

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JUL 30 2012

PUBLIC SERVICE
COMMISSION

In the Matter of:

Application of Big Rivers Electric Corporation for Approval)
of its 2012 Environmental Compliance Plan, Approval of its) CASE NO. 2012-00063
Amended Environmental Cost Recovery Surcharge Tariffs,)
and for the Certificates of Public Convenience and Necessity,)
and the Authority to Establish a Regulatory Account)

BEN TAYLOR AND SIERRA CLUB'S REQUEST FOR
INFORMATION TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS

Intervenors Ben Taylor and Sierra Club (collectively "Movants"), pursuant to the Kentucky Public Service Commission's ("Commission") Orders of April 30, June 19, and July 19, 2012, propound the following requests for information on the Kentucky Industrial Utility Customers ("KIUC") regarding Big Rivers Electric Corporation's application for certificates of public convenience and necessity and approval of its 2012 compliance plan that is the subject of the above captioned proceeding.

KIUC shall answer these requests for information in the manner set forth in the April 30 Order and by no later than the August 6, 2012 deadline set forth in the Appendix of the June 19 Order. Please produce the requested documents in electronic format at the offices of Sierra Club, 85 Second Street, 2nd Floor, San Francisco, CA 94105 or at such other location as may be mutually agreed upon between counsel of record.

Intervenors reserve the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

DEFINITIONS

“CCR” means coal combustion residuals

“Company” refers to Big Rivers Electric Cooperative, and its affiliates, employees, and authorized agents.

“CPCN” means certificate of public convenience and necessity

“FGD” means flue gas desulfurization

“Hg” means mercury

“NAAQS” means National Ambient Air Quality Standards

“NO_x” means nitrogen oxides

“NPV” means net present value

“NPVRR” means net present value of revenue requirements

“O&M” means operation and maintenance

“SCR” means selective catalytic reduction technology

“SO₂” means sulfur dioxide

“316(b)” refers to Section 316(b) of the Clean Water Act

PRIVILEGE OR CONFIDENTIALITY

If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any interrogatory or request for production, describe the basis for your claim of privilege in sufficient detail so as to permit the Commission to adjudicate the validity of the claim if called upon to do so. With respect to documents for which a privilege is claimed, produce a “privilege log” that identifies the author, recipient, date and subject matter of the documents or interrogatory answers for

which you are asserting a claim of privilege and any other information pertinent to the claim that would enable the Intervenor or the Commission to evaluate the validity of such claims.

To the extent that you can legitimately claim that any interrogatory response or responsive document is entitled to confidentiality, the Intervenor is willing to enter into a confidentiality agreement that would protect such response or document from public disclosure.

REQUESTS FOR INFORMATION

1. Please execute a PaR model run of the Company’s Build case with the following changes:
 - a. Refer to page 22 lines 17-18 of the direct testimony of Philip Hayet, which states that the Company’s results do not include all incremental O&M costs shown in Exhibit Berry-2. Please add in these additional O&M costs that are identified in the Hayet testimony that were not included in the Company’s original run.
 - b. Please change the Company’s environmental capital expenditures given in real 2011\$ to nominal dollars in the calculation of NPVRR as follows:

	2012	2013	2014	2015	2016	2017	2018	2019	2020
Wilson FGD	\$1.78	\$27.73	\$56.19	\$49.50	\$7.41	\$0.00	\$0.00	\$0.00	\$0.00
Green 2 SCR	\$0.99	\$20.09	\$44.95	\$16.64	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
HMPL 1 SO2 (Gross)	\$0.15	\$1.13	\$1.57	\$0.35	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
HMPL 2 SO2 (Gross)	\$0.15	\$1.13	\$1.57	\$0.35	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Reid 1 NG	\$0.10	\$1.11	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Wilson Hg	\$0.00	\$1.21	\$4.90	\$5.45	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Green 1 Hg	\$0.00	\$0.60	\$4.09	\$4.82	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Green 2 Hg	\$0.00	\$0.60	\$4.09	\$4.82	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Coleman 1 Hg	\$0.00	\$0.40	\$4.90	\$4.45	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Coleman 2 Hg	\$0.00	\$0.40	\$4.90	\$4.45	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Coleman 3 Hg	\$0.00	\$0.40	\$4.90	\$4.45	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
HMPL 1 Hg	\$0.00	\$0.00	\$0.00	\$0.25	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
HMPL 2 Hg	\$0.00	\$0.00	\$0.00	\$0.25	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

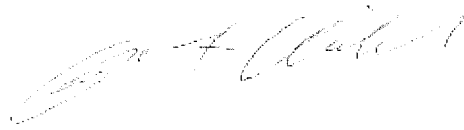
- c. Please add the capital expenditures recommended by Sargent & Lundy to comply with the forthcoming NAAQS revisions, the CCR rule, and the 316(b) rule, in nominal dollars as follows:

	2012	2013	2014	2015	2016	2017	2018	2019	2020
Green 1 NAAQS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$87.41	\$0.00	\$0.00	\$0.00
Green 1 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$15.11	\$0.00	\$0.00	\$0.00
Green 1 316(b)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1.11	\$0.00	\$0.00	\$0.00
Green 2 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$15.11	\$0.00	\$0.00	\$0.00
Green 2 316(b)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1.11	\$0.00	\$0.00	\$0.00
HMPL 1 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$15.11	\$0.00	\$0.00	\$0.00
HMPL 2 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$15.11	\$0.00	\$0.00	\$0.00
Coleman 1 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$13.67	\$0.00	\$0.00	\$0.00
Coleman 1 316(b)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1.44	\$0.00	\$0.00	\$0.00
Coleman 2 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$13.67	\$0.00	\$0.00	\$0.00
Coleman 2 316(b)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1.44	\$0.00	\$0.00	\$0.00
Coleman 3 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$13.67	\$0.00	\$0.00	\$0.00
Coleman 3 316(b)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1.44	\$0.00	\$0.00	\$0.00

- d. Please add the additional O&M expenditures associated with the technologies recommended by Sargent & Lundy to comply with the forthcoming NAAQS revisions, the CCR rule, and the 316(b) rule, in nominal dollars as follows:

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
Green 1 NAAQS	\$ -	\$ 2,330,869	\$ 2,376,845	\$ 2,424,382	\$ 2,472,870	\$ 2,522,327	\$ 2,572,774	\$ 2,624,229	\$ 2,676,714	\$ 2,730,248	\$ 2,784,853
Green 1 CCR	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Green 1 316(b)	\$ -	\$ 199,635	\$ 203,572	\$ 207,644	\$ 211,797	\$ 216,033	\$ 220,353	\$ 224,760	\$ 229,256	\$ 233,841	\$ 238,518
Green 2 CCR	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Green 2 316(b)	\$ -	\$ 199,635	\$ 203,572	\$ 207,644	\$ 211,797	\$ 216,033	\$ 220,353	\$ 224,760	\$ 229,256	\$ 233,841	\$ 238,518
HMPL 1 CCR	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
HMPL 2 CCR	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Coleman 1 CCR	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Coleman 1 316(b)	\$ -	\$ 269,776	\$ 275,098	\$ 280,600	\$ 286,212	\$ 291,936	\$ 297,775	\$ 303,730	\$ 309,805	\$ 316,001	\$ 322,321
Coleman 2 CCR	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Coleman 2 316(b)	\$ -	\$ 269,776	\$ 275,098	\$ 280,600	\$ 286,212	\$ 291,936	\$ 297,775	\$ 303,730	\$ 309,805	\$ 316,001	\$ 322,321
Coleman 3 CCR	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Coleman 3 316(b)	\$ -	\$ 269,776	\$ 275,098	\$ 280,600	\$ 286,212	\$ 291,936	\$ 297,775	\$ 303,730	\$ 309,805	\$ 316,001	\$ 322,321

Respectfully submitted,



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Dated: July 30, 2012

CERTIFICATE OF SERVICE

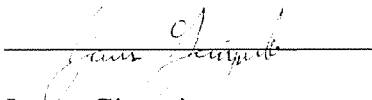
I certify that I mailed a copy of Ben Taylor and Sierra Club's Request for Information from Kentucky Industrial Utility Customers by first class mail on July 30, 2012 to the following:

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