

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST	)	
KENTUCKY POWER COOPERATIVE, INC. FOR	)	
A CERTIFICATES OF PUBLIC CONVENIENCE	)	
AND NECESSITY AND SITE COMPATIBILITY	)	
CERTIFICATES FOR THE CONSTRUCTION OF	)	
A 96 MW (NOMINAL) SOLAR FACILITY IN	)	CASE NO.
MARION COUNTY, KENTUCKY AND A 40 MW	)	2024-00129
(NOMINAL) SOLAR FACILITY IN FAYETTE	)	
COUNTY, KENTUCKY AND APPROVAL OF	)	
CERTAIN ASSUMPTIONS OF EVIDENCES OF	)	
INDEBTEDNESS RELATED TO THE SOLAR	)	
FACILITIES AND OTHER 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 August 16, 2024. 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

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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.

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 1.

a. Confirm that the tables and the capacity additions attributable to Fayette and Marion County solar facilities are presented on a nameplate basis.

b. Provide an update to the tables accounting for the PJM effective load carrying capability (ELCC) class ratings.

2. Refer to the Direct Testimony of Patrick Bischoff (Bischoff Testimony), page 9, lines 18-23 and page 14, lines 22-23, EKPC's response to Staff's Second Request, Item 5 and the Application Exhibit PB-1 Table 5-2, page 69, and EKPC's response to Lexington Fayette Urban County Government's Second Request for Information, Item 3.

a. Explain whether the Annual Operating & Maintenance (O&M) costs in Table 5-2 are premised on the 2022 O&M cost of \$15.97 per kW-yr.

b. If so, provide an update to the table using the 2023 annual O&M cost of \$17.16 per kW-yr and the 2024 annual O&M cost of \$20.23 per kW-yr.

c. Explain whether the 2023 and 2024 data were available to EKPC when the self-build proposal cost estimates were assembled.

d. Explain whether using the updated annual O&M data alters either the cost effectiveness of EKPC's self-build proposal or once completed, the cost effectiveness of the solar facilities.

3. Provide the estimated annual energy savings that the proposed solar project is expected to provide once in service, including calculations and documents used to determine these savings.

4. Refer to the Application, page 7, paragraph 22. For each project, state any facts or arguments in support of the requested deviation from KRS 278.708(3)(a)(7) regarding the setback requirements contained in KRS 278.704(2).

5. Refer to the Application, Exhibit PB-3, page 9 of 193, which states “Large portions of the site are not visible from surrounding roads or residential properties.” State what approximate percentage is visible from roads and from residential properties.

6. Refer to Direct Testimony of Julia J. Tucker, page 14. Identify and explain the reference to “repeated setbacks in concluding a contractually binding signed PPA.”

7. Refer to Bischoff Testimony, pages 4-5.

a. Explain why EKPC only considered self-build projects that held positions within PJM’s generation interconnection queue.

b. Provide estimated costs and an estimated design, construction, and interconnection timeline for a hypothetical self-build option if EKPC were to select a location and file its own PJM interconnection application.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
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DATED       JUL 31 2024      

cc: Parties of Record

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