

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 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 March 17, 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 the Direct Testimony of Julia Tucker (Tucker Direct Testimony), page 16. Provide the financial impacts associated with EKPC's PJM Interconnection, LCC (PJM) purchases required to meet the excess energy needs during Winter Storms Elliott and Gerri.

2. Provide the Revenue and Cost profile for the Cooper 2, Spurlock 1, Spurlock 2, Spurlock 3, and Spurlock 4 facilities for each year beginning in 2014 through 2025, as of February 2025. Include all fixed and variable costs, energy revenue, capacity revenue, and ancillary revenue by unit.

3. Refer to Case No. 2022-00098,² 2022 Integrated Resource Plan Section 1 at 2. EKPC states, “In total, EKPC owns and/or purchases 3,438 MW (winter rating) or 3,136 MW (summer rating) of generation.” In the present proceeding (Application at 2), EKPC states it has 3,265 MW net winter and 2,963 MW net summer capacity rating. Also in the present proceeding, Tucker Direct Testimony Attachment JJT-4, EKPC’s Existing Winter Capacity ranges from 3,727 MW to 3,300 MW and Existing Summer Capacity ranges from 2,580 MW to 2,474 MW. Explain the differences between these three sets of capacity ratings. Include in the response the summer (and winter if known) Effective Load Carrying Capability (ELCC) ratings for each of EKPC’s owned and purchased generation resources.

4. Refer to the Direct Testimony of Julia T. Tucker (Tucker Direct Testimony) Attachment JJT-4. Beginning in 2025, explain why the summer Total Effective Addition amounts decrease. If the decrease is an error, provide a corrected Attachment JJT-4.

5. Refer to Tucker Direct Testimony Attachments JJT-2 at 46 and 48 and Attachment JJT-4. Explain the rationale for subtracting six percent from the summer Long Term Load Forecast (LTLF) in Attachment JJT-4 as opposed to using the actual summer base case LTLF.

² Case No. 2022-000098, *Electronic 2022 Integrated Resource Plan of East Kentucky Power Cooperative, Inc.* (filed Apr 1, 2022).

6. Refer to Tucker Direct Testimony page 13, lines 8–16 and page 14 lines 1–22 and page 15 lines 1–19.

a. Explain whether PJM requires EKPC to maintain a capacity reserve margin, and if so, provide and explain how that margin is calculated for EKPC. Include in the response whether the same calculation for the required reserve margin in summer is also applied to EKPC's winter required reserves for the PJM's three forward planning years.

b. Referring to page 14 lines 1–22, if the actual winter peaks are higher than forecast, explain the rationale for using the winter base case forecast and not the extreme weather winter forecast.

7. Refer to Tucker Direct Testimony page 15 lines 1–19 and Attachment JJT-4.

a. Confirm that the ELCC generation unit accreditation methodology effectively derated all EKPC's units seasonally.

b. Explain why EKPC did not apply the ELCC methodology to its winter unit capacity ratings. Include in the response why this omission does not present an inflated winter unit capacity over what each unit will provide during a forecast winter peak.

c. Explain whether the Existing Capacity column in Attachment JJT-4 has been adjusted to account for ELCC ratings. If not, explain the rationale for not calculating reserve margins using existing and added unit capacities all on an equivalent apples-to-apples basis.

Linda Bridwell **PP**

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DATED **MAR 03 2025**

cc: Parties of Record

Case No. 2024-00370

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