

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC. FOR)	
A GENERAL ADJUSTMENT OF RATES,)	CASE NO.
APPROVAL OF DEPRECIATION STUDY,)	2025-00208
AMORTIZATION OF CERTAIN REGULATORY)	
ASSETS, 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 13, 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 EKPC's response to the Attorney General and Nucor's First Request for Information (AG/NUCOR's First Request), Item 8. Confirm that no part of the dues paid to Touchstone Energy Cooperatives are related to covered activities including advertising, marketing, legislative policy research, and/or regulatory policy research. If not confirmed, state the percentage of dues paid that are tied to these covered activities.

2. Refer to EKPC's response to the AG/NUCOR's First Request, Item 37. Confirm that insurance expense, specifically related to outages, is a normally incurred expense for EKPC annually. If not confirmed, explain why outage reimbursements were excluded in the base revenue requirement for this case, yet the expenses associated were included in the base revenue requirement for this case.

3. Refer to EKPC's response to the AG/NUCOR's First Request, Item 62. Provide the total defined contribution plan expense for employees who are also covered under a defined benefit pension plan for each of the years 2020, 2021, 2022, 2023, and 2024. Further, provide the amount included for recovery in the test period.

4. Refer to EKPC's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 41. Provide the Schedule of Outstanding Long-Term Debt for the Year Ended December 31, 2024.

5. Refer to the 2024 Regional Transmission Expansion Plan (RTEP)² at 56 and the 2025 Load Forecast Report³ at 33.

6. Confirm if Peak Shaving is expected to continue for the remainder of calendar year 2025, as well as calendar years 2026 and 2027.

a. If not confirmed, explain the response.

b. If confirmed, explain Peak Shaving's effect on the current rate case calculations.

7. Refer to EKPC's response to Staff's Second Request, Item 24. Refer also to the Direct Testimony of Jacob R. Watson (Watson Direct Testimony), Schedules 1.06,

² [pjm.com/-/media/DotCom/library/reports-notices/2024-rtep/2024-rtep-report.pdf](https://www.pjm.com/-/media/DotCom/library/reports-notices/2024-rtep/2024-rtep-report.pdf).

³ <https://www.pjm.com/-/media/DotCom/library/reports-notices/load-forecast/2025-load-report.pdf>.

1.07, and 1.08. Each of the referenced schedules states an adjustment was made to exclude a portion of expenses recovered through the environmental surcharge. Provide an update to Schedules 1.06, 1.07, and 1.08 detailing:

a. The amount that was excluded due to recovery through the environmental surcharge;

b. Where in the schedule the adjustment was made; and

c. Where the individual adjustment documented in Schedule 1.02 or

1.03.



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

DATED SEP 29 2025

cc: Parties of Record

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

*Lawrence W Cook
Assistant Attorney General
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

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

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

*J. 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

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

*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

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

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

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