

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST	)	
KENTUCKY POWER COOPERATIVE, INC. FOR	)	
APPROVAL OF THE AUTHORITY TO ISSUE UP	)	CASE NO.
TO \$450,000,000 OF SECURED OR	)	2025-00044
UNSECURED PRIVATE PLACEMENT OR	)	
BANK/FINANCIAL INSTITUTION DEBT	)	
OBLIGATIONS	)	

COMMISSION STAFF'S FIRST 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 28, 2025. 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 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

---

<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).

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 Application, pages 3 and 4. Explain how the \$450,000,000 financing amount was determined, including any specific project or expenditure examples besides the \$350,000,000 listed on page 4.

2. Explain if EKPC has evaluated alternative financing structures, and if so, provide the results of those evaluations.

3. Refer to Application, page 8. EKPC stated that as of February 15, 2025, it had drawn \$450,000,000 of the available \$600,000,000 that was approved in Case No. 2021-00473<sup>2</sup>. Provide the total available amount of approved financing as of the date of this response. Additionally, indicate the timing EKPC expects to draw additional funding of the available \$600,000,000.

4. Refer to EKPC's response to deficiency, page 2. EKPC stated that private placement debt would be secured under the indenture. Confirm that this indenture is the Trust Indenture described in the Application. If this cannot be confirmed, provide an explanation for the indenture referred to in EKPC's Response to Deficiency.

5. Explain how the new financing will affect EKPC's credit rating and overall financial stability.

6. Provide the advantages and disadvantages of issuing unsecured floating-rate bank debt.

7. Provide the advantages and disadvantages of issuing private placement debt, secured under the indenture.

8. Provide the estimated timeline for the Rural Utilities Services (RUS) loan approval and disbursement.

9. Explain how EKPC plans to transition from the financing proposed in the application to the RUS loans or other long-term funding sources.

10. Explain what financing options EKPC will consider if the RUS loan is denied.

---

<sup>2</sup> Case No. 2021-00473, *Electronic Application of East Kentucky Power Cooperative, Inc., for Approval of the Amendment and Extension or Refinancing of an Unsecured Revolving Credit Agreement in an Amount up to \$800,000,000 or Which up to \$100,000,000 may be in the Form of an Unsecured Renewable Term Loan and up to \$400,000,000 of Which will be in the Form of a Future Increase Option* (Ky. PSC Feb. 8, 2022), Order.

11. Provide a detailed breakdown of capital expenditures that will be funded with the financing proposed in the application including anticipated projects and cost-estimates.

12. Explain if any of the financing will be or is anticipated to be used for projects that do not yet have Commission-approved Certificates of Public Convenience and Necessity (CPCNs).

13. Provide a detailed breakdown of how the \$450 million will be allocated (e.g., how much will be allocated to the solar project, general liquidity, etc.).

14. Provide the expected repayment sources for the proposed financing.

15. Explain if EKPC will seek rate adjustments or other cost recovery mechanisms related to the proposed financing.

16. Explain how EKPC will determine the mix of secured and unsecured debt under the proposed financing. List what assets would be used as collateral for the secured debt issuance.

17. Explain how EKPC will anticipate if bondholder or lender conditions may affect the proposed financing.

18. Explain if EKPC has considered hedging strategies to mitigate interest rate risk. If hedging is planned, explain how EKPC will update the Commission on its impacts and associated costs.

19. Explain if EKPC anticipates additional regulatory approvals for projects or related financing beyond Commission authorization. If so, provide what approvals will be required.

20. Explain if EKPC will seek any waivers or amendments to its existing credit agreements or indentures as part of the proposed financing.

21. Provide the potential implications if the Commission does not approve the financing as requested.

22. Provide a status of the tax credits received from Case No. 2024-00129.<sup>3</sup> Explain if EKPC has received any of the credits, and if so, provide the total of tax credits based on EKPC's capital outlay of \$350 million.



---

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

DATED   **MAR 18 2025**  

cc: Parties of Record

---

<sup>3</sup> Case No. 2024-00129, *Electronic Application of East Kentucky Power Cooperative, Inc. for Certificates of Public Convenience and Necessity and Site Compatibility Certificates for the Construction of a 96 MW (Nominal) Solar Facility in Marion County, Kentucky and a 40 MW (Nominal) Solar Facility in Fayette County, Kentucky and Approval of Certain Assumptions of Evidences of Indebtedness Related to the Solar Facilities and Other Relief* (Ky. PSC Dec. 26, 2024), Order.

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

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

\*Heather Temple  
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

\*Meredith L. Cave  
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