

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2025 INTEGRATED RESOURCE	)	CASE NO.
PLAN OF EAST KENTUCKY POWER	)	2025-00087
COOPERATIVE, INC.	)	

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 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 person supervising the preparation of the response on behalf of the entity that 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).

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 Integrated Resource Plan (IRP) Table 8-3, page 184. Refer also to Case No. 2025-00140, EKCP's response to Commission Staff's First Request for Information, Item 5b and 5c.<sup>2</sup>

---

<sup>2</sup> Case No. 2025-00140, *Electronic Tariff Filing of East Kentucky Power Cooperative, Inc. to Establish a New Tariff for Data Center Power* (filed July 14, 2025), EKPC's Response to Commission Staff's First Request for Information.

a. Item 5b indicates that a Certificate of Public Necessity and Convenience (CPCN) will be filed with the Commission for a new combustion turbine (CT). The IRP Table 8-3 does not indicate that a CT is warranted. Explain when EKPC's load forecast was updated such that another CT is warranted for resilience and reliability. Include in the response the size of the contemplated CT unit.

b. Item 5b also indicates that EKPC secured options for a third Siemens turbine aside from the two required to build the 745 MW (winter rating) natural gas combined cycle.

(1) Explain if and when the Commission was made aware that EKPC secured the option for the third turbine.

(2) Explain whether the price of the option for the third turbine was the same as for the other two turbines to be used for the Natural Gas Combined Cycle (NGCC). Include in the response whether the reservation fee is applicable to the purchase price.

(3) When was the deadline for EKPC to notify Siemens that it would exercise its purchase option?

c. Item 5c contemplates the possibility of a fourth turbine. Explain whether EKPC has already secured an option for this turbine, the option cost, and when a final purchase decision must be made.

2. Refer to EKPC's response to Commission Staff's Second Request for Information (Staff's Second Request) Item 7. Provide an explanation on how electric vehicle charging is expected to contribute 563,000 MWh to total energy requirements

when only 12.7 percent of EKPC residential customers are likely to purchase an electric vehicle (EV) within the next five years.

3. Refer to the IRP Table 8-2, page 180, and EKPC's Response to Staff's Second Request, Item 23, Staff 2-23 – Table 8-2 (Revised).

a. Compare and explain the differences in capital cost estimates between the National Renewable Energy Laboratory's Annual Technology Baseline (NREL ATB) and EKPC's Owner's Engineer, including the factors contributing to any variances.

b. From a resource assessment and production cost modeling perspective, explain why the various potential resources shouldn't be approximately the same estimated cost level of precision, such as overnight capital costs.

c. If the potential resources are modeled at different levels of precision, such as overnight capital costs for some resources and more detailed known engineering and construction costs for other resources, explain why that would not bias the choice and timing of additional resources selected in the portfolio modeling processes.

d. Refer also to Case No. 2024-00310, EKPC's response to Commission Staff's Second Request for Information, Item 6 page 2 of 4.<sup>3</sup> In that case, the assumed capital cost of the reciprocating internal combustion engine (RICE) units was significantly smaller than the assumed capital cost for the RICE unit in the present proceeding Table 8-2 (Revised). Explain the differences between these capital costs.

---

<sup>3</sup> Case No. 2024-00310, *Electronic Application of East Kentucky Power Cooperative, Inc. for 1) a Certificate of Public Convenience and Necessity to Construct a New Generation Resource; 2) a Site Compatibility Certificate; and 3) Other General Relief* (filed Dec. 15, 2024), EKPC's Responses to Commission Staff's Second Request for Information.

e. Confirm that the resource assessment and production cost modeling in Case No. 2024-00310 evaluated potential resources that were at approximately the same level of cost estimation precision.

4. Refer to EKPC's response to Staff's Second Request Item 23 page 2. EKPC stated,

[T]he RICE and Combined Cycle costs do not match the CPCNs submitted in Case Nos. 2024-00310 and 2024-00370 because the capital costs do not represent those costs submitted for Liberty RICE or Cooper CCGT. The resources in Table 8-2 (Revised) represent costs estimates for each resource and does not include transmission expenses that would be incurred for any future project.

Confirm that the capital costs in Case Nos. 2024-00310 and 2024-00370 also did not include transmission costs.

5. Refer to EKPC's response to Staff's Second Request, Item 25a. Confirm that the reason environmental compliance costs that were included as base assumptions to the IRP modeling were not included in the plans represented in Table 8-4 is because modeling for the specific plans in Table 8-4 had already accounted for or included the environmental costs, so including environmental costs in modeling in those specific plans would have been "double counting." If not confirmed, explain.

6. Refer to EKPC's response to Staff's Second Request Item 26.

a. Confirm which Mercury and Air Toxics Standards (MATS) filterable particulate matter numeric emission limitation EKPC is required to maintain compliance with for each generation unit.

b. Explain whether EKPC has been granted the Presidential Exemption (Exemption) upon the signing of the proclamation dated April 8, 2025,<sup>4</sup> or whether EKPC must go through a formal request process to have the Exemption, and which specific environmental regulations are affected by the Exemption.

c. Explain whether the Exemption means that EKPC could cease compliance with existing current environmental regulations, and if yes, identify which environmental regulations it would create noncompliance with.

d. Once EKPC has the Exemption, explain the specific actions EKPC will take to meet each environmental compliance limitation that is applicable to the Exemption and the date by which EKPC must be in compliance.

e. Explain why EKPC needed the exemption, including the specific reasons EKPC would have been unable to comply without the Exemption.

f. Provide a list of the Environmental Protection Agency (EPA) rules pertaining to the Spurlock Units to which EKPC must still comply and the compliance standards that must be attained, or if in compliance already, must be maintained.

7. Refer to EKPC's response to Staff's Second Request Item 27b, attachment Staff 2-27b.pdf.

a. In the Total Capacity column, identify and explain the sources of winter capacity additions that will support increases of 100 MWs in 2026, 50 MWs in 2027, and 50 MWs in 2028.

---

<sup>4</sup> Regulatory Relief for Certain Stationary Sources to Promote American Energy, Apr. 8, 2025. <https://www.whitehouse.gov/presidential-actions/2025/04/regulatory-relief-for-certain-stationary-sources-to-promote-american-energy/>

b. Explain whether the 300 MW Hydro Power Purchase Agreement (PPA) listed in both winter and summer means that the modeled/assigned capacity factor is at or near 100 percent year-round.

8. Refer to EKPC's response to Staff's Second Request, Item 27b, attachment Staff 2-27b.pdf, and Item 28b, attachment Staff 2-28b – EKPC IRP 2025 Resource Expansion Plan.pdf.

a. In Staff 2-28b – EKPC IRP 2025 Resource Expansion Plan.pdf, there are capacity addition purchases, but in attachment Staff 2-27b.pdf, the purchases appear to be listed under Energy additions. Explain the differences and whether Table 8-3 (Revised) should be updated to reflect the capacity purchases.

b. Explain whether EKPC has already signed contracts for the capacity purchases illustrated in the Staff 2-28b – EKPC IRP 2025 Resource Expansion Plan.pdf.

c. Confirm that these winter capacity purchases are for resource capacity only and explain how EKPC recovers the cost of the winter capacity purchases.

9. Refer to EKPC's response to Staff's Second Request, Item 28, page 2 of 3.

a. In the Long-Range Forecast chart, the amount of Coal – Co-Fire generation declines from 2031–2033 and then remains stable beginning in 2034. Explain whether the decline is due to lower ELCC values attributable to co-firing or the retirement of the Cooper coal units.

b. Explain whether the co-firing of Cooper Unit 2 is necessary due to EKPC receiving the Presidential Exemption.

10. Refer to EKPC's response to Staff's Second Request, Item 30b. Confirm that when EKPC states that the RICE and Cooper Combined Cycle Gas Turbine (CCGT) were added as base case assumptions, for capacity and energy modeling and forecasting purposes that means that these units were treated as already part of EKPC's existing resource portfolio along with the existing Cooper and Spurlock units.

11. Refer to EKPC's response to Staff's Second Request, Item 14b. Conduct and provide an analysis of the effects of the potential expiration or termination of federal financial stimuli.

12. Refer to EKPC's response to Staff's Second Request, Item 16. Explain how EKPC plans to advertise the improvements made to the Button-up Program to end-use members and local contractors.

13. Refer to EKPC's response to Staff's Second Request, Item 16. Explain how EKPC calculated the "estimation of how the Button-up Program will grow once knowledge of the program with end-use members and local contractors improves along with reflecting the impact of an increased incentive."



---

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

DATED       AUG 12 2025      

cc: Parties of Record



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

\*John Horne  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Angela M Goad  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Kristin Henry  
Staff Attorney  
Sierra Club Environmental Law Program  
2101 Webster Street  
Suite 1300  
Oakland, CA 94612

\*Bethany Baxter  
Childers & Baxter PLLC  
300 Lexington Building, 201 West Sho  
Lexington, KY 40507

\*Larry Cook  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

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

\*Michael West  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Heather Temple  
Honaker Law Office, PLLC  
1795 Alysheba Way  
Suite 1203  
Lexington, KY 40509

\*Nathaniel Shoaff  
Sierra Club  
2101  
Webster St. , Suite 1300  
Oakland, CA 94612

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

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

\*Joe F. Childers  
Childers & Baxter PLLC  
300 Lexington Building, 201 West Sho  
Lexington, KY 40507

\*Toland Lacy  
Office of the Attorney General  
700 Capital Avenue  
Frankfort, KY 40601