

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
1) A CERTIFICATE OF PUBLIC CONVENIENCE)	CASE NO.
AND NECESSITY TO CONSTRUCT A NEW)	2024-00310
GENERATION RESOURCE; 2) A SITE)	
COMPATIBILITY CERTIFICATE; AND 3) 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 November 12, 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

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).

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 the Direct Testimony of Julia J. Tucker (Tucker Direct Testimony), page 8, lines 4-16.

a. Provide a copy of the long-term load forecast (LTLF). Include with the response a copy of the individual Owner-Member load forecasts, all forecast equations, discussion of assumptions, and data sources.

b. Explain the extent to which EKPC expects energy intensive manufacturing or data centers to locate within its service territory.

c. Refer also to the Tucker Direct Testimony, page 10, lines 3-5. Provide an explanation of the Itron, Inc., modeling methodology including the formulation of the various modeling variables.

2. Refer to the Tucker Direct Testimony, page 9, lines 5-14.

a. Provide the Demand Side Management (DSM) Potential Study serving as the basis for EKPC's increased program selection.

b. The table shows the potential energy and capacity impacts of increased DSM program implementation. Explain whether individual Owner-Members have the option to implement these programs and if so, what assumptions were made regarding retail customer participation.

3. Refer to the Tucker Direct Testimony, page 12, lines 11-16. Explain what EKPC's PJM seasonal planning reserve margins are and how that compares to EKPC's seven percent winter and summer planning reserve margin.

4. Refer to the Tucker Direct Testimony, page 13, lines 14-18. Provide the analysis and a more detailed explanation of how EKPC quantified the risk of an unexpected extreme weather event or generator outage.

5. Refer to the Tucker Direct Testimony page 16 lines 5-7. Explain the source of the potential hydro resources.

6. Refer to the Tucker Direct Testimony page 16 lines 11-23, page 17 lines 1-16, and Exhibit JJT-3. Provide the resource selection and resource optimization analyses complete with a detailed explanation of all the assumptions (including Environmental

Protection Agency (EPA) and PJM related assumptions), and all potential resource (including power purchase agreements (PPAs)) fixed and variable cost data used determine the specific resources selected and the timing of new resource implementation represented in Exhibit JJT-3.

7. Refer to the Tucker Direct Testimony, page 23, line 23 and page 24, line 1. Also refer to the Direct Testimony of Craig A. Johnson (Johnson Direct testimony), page 5, lines 13-16 and page 9, lines 22-23.

a. If the Reciprocating Internal Combustion Engines (RICE) units are expected to run as much as 6,000 hours per year, between 20 percent to 70 percent capacity factors, and burn natural gas and low sulfur diesel fuel, explain what environmental controls the RICE units will be required to meet.

b. Explain whether CO₂ is produced in addition to CO when natural gas and low sulfur diesel fuel are burned. If so, explain whether the addition of a CO catalyst is sufficient to control carbon emissions in compliance with EPA rules.

c. Explain whether the RICE units will be able to burn hydrogen gas to reduce carbon emissions in the event a CO catalyst insufficient.

8. Refer to the Tucker Direct Testimony, page 24, line 1, the Application paragraph 12 and the Direct Testimony of Darrin Adams (Adams Direct Testimony), page 10, lines 15-23 and page 11, lines 1-18. The RICE units are expected to run as much as 6,000 hours per year and are expected to support Cooper Station for regional reliability purposes.

a. Explain whether the addition of the RICE units will allow the Cooper units to run less with a resulting lower capacity factor and potentially aid in environmental compliance due to the lower capacity factor.

b. Explain whether the addition of the RICE units will allow EKPC to rely less upon Kentucky Utilities' Brown Station and TVA for voltage support and reliability. If so, explain whether there are any monetary savings connected with this reduced reliance.

9. Refer to the Tucker Direct Testimony, page 26, lines 12-17 and Johnson Direct testimony page 5 line 4.

a. With a RICE unit nameplate capacity rating of 18.132 MW, explain the PJM seasonal capacity rating.

b. Explain how the RICE units will be bid into the PJM energy market, individually or in groups.

10. Refer to the Adams Direct Testimony, page 6, lines 13-23 and page 7, lines 1-18.

a. For the four lower bound projects, explain whether EKPC expects that these projects will have to be completed prior to the RICE project completion date.

b. For the upper bound of network upgrades, explain whether the three upper bound projects listed on page 7 are projects that EKPC expects to be completed regardless of the RICE project but at a later date.

11. Refer to the Direct Testimony of Jerry B. Purvis (Purvis Direct Testimony), page 5, lines 3-4. Explain how the RICE facility is exempt from the Greenhouse Gas (GHG) Rule, the Mercury, and Air Toxics (MATs) Rule, and the Good Neighbor Federal

Implementation Plan (GNFIP). Include in the response, whether EPA rules are applicable and whether they are applied to individual RICE units or to the facility as a whole.

12. Refer to the Purvis Direct Testimony, page 7, lines 10-14. Presuming the RICE units have a capacity of 18.132 MW and are expected to run up to approximately 6,000 hours per year (20 percent – 70 percent capacity factor), if the RICE units were to be operationally bid into the PJM energy market as a group of three units, that would equal 54.396 MW of gross nameplate generation ($18.132 \times 3 = 54.396$). Since this operationally equates to more than 25 MW, explain why this wouldn't trigger new GHG rule compliance.

13. Refer to the Purvis Direct Testimony, Attachment JP-1. Provide the current status of listed federal and state permits listed in the exhibit. This is an ongoing request that is to be updated as the status of each requested permit changes.

14. Refer to the Tucker Direct Testimony, pages 8-9, lines 23-1. Provide a complete cost benefit analysis for each energy efficiency program analyzed for use in the development of DSM programs.

15. Explain whether EKPC has or intends to set up a complaint resolution process during the construction phase. If so, provide a discussion of the process.

16. State whether EKPC has received any written comments regarding this project. If yes, provide a copy of the written comments.

17. Explain why the potential unevaluated sites listed in the Site Assessment Report (SAR) were not evaluated to be compared to the other potential sites listed.

18. Provide a list of any existing environmental concerns, such as soil contamination or protected habitats, that exists with the selected site.

19. Provide the Environmental Impact Assessment (EIA).
20. Describe any new infrastructure necessary (e.g., transportation, water, gas lines to connect to the existing infrastructure, and other utilities) to support the construction and ongoing operation of the facility.
21. Describe any new roads or utility connections that will be needed, the corresponding cost estimates as well as map depicting each additional road or connection.
22. Provide any feedback EKPC has received from any surveys or consultations with local residents regarding potential noise, traffic, or visual impacts. Include any summaries of attempts to obtain feedback, if no feedback has been received.
23. Explain what steps EKPC is taking to minimize community conflict surrounding the construction of the Liberty RICE Facility.
24. Refer to the mitigation strategies listed in the SAR, specifically sound walls, visual buffers, etc. Provide specific plans for the implementation of these mitigation measures. Include a timeline and detailed map of where the mitigation strategies will be implemented for maximum efficiency.
25. Provide any assessments that have been conducted to ensure that the site is safe for both the workers who will build and operate the facility and the nearby community.
26. Explain how EKPC will mitigate any risks related to air and water quality during and after construction.
27. Explain how EKPC will mitigate any risks related to increased traffic in and around the site area during and after construction.

28. State whether construction of the Liberty RICE facility is expected to create new jobs in the area. If yes, provide an estimate of the number and type of jobs that EKPC expects this project to create.

29. Explain how many employees will be present at the facility on a day-to-day basis and describe their job duties.

30. Provide and describe any policies or procedures relating to health and safety related emergencies that EKPC either has prepared, or is preparing, for the facility, including fire, severe weather, chemical contamination, cyber and physical security emergencies.

31. Describe whether any policies or procedures relating to fire responses rely upon local fire departments.

32. Explain any physical security measures being taken beyond the security fence and security guards posted at the entrance to the facility.

33. Describe how the RICE generators will be controlled and from where.

34. Explain any cyber security measures EKPC has currently in place or plans to put into place to protect the proposed facility.

35. Provide a narrative description of the location of each of the following site features:

- a. Each construction entrance.
- b. Each entrance to be used in operations.
- c. Operations and Maintenance Area (O&M) area.
- d. Each laydown area.

36. Explain whether the construction and operational entrances will be locked outside of normal working hours.
37. Provide the security measures for the O&M area and substation.
38. Provide a one-page site map that contains the locations of water features, including rivers, streams, lakes, and ponds. Include any known or suspected karst features.
39. Provide a detailed table listing all residential structures located within 2,000 feet of the Project boundary line. For each structure, provide:
 - a. The distance to the boundary line.
 - b. The distance to the closest solar panel.
 - c. The distance to the nearest inverter.
 - d. The distance to the substation.
40. Provide a detailed table listing all non-residential structures located within 2,000 feet of the Project boundary line. For each structure, provide:
 - a. The distance to the boundary line.
 - b. The distance to the closest solar panel.
 - c. The distance to the nearest inverter.
 - d. The distance to the substation.
41. Explain if any existing structures on the Project site will be demolished or removed in order to accommodate the Project. If so, identify each structure and its location within the site project boundary on a map.
42. For each proposed transmission line:

a. Provide a narrative description of the proposed transmission line and alternate route, including the number of poles to be installed, the height of the poles and the length and width of the transmission line corridor.

b. Provide a map showing the existing property lines that the proposed transmission line is proposed to cross.

c. Explain how the proposed route of the transmission line will minimize significant adverse impact to the scenic assets of Kentucky.

d. Provide a detailed map of the proposed transmission line route and the alternate route, including proposed pole locations, access roads and nearby residences.

e. Provide any sketches of the proposed transmission line support structure.

f. Provide a table showing the distance between transmission line structures (poles) and nearby residences, for the proposed route and the alternate route.

g. Explain how the proposed transmission route was determined. Include in this explanation the basis for which other routes were excluded or eliminated.

43. Refer to the Direct Testimony of Craig A. Johnson, page 10, lines 9-10. Provide itemized estimates and detailed explanations for RICE engine maintenance costs, both daily and annually.

44. Refer to the Direct Testimony of Darrin Adams, page 10, lines 11-14. Outline and estimate the costs for all transmission projects supporting the Liberty RICE Facility generation additions.

45. Refer to the Direct Testimony of Jerry B. Purvis, page 4, lines 5-20. Identify and explain any pending environmental legislation or regulations that could foreseeably hinder RICE engine usage.

46. Provide documentation of each voltage violation by substation, including time and date, in the proposed project area for the period beginning October 1, 2022, through September 2024.

47. Explain whether the voltage problems in the area are the result of equipment failure or demand.

48. Absent the installation of the RICE units, describe EKPC's five-year plan to address the voltage issues.

49. Refer to Application, Attachment BY-3. Provide maps and a narrative explanation for each transmission line connected to the project as to where the line will connect into the EKPC system, whether those property owners have been notified of the project, and the easement requested by EKPC, if these transmission lines were considered part of the proposed project. If the transmission lines are not considered part of the proposed project, explain why not.



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cc: Parties of Record

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