SULLIVAN, MOUNTJOY, STAINBACK & MILLER PSC ATTORNEYS AT LAW

ald M. Sullivan Lesse T. Mountjoy Frank Stainback

James M. Miller
Michael A. Fiorella

August 17, 2012

RECEIVED

AUG 2 0 2012

PUBLIC SERVICE COMMISSION

Bryan R. Reynolds
Tyson A. Kamuf

Allen W. Holbrook

R. Michael Sullivan

Mark W. Starnes
C. Ellsworth Mountjoy
Susan Montalvo-Gesser

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601

Re: In the Matter of: Application of Big Rivers Electric Corporation for Approval of its 2012 Environmental Compliance Plan, for Approval of its Amended Environmental Cost Recovery Surcharge Tariff, for Certificates of Public Convenience and Necessity, and for Authority to Establish a Regulatory Account, P.S.C. Case No. 2012-00063

Dear Mr. Derouen:

Enclosed Big Rivers Electric Corporation ("Big Rivers") provides its Fourth Update to its response to Item 1 of the Commission Staff's Initial Request for Information dated May 21, 2012, in Case No. 2012-00063. Please confirm the Commission's receipt of this update by placing the Commission's filestamp on the enclosed additional copy and returning it to Big Rivers in the self-addressed, postage-paid envelop provided.

Sincerely,

Tyson Kamuf

TAK/ei

Enclosures

c: Albert M. Yockey Service List

Telephone (270) 926-4000 Telecopier (270) 683-6694

> PO Box 727 Owensboro, Kentucky 42302-0727

Service List PSC Case No. 2012-00063

Jennifer B. Hans, Esq.
Dennis G. Howard, II, Esq.
Lawrence W. Cook, Esq.
Matt James, Esq.
Assistant Attorneys General
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Boehm, Kurtz and Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202

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

Joe Childers, Esq. Joe F. Childers & Associates 300 Lexington Building 201 West Short Street Lexington, Kentucky 40507

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

Shannon Fisk 745 N. 24th St. Philadelphia, PA 19130 Christopher Leung Earthjustice 156 William Street Suite 800 New York, New York 10038

Walt Drabinski Vantage Energy Consulting LLC 24160 Overseas Highway Cudjoe Key, Florida 33042

Chuck Buechel 10 Eagleview Lane Fort Thomas, KY 41075

Mike Boismenu 3 Lotus Bay Estate Drive Irving, NY 14081

Greg Starheim
President and CEO
Kenergy Corp.
P.O. Box 18
Henderson, Kentucky 42419-0024

J. Christopher Hopgood, Esq. 318 Second Street Henderson, Kentucky 42420

BIG RIVERS ELECTRIC CORPORATION

THE APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR APPROVAL OF ITS 2012 ENVIRONMENTAL COMPLIANCE PLAN AND REVISIONS TO ITS ENVIRONMENTAL SURCHARGE TARIFF, FOR CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY, AND FOR AUTHORITY TO ESTABLISH A REGULATORY ACCOUNT

CASE NO. 2012-00063

VERIFICATION

I, Ralph A. Ashworth, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Ralph A. Ashworth

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Ralph A. Ashworth on this the day of August, 2012.

Notary Public, Ky. State at Large My Commission Expires

> Notary Public, Kentucky State-At-Large My Commission Expires: July 3, 2014 ID 421951

ORIGINAL



Your Touchstone Energy® Cooperative

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

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

Fourth Updated Responses to the Commission Staff's Initial Request for Information Dated May 21, 2012

FILED: August 20, 2012

ORIGINAL

BIG RIVERS ELECTRIC CORPORATION

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

> Fourth Updated Response to Commission Staff's **Initial Request for Information** Dated May 21, 2012

> > June 1, 2012 First Update June 15, 2012 Second Update July 16, 2012 Third Update August 15, 2012 Fourth Update August 20, 2012

1	Item 1) Refer to the Application, page 7, which states that Big Rivers
2	is requesting authority to establish a regulatory account. The Application
3	states, "[a]s explained further in Mr. Hite's testimony, Big Rivers has
4	incurred costs in developing this Application, and it will incur additional
5	costs to prosecute this case. These costs primarily stem from the retention
6	of experts in the legal, regulatory, and engineering professions." Provide
7	the actual costs incurred to date by type and vendor. Consider this an
8	ongoing request to be updated by the 15th of the month, to report the prior
9	month's expense, for each month up to and including the month of the
10	hearing in this case.
11	
12	Response) Attached hereto is Big Rivers' August 20th update for the costs
13	incurred in its Environmental Compliance Plan Application.

Ralph A. Ashworth 15 Witness)

16

14

Big Rivers Electric Corporation Case No. 2012-00063

Cost Incurred To-date for Environmental Compliance Plan Application <u>Fourth Update</u> to Big Rivers' Response to Item 1 of Commission Staff's Initial Request for Information dated May 21, 2012

Entity/Vendor	Amount	Invoice Number	Invoice Date	Date Paid	Purpose/Type
Total Per Response Dated August 14, 2012 (Invoices Paid thru 07-31-2012)	\$ 403,752.53				
Catalyst Consulting LLC Siemens Industry Inc. Sullivan, Mountjoy, Stainback Vantage Energy Consulting, LLC	\$ 21,309.77 7,993.13 35,276.50 27,560.00	109 1415 113,893 20120703	6/28/2012	8/16/2012 8/2/2012 8/16/2012 8/16/2012	Consultants Engineering Consultants Legal Commission Consultants
Total Paid in August thru August 16, 2012 Total Payments To-Date thru August 16, 2012	\$ 92,139.40 \$ 495,891.93				

Note: Per Big Rivers' response to Item 1 of the Staff's Initial Request for Information, dated June 1, 2012, the estimated cost to develop and prosecute this Case is \$900,000. Big Rivers will seek to update this estimate throughout the proceeding.

Case No. 2012-00063

Attachment for Fourth Updated Response to Item PSC 1-1

Witness: Ralph A. Ashworth

Page 1 of 1