

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES SUPPORTED BY FULLY FORECASTED TEST PERIOD	)	CASE NO.
	)	2013-00199
	)	
	)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION  
TO BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation ("Big Rivers"), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response 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 response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Big Rivers shall make timely amendment to any prior responses if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which

Big Rivers fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied 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.

1. Refer to page 12 of 101 of the response to Item 55.a. of Commission Staff's First Request for Information ("Staff's First Request"). Refer also to the response to Item 29 of Commission Staff's Second Request for Information in Case No. 2012-00535.<sup>1</sup> The response to Item 55.a. is a summary of Big Rivers' 2012 depreciation rate study, based on its utility plant balances as of July 31, 2012, while the response to Item 29 is a similar summary based on Big Rivers' average utility plant balances for the test year used in Case No. 2012-00535. Provide, in a format similar to that of these summaries, an additional summary which compares Big Rivers' depreciation expense based on the existing and proposed depreciation rates shown in the two summaries and the average utility plant balances for the forecasted test period used in this case.

2. Refer to Big Rivers' fourth update to its response to Item 43 of Staff's First Request, the attachment to Tab 16 of its application, and its response to Item 8 of Commission Staff's Third Request for Information ("Staff's Third Request").

a. The Item 43 update is Big Rivers' statement of operations, or income statement, for September 2013, and for calendar year 2013 year-to-date shown

---

<sup>1</sup> Case No. 2012-00535, Application of Big Rivers Electric Corporation for an Adjustment of Rates (Ky. PSC Oct. 28, 2013).

on the Rural Utilities Service monthly financial and operating report form. With actual results now available for September 2013, the last month of the base period, provide an income statement, or statement of operations, for Big Rivers for the base period in the same form as used in the attachment to Tab 16 of Big Rivers' application.

b. With actual information now available for all 12 months of the base period, provide the same information on base period off-system sales as was provided in response to Item 8 of Staff's Third Request for the test period using the same format that was used in that response.

3. Refer to the table on page 2 of 2 of the response to Item 7 of Staff's Third Request. Staff has attempted to replicate this table and has obtained slightly different results using information in Exhibit Wolfram-5 to derive the percentage of environmental surcharge ("ES") revenue that would be allocated to each rate class and to off-system sales. Provide the supporting calculations for the percentages used in this table to allocate ES revenues.



---

Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED NOV 01 2013

cc: Parties of Record

Mark A Bailey  
President CEO  
Big Rivers Electric Corporation  
201 Third Street  
Henderson, KY 42419-0024

Honorable Michael L Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

Honorable Thomas C Brite  
Attorney At Law  
Brite & Hopkins, PLLC  
83 Ballpark Road  
P.O. Box 309  
Hardinsburg, KENTUCKY 40143

Burns E Mercer  
Manager  
Meade County R.E.C.C.  
P. O. Box 489  
Brandenburg, KY 40108-0489

Thomas J Cmar  
5042 North Leavitt Street, Suite 1  
Chicago, ILLINOIS 60625

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

Shannon Fisk  
Earthjustice  
1617 JFK Boulevard, Suite 1675  
Philadelphia, PENNSYLVANIA 19103

Ruben Mojica  
Sierra Club Environmental Law Program  
85 2nd Street, 2nd Floor  
San Francisco, CALIFORNIA 94105

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

G. Kelly Nuckols  
President & Ceo  
Jackson Purchase Energy Corporation  
2900 Irvin Cobb Drive  
P. O. Box 4030  
Paducah, KY 42002-4030

Kristin Henry  
Staff Attorney  
Sierra Club  
85 Second Street  
San Francisco, CALIFORNIA 94105

Billie J Richert  
Vice President Accounting, Rates & CFO  
Big Rivers Electric Corporation  
201 Third Street  
Henderson, KY 42419-0024

J. Christopher Hopgood  
Dorsey, King, Gray, Norment & Hopgood  
318 Second Street  
Henderson, KENTUCKY 42420

Melissa D Yates  
Attorney  
Denton & Keuler, LLP  
555 Jefferson Street  
P. O. Box 929  
Paducah, KENTUCKY 42002-0929