

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 THIRD 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 February 20, 2025. 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

---

<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 Commission Staff's Second Request for Information (Staff's Second Request), Item 2 Attachment Staff\_DR2\_-\_2a.xlsx.

a. Commission Staff frequently sees the Effective Load Carrying Capability (ELCC) applied to installed generation capacity ratings. For Column C in the Attachment, explain how and why ELCC is applied to "Winter Peak Load."

b. Confirm that the “ELCC-Adjusted Summer Capacity after Additions,” in Column F refers exclusively to the addition of the reciprocating internal combustion engine (RICE) units to EKPC’s existing generation portfolio. If not, explain what other additions are included in the figures.

c. Confirm that the Winter Peak Forecast in Column B is EKPC’s most recent long-term load forecast. If these have been previously filed, please identify the specific location in a case before the Commission.

d. As EKPC has historically and is forecasted to continue as a winter peaking utility, explain why it would not be more accurate to calculate its capacity positions using the ELCC adjusted winter capacity ratings of existing generation units plus any additions.

e. Provide an update to the table using winter ELCC capacity ratings to determine EKPC’s capacity positions to satisfy its winter peaks.

2. Refer to EKPC’s response to Commission Staff’s First Request for Information (Staff’s First Request), Item 6, pages 2 and 3 of 4. To paraphrase, EKPC’s response states that when the price of natural gas is \$4.00 per mmbtu, the RICE units must run 6,328 hours per year to overcome their higher capital and fixed Operating & Maintenance (O&M) expenses as compared to combustion turbines (CTs). When natural gas is \$3.00 per mmbtu, the RICE units must run 7,350 hours per year and at \$5.00 per mmbtu, the RICE units must run 5,560 hours per year to overcome the higher capital and fixed O&M costs.

a. Explain whether the components comprising the natural gas costs used in the calculations represent the commodity cost only or represent a contracted

price, which includes the infrastructure expense. If the cost is inclusive of more than the commodity price, provide a list of the factors included in the price.

b. Provide EKPC's forecast for the same period for the natural gas cost if the cost includes more than just the commodity price used to determine the long-term cost-effectiveness of the RICE units.

c. In addition to participating in the PJM capacity and energy markets, explain whether the RICE units will provide revenue from PJM ancillary services and, if so, provide a list of potential services for which EKPC will derive revenues.

d. When the expected revenues from participating in PJM's ancillary markets is considered, explain whether the RICE units' total benefits outweigh that of a CT if natural gas prices remain relatively low. As a part of the response, explain whether the expected ancillary revenues lower the cross-over point when compared to a CT.

3. Explain whether the RICE units are designed to perform continuously for six thousand or more hours per year and the number of years they typically run. Include any workpapers or supporting documentation.

4. Explain how the useful life is impacted with the hours run each year including whether the run time shortens the useful life. Include any workpapers or supporting documentation.

5. If RICE units are utilized for purposes other than electricity generation, provide examples.

6. Refer to the Direct Testimony of Brad Young, Attachment\_BY-3\_optimize.pdf.

a. Provide an updated expanded picture or map similar to those found on pages 22 and 24 for the proposed Liberty site showing the proposed location of all known equipment, the location of the gas pipeline from which natural gas will be provided to the site, the proposed location of the gas pipelines inside the site to the RICE units, the location of the EKPC's existing transmission line that will interconnect with the proposed Liberty site, and the transmission lines extending from the site to EKPC's existing transmission line,

7. Refer to EKPC's response to Staff's Second Request, confidential response, Item 18. Provide an update to this response.

8. Explain whether EKPC experienced a new winter peak during winter storm Elliott and whether any large industrial customers were interrupted.

9. Winter Storm Elliott had multiple days of sustained intense cold. Explain whether EKPC had sufficient capacity including potential interruptible power to avoid blackouts if a new winter peak had been reached and sustained.

10. Provide any permitting updates since the filing of the Application in this case.

11. Provide any transportation studies or analyses related to the Liberty project performed since the filing of the Application.

12. Refer to the Direct Testimony of Julia J. Tucker, Attachment JJT-3. Explain the status of the planned 300 MW Hydro Purchase Power Agreement beginning in 2026 as shown in the Exhibit.

13. Refer to EKPC's response to Staff's First Request, Item 18. Provide any NEPA reports, or other studies related to such a report that have been performed since the response.

14. Provide an updated estimate of costs including updates to EKPC's response to Staff's First Request, Item 43, Item 44, and Application, Confidential Attachment to BY-1 Appendix R as well as to the schedule provided in Appendix Q.

15. Provide the status of the PJM Interconnection Study.

16. Refer to EKPC's response to Attorney General's First Request for Information, Item 5. Confirm that the natural gas prices in the Excel sheet included in the response account for the expense of the infrastructure in the price. If not confirmed, provide a re-calculated Excel sheet with the cost of the infrastructure factored into the price.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED FEB 05 2025

cc: Parties of Record

\*L. Allyson Honaker  
Honaker Law Office, PLLC  
1795 Alysheba Way  
Suite 1203  
Lexington, KENTUCKY 40509

\*Heather Temple  
Honaker Law Office, PLLC  
1795 Alysheba Way  
Suite 1203  
Lexington, KENTUCKY 40509

\*Honorable Michael L Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*Angela M Goad  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Jacob Watson  
East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707

\*Nathaniel Shoaff  
Sierra Club  
2101  
Webster St. , Suite 1300  
Oakland, CALIFORNIA 94612

\*Ashley Wilmes  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KENTUCKY 40602

\*Jody Kyler Cohn  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707

\*Byron Gary  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KENTUCKY 40602

\*John G Horne, II  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Joe F Childers  
Joe F. Childers & Associates  
300 Lexington Building  
201 West Short Street  
Lexington, KENTUCKY 40507

\*Kristin Henry  
Staff Attorney  
Sierra Club Environmental Law Program  
2101 Webster Street  
Suite 1300  
Oakland, CALIFORNIA 94612

\*Tom Fitzgerald  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KENTUCKY 40602

\*Lawrence W Cook  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Greg Cecil  
East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707

\*J. Michael West  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204