

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 07 2012

In the Matter of:

PUBLIC SERVICE  
COMMISSION

APPLICATION OF BIG RIVERS ELECTRIC )  
CORPORATION FOR AN 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

**KIUC'S RESPONSES TO  
BEN TAYLOR AND SIERRA CLUB'S  
FIRST REQUEST FOR INFORMATION**

1. Please execute a PaR model run of the Company's Build case with the following changes:
  - a. Refer to page 22 lines 17-18 of the direct testimony of Philip Hayet, which states that the Company's results do not include all incremental O&M costs shown in Exhibit Berry-2. Please add in these additional O&M costs that are identified in the Hayet testimony that were not included in the Company's original run.
  - b. Please change the Company's environmental capital expenditures given in real 2011\$ to nominal dollars in the calculation of NPVRR as follows:

	2012	2013	2014	2015	2016	2017	2018	2019	2020
Wilson FGD	\$1.78	\$27.73	\$56.19	\$49.50	\$7.41	\$0.00	\$0.00	\$0.00	\$0.00
Green 2 SCR	\$0.99	\$20.09	\$44.95	\$16.64	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
HMPL 1 SO2 (Gross)	\$0.15	\$1.13	\$1.57	\$0.35	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
HMPL 2 SO2 (Gross)	\$0.15	\$1.13	\$1.57	\$0.35	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Reid 1 NG	\$0.10	\$1.11	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Wilson Hg	\$0.00	\$1.21	\$4.90	\$5.45	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Green 1 Hg	\$0.00	\$0.60	\$4.09	\$4.82	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Green 2 Hg	\$0.00	\$0.60	\$4.09	\$4.82	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Coleman 1 Hg	\$0.00	\$0.40	\$4.90	\$4.45	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Coleman 2 Hg	\$0.00	\$0.40	\$4.90	\$4.45	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Coleman 3 Hg	\$0.00	\$0.40	\$4.90	\$4.45	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
HMPL 1 Hg	\$0.00	\$0.00	\$0.00	\$0.25	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
HMPL 2 Hg	\$0.00	\$0.00	\$0.00	\$0.25	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

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- c. Please add the capital expenditures recommended by Sargent & Lundy to comply with the forthcoming NAAQS revisions, the CCR rule, and the 316(b) rule, in nominal dollars as follows:

	2012	2013	2014	2015	2016	2017	2018	2019	2020
Green 1 NAAQS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$87.41	\$0.00	\$0.00	\$0.00
Green 1 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$15.11	\$0.00	\$0.00	\$0.00
Green 1 316(b)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1.11	\$0.00	\$0.00	\$0.00
Green 2 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$15.11	\$0.00	\$0.00	\$0.00
Green 2 316(b)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1.11	\$0.00	\$0.00	\$0.00
HMPL 1 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$15.11	\$0.00	\$0.00	\$0.00
HMPL 2 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$15.11	\$0.00	\$0.00	\$0.00
Coleman 1 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$13.67	\$0.00	\$0.00	\$0.00
Coleman 1 316(b)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1.44	\$0.00	\$0.00	\$0.00
Coleman 2 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$13.67	\$0.00	\$0.00	\$0.00
Coleman 2 316(b)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1.44	\$0.00	\$0.00	\$0.00
Coleman 3 CCR	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$13.67	\$0.00	\$0.00	\$0.00
Coleman 3 316(b)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1.44	\$0.00	\$0.00	\$0.00

- d. Please add the additional O&M expenditures associated with the technologies recommended by Sargent & Lundy to comply with the forthcoming NAAQS revisions, the CCR rule, and the 316(b) rule, in nominal dollars as follows:

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	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
<b>Green 1 NAAQS</b>	\$ -	\$ 2,330,869	\$ 2,376,845	\$ 2,424,382	\$ 2,472,870	\$ 2,522,327	\$ 2,572,774	\$ 2,624,229	\$ 2,676,714	\$ 2,730,248	\$ 2,784,853
<b>Green 1 CCR</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Green 1 316(b)</b>	\$ -	\$ 199,635	\$ 203,572	\$ 207,644	\$ 211,797	\$ 216,033	\$ 220,353	\$ 224,760	\$ 229,256	\$ 233,841	\$ 238,518
<b>Green 2 CCR</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Green 2 316(b)</b>	\$ -	\$ 199,635	\$ 203,572	\$ 207,644	\$ 211,797	\$ 216,033	\$ 220,353	\$ 224,760	\$ 229,256	\$ 233,841	\$ 238,518
<b>HMPL 1 CCR</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>HMPL 2 CCR</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Coleman 1 CCR</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Coleman 1 316(b)</b>	\$ -	\$ 269,776	\$ 275,098	\$ 280,600	\$ 286,212	\$ 291,936	\$ 297,775	\$ 303,730	\$ 309,805	\$ 316,001	\$ 322,321
<b>Coleman 2 CCR</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

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<b>Coleman 2 316(b)</b>	\$ -	\$ 269,776	\$ 275,098	\$ 280,600	\$ 286,212	\$ 291,936	\$ 297,775	\$ 303,730	\$ 309,805	\$ 316,001	\$ 322,321
<b>Coleman 3 CCR</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Coleman 3 316(b)</b>	\$ -	\$ 269,776	\$ 275,098	\$ 280,600	\$ 286,212	\$ 291,936	\$ 297,775	\$ 303,730	\$ 309,805	\$ 316,001	\$ 322,321

RESPONSE:

a - d. Mr. Hayet has not conducted this PaR analysis, but will do so, and will provide results by 8/8/2012.