

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 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 December 16, 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 application, BY-2, Volume 1, Site Selection Study, page 29. Explain and elaborate on the reason behind the higher point value for Columbia Gulf Transmission Co.

2. Refer to the Direct Testimony of Julia Tucker (Tucker Direct Testimony), Exhibit JJT-3.

a. Provide an update to the table with an updated LTLF 2024 column accounting for the winter load adjusted for PJM Effective Load Carrying Capability (ELCC).

b. Explain from a Kentucky perspective, as opposed to a PJM planning perspective, why it would not be appropriate to conduct EKPC's generation expansion plan accounting for ELCC seasonally.

c. Referring to the Existing Capacity winter column, explain the capacity decreases of 300 MW in 2026 and the 127 MW decrease in 2030.

d. Provide a table showing each potential resource's cost and operating characteristics that were used to formulate EKPC's resource selection and production cost models.

e. Provide a table showing the resource portfolios that were least cost or reasonable least cost from which EKPC selected the resource portfolio identified / represented in Exhibit JJT-3.

3. Refer to the Tucker Direct Testimony, page 23, lines 22–23; and page 24, lines 1–3, and Exhibit JTT-3.

4. Explain the number of hours EKPC's production cost model dispatched the RICE units within the resource portfolio represented in Exhibit JJT-3.

5. Explain the number of hours EKPC's current Combustion Turbines (CTs) run each year and the standard number of hours they are designed to run, including the maximum range.

6. Refer to the example comparing the run times of the F-class CT and the RICE engines. Explain the maximum number of hours the CT is designed to run and the

number of hours the production cost model dispatched the CT in portfolios where it was included in an expansion resource portfolio.

7. Refer to EKPC's response to Commission Staff's First Request for Information (Staff's First Request), Item 1a. Provide a copy of all forecast equations in functional form. If already provided, explain where in the response the equations may be found.

8. Refer to EKPC's response to Staff's First Request, Item 6.

a. Explain when EKPC entered into the short-term purchase power agreement (PPA) with Safe Harbor Hydro.

b. Explain how the RICE unit is considered to be the least-cost option considering a RICE unit costs approximately \$61,000/MW-yr more in fixed costs, has a higher CAPEX cost by \$666/kW, and a lower average annual heat rate by 1,336. Include in the response an explanation, specifically, for how EKPC's customers would benefit more from RICE units than a CT.

c. Confirm that even with all the capacity additions from 2026-2033, EKPC will still have a capacity deficit, excluding seasonal market purchases.

9. Refer to EKPC's response to Staff's First Request, Item 17, and the Site Selection Study. Explain, in detail citing specific criteria, why Liberty 3 was chosen over Liberty 4.

10. Refer to EKPC's response to Staff's First Request, Item 20. The response references the project feasibility report, but the project feasibility report does not appear to address these specific expenses. For each item listed, provide the following:

a. An estimated expense for each portion of the proposed project.

b. The party responsible for paying for each portion of the proposed project.

c. The contract for services or supplies in place, if any, as part of the service or project. If no contract exists, consider this an ongoing request for the pendency of the case.

d. Explain why these costs were not included in Appendix R of Attachment BY-1, proposed to be confidential.

11. Refer to EKPC's response to Staff's First Request, Item 22. Since EKPC has requested approval for the project as proposed, explain the purpose of conducting a public meeting after proposing the project to the Commission, especially in light of the request for approval as proposed.

12. Refer to EKPC's response to Staff's First Request, Item 39, and Item 40. The response is unresponsive. The table referenced in the response does not contain a list of structures, an owner, and the map on either page of the valuation report does not specify type.

a. Provide the requested information without the solar panel request.

b. In place of the solar panels, provide the distance to the onsite natural gas facility.

c. Provide a corresponding map with the structure location to each table.

13. Refer to EKPC's response to Staff's First Request, Item 42. Confirm that each property owner affected by the proposed transmission line have been notified of the project. If not confirmed, explain why not.

14. Confirm that each property owner affected by the proposed natural gas line has been notified of the project. If not confirmed, explain why not.

15. Refer to Attachment BY-1 filed with a request for confidential treatment. Confirm that the land acquisition costs include the negotiations for easements, leases, or property purchases beyond the approximate 93 acres EKPC proposes to purchase for the RICE facility.

16. Confirm that EKPC does not own the land the RICE facility is proposed to be built. If not confirmed, explain why not.

17. Detail any contracts for which EKPC has paid, has negotiated to pay, or any compensation paid to non-participating landowners, whether cash or otherwise, near the project. Include the terms of the agreements and which properties are involved in terms of distance to the project boundaries.

18. Detail any contracts for which EKPC has paid, has negotiated to pay, or any compensation paid to participating landowners, whether cash or otherwise, near the project. Include the terms of the agreements and which properties are involved in terms of distance to the project boundaries, including the project itself.

19. Explain whether the natural gas transmission line will be located in an existing right-of-way. If not, provide information about any agreements in place with affected landowners.

20. Explain whether the proposed natural gas transmission line is fully located within Casey County, Kentucky, and if so, identify and describe any Casey County development or zoning regulations that would apply to the construction and operation of that transmission line. If not, identify any additional counties the proposed natural gas

transmission line is expected to be located and identify and describe any development or zoning regulations that would apply.

21. EKPC confirmed that at least one structure will need to be demolished for the proposed project.

a. Provide a map and identify each structure and its location within the site project boundary, include any structures to be demolished related to the natural gas transmission line and the electric transmission line.

b. Confirm that EKPC has finalized agreements related to the ownership of each structure identified. If not confirmed, identify the structures using the map as reference, that EKPC does not currently have a right to demolish.

c. Describe the hazard detection systems that will be used within the facility.

d. Describe alert systems that will be in place and who will monitor and maintain those systems. Include in the description whether those systems provide remote alert and annunciation to offsite personnel and a fire department.

e. Explain whether EKPC has had any contact with the Environmental Protection Agency (EPA) regarding the proposed project. If so, provide all documentation of any communication that has occurred.

f. Provide how many tons of hazardous air pollutants (HAP) are expected to be emitted from the project each year.

g. Explain whether the facility be subject to emission limits.

h. Describe which emission standards the facility will be required to comply.

22. Explain how often performance testing of the RICE engines will occur and who will conduct said testing.

23. Explain who will be responsible for recordkeeping and reporting for each portion of this project including but not limited to the construction of the transmission line, the natural gas pipeline, and the facility for the natural gas within the project boundaries.

24. Provide the contract with the natural gas supplier for the facility.

25. Explain whether the natural gas provider will have access to the facility both during construction and operation. If yes, explain who, if anyone, will monitor the access and how will the access be allowed.

26. Provide a map of the natural gas portion of the proposed project including, but not limited to, the natural gas transmission pipeline, any easements needed, current property owners, parcel boundaries, and the location of the natural gas facility within the project boundaries.

27. Provide descriptions of land uses and ownership of parcels adjacent to the natural gas transmission line.

28. Provide the values of residential structures on properties adjacent to the natural gas transmission pipeline, the transmission line, and the project itself.

29. Provide the maximum expected truck weights and load weights for each type of delivery for plant and substation construction, including cement and water trucks (if utilized), heavy equipment, gravel for access roads, transformers, RICE generators, etc.

30. Explain the plan for repairing Project-related damage to any roadways, railway crossings, or bridges.

31. Explain whether any traffic stoppages will be necessary to accommodate large truck deliveries for constructing the Project Plant, Substation, and/or transmission lines (natural gas/electric). If yes, provide the expected location(s), frequency, and length of those stoppages.

32. Explain any specific traffic management strategies to be employed during plant and substation construction.

33. Describe any additional access roads to be developed for construction of the natural gas transmission line. For those access roads:

a. Include on a map and identify the transmission line access roads.

b. Provide details about the proposed access roads, including total length, width(s), and material(s) used.

34. Provide a visual rendering of the power plant (engine hall building) or a photo of a similar type of structure in another location.

35. Describe the physical characteristics of the Project Substation (i.e., footprint acreage, height).

36. Describe the physical characteristics of the generator lead line connecting the Plant to the Substation, including length, number of poles, height.

37. Explain what conversations have occurred with the FERC or PHMSA related to the natural gas line portion of the project.

38. Confirm that a chromatograph will be included as a project component and who will be responsible for monitoring it. If not confirmed, explained why not.



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DATED DEC 02 2024

cc: Parties of Record

Case No. 2024-00310

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