

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 FOURTH 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 28, 2025. 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 Application, Exhibit 6, Direct Testimony of Darrin Adams, page 10, lines 18-19 in which EKPC noted that there are transmission system reliability concerns, particularly when a Cooper Generation Unit is not available. Given that EKPC

currently has an application in Case No. 2024-00370,² to construct additional CCGT generation at the Cooper facility, explain if the addition of the new generation source in Case No. 2024-00370 will improve the reliability of the transmission system concerns addressed in the testimony without the addition of this project. Include in this analysis specific quantitative evidence (i.e. load forecasts, cost projections) and work papers.

2. Refer to the Application, Exhibit 3, Direct Testimony of Julia J. Tucker, page 20, line 15. Confirm that one alternative EKPC considered included the addition to or upgrading of the 161kV transmission system to the Liberty Transmission Region. If unable to confirm, explain why.

3. Would the addition to or upgrading of the 161kV transmission system negate the need to provide additional generation capability with the proposed RICE Units. If confirmed, provide the cost analysis and specific description(s) of each alternative to add to or upgrade the 161kV transmission system.

4. Provide a copy of the Air Application submitted to the Kentucky Division for Air Quality on or about September 20, 2024. Also provide a status update on the progress of the application and the projected schedule.

5. Refer to the Cooper Generation Unavailability Transmission Analysis, dated June 5, 2024, in Case No. 2024-00370. Of the six identified options, identify which option EKPC determined as the most beneficial alternative and explain why they were

² Case No. 2024-00370, *Electronic Application of East Kentucky Power Cooperative, Inc. For 1) Certificates of Public Convenience And Necessity To Construct A New Generation Resources; 2) For A Site Compatibility Certificate Relating To The Same; 3) Approval Of Demand Side Management Tariffs; And 4) Other General Relief* (filed Nov. 25, 2024).

chosen as the most beneficial. Explain if any of these alternatives either negate the need for or reduce the benefit from the construction of the RICE units.

6. Refer to Application, Exhibit 4, Direct Testimony of Brad Young, page 8, lines 11 thru 17. Confirm EKPC included the ancillary benefits to the PJM System associated with the dispatchability of the RICE Units. If confirmed, provide details of the ancillary benefits including any work papers to support the response. If not confirmed, provide an analysis of the ancillary benefits.

 RP

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DATED FEB 21 2025

cc: Parties of Record

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