

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
APPROVAL TO AMEND ITS ENVIRONMENTAL)	CASE NO.
COMPLIANCE PLAN, AND RECOVER COSTS)	2025-00053
PURSUANT TO ITS ENVIRONMENTAL)	
SURCHARGE, AND 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 October 20, 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 governmental agency, be accompanied by a signed certification of the preparer or the

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).

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, the Direct Testimony of Jerry Purvis, Exhibit 3, page 2, line 12.
 - a. Provide a detailed description of the proposed Projects 58 and 59.
 - b. State whether costs for these projects are considered capital or operating and maintenance (O&M) costs.

2. Provide a description of the projected or expected potential impact of the EPA's on-going proposals to withdraw regulations related to many of the power industry's air and water regulations on EKPC's current Environmental Compliance Plan.

3. Refer to the Application, Direct Testimony of Joseph VonDerHaar (VonDerHaar Direct Testimony), Exhibit 4, compliance plan fact sheet, Attachment JV-1 and Attachment JRW-2, Project 42, Spurlock Landfill, South Side C. Provide documentation that supports that the proposed caps on the Spurlock Area B and C landfills are in excess of costs associated with the originally approved landfill project.

4. Refer to the Application, VonDerHaar Direct Testimony, Exhibit 4, compliance plan fact sheet, Attachment JV-1. Also, reference Attachment JRW-2, Project 43, JK Smith Landfill, Final Cap. Provide documentation that supports that the proposed cap on the Smith Landfill is in excess of costs associated with the originally approved landfill project.

5. Refer to the Application, page 10. Provide details that support the \$1,750,000 annual O&M expense estimate.

6. Refer to the Application, Direct Testimony of Jacob Watson, and Attachment JRW-1. For each of the 19 proposed projects, provide a summary of the specific activities, the associated capital costs, and annual O&M for each activity.

Linda Bridwell RP

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DATED **OCT 03 2025**

cc: Parties of Record

Case No. 2025-00053

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