

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
1) CERTIFICATES OF PUBLIC CONVENIENCE)	
AND NECESSITY TO CONSTRUCT A NEW)	CASE NO.
GENERATION RESOURCES; 2) FOR A SITE)	2024-00370
COMPATIBILITY CERTIFICATE RELATING TO)	
THE SAME; 3) APPROVAL OF DEMAND SIDE)	
MANAGEMENT TARIFFS; AND 4) 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 March 7, 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

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).

governmental agency, be accompanied by a signed certification of the preparer or the 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 23.

- a. Explain if the estimated transmission costs that EKPC noted ranged from \$79,430,000 to \$127,595,000, are included in the estimated \$1.317 billion cost estimate for the Combine Cycle Gas Turbine (CCGT).

b. If not, provide details on the transmission-related activities and related costs required to support the Cooper CCGT project.

2. Refer to EKPC's response to Staff's Second Request, Item 25. Explain if the installation of the proposed Cooper 1 CCGT would be required if the transmission upgrades, as detailed in the response, were implemented.

3. Refer to the Direct Testimony of Julia Tucker (Tucker Direct Testimony), page 26, line 11. State whether any generating units connected to EKPC's transmission system were offline or derated during Winter Storm Elliott, and if so, identify each such unit, and explain why each such unit was offline or derated, how long each unit was offline or derated, and the extent to which each unit was derated.

4. Refer to EKPC's response to Staff's Second Request, Item 1, page 2. Provide any analysis, details, and supporting explanations of how the 2025 projects conform to the current and projected needs of EKPC.

5. Provide a detailed description of how the co-fired Cooper Unit 2, Spurlock Unit 1, Spurlock Unit 2, Spurlock Unit 3, and Spurlock Unit 4 will comply with the May 2024 Environmental Protection Agency (EPA) Mercury and Air Toxics Standards (MATS) Rule as it relates to the required reduction of the Particulate Matter (PM) limits from 0.030 lbs./MMBtu to 0.010 lbs./MMBtu.

6. Refer to EKPC's response to Staff's Second Request, Item 8. If the environmental regulations discussed in the Declaration of Harm were to be rescinded, explain how that would affect EKPC's intentions toward implementing each of the proposed Certificates of Public Convenience and Necessity (CPCNs) in this proceeding.

7. Refer to the Direct Testimony of Brad Young, EKPC Cooper Combined Cycle Project Scoping Confidential Attachment BY-1, Cooper Unit-2 Project Scoping Report Confidential Attachment BY-2, and Spurlock Unit 1-4 Co-Fire Project Scoping Report Confidential Attachment BY-3. Provide a more concise timeline for implementing each of the proposed CPCN projects in a single document with all estimated and drop-dead dates for major events, including dates on which EPKC expects to obtain financing; file for and obtain required permitting from other agencies; retain engineering, project manager, and construction contractors; begin construction; and bring the projects into operation.

8. Refer to the Direct Testimony of Scott Drake (Drake Direct Testimony), page 22, lines 17 through 19. Explain the methods in which EKPC advertises and markets the Button-Up Weatherization Program to target “end-use members with poor energy-performing homes.”

9. Refer to the Drake Direct Testimony, page 39 through 40. Clarify if the proposed Commercial & Industrial Thermostat Program caps the incentive for commercial and industrial customers. If yes, provide the capped incentive amount.

10. During construction, explain what mitigation measures will be taken to reduce both the impact of the increased traffic as well as noise as it relates for the new school to be built near Cooper Station.

11. Explain whether EKPC considered any alternatives to the proposed projects in this application if PJM Interconnection, LLC (PJM); neighboring utilities; or PJM market participants, including merchant generators within PJM, change expected resources decisions due to the withdrawal of or material changes to expected or proposed

environmental regulations. Please update this response during this proceeding if changes during the course of this proceeding impact the proposed projects

12. Refer to the Direct Testimony of Don Mosier, page 16.

a. Quantify the financial impact of the retirement of the Cooper Unit 1 facility. Include the impact on energy sales, capacity payments, and ancillary services and provide all work papers.

b. Provide the impact of the retirement on operating and maintenance costs and provide all work papers.

 *Linda Bridwell* *rp*

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

DATED FEB 19 2025

cc: Parties of Record

Case No. 2024-00370

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

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

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

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OHIO 45202

*Ashley Wilmes
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

*Byron Gary
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

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

*Michael West
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

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OHIO 45202

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

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