

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

**RECEIVED**

In the Matter of:

2014 INTEGRATED RESOURCE PLAN OF )  
BIG RIVERS ELECTRIC CORPORATION )

SEP 26 2014  
PUBLIC SERVICE  
COMMISSION

CASE No. 2014-00166

ATTORNEY GENERAL'S SUPPLEMENTAL 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 Supplemental 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



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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](mailto:Jennifer.Hans@ag.ky.gov)  
[Larry.Cook@ag.ky.gov](mailto: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  
Staff Attorney  
Sierra Club  
85 Second Street  
San Francisco, CA 94105

this 26<sup>th</sup> day of September, 2014



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Assistant Attorney General

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

1. Reference Big Rivers' Response to AG 1-13, and please provide the following:
  - a. Copies of all RFPs to which Big Rivers has responded since January 2014;
  - b. Copies of all Big Rivers' responses to the RFPs listed above;
  - c. All other RFPs Big Rivers has responded to before January 2014 that were not previously provided to the parties in CN 2013-00199;
  - d. All other Big Rivers' responses to RFPs before 2014 that were not previously provided to the parties in CN 2013-00199.
2. Reference the production cost model runs provided in response to AG 1-7. Please provide the associated financial forecast models in electronic format with data and formulae in all cells and rows intact and fully accessible. If there are any other workpapers, memos, reports, spreadsheets, email, etc. utilizing the information developed by the production cost model runs, please provide that information electronically, with all formulae intact.
3. Has Big Rivers evaluated the sales price it would need to receive for the Coleman units in each year of the study period to provide lower costs and greater benefits than the base case scenario? If not, why not?
4. Please provide the sales price for all of the Coleman units that Big Rivers believes would be acceptable for each year from 2015 through 2028.
5. Reference the response to AG 1-12. Has Big Rivers evaluated whether or not the price offers for Coleman and/or Wilson would generate net benefits or lower costs than the base case scenario?
6. Referencing Big Rivers' response to AG 1-12 which refers to all offers discussed in CN 2013-00199, and KIUC 1-8 in CN 2013-00199, does Big Rivers maintain that selling either Coleman, Wilson or both for less than net book value would result in IRP present value costs more than the base case as detailed in the response to SC 1-15c, if all other cost assumptions are the same as in the base case?
  - a. Please provide all analysis used to derive the sales cost of Coleman and Wilson and how the revenues from these sales would affect the base case present value costs.
  - b. Please explain how the Mitigation Plan is incorporated into the IRP scenarios evaluated and all elements of the Mitigation Plan incorporated in the IRP analysis.

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7. Please provide the forecasted increase in demand and energy over the IRP period related to the Aleris Corporations' announced <sup>1</sup> \$350 million expansion of its Lewisport rolling mill in Hancock County.
8. With regard to Big Rivers' responses to initial data requests tendered by the Public Service Commission Staff, the Attorney General, and KIUC, does the company agree that as to those responses in which the company refers to information provided in prior cases, that such information is incorporated by reference into the instant matter pursuant to 807 KAR 5:001 § 4(12)(d)(3)? If not, why not? Please explain in full.
9. With regard to your response to the question immediately above, if Big Rivers continues to request confidential protection for any material, please provide (under petition for confidential protection subject to 807 KAR 5:001 § 13) copies of all documents from prior cases for which Big Rivers continues to seek confidential treatment.

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<sup>1</sup> See, e.g., <http://kentucky.gov/Pages/Activity-Stream.aspx?viewMode=ViewDetailInNewPage&eventID={FB7C4B61-C4FD-4DFC-9418-04984790A366}&activityType=PressRelease>