

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 FIRST REQUEST FOR INFORMATION  
TO APPALACHIAN CITIZENS' LAW CENTER, KENTUCKIANS FOR THE  
COMMONWEALTH, AND MOUNTAIN ASSOCIATION

Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Mountain Association (collectively, Joint Intervenors), 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 17, 2025. The Commission directs Joint Intervenors 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

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<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).

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 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.

Joint Intervenors shall make timely amendment to any prior response if Joint Intervenors 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 Joint Intervenors fails or refuses to furnish all or part of the requested information, Joint Intervenors 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, Joint Intervenors 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 Direct Testimony of Elizabeth Stanton (Stanton Direct Testimony), generally. As opposed to how East Kentucky Power Cooperative, Inc.

(EKPC) forecasted its short term and long-term large customer load, explain specifically how EKPC should have forecasted its short term and long term load.

2. Refer to the Stanton Direct Testimony page 14 lines 4-9 and page 15, Figure 4.

a. Explain PJM Interconnection, LLC (PJM) forecasting methodology. Include in the response the reasons for PJM's winter peak and winter peak load forecast for EKPC to be lower than EKPC's actual peak.

b. Explain whether the Joint Intervenors are aware of the Commission's prior decisions regarding retail electric utilities having sufficient capacity to serve native load.

c. Explain the relevance of PJM's winter peak forecast when the forecasts as represented in Figure 4 appear to under forecast the experienced winter peak by hundreds of MWs in multiple years.

d. For capacity planning purposes for EKPC, explain whether the Joint Intervenors are advocating that the PJM winter load forecast methodology for EKPC should be employed.

3. Refer to the Stanton Direct Testimony page 15, lines 5-10. Since PJM is adopting a new Effective Load Carrying Capability (ELCC) generation unit accreditation rating for its members' generation units, explain whether it is required if not incumbent on the PJM members to adopt the ELCC ratings to fulfill their current and forecast load obligation.

4. Refer to the Stanton Direct Testimony page 16, lines 12-15. In addition to PJM's new ELCC capacity accreditation ratings reducing renewables and Battery Storage

System's (BESS) projected contribution to Winter Peak supply, explain whether the ELCC ratings lowered the capacity accredited ratings of fossil fueled or any other generation technology. If so, provide a list of generation technologies with the capacity ratings prior to and after PJM applied ELCC ratings.

5. Refer to Stanton Direct Testimony, page 45, lines 20-24 and page 46, lines 1-2. Provide additional data to support the Joint Intervenors' claim that the EKPC Cooper Unit 2 costs continue to exceed its revenue from 2019 through 2024.

6. Refer to Stanton Direct Testimony, page 26, line 6. Explain why the actual EKPC January 2025 peak load exceeded the January 2025 PJM EKPC Regional forecast.

7. Refer to Stanton Revised Direct Testimony, filed February 20, 2025, at page 14, lines 6-9. Explain in detail why it is appropriate to compare territory forecast to EKPC's company specific forecasts.

8. Refer to the Stanton Revised Direct Testimony, filed February 20, 2025, page 18, lines 5-10. Explain whether it is possible for EKPC to purchase capacity for 1-8 hours per year only and how EKPC would pinpoint with any surety the time period during the winter heating season when those hours should be purchased.

8. Refer to the Stanton Direct Testimony, page 7 line 18 through page 8, line 2. Refer also to page 17, lines 1-3. Explain the reasoning behind the assumption of duplication regarding the 7 percent Winter Reserve Margin with the knowledge that EKPC has not provided an explanation or calculation of how the Winter Reserve Margin increase, winter load increase, and PJM's ELCC interact.

*Linda Bridwell* PP

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DATED MAR 04 2025

cc: Parties of Record

Case No. 2024-00370

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