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RECEIVED

FEB 06 2013

PUBLIC SERVICE
COMMISSION

Via Overnight Mail

February 5, 2013

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: Case No. 2012-00492

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.'s SUPPLEMENTAL DATA REQUESTS TO BIG RIVERS ELECTRIC CORPORATION for filing in the above-referenced matter.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place these documents of file.

Very Truly Yours,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

BOEHM, KURTZ & LOWRY

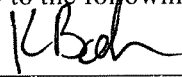
MLKkew

Attachment

cc: Certificate of Service
Quang Nyugen, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic mail (when available) and by regular U.S. Mail, unless other noted, this 5th day of February, 2013 to the following



Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.

Honorable James M Miller
Sullivan, Mountjoy, Stainback & Miller, PSC
100 St. Ann Street
P.O. Box 727
Owensboro, KY 42302-0727

David Brown
Stites & Harbison, PLLC
1800 Providian Center
400 West Market Street
Louisville, KY 40202

Jennifer B Hans
Assistant Attorney General's Office
1024 Capital Center Drive, Ste 200
Frankfort, KY 40601-8204

Donald P Seberger
Rio Tinto Alcan
8770 West Bryn Mawr Avenue
Chicago, IL 60631

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FEB 06 2013

**PUBLIC SERVICE
COMMISSION**

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF: THE APPLICATION OF BIG RIVERS :
ELECTRIC CORPORATION FOR APPROVAL TO ISSUE : Case No. 2012-00492
EVIDENCES OF INDEBTEDNESS :

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

SUPPLEMENTAL DATA REQUESTS

TO

BIG RIVERS ELECTRIC CORPORATION

Dated: February 5, 2013

DEFINITIONS

1. "Document(s)" is used in its customary broad sense and includes electronic mail and all written, typed, printed, electronic, computerized, recorded or graphic statements, memoranda, reports, communications or other matter, however produced or reproduced, and whether or not now in existence, or in your possession.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion whether preliminary or final, and whether or not referred to in Big Rivers' direct testimony.
3. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, including the type of document, its date, the date or approximate date it was lost, discarded or destroyed, the identity of the person (s) who last had possession of the document and the identity of all persons having knowledge of the contents thereof.
4. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
5. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
6. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it.
7. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
8. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
9. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
10. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
11. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
12. "BREC" means Big Rivers Electric Corporation and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed.
13. "Goldman Sachs" means Goldman, Sachs & Co. and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed
14. "The County" means the County of Ohio, Kentucky and/or any of its officers, directors, employees, or agents who may have knowledge of the particular matter addressed
15. "RUS" means the United States of America, Department of Agriculture, Rural Utilities Service and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed.
16. "The Application" means the Application and attachments filed by BREC on November 13, 2012 with the Kentucky Public Service Commission in Case No. 2012-00492.
17. "Going Concern Qualification" means an audit opinion that is qualified by the auditing firm that performs the annual audit of Big Rivers' books, records and financial statements; expressing concern as to whether Big Rivers can continue to operate on a viable basis for a one year period following any given audit.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

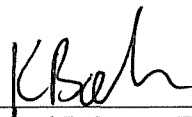
**SUPPLEMENTAL DATA REQUESTS OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.
TO BIG RIVERS ELECTRIC CORPORATION**

Case No. 2012-00492

- Q2.1 Provide a copy of all correspondence and documents between and among BREC and the three rating agencies since January 1, 2013. This data request remains active throughout the proceeding. If BREC obtains any further or supplemental documents or information subsequent to the preparation and service of BREC's responses hereto, please provide such documents or information as part of a supplemental response.
- Q2.2 Provide a copy of any document, letter or rating report concerning BREC issued by any of the three rating agencies since January 1, 2013. This data request remains active throughout the proceeding. If BREC obtains any further or supplemental documents or information subsequent to the preparation and service of BREC's responses hereto, please provide such documents or information as part of a supplemental response.
- Q2.3 Identify the Auditing Firm that will perform the Audit for the Fiscal Year ending December 31, 2012.
- Q2.4 Provide any correspondence and documents regarding a "Going Concern Qualification" between and among BREC and the Auditing Firm identified in the previous request within the last 12 months. This data request remains active throughout the proceeding. If BREC obtains any further or supplemental documents or information subsequent to the preparation and service of BREC's responses hereto, please provide such documents or information as part of a supplemental response.
- Q2.5 Provide a copy of Alcan's notice of termination of the Alcan electric service agreement.
- Q2.6 Provide the current balance of the Transition Reserve account.
- Q2.7 Provide the name of the financial institution and type of account in which the Transition Reserve funds are held.
- Q2.8 Provide the current balance of the Economic Reserve account.
- Q2.9 Provide the name of the financial institution and type of account in which the Economic Reserve funds are held.
- Q2.10 Provide the current balance of the Rural Reserve account.

Q2.11 Provide the name of the financial institution and type of account in which the Rural Reserve funds are held.

Respectfully submitted,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

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**COUNSEL FOR KENTUCKY INDUSTRIAL
UTILITY CUSTOMERS, INC.**

February 5, 2013