

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 APPROVAL OF PROPOSED CHANGES TO	)	2024-00101
THEIR QUALIFIED COGENERATION AND	)	
SMALL POWER PRODUCTION FACILITIES	)	
TARIFFS	)	

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, shall file with the Commission an electronic version of the following information. The information requested is due on June 26, 2024. The Commission directs EKPC to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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 governmental agency, be accompanied by a signed certification of the preparer or the

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<sup>1</sup> 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).

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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 Staff's First Request for Information (Staff's First Request), Item 3.
  - a. Provide detailed evidence to support the statement that combustion turbines (CTs) commonly take up to 30 minutes to reach full output.

b. Provide the length of time each of EKPC's CTs took to reach the minimum PJM dispatched output level once called upon to run during one week in February 2023. Include in the response the CT dispatched MW versus bid in peak output level and whether each CT was bid into the day ahead market as "economic."

c. Provide an update to the Table in 3b that includes startup costs, no-load costs, fixed cost and O&M costs ( i.e., all cost components that would be utilized by EKPC's production cost and dispatch models). Include in the response the source(s) of the cost comparison data.

d. Aside from specific fuel type and location, explain whether a RICE engine essentially is functionally and operationally the same as the internal combustion engine generators that EKPC operates at landfill sites.

2. Refer to EKPC's response to Staff's First Request, Item 3b. Provide an update to the Table in 3b comparing the fixed and variable costs of a group of 10–14 reciprocating internal combustion engines (18-20 MW) facility to the cost of a comparable CT.

3. Explain how PJM would accredit and call upon a RICE facility containing 10–14 engines.

4. Explain how a RICE facility containing 10-14 engines would be bid into PJM's capacity and energy markets.

5. For any EKPC Certificate of Public Convenience and Necessity or Integrated Resource Plan, provide the case number and document citation reference for any EKPC case in which EKPC considered or proposed a RICE facility containing multiple engines as an alternate resource.

6. Explain how EKPC treats qualifying facility (QF) capacity with respect to its capacity planning and with respect to how it affects its PJM capacity obligation.

7. Refer to EKPC's response to Staff's First Request, Item 1. Identify any other utility that EKPC is aware of that separates Cogeneration and Small Power Production Tariffs by co-located qualifying facilities and grid connected qualifying facilities.

8. Refer to EKPC's response to Staff's First Request, Item 1. Provide the estimated savings to EKPC of this tariff revision.

9. Refer to EKPC's response to Staff's First Request, Item 1. Provide the number of QF customers that will receive service under the grid-connection QF tariff and the number of QF customers that will receive service under the co-located QF tariff.

10. Refer to EKPC's response to Staff's First Request, Item 8a and Item 8d. Provide the list of activities that EKPC referenced in response to Item 8d, referencing Item 8a as well as how EKPC made the 40 percent determination.



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DATED JUN 10 2024

cc: Parties of Record

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