in this matter, neither opening statements nor summarization of direct testimonies shall be permitted.

15. Pursuant to KRS 278.360 and 807 KAR 5:001, Section 9(9), a digital video recording shall be made of the hearing.

16. The Commission does not look favorably upon motions of continuance. Accordingly, motions for extensions of time with respect to the schedule herein shall be made in writing and will be granted only upon a showing of good cause.

17. Nothing contained herein shall prevent the Commission from entering further Orders in this matter.

By the Commission



ATTEST:



Acting Executive Director

ATTACHMENT

ATTACHMENT TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2020-00317 DATED SEP 29 2020

[TEN PAGES TO FOLLOW]



A Touchstone Energy[®] Cooperative 

August 7, 2020

Mr. Kent A. Chandler
Acting Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: East Kentucky Power/Owen Electric Cooperative/Nucor Steel Gallatin Amendment of Special Contract - Original Filing No. TFS2013-00425 *Industrial Power Agreement with Interruptible Service dated April 30, 2013*

Dear Mr. Chandler:

On behalf of East Kentucky Power Cooperative, Inc. ("EKPC"), please find enclosed and accept for filing EKPC's responses to the Commission Staff Questions dated July 23, 2020.

Included with the response to Staff Question #4 is the requested Excel spreadsheet that demonstrates the variable costs to serve Nucor's expanded load and the expected revenue for each year of the contract term. This spreadsheet response is labeled "Confidential." This analysis includes the proposed bill discounts that EKPC previously requested confidential treatment at the time the Third Amendment to the Industrial Power Agreement with Interruptible Service ("Third Amendment") was submitted on July 14, 2020. In addition, the variable costs contained in the analysis are based on projections that are sensitive in nature and for which EKPC requests confidential treatment. The variable costs include projections for PJM administration charges, PJM capacity charges, PJM NITS charges, PJM day-ahead energy charges, and PJM RTEP charges.

In accordance with KRS 61.878, 807 KAR 5:001, Section 13(3) and other applicable law, EKPC hereby respectfully requests that the bill discounts contained in the Third Amendment and the variable costs be classified as confidential for a period of ten (10) years from the date of this filing for the specific reasons set forth below. The Kentucky Open Records Act exempts from disclosure certain commercial information. See KRS 61.878(1)(c). To qualify for this exemption from public disclosure and, therefore, to maintain the confidentiality of the information, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors of that party. Public disclosure of the specific terms of the bill discount provided for in the Third Amendment and the variable costs (the "Confidential Information") would, in fact, prompt such results.

4775 Lexington Road, POB 707
Winchester, KY 40392
859-744-4812

The Confidential Information is commercially sensitive, retained by EKPC on a "need-to-know" basis, and not publicly available. If disclosed, the Confidential Information would give potential competitors of EKPC and Owen a tremendous advantage in the course of ongoing and future negotiations to attract and secure new or expanded load in their service territory. Disclosure would also give participants in the broader commercial market a material, unfair advantage in relations with EKPC as a result of knowing its special pricing strategies, variable cost expectations, and business-sensitive decisions. These market advantages would likely translate into higher costs for EKPC and Owen and, by extension, detrimentally higher rates for their customers.

Maintaining the confidentiality of the Confidential Information is necessary to protect the economic interests of EKPC, Owen, and the remainder of EKPC's Owner-Member Cooperatives. Indeed, EKPC derives economic value from the Confidential Information based on its confidentiality since competitors and entities with whom EKPC transacts business could obtain economic value by its disclosure. The public disclosure of the contract-specific bill discount and variable costs would reveal information that is, quite obviously, highly sensitive, commercially valuable and strictly proprietary - and thus its release could significantly harm EKPC's competitive position in the marketplace. Because the Confidential Information is critical to EKPC's effective execution of business decisions and strategy, treating the information confidentially is also consistent with the Kentucky Supreme Court's determination that, "information concerning the inner workings of a corporation is 'generally accepted as confidential or proprietary.'" *Hoy v. Kentucky Industrial Revitalization Authority*, 907 S.W.2d 766, 768 (Ky. 1995).

Consistent with 807 KAR 5:001, Section 13(3) and directives of Commission Staff, accompanying this letter as part of EKPC's electronic submission EKPC hereby electronically files its Responses to Staff's Questions and respectfully requests confidential treatment of the Confidential Information submitted herein in accordance with its arguments set forth above and requests that the confidential version not be posted on the Commission website. Pursuant to the Commission's March 24, 2020 Order in Case No. 2020-00085, EKPC is submitting the confidential material to the Commission via an email to PSCED@ky.gov with a read receipt.

Please contact me if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. Cowden", written in a cursive style.

Roger R. Cowden
Counsel

Commission Staff Requests dated July 23, 2020

REQUEST 1. Explain why EKPC did not structure this special contract under its Economic Development Rider tariff.

RESPONSE 1. The Nucor Steel Gallatin (“Nucor”) melting and casting operation expansion (“expansion”) will increase the annual capacity of the plant from 1.6 million tons of manufactured coiled sheet metal to over 3 million tons. The expansion will result in 195 MWs of new load to Owen and EKPC, \$650 million of new plant investment and 75 new jobs in Gallatin County. The mill currently has approximately 465 employees. The Nucor expansion represents a significant investment in Kentucky by Nucor.

Nucor, like many organizations, recognizes that investment capital is a constrained resource and relies on a capital allocation process that reviews and determines which projects creates the best internal rate of return for Nucor shareholders. Different business units within Nucor essentially compete for capital for expansions at existing plants, development of new plant or purchase of competitors’ plants.

The Nucor plant has proven that it can and will interrupt its operations as directed by EKPC in accordance with the Owen and EKPC interruptible tariffs. The expansion at Nucor will be able to interrupt in the same manner as the existing plant operation does. Nucor receives an interruptible credit against its demand charge such that the demand charge for the melting operation is reduced to \$0.70/kW month. Application of the EDR tariff to the reduced demand charge produces a very modest reduction in Nucor’s power expenses and Nucor, Owen and EKPC were concerned that the proposed expansion would not be realized in the Nucor capital allocation process. Accordingly, EKPC proposed to use a similar rate structure that was used to attract the galvanizing line expansion to the Nucor campus.

In the galvanizing line expansion, Nucor received a similar \$kWh energy credit that diminished over 5 years with a 10-year contract term. The credit for the new expanded melting and casting operation is comparable to the previous galvanizing line expansion credit but it is spread across the entire melting and casting operation load as opposed to just the new expansion load. This ensures that there is no benefit to move operations away from the existing operation to the new operation. The 3-month rolling average of the new expansion and existing melting and casting operation must exceed 1.5 times the 2017 monthly average energy usage or the discount will be suspended. These provisions were drafted to assure that Nucor brought new load and jobs in order to receive the energy discount.

Nucor, Owen and EKPC operate in accordance with the terms of the 2013 Industrial Power Agreement with Interruptible Service. The term of the 2013 Agreement reached the evergreen provisions as of December 1, 2015 and either party could give 12 months notice to terminate the 2013 Agreement. As part of the negotiations for the proposed amendment to that 2013 Agreement that is before the Commission herein, Nucor, Owen and EKPC agreed that the term of the 2013 Agreement would be extended for 10 years. The proposed amendment captures both existing and expansion load for an additional 10 year term. Nucor requested, and Owen and EKPC were agreeable, to adding a 6th year to the discount period. Having the existing and expansion load on the same contract schedule will simplify current contract management and future contract negotiations.

REQUEST 2. Explain whether EKPC has adequate capacity to meet anticipated load growth each year of the contract term. Provide load and capacity projections for each year of the contract term in Excel spreadsheet format with all rows and column accessible and formulas intact.

RESPONSE 2. EKPC has more than adequate capacity reserves to meet its summer peak load obligation. PJM capacity expenses are based on summer peak load obligations. EKPC begins to be short on winter capacity reserves in the 2026 time frame. The impact of the 15 MW of firm load from the additional Nucor load has a minimal impact on the amount of winter reserves available to serve existing EKPC load. PJM has more than adequate reserve margins in the winter peak load season. EKPC would expect to be able to make an economic seasonal purchase to adequately cover its load. The 15 MW Nucor firm load is charged at EKPC's standard tariff rates and is not receiving a reduced rate incentive. Please see the attached Excel spreadsheet "Response 2 – Nucor – Projected Reserve Margins.xlsx" for the requested load and capacity projections.

REQUEST 3. Explain whether Nucor's expansion will require customer specific fixed costs. If so, provide the total projected fixed costs.

RESPONSE 3. EKPC will install additional metering and telemetry equipment required due to the expansion. The estimated total costs of the equipment and labor required for these installations is \$60,000. No other transmission and/or distribution equipment modifications are necessary due to the expansion.

REQUEST 4. Confirm that the discounted rate will cover EKPC's variable costs to serve the expanded load and make a contribution towards fixed costs. Provide a schedule that demonstrates the variable costs to serve Nucor's expanded load and the expected revenue for each year of the contract term in Excel spreadsheet format with all rows and column accessible and formulas intact.

RESPONSE 4. Please see the attached Excel spreadsheet "Response 4 – Confidential – Nucor Analysis.xlsx", which is subject to a request for confidential treatment. As shown in the marginal analysis included in the spreadsheet, EKPC confirms that the discounted rate will cover EKPC's variable costs to serve the expanded load and make a contribution towards fixed costs. EKPC notes that the marginal analysis shows the variable costs are not covered in the off-peak period in the 9th and 10th years. The discounted energy rate is not a factor in this part of the analysis. In the 9th year, the on-peak positive margin is greater than the off-peak deficit, for a net positive margin, or that annually the costs are covered. In the 10th year, the on-peak positive margin nearly offsets the off-peak deficit. For the entire 10-year period the marginal analysis shows the variable costs being covered.

REQUEST 5. Explain why a discount period of 6 years is appropriate, including a discussion of the reasonableness of a discounted period that is more than half of the total contract term.

RESPONSE 5. Please see the response to Request No. 1.

REQUEST 6. Explain whether EKPC considered including contract terms related to situation in which EKPC no longer has adequate reserve to meet anticipated load growth.

RESPONSE 6. The Nucor expansion contributes only 15 MW of load that EKPC must plan for. The balance of the Nucor expansion is interruptible load and EKPC will not plan or develop resources to serve this load. EKPC can shut down the Nucor interruptible load under peak / emergency conditions. In exchange for the ability to interrupt the service, the load is given a rate

incentive. EKPC currently has adequate capacity to take on the 15 MWs of firm load from the Nucor expansion without needing additional resources.

The Nucor expansion will not impact EKPC in the PJM market because EKPC can offer the interruptible portion of the load into the PJM Reliability Pricing Model (capacity market) as a Demand Response (“DR”) resource. The revenue EKPC receives from offering the interruptible attributes of the Nucor expansion load in the DR market will offset the additional load expense in the capacity auction. The 15 MWs of firm load will be incremental load in the PJM capacity market but Nucor will be paying the standard tariff demand rate for that load.

REQUEST 7. Explain how EKPC determined the per kWh discount for each year.

RESPONSE 7. As described in the response to Request No. 1, EKPC proposed the structure to be comparable to the structure used to attract the galvanizing line expansion which was approved by the Commission in 2017. Nucor put some of the expansion credit at risk when it agreed to spread it over the existing and expansion melting and casting load. If the rolled steel orders Nucor expects do not materialize, it will not receive the benefits it expected. In recognition of this potential shortfall and the significant increase in capital investment over the galvanizing and pickling line, EKPC increased the energy discount slightly above what was offered for the galvanizing and pickling line.

REQUEST 8. Explain the process and expected timeline for any necessary amendments to the Network Integration Transmission Service Agreement between LG&E/KU and EKPC.

RESPONSE 8. EKPC submitted a request for additional Network Integration Transmission Service (“NITS”) for the increased load at the Nucor facility to LG&E/KU on September 28, 2018. The LG&E/KU Independent Transmission Operator – TranServ International (“TranServ”) – issued a report documenting the results of its System Impact Study for this request on December 18, 2018. The report identified one potential constraint for the NITS request on an LG&E/KU 138 kV facility, with an estimated mitigation cost of \$10,000. EKPC then entered into a Facilities Study Agreement with TranServ and LG&E/KU to perform preliminary engineering activities related to this needed upgrade. The Facilities Study report was issued to EKPC on February 25, 2019 indicating that the constrained equipment could be upgraded in sufficient time to allow the requested incremental transmission service. The report further indicated that EKPC would not be responsible for any costs associated with the upgrade. The Network Integration Transmission Service Agreement (“NITSA”) was then amended to include the revised maximum demand for Nucor and was executed by both parties in January 2020. LG&E/KU filed the amended NITSA with FERC on February 13, 2020, which was subsequently accepted by FERC on March 27, 2020.

REQUEST 9. Confirm that Nucor continues to pay the per kWh and demand rates set forth in the 2013 agreement. If this cannot be confirmed, provide the current per kWh and demand rates.

RESPONSE 9. Nucor continues to pay the per kWh and demand rates previously authorized by the Commission. The demand rate has not been changed since the 2013 agreement became effective. The per kWh rates have changed from those originally listed in the 2013 agreement due to FAC roll-in cases. The most current rates are shown in the attachment “Response 9 – Current Rates effective 2020-02-01.pdf”, which was submitted in conjunction with Case No. 2019-00003.

EXHIBIT A

Effective for Service Rendered on and after February 1, 2020
Pursuant to KPSC Order dated December 26, 2019 in Case No. 2019-00003

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Rates

<u>Description</u>	<u>June 1, 2013 Contract Rate</u>	<u>Current Approved Rate</u>	
Demand Charge – Billing Demand at or below 180 MW In On-Peak Periods [Paragraph 3(b)]	\$ 6.92/kW/month	\$ 6.92/kW/month	
Interruptible Credit – 10 Minute Interruptible Demand Service [Paragraph 4(a)]	\$ 6.22/kW/month	\$ 6.22/kW/month	
Interruptible Credit – 90 Minute Interruptible Demand Service [Paragraph 4(b)]	\$ 4.20/kW/month	\$ 4.20/kW/month	
Energy Rate – Off-Peak [Paragraph 12]	\$0.039377/kWh	\$0.035477/kWh	R
Energy Rate – On-Peak [Paragraph 12]	\$0.042805/kWh	\$0.038905/kWh	R

KENTUCKY PUBLIC SERVICE COMMISSION
Kent A. Chandler Executive Director 
EFFECTIVE 2/1/2020 PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

EKPC Expected Reserve Margins w/ 15 MW NUCOR Firm Load Included

YEAR	2019 Load Forecast		Existing Capacity		Retirement/ Derate		CAPACITY ADDITIONS										Total Addition		Total Capacity		Planning Reserves (Excl Seas Pur)	
	WIN	SUM	WIN	SUM	WIN	SUM	SCGT		CCGT		Purchased		Baseload		RE		WIN	SUM	WIN	SUM	WIN	SUM
							WIN	SUM	WIN	SUM	WIN	SUM	WIN	SUM	WIN	SUM						
2020	3,248	2,376	3,434	3,132													-	-	3,434	3,132	6%	32%
2021	3,296	2,530	3,434	3,132													-	-	3,434	3,132	4%	24%
2022	3,363	2,543	3,434	3,132													-	-	3,434	3,132	2%	23%
2023	3,356	2,581	3,434	3,132													-	-	3,434	3,132	2%	21%
2024	3,383	2,599	3,434	3,132													-	-	3,434	3,132	2%	21%
2025	3,395	2,616	3,434	3,132													-	-	3,434	3,132	1%	20%
2026	3,420	2,638	3,434	3,132													-	-	3,434	3,132	0%	19%
2027	3,440	2,657	3,434	3,132													-	-	3,434	3,132	0%	18%
2028	3,468	2,680	3,434	3,132													-	-	3,434	3,132	-1%	17%
2029	3,479	2,696	3,434	3,132													-	-	3,434	3,132	-1%	16%
2030	3,494	2,710	3,434	3,132													-	-	3,434	3,132	-2%	16%
2031	3,511	2,730	3,434	3,132													-	-	3,434	3,132	-2%	15%
2032	3,536	2,756	3,434	3,132													-	-	3,434	3,132	-3%	14%

Existing Capacity (as of 2020)

Year	SEPA		LFG		Solar	1x116				1x268	Smith CTs						BG CTs		Total Coal fired	Total Gas fired		TOTAL FOSSIL FLEET		Total Other		Total Capacity	
	WIN	SUM	WIN	SUM		1x225 Cooper	1x300 Spur 1	1x510 Spur 2	1x268 Spur 3		1x268 Spur 4	#1-3		#4-7		#9-10		WIN		SUM	WIN	SUM	WIN	SUM	WIN	SUM	WIN
2020	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2021	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2022	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2023	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2024	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2025	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2026	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2027	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2028	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2029	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2030	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2031	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	
2032	170	16.1	16.1	5.2	341	300	510	268	268	426	312	357	292	206	149	567	501	1,687	1,556	1,254	3,243	2,941	191	191	3,434	3,132	

Purchases (MW)

Year	Pumping Station Mkt Purch		Purchase		Purchase		Purchase		Purchase		Total	
	WIN	SUM	WIN	SUM	WIN	SUM	WIN	SUM	WIN	SUM	WIN	SUM
2020											0	0
2021											0	0
2022											0	0
2023											0	0
2024											0	0
2025											0	0
2026											0	0
2027											0	0
2028											0	0
2029											0	0
2030											0	0
2031											0	0
2032											0	0

Budget October 2019: 2020-2022; LT 2023-2039

PJM SUMMER

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Winter Peak (MW)	Summer Peak (MW)
2020	3247.9	3069.3	2576.8	2110.3	2039.8	2375.8	2349.7	2280.7	2319.9	1930.1	2490.9	2894.3	3,248	2,376
2021	3296.5	3122.2	2750.9	2253.8	2190.7	2529.8	2410.7	2340.6	2471.9	2074.9	2682	3038.5	3,296	2,530
2022	3362.6	3267.1	2770	2261.5	2205.1	2543	2441.5	2356	2492.8	2084.8	2695.8	3072.8	3,363	2,543
2023	3356.1	3272.6	2762.2	2287.3	2238.7	2581.3	2449.8	2375.9	2506.4	2097.4	2677.5	3087.5	3,356	2,581
2024	3382.7	3297	2779.7	2300.5	2255.1	2598.9	2469.4	2394.4	2524	2111.2	2694.2	3109.3	3,383	2,599
2025	3394.8	3308.9	2787.1	2305.6	2270.4	2616.4	2487.8	2412	2541.5	2118.2	2701.6	3117.6	3,395	2,616
2026	3419.6	3331.4	2804.8	2319.1	2289.1	2638.3	2510.7	2434.6	2562.4	2131.3	2718.5	3136.4	3,420	2,638
2027	3440.4	3349.9	2818.7	2330.7	2305.8	2657.3	2530.5	2432.8	2580.3	2144	2731.4	3150.3	3,440	2,657
2028	3468.3	3375.6	2838.7	2345.3	2326.6	2680.3	2554.5	2476.4	2602.3	2159.3	2750.5	3172.5	3,468	2,680
2029	3478.9	3385.9	2845.3	2350.8	2340.3	2696.2	2571.3	2493.1	2618.2	2166.2	2757.2	3183.3	3,479	2,696
2030	3493.6	3399.4	2855.1	2357.3	2352.9	2709.9	2586	2507.9	2632	2175.9	2766.1	3190	3,494	2,710
2031	3511.3	3415.7	2866.9	2366.8	2370.6	2729.9	2606.9	2527.8	2651	2185	2778	3205	3,511	2,730
2032	3536.3	3483.8	2884.8	2380.4	2389.3	2756.5	2639.9	2549.7	2670.9	2201	2769.1	3190.3	3,536	2,756

APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2020-00317 DATED SEP 29 2020

Requests for intervention shall be filed no later than	10/12/2020
All initial requests for information to EKPC shall be filed no later than	10/19/2020
EKPC shall file responses to initial requests for information no later than.....	11/02/2020
Intervenor Testimony, if any, in verified prepared form shall be filed no later than.....	11/09/2020
All requests for information to Intervenors shall be filed no later than.....	11/18/2020
Intervenors shall file responses to requests for information no later than.....	11/25/2020
EKPC or any Intervenor shall request either a hearing or that the case be submitted for decision based on the record no later than	12/04/2020

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