

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST KENTUCKY POWER COOPERATIVE, INC. FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT A 161 KV TRANSMISSION LINE IN PULASKI COUNTY, KENTUCKY AND OTHER GENERAL RELIEF))))) CASE NO. 2025-00311

COMMISSION STAFF'S SECOND 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 January 16, 2026. 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 person supervising the preparation of the response on behalf of the entity that 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).

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, Attachment LS-1 page 22. Confirm that the 150-foot right of way on each side of the centerline is constant and will not shift throughout the entirety of the construction of the Cooper-Alcalde 161 kV double-circuit transmission line. If not confirmed, explain why the 150-foot right of way would shift and whether EKPC intends to request Commission permission to modify the right of way.

2. Refer to the Direct Testimony of Darrin Adams (Adams Direct Testimony), page 9, lines 18–20. Provide a breakdown of any quantified economic benefits that EKPC members will incur as a result of the Cooper-Alcalde 161 kV double-circuit line being constructed.

3. Refer to the Adams Direct Testimony, page 10. Explain how much new line installation will be avoided as a result of the construction of the new Cooper-Alcalde double-circuit 161 kV transmission line.

4. Refer to the Adams Direct Testimony, page 12, lines 11–14.

a. Further explain the benefits and reasonableness of constructing the Cooper-Alcalde 161 kV double-circuit line compared to constructing the Cooper-Alcalde line at 345 kV. In the response, include the estimated cost of constructing the Cooper-Alcalde line at 345 kV.

b. Explain the estimated cost of constructing the second Cooper-Alcalde 161 kV transmission line circuit as opposed to a single-circuit transmission line. Include in the response a comparison of how running the second circuit is less expensive than the cost of the additional projects that would have been required with running only a single circuit Cooper-Alcalde transmission line.

5. Refer to the Adams Direct Testimony, Attachment DA-1, Table 1.1 page 5–

6. For each individual project that was not included in EKPC's Cooper Station Certificate of Public Convenience and Necessity (CPCN), Case No. 2024-00370,² but is included in

² Case No. 2024-00370, *Electronic Application of East Kentucky Power Cooperative, Inc. for 1) Certificates of Public Convenience and Necessity to Construct a New Generation Resources; 2) for a Site Compatibility Certificate Relating to the Same; 3) Approval of Demand Side Management Tariffs; and 4) Other General Relief.*

this proceeding, provide specific justification for these additional costs included in the current proceeding, and specify any potential benefits to EKPC and its members may receive as a result of the additional costs.

6. Refer to the Adams Direct Testimony, Attachment DA-1, page 21. List all thermal overload violations that EKPC has identified. For each, specify which of the alternative projects would address the violation (single-circuit 161 kV line, double-circuit 161 kV line, and/or 345 kV line), and include whether an upgrade is required by PJM Interconnections, LLC., or whether EKPC determined an upgrade was necessary internally.

7. Refer to the Direct Testimony of Lucas Spencer (Spencer Direct Testimony) Attachments EKPC Cooper Alcalde – 161kV Greenfield Transmission Routing Study, Part XI: Alternate Routes page 63. The routing study states, “The first 2.90 miles of Route B is a double circuit transmission circuit, while the final 1.64 miles of Route B is a single transmission circuit.”

8. Refer also to the Application, page 4, paragraph 8 and the Direct Testimony of Darrin Adams (Adams Direct Testimony), page 4, lines 8–16. This statement does not appear to conform to the explanations of solutions for transmission contingencies given in the in the Application and the Adams Direct Testimony for the proposed 161 kV transmission line exiting Cooper Station and terminating at the Alcalde substation as a double circuit. Explain the apparent contradiction.

a. If the statement is correct, explain how the proposed line satisfies the transmission contingencies identified in the transmission studies.

b. If the statement is not correct and the proposed line will be a double 161kV circuit terminating at the Alcalde Substation, explain whether the siting study results are impacted by having a second circuit for the last 1.64 miles of the proposed route.

9. Refer to EKPC's response to Commission Staff's First Request for Information (Staff's First Request), Item 1. Confirm that the potential addition of the 2,200 MW load added to the Maysville area south of EKPC's Spurlock Station has no impact on the need for any transmission upgrades as a result of the additional generation from the Liberty Rice Units, the Cooper Combined Cycle Gas Turbine (CCGT), and the additional generation from Louisville Gas and Electric/Kentucky Utilities. If not, confirmed, explain the response.

10. Refer to EKPC's response to Staff's First Request, Item 2. Explain the need for the eventual 345 MW double circuit lines as opposed to a single circuit line.

11. Refer to EKPC's response to Staff's First Request, Item 3b.

a. Explain whether the remaining mitigation required after the Cooper-Alcalde double circuit 161 kV line is completed that EKPC will be responsible for constructing will require one or more separate CPCN and when the Commission can expect such a filing.

b. Explain how EKPC will increase the mean operating temperature (MOT) of a transmission line.

12. Refer to EKPC's response to Staff's First Request, Item 4, page 2. Identify the parcel owner for the parcel situated between parcel #4 and parcel #2 and confirm the parcel owner was notified of the proposed project. If not confirmed, explain the response.

13. Refer to EKPC's response to Staff's First Request, Item 4, page 3. Identify the parcel owner for the parcel situated between parcel #72 and parcel #81 and confirm the parcel owner was notified of the proposed project. If not confirmed, explain the response.



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DATED DEC 31 2025

cc: Parties of Record

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