

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION OF)	
THE FUEL ADJUSTMENT CLAUSE OF EAST)	CASE NO.
KENTUCKY POWER COOPERATIVE, INC.)	2024-00137
FROM NOVEMBER 1, 2022 THROUGH APRIL)	
30, 2023)	

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 September 23, 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 EKPC's response to Commission Staff's First Request for Information (Staff's First Request), Item 6. Explain whether EKPC has any long-term contracts for natural gas. If so, provide the vendor and the quantity of the contract. If not, explain why it is more cost beneficial to rely on spot purchases of natural gas rather than entering into a long-term contract.

2. Refer to EKPC's response to Staff's First Request, Item 7. During Winter Storm Elliot, EKPC explained that interstate pipeline was curtailed due to frozen pipelines.

a. Provide a detailed response for if EKPC curtailed load with its interruptible customers. If so, then provide which customers and the specific MWs for each customer that were curtailed.

b. Explain whether any of EKPC's generation units were out during Winter Storm Elliot or if they all were operating. If the units were generating, then provide the capacity factor for each operating unit and the price(s) for each unit that was called to run in the PJM market. If the units were out, provide the reasoning for why they were out and the hours they were out.

c. If EKPC was required to purchase energy from the PJM market during Winter Storm Elliot, provide the average price of energy as well as the total amount of MWs purchased.

3. Refer to EKPC's response to Staff's First Request, Item 16. Provide the following in Excel spreadsheet format with all formulas, rows, columns, and cells unprotected and fully accessible:

a. The hourly energy purchased (MW's) and at what price.

b. The day ahead and real time locational marginal price (LMP) at each hour.

c. The hourly bids for Spurlock, Cooper, Bluegrass, and Smith units broken out by cost. Include in the response a breakdown for how much of the cost-based offer is fuel costs.

d. The price that PJM called each unit to run.

e. Hourly generation hours for Spurlock, Cooper, Bluegrass, and Smith units for each month.

4. Explain if EKPC was subject to PJM Performance Assessment Interval penalties during the review period. If so, include an explanation for why, the penalty assessment date(s) and the amount(s) of the penalties.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED SEP 09 2024

cc: Parties of Record

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