

RECEIVED

AUG 08 2012

PUBLIC SERVICE COMMISSION

Via Courier and Electronic Mail

August 6th, 2012

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

Re: Sierra Club Response to KIUC's Requests for Information Docket 2012-00063

Dear Mr. DeRouen:

Enclosed for the filing are an original and ten copies of Sierra Club's response to KIUC's initial request for information, including verification pages. Copies of this letter and all enclosures have been served on each of the persons listed on the attached service list. A copy of the information for which confidential treatment is sought has also been served on each party that has entered into Big Rivers' confidentiality agreement and will be filed with the Commission separately today.

Sincerely,

James Giampietro

Sierra Club Environmental Law Program 85 2nd Street, 2nd Floor

San Francisco CA, 94105 Office: (415)977-5638

CERTIFICATE OF SERVICE

I certify that on August 6, 2012 I served an electronic and paper copy of Sierra Club's Response to KIUC's initial request for information to Sierra Club on the below parties of record:

James M. Miller, Esq. Tyson Kamuf Sullivan, Mountjoy, Stainback & Miller, PSC 100 Saint Ann Street P.O. Box 727 Owensboro, KY 42302-0727

Michael L. Kurtz Kurt J. Boehm Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202 Jennifer B. Hans Larry Cook Matt James Assistant Attorney General's Office 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204

David C. Brown, Esq. Stites & Harbison 1800 Aegon Center, 400 West Market Street Louisville, KY 40202

James Giampietro

VERIFICATION

STATE OF MASSACHUSETTS)) SS:
COUNTY OF MIDDLESEX)

The undersigned, Rachel Wilson, being duly sworn, deposes and says that she is an Associate with Synapse Energy Economics, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge, and belief

Subscribed and sworn before me on this 3 day of 4012

Public

JANICE CONYERS Notary Public
Commonwealth of Massachusetts
My Commission Expires
July 27, 2018

Commonwealth of Kentucky Before the Public Service Commission

APPLICATION OF BIG RIVERS ELECTRIC)	
CORPORATION FOR APPROVAL OF ITS)	
2012 ENVIRONMENTAL COMPLIANCE)	
PLAN, FOR APPROVAL OF ITS)	Case No. 2012-00063
AMENDED ENVIRONMENTAL COST	j	
RECOVERY SURCHARGE TARIFF, FOR)	
CERTIFICATES OF PUBLIC)	
CONVIENENCE AND NECESSITY, AND)	
FOR AUTHORITY TO ESTABLISH A)	
REGULATORY ACCOUNT.)	

BEN TAYLOR AND SIERRA CLUB'S RESPONSES TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS' FIRST REQUEST FOR INFORMATION TO SIERRA CLUB

Intervenors Ben Taylor and Sierra Club hereby submit their response to Kentucky Industrial Utility Customers' First Request for Information.

Request No. 1

Please provide all spreadsheets, models and workpapers, with all formulas intact, and all referenced spreadsheets included, that were used in the development of the results presented in Ms. Wilson's Tables 1 and 12 of her testimony. This should include the cash flow models that were used, as discussed on page 31 of Ms. Wilson's testimony.

Response to Request No. 1 – Respondent: Rachel Wilson

Please see attached file "BREC cash flow - v16 - AllEnv.xlsx"

KY PSC Docket 2012-00063

Attachment to SC Response to KIUC 1-1

"BREC cash flow - v16 - AllEnv.xlsx"

This attachment is confidential and therefore not included in this public filing. It was filed separately under seal with the Commission on August 6, 2012.