

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 FIRST REQUEST FOR INFORMATION
TO THE ATTORNEY GENERAL OF THE COMMONWEALTH OF KENTUCKY

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 24, 2025. The Commission directs the Attorney General 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.

The Attorney General shall make timely amendment to any prior response if the Attorney General 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 the Attorney General fails or refuses to furnish all or part of the requested information, the Attorney General 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, the Attorney General 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 Stephen J. Baron (Baron Direct Testimony) page 8, lines 17-20. Explain, in detail, how interruptible customers would “essentially lose the interruptible credits” without the adjustment made to the cost-of-service study (COSS).

2. Refer to the Baron Direct Testimony page 12, lines 9-12. Explain, in detail, how customers who receive the Economic Development Rate (EDR) credits would be charged for the cost of providing the credits.

3. Refer to the Baron Direct Testimony page 13, lines 7-10.

a. Provide explanation as to why the Average and Excess (A&E) allocation factor is the most reasonable allocation factor for EDR credits.

b. Explain how using the A&E allocation factor impacts the results of the COSS.

4. Refer to the Baron Direct Testimony page 15, lines 16-18. Explain how leaving the fuel and purchased energy expenses and revenues in the COSS is the most efficient approach to address the imbalance.

5. Refer to the Baron Direct Testimony page 29, lines 4-7.

a. Explain why the COSS was based upon the East Kentucky Power Company (EKPC)'s filed revenue requirement and not the revenue requirement produced by witnesses Lane Kollen and Randy Futral.

b. Provide a COSS utilizing the revenue requirement produced by witnesses Lane Kollen and Randy Futral.

c. Additionally, explain the reasonableness of that COSS.

6. Refer to the Baron Direct Testimony page 40, lines 7-9. Explain how increasing the interruptible credit by \$2/kW-month satisfies the issue raised of the credit being too low.

7. Refer to Baron Direct Testimony page 20. Explain why Lexington, Kentucky was selected as the proxy for EKPC's Heating Degree Days (HDD).

8. Refer to Baron Direct Testimony page 21. Confirm that the data presented in Figure 1 is representative of the national HDDs based on data from 1991 to 2020. If that is not confirmed, identify the source and provide a copy of the information

9. Refer to the Direct Testimony of Lane Kollen (Kollen Direct Testimony), page 17, lines 2-4, where Kollen states: “[t]he cost of decommissioning is thus a transition cost to the newer, more efficient, and lower cost replacement generation and appropriately recovered from the customers who benefit from the new replacement generation.” Provide the support for saying that future generations of customer will be paying for lower-cost replacement generation. If calculations are included in the explanation, provide the workpapers in Excel spreadsheet Excel spreadsheet format with all formulas intact and cells unlocked.

10. Refer to the Kollen Direct Testimony, page 17, lines 8-9. Explain how the inclusion of the decommissioning expense in EKPC’s revenue requirement results in intergenerational inequity among customers.

11. Refer to the Kollen Direct Testimony page 27, lines 13-15. Explain the basis of extending the life spans for each of the Smith units to 45 years, when the longest useful life span, as filed, for any of the Smith units is currently 40 years.

12. Refer to the Kollen Direct Testimony page, 29. Compare and contrast specific advantages or disadvantages of the recommendation to deny EKPC’s request to terminate Rate EM versus the recommendation to terminate Rate EM and transition to the proposed deferral mechanism.

13. Refer to the Kollen Direct Testimony page 30. If the Commission were to terminate the Rate EM, as proposed by EKPC, explain what effect that would have on the

recommendation regarding EKPC's request to defer increases in the regional transmission expansion plan (RTEP).

14. Refer to the Direct Testimony of Randy Futral, page 16, lines 11-12. Explain how extending the amortization periods for the deferred Smith 1 cancelation costs and 2019 deferred major maintenance expenses at the Spurlock generating station would result in reasonable recovery for EKPC when the Commission has already set a defined amortization period for these specific deferred costs.



Linda C. Bridwell, PE
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DATED **NOV 7 2025**

cc: Parties of Record

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