

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

2014 INTEGRATED RESOURCE PLAN OF) CASE NO.
BIG RIVERS ELECTRIC CORPORATION) 2014-00166

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

Big Rivers Electric Corporation ("Big Rivers"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due by October 15, 2014. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the individual responsible for responding to 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 response 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 the Big Rivers' Demand-Side Management Potential Study, page 52, where it states, "For air conditioners, the study used load impact estimates from potential studies for utilities in four other states."

- a. Identify the utilities and other states referenced in this statement.
- b. Explain how and why the utilities in the four other states referenced were chosen.
- c. Explain whether the information obtained from the utilities in the four other states was adjusted for differences in climate.

2. Refer to the response to Item 2 of Commission Staff's Initial Request for Information ("Staff's First Request").

- a. Explain how the information in the technical reference manuals was adapted to fit the climate in Big Rivers' service territory.
- b. Explain how the technical reference manuals were used to determine which end uses were targeted.

3. Refer to the response to Item 9 of Staff's First Request. That request's reference to the increase of "approximately 800 percent between 2016 and 2021" was intended to elicit a response as to why the increase was not more gradual and was of

such a large percentage over only five years. Provide a supplemental response based on this clarification of the original request.

4. Refer to the response to Item 11.a. of Staff's First Request. Provide a description of Pennyrile Energy, LLC and an explanation of the expected growth in its load in the years 2014 and 2015.

5. Refer to the response to Item 20.b. of Staff's First Request. Explain why Jackson Purchase Energy's results are so much lower than the results of the other two distribution cooperatives.

6. Refer to the response to Item 29 of Staff's First Request, which states that the Wilson Station currently has an idle date of January 1, 2016, but that it is not expected to be idled at that time "given current market conditions." Explain what has occurred since Big Rivers' notification to the Commission that the Wilson Station would be idled that causes Big Rivers to now believe that the station will not be idled.

7. Refer to the response to Item 13 of the Initial Request of the Attorney General, which states that the operation of the Wilson Station through 2015 has added value to Big Rivers' Members, "both through increased margins for the organization and direct savings that flow to Members through the Fuel Adjustment Clause on a near real-time basis." Explain whether these "direct savings" refer to fuel costs assigned to off-system sales being subtracted from fuel costs charged to native load customers in calculating Big Rivers' monthly fuel adjustment clause factors. If not, explain.



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DATED **SEP 26 2014**

cc: Parties of Record

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