

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 POST-HEARING 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 no later than March 31, 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. Provide a list of the twenty-five reciprocating internal combustion engines (RICE) facilities built or supervised by Burns and McDonald and the locations of each. Identify as part of the list the facilities toured by EKPC.

2. Provide a list of locations of Wartsila RICE electricity generating units in the United States.

3. Provide the noise impact studies available to EKPC for any other RICE facility.
4. Provide the size and type of natural gas pipeline that will connect from the TC Energy Corporation (TC Energy) line to the natural gas provider EKPC will contract with for gas supply to the Liberty facility.
5. Provide each size and type of natural gas pipeline that will run within the project boundary.
6. State whether the RICE units will require a minimum natural gas pressure for the natural gas to be supplied to the Liberty facility.
7. State what the necessary or preferred heat value of the natural gas is to be supplied for the units.
8. Refer to the recently disclosed prospective customer in Marion County, Kentucky, included in the most recent PJM Load Forecast. State and explain what stage of the negotiating or contracting process EKPC is currently in for the special contract with the prospective customer.
9. Provide the exhibit presented by Julia Tucker at the hearing on March 18, 2025, titled "EKPC Existing Generation and Long Term PPA."
10. Provide the current contract or draft of special contract with Columbia Gas for this facility.
11. Explain how current greenhouse gas (GHG) regulations will affect your planned natural gas combined cycle (NGCC), which is projected to come online in 2029.
12. Assuming the current GHG regulations stay in effect, explain whether this unit would have dispatch and or capacity factor limitations as a result of the GHG

regulations. If there are limitations, explain what they are and whether it would be possible for the unit to circumvent the restrictions.

13. If restrictions exist, explain whether they affect the unit's PJM accredited capacity value.

14. If the restrictions exist, explain whether they affect the amount of and potentially the timing of energy that could be sold into the energy market.

15. Explain whether EKPC's RTSim modeling considered any restrictions brought about by current GHG regulations. If so, explain how the generation limitations were modeled and what were the results.

16. Provide any quantitative support or rate impact of EKPC's goal of reducing greenhouse gas emissions by 35 percent by 2035.

17. State whether EKPC intends to bring the RICE units online as they are completed or whether EKPC intends to bring all 12 units online at once.

18. State whether EKPC is aware of dispatch or capacity factor constraints that may be placed on the RICE units as a result of related air permits.

19. State whether the air permit dispatch or capacity factor constraints for combustion turbines (CT) are included EKPC's RTSim modeling.

Linda Bridwell AP

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DATED **MAR 20 2025**

cc: Parties of Record

Case No. 2024-00310

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