

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
CERTIFICATES OF PUBLIC CONVENIENCE)	CASE NO.
AND NECESSITY FOR CONSTRUCTION)	2024-00108
PROJECTS IN MARION COUNTY, KENTUCKY)	
AND OTHER GENERAL RELIEF)	

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, shall file with the Commission an electronic version of the following information. The information requested is due on July 8, 2024. 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 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

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).

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 Application, page 4, paragraph 8.
 - a. State how EKPC decided on 161 kV transmission lines.
 - b. State whether EKPC considered other transmission line voltage options and why those options were rejected.
2. Refer to Application, pages 5-6, paragraph 16 and Exhibit 21 at unnumbered 171.

a. Provide a copy of any maps or other documents used to ascertain whether the right-of-way crossed listed property owners' property.

b. Explain whether there are property owners whose property boundary is near or adjacent to the new proposed transmission lines or to the new proposed substation, but not crossed, who were not notified of the proposed projects. If so, provide the names, addresses, and a map showing the property locations/boundaries in relation to the proposed projects.

3. For either of the transmission projects or the substation project, explain whether any sort of environmental assessment is required. If so, provide a copy of the assessment.

4. Refer to Application, Exhibit 2, Direct Testimony of Lucas Spencer (Spencer Direct Testimony) at 5.

a. State whether any alternative designs (other than location) or materials were considered for the Marion County Industrial Tap Line Loop-In transmission line and why those options were rejected.

b. State why the Marion County Industrial 161 kV Tap Line Loop-In will not result in any duplication of service with the existing Marion County Industrial Tap.

5. Refer to Application, Exhibit 19 (Metts Drive Route Selection Report) at 57-58 and Exhibit 20 (Marion County Industrial 161 kV Tap Line Loop-In Route Selection Report) at 59-60.

a. Explain how the estimated costs per mile and acre were determined and provide any documents supporting these estimates.

b. State whether EKPC plans to self-build these projects or solicit bids. Provide any Requests for Proposals (RFPs).

6. Refer to Application, Exhibit 19 at 57-58. State whether any of the evaluated transmission line routes contained additional estimated costs beyond per mile or per acre costs. Identify and explain any such extra estimated costs, including the “Cost adder” entries in Table 12 on page 58.

7. Refer to Application, Exhibit 19 at 68. Confirm that the lack of medium or high impact route selection factors or other identified factors not present in the model means that no such factors made any of the evaluated routes prohibitive.

8. Refer to Application, Exhibit 20 at 60. State whether any of the evaluated transmission line routes contained additional estimated costs beyond per mile or per acre costs. Identify and explain any such extra estimated costs, including the “Cost adder” entries in Table 13 on page 60.

9. Refer to the Application, Exhibit 23, Direct Testimony of Darrin Adams (Adams Direct Testimony), page 4, lines 21-23 and page 5, lines 1-12.

a. Explain whether the Lebanon Substation’s primary purpose was to serve residential customers prior to the Inter-County load shift.

b. Explain whether the residential customers served out of the Marion County Industrial Substation were subjected to power-quality issues due to the non-linear nature of industrial electrical equipment prior to the load shift. If not, explain why the load shift introduced the power-quality issues.

10. Refer to Application, Exhibit 23, Adams Direct Testimony pages 4-5.

a. Provide any documents related to Inter-County Energy Cooperative Corporation's report of potential thermal overload, including but not limited to, correspondence, reports, work orders, studies, and diagrams.

b. Provide any documents related to load forecasts identified in the testimony, including but not limited to, correspondence, reports, studies, and diagrams.

c. State whether the proposed transmission line projects will completely eliminate the transmission fees paid to Louisville Gas and Electric (LG&E) and Kentucky Utilities (KU) (jointly, LG&E/KU) for service to the Lebanon Substation. If not, provide estimated fees through 2029 based on expected reduction of vias due to the proposed projects.

11. Refer to the Application, Exhibit 23, Adams Direct Testimony, page 6, lines 6-9. Confirm that the Lebanon Substation is connected to LG&E/KU's transmission lines only and not to EKPC's transmission lines.

12. Refer to the Application, Exhibit 23, Adams Direct Testimony, page 6, lines 9-11. Aside from the potential transformer overload at the Lebanon Substation, explain any additional reliability issues including increasing maintenance, equipment failures, power quality, etc.

13. Refer to the Application, Exhibit 23, Adams Direct Testimony, page 6, lines 12-14. Absent the Inter-County distribution feeder loading concerns, explain whether the Lebanon Substation loading concerns would warrant the two projects in the current proceeding.

14. Refer to the Application, Exhibit 23, Adams Direct Testimony, page 8, lines 7-10. Explain whether EKPC and or Inter-County has been notified of a commercial or industrial load planning to locate in the industrial park or adjacent area.

15. Refer to the Application, Exhibit 23, Adams Direct Testimony, page 9, lines 10-11. Once completed, provide a copy of PJM's do-no-harm study results.

16. Refer to the Application, Exhibit 23, Adams Direct Testimony, page 9, lines 20-23 and page 10, lines 1-3. Explain whether the PJM do-no-harm study is addressing the two transmission line projects together or separately.

17. Refer to the Application, Exhibit 23, Adams Direct Testimony, Attachment DA-1, pages 9-10. For Alternatives 1 and 6, in addition to the cessation of the Network Interconnection Transmission Service (NITS) payments, explain whether the Lebanon Substation retirement cost was included in each Alternative cost estimate.

18. Refer to the Application, Exhibit 2, Spencer Direct Testimony, page 5, lines 13-22 and page 10 lines 1-15, and Exhibit 23, Adams Direct Testimony, Attachment DA-1, Table 5.1, page 10.

a. For the new 2.3 mile 161 kV line section connecting to the existing Marion County-Green County 161 kV line, explain whether EKPC will include a breaker at the Tap interconnection point. If not, explain how the loop being created avoids a N-1 or N-2 contingency affecting the EKPC Marion County-Green County 161 kV line.

b. Provide the results of any PJM transmission studies related to the project.

19. Refer to the Application, Exhibit 23, Adams Direct Testimony, Attachment DA-1, Table 5.1, page 11. Once the Lebanon Substation has been retired, explain what

will happen to the substation property and whether EKPC will relinquish the transmission ROW to the existing property owners.

A handwritten signature in blue ink, appearing to read "Linda C. Bridwell", with a horizontal line underneath it. To the right of the signature, the letters "F&E" are written in blue ink.

Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED JUN 18 2024

cc: Parties of Record

Case No. 2024-00108

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