

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 20 2014

PUBLIC SERVICE
COMMISSION

In the Matter of:

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

ATTORNEY GENERAL'S INITIAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Requests for Information to Big Rivers Electric Corporation [hereinafter referred to as "Big Rivers"] to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for Big Rivers with an electronic version of these questions, upon request.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information

within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If you believe any request appears confusing, please request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and

shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-


readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL



JENNIFER BLACK HANS
LAWRENCE W. COOK
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE
SUITE 200
FRANKFORT, KY 40601-8204
(502) 696-5453
FAX: (502) 573-8315
Jennifer.Hans@ag.ky.gov
Larry.Cook@ag.ky.gov

Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:


Hon. James M. Miller
Sullivan, Mountjoy, Stainback & Miller,
PSC
P.O. Box 727
Owensboro, KY 42302-0727

Hon. Michael L. Kurtz
Boehm, Kurtz & Lowry
36 E. 7th St.
Ste. 1510
Cincinnati, Ohio 45202

Joe F. Childers and Associates
The Lexington Building
201 W. Short Street, Suite 300
Lexington KY 40507

Kristin Henry
85 Second Street
San Francisco, CA 94105

this 20th day of August, 2014



Assistant Attorney General

Big Rivers Electric Corporation's 2014 Integrated Resource Plan Filing
Case No. 2014-00166
Attorney General's Initial Data Requests

1. Big Rivers' 2014 Integrated Resource Plan, prepared on Big Rivers' behalf by GDS Associates, Inc., and filed with the Commission on May 15, 2014 ["IRP Filing"], at page 21 states that, "Due to recent, favorable conditions in the wholesale power market, Big Rivers has made forward power sales from Wilson that have enabled Big Rivers to postpone the idling of the Wilson Station until February 2015 and possibly beyond." Please provide a list of all forward power sales detailing quantity, purchaser, term, and start and stop dates.
2. With regard to the costs that will be associated with restarting the three Coleman units:
 - a. Provide a description of each type of restart or startup costs expected to be incurred by Big Rivers and the year these costs will be incurred, including: (i) a detailed breakdown of each type of restart or startup costs; (ii) the year these costs will be incurred; and (iii) whether these costs will be capital costs or expenses.
 - b. Provide a description of all anticipated environmental upgrades that will be required prior to restarting these units, including: (i) a detailed breakdown of all costs related to any such environmental upgrades; and (ii) the year these costs will be incurred.
 - c. Provide a description of each type of major maintenance activity that has been deferred that will be completed prior to restarting these units, including: (i) a detailed breakdown of all costs related to all such major maintenance activities; and (ii) the year these costs will be incurred.
 - d. Provide a description of all necessary permits that will be required prior to restarting these units, including: (i) a detailed breakdown of all costs related to achieving these permits; and (ii) the year these costs will be incurred.
 - e. Provide a discussion whether the restart of Coleman could or might trigger an EPA New Source Review.
3. Please provide the latest estimated date for Wilson's idling, together with any projected dates for its re-start.
4. With regard to the costs that will be associated with restarting Wilson, please provide responses to the questions set forth in question number 2, subparts (a) - (e), above, as pertains specifically to Wilson.

Big Rivers Electric Corporation's 2014 Integrated Resource Plan Filing
Case No. 2014-00166
Attorney General's Initial Data Requests

5. Please provide the revenue requirements for Coleman and Wilson for the period 2014 through 2027, in the same format as was supplied in response to KIUC 1-21 and 1-22 in Case No. 2013-00199. Provide this information in electronic format with data and formulae in all cells and rows intact and fully accessible.
6. Please provide Big Rivers' most recent long-term financial forecast model, in electronic format with data and formulae in all cells and rows intact and fully accessible. If there are any other workpapers, memos, reports, emails etc. concerning how the data in those files were developed, please provide that information electronically, with all formulae intact.
7. Please provide Big Rivers' most recent production cost model, in electronic format with data and formulae in all cells and rows intact and fully accessible. If there are any other workpapers, memos, reports, emails etc. concerning how the data in those files were developed, please provide that information electronically, with all formula intact.
8. Please provide a list of any and all contracts for the supply of power from Big Rivers (whether directly or through its member, Kenergy) to Century Aluminum of Kentucky General Partnership, and Century Aluminum Sebree LLC, at the Hawesville and Sebree smelters.
 - a. If there have been any changes to those contracts since the time they were introduced into the public record in Case Nos. 2013-00221 and 2013-00413, please provide copies of any and all such changes.
9. Please provide copies of any written documents, memoranda, power point slides, excel spreadsheets and emails pertaining in any manner to any and all presentations Century Aluminum may have made to Big Rivers' Board of Directors since January 1, 2014.
10. Please provide any analyses or studies, including sensitivity analyses, which Big Rivers, or any consultant or contractor on its behalf, may have conducted regarding whether market prices by 2019 will or might increase to levels that would justify returning any and/or all idled units to operational status.
 - a. Please provide any updates to the analyses and studies that Big Rivers provided in response to PSC 2-14 in Case. No. 2013-00199, together with any new such analyses.

Big Rivers Electric Corporation's 2014 Integrated Resource Plan Filing
Case No. 2014-00166
Attorney General's Initial Data Requests

11. Please provide the latest load forecast (and associated documentation and workpapers) performed by outside consultants for Big Rivers, and identify any and all such outside consultants. Please provide this information in Excel spreadsheets with data and formulae in all cells and rows intact and fully accessible.
12. Please provide an update regarding Big Rivers' efforts to sell or lease one or more of its generating plants, including price offers.
13. Please provide copies of any and all responses Big Rivers has made to requests for proposals for long-term power contracts, other than those provided in Case No. 2014-00134. For the Attorney General's purposes, electronic copies will suffice.
14. Please provide the annual average plant account balances and depreciation expense for Coleman and Wilson Stations for each year from 2013 through 2020.
15. Section 6.2 of the IRP filing states that "the existing transmission system is sufficient to support the export of all Big Rivers' generation power greater than the amount required to serve native load." Please provide the following:
 - a. A copy of the analysis or study performed to reach this conclusion.
 - b. A list of Big Rivers' generating plants assumed to be available in this study or analysis.
 - c. Explain if the above statement is still correct if Coleman is idled indefinitely.
16. Please fully describe the 25 MW growth in native load due to new customer additions discussed on page 22, section 3.0.
17. Please provide in electronic Excel spreadsheet format, with data and formulae in all cells and rows intact and fully accessible, the spreadsheet(s) used to develop the following tables: 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 4.4, 4.5, 4.6, 4.7, 4.8, 4.9, 4.11, 4.12, 4.14, 4.16, 4.17, 4.18, 4.19, 4.20, 4.21, 4.22, 5.1, 5.2, 5.3, 5.15, 5.16, 5.17, 5.18, 9.1, 9.4, 9.6, 9.8, 10.1, 10.2, and 11.1.
18. On page 37, section 4.2 of the IRP the following statement is made: "Big Rivers currently projects that market prices will return to a level that may justify returning the idled plant to operational status in 2016 or 2017 as demonstrated in the base case of this IRP; ..." Please provide the following related to this statement:

Big Rivers Electric Corporation's 2014 Integrated Resource Plan Filing
Case No. 2014-00166
Attorney General's Initial Data Requests

- a. Explain how the base case demonstrates market prices will return to such a level in 2016 and 2017.
 - b. Please list in detail all deferred maintenance activities and associated costs necessary to return Coleman to service.
 - c. Please provide a detailed list of all environmental upgrades and the projected costs of each upgrade required to return Coleman to service in 2016 or 2017.
 - d. Please provide a detailed list of all costs associated with returning Coleman to service.
 - e. Please explain where the costs referenced in subpart (d), above, are addressed in the base case study provided in section H.
19. Table 4.14 lists the projected rural retail electricity price through 2018. Please provide the following:
- a. Electronic copies of all workpapers, spreadsheets, etc. used to derive these price projections.
 - b. Please explain why retail electric prices stay the same from 2016 through 2018 in this forecast even though replacement load sales increase throughout this time period.
 - c. Please provide escalation and inflation rates assumed for each year in the forecast period to derive real prices.
20. Page 57, section 4.7 of the IRP describes a decrease in native system sales by 2028 related to a \$30 per metric ton CO₂ policy. Is this entire decrease related to price increases? Please explain.
21. Please provide the estimated (or actual) total cost for each of the transmission projects listed in Table 6.1.
22. Please provide the estimated total cost for each of the transmission projects listed in Table 6.2.
23. Referencing Table 9.2, please provide the following:
- a. All source material used to prepare Table 9.2.
 - b. Explanation of why the typical size of units was 50 MW for Nuclear, Coal, Combined Cycle, Combustion Turbine, and Biomass units.
 - c. Is it assumed that partial ownership of nominally sized units of these types would be available?

24. Please provide all Appendix H electronic information in Excel spreadsheet format, with data and formulae in all cells and rows intact and fully accessible.
25. Please explain fully why climatic data in Table 2.1, page 10, of Appendix A, provided by the National Oceanic and Atmospheric Administration (NOAA) is confidential.
26. Please provide the data elements described in Table 3.1, page 12, of Appendix A.
27. Please provide tables in Appendix A in electronic Excel spreadsheet format, with data and formulae in all cells and rows intact and fully accessible.
28. Please provide Appendix F electronic information in electronic Excel spreadsheet format, with data and formulae in all cells and rows intact and fully accessible.
29. Please provide Appendix G electronic information in electronic Excel spreadsheet format, with data and formulae in all cells and rows intact and fully accessible.
30. Big Rivers' 2014 IRP filing, which was filed with the Commission on May 15, 2014, includes an eight (8) page section regarding projected environmental costs. However, on August 8, 2014, Big Rivers filed with the Commission a document entitled "ELG Master Planning Study" (this Study defines the abbreviation "ELG" as "National Effluent Limitations Guidelines and Standards"). The ELG Master Planning Study, performed on Big Rivers' behalf by Burns & McDonnell Engineering Company and signed on June 20, 2014, includes extensive analysis on projected environmental capital spending that either was not included in the IRP filing, or which changes the data supplied in the IRP filing.¹ Regarding this study and the IRP plan submitted in this filing, please provide the following:
 - a. Any table, figure, graph or chart in the IRP plan affected by the new information presented in this study, including but not limited to forecasted spending pertaining to environmental compliance.
 - b. Updated tables, figures, graphs, charts and conclusions in the IRP plan resulting from the new information presented in this study.
 - c. Any resulting changes to Big Rivers' financial forecasts and production cost modeling.

¹ This was filed as an update to request for information Item 15 from the January 6-9, 2014 hearing in Case No. 2013-00199. Big Rivers is seeking confidential protection for a portion of this update.

Big Rivers Electric Corporation's 2014 Integrated Resource Plan Filing
Case No. 2014-00166
Attorney General's Initial Data Requests

- d. Any effect this has on Big Rivers' projected replacement power sales.
 - e. Any effect this has on Big Rivers' forecasted power prices.
 - f. Any effect this has on Big Rivers' forecasted variable operating and maintenance costs for any Big Rivers' units.
31. For 2014 YTD, please provide copies of all monthly or otherwise periodic reports given to the Board of Directors in the ordinary course of business regarding the following, broken down on a monthly basis, and by customer class:
- a. Big Rivers' MWh Sales volume and revenues, both system and off-system;
and
 - b. Cash on hand including specific MRSB balances.