

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
A (1) CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY FOR THE CONSTRUCTION OF)	CASE NO.
TRANSMISSION FACILITIES IN MADISON)	2022-00314
COUNTY, KENTUCKY; AND (2) DECLARATORY)	
ORDER CONFIRMING THAT A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY IS)	
NOT REQUIRED FOR CERTAIN FACILITIES)	

COMMISSION STAFF'S FIRST 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 is due on November 23, 2022. The Commission directs EKPC to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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 association or a

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 its 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 the Application, Exhibit 3, page 1.
 - a. Explain the source of the new 138 kV circuit energy.
 - b. Explain whether the existing EKPC 138 kV circuit will interconnect with the proposed 138 kV circuit at its starting point or anywhere else.
2. Refer to the Application, Exhibit 17 Direct Testimony of Laura Lemaster (Lemaster Testimony), page 5, lines 1-19. Refer also to the Application, Exhibit 3.

a. Provide a one-page map that identifies the location of the Kentucky Utilities Company (KU) Fawkes substation, the EKPC Fawkes Substation, the 69kV transmission lines, the 138 kV transmission lines, the proposed expansion of the substation, the planned Madison County Switching Station, the 138 kV-69 kV stepdown transformer, and the New Industrial Substation.

3. Provide a map showing the proposed location for the Madison County Switching Station with the proposed four termination points for the line segments in the area. Refer to the Application, Exhibit 3, page 24 and the Lemaster Testimony, page 9.

a. Explain whether the area around the termination point has been zoned as an industrial site and, if not, explain and identify where the potential industrial site will be located in relation to the 138 kV termination point.

b. Explain whether EKPC is aware of any other necessary utilities locating facilities in order to serve potential industrial customers.

4. Refer to the Lemaster Testimony, pages 10–11.

a. Provide an estimate of the annual operating expense for the 69 kV Madison County Switching Station, the 138-69 kV step-down transformer, the Fawkes Expansion, and the New Industrial Substation.


b. Provide an itemized breakdown of the estimated capital costs for the 69 kV Madison County Switching Station, the 138-69 kV step-down transformer, the Fawkes Expansion, and the New Industrial Substation.

c. Provide a breakdown of the estimated capital costs for the 69 kV Madison County Switching Station, the 138-69 kV step-down transformer, the Fawkes

Expansion, and the New Industrial Substation by plant account with the current depreciation rates for each plant account.

5. Refer to the Lemaster Testimony, pages 10-11.
 - a. Explain how the future projects will be financed.
 - b. Explain how the additional cost will affect the financial condition of EKPC.
6. Explain, in detail, the need for each project:
 - a. The 69 kV Madison County Switching Station.
 - b. The 138-69 kV step-down transformer.
 - c. The Fawkes Expansion.
 - d. The New Industrial Substation.
7. Provide an approximate date the for the start and end of construction for the 138 kV transmission line.
8. Provide an approximate start and end date for the construction of the 69 kV Madison County Switching Station, 138-69 kV step-down transformer, the Fawkes Expansion, and the New Industrial Substation.
9. Refer to the Application, Exhibit 16 Direct Testimony of Darrin Adams (Adams Testimony), page 9, lines 1–8. Further explain the mitigation actions that will be taken if there is an operational load issue in the 2022/2023 winter.
10. Refer to the Application, Exhibit DA-1, Transmission Planning Study, Section 2.3, pages 4–5.
 - a. Explain, in detail, each of the four alternatives to the Fawkes-Duncannon Lane Tap 69 KV line section overload.

- b. Explain, in detail, why Alternative B was chosen.



Linda C. Bridwell, PE
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DATED NOV 09 2022

cc: Parties of Record

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