

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL ADJUSTMENT)	CASE NO.
CLAUSE OF EAST KENTUCKY POWER)	2025-00339
COOPERATIVE, INC. FROM NOVEMBER 1, 2022)	
THROUGH OCTOBER 31, 2024.)	

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 February 20, 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 EKPC's responses to Commission Staff's First Request for Information (Staff's First Request), the Direct Testimony of Chris E. Adams (Adams Direct Testimony), page 4 of 9, lines 1-16. Hypothetically, when EKPC is aware of forecasted extreme winter weather especially heading into a weekend, such as winter storms Elliot²

² A major, deadly U.S. weather event occurring in December of 2022 related to freezing temperatures, snow and ice accumulation, which placed stress upon power grids both inside and outside EKPC territory.

and Fern,³ explain whether EKPC held additional planning or approval meetings to procure forward natural gas, pipeline transportation, and/or power contracts and whether such actions were successful. Include in the response the timing of the meetings, examples of actual plans, and actions taken.

2. Refer to EKPC's responses to Staff's First Request, Adams Direct Testimony, page 5 of 9, lines 6-15. Explain whether EKPC ever proactively engages in off-system sales of either energy or capacity.

3. Refer to EKPC's responses to Staff's First Request, Adams Direct Testimony, page 7 of 9, lines 19-23. If both EPKC and PJM Interconnection, LLC (PJM) have dispatched Cooper Station out of economic merit for reliability and area voltage support, identify and explain all the difference circumstances where EKPC would proactively dispatch Cooper Station. Include in the response what system information EKPC may have which PJM would not necessarily be aware of.

4. Refer to EKPC's responses to Staff's First Request, the Direct Testimony of Mark Horn (Horn Direct Testimony), page 3 of 5, lines 17 -19. Explain the difference between delivered tons and committed tons.

5. Refer to EKPC's responses to Staff's First Request, Horn Direct Testimony, page 4 of 5, lines 18-20. Explain why coal suppliers may have to deal with limited access to capital, bonding, and insurance in the coming years.

6. Refer to EKPC's response to Commission Staff's First Request, Item 2, Attachment PSC DR1 Response 2 – Long Term Coal Contracts.pdf. Explain the reasons

³ A major, deadly U.S. weather event occurring in January of 2026 related to freezing temperatures, snow and ice accumulation, which placed stress upon power grids both inside and outside EKPC territory.

for the prices in Contract nos. 558, 560, 840, and 844, individually, being as high as they are relative to the other contract prices. Include in the response how each of the evaluated prices is determined from the delivery prices.

7. Refer to EKPC's response to Staff's First Request, Item 4, and Confidential PSC DR1 Response 4a – Coal Solicitations and Confidential PSC DR1 Response 4b – Solicitation Bid Tabs.

a. From the two confidential responses, [REDACTED]

[REDACTED]

b. In the Confidential PSC DR1 Response 4a – Coal Solicitations response, [REDACTED]

[REDACTED]

8. Refer to EKPC's response to Staff's First Request, Item 6. Explain whether EKPC has firm natural gas pipeline transportation to all of its combustion turbine (CT) generating stations. If not, explain whether that lack of transportation can cause PJM required unit availability issues during extreme and extended weather events.

9. Refer to EKPC's response to Staff's First Request, Item 13, Attachment PSC_DR1_Response_13_-_Monthly_Billing_Series.pdf. For the transactions listed in the Power Transaction Schedules:

a. Explain why EKPC would sell energy at a loss.

b. Explain the calculations that determine when EKPC's sales represent a positive margin or a loss. Include in the response whether it makes a difference if the sale is to PJM or another entity such as Louisville Gas & Electric (LG&E) or Brookfield Renewable Trading & Marketing.

10. Refer to EKPC's response to Staff's First Request, Item 32. Explain the reasons for the reduction in EKPC's forecasted quantities of natural gas consumption at the Bluegrass and Smith Stations.

11. Refer to EKPC's response to Staff's First Request, Item 35 page 2 of 2.

a. Explain when the New Empowering Rural America (ERA) grant application (grant application) was filed with the Rural Utilities Service (RUS) and the purpose of the grant.

b. Explain further the reasoning behind why only 11 months of the hydroelectric power purchase agreement (PPA) was included in the grant application.

c. Explain why only 25 percent of the cost of the PPA was included in the grant application.

d. If and when the grant application is approved, explain if EKPC's Owner Members will be reimbursed for the funds recovered through the FAC previously.

e. Explain whether EKPC has more than the one referenced grant application pending at RUS, and if so, provide a list of the grant applications and the intended purpose of the funds.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601-8294

DATED **FEB 06 2026**

cc: Parties of Record

Case No. 2025-00339

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