

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BIG RIVERS ELECTRIC CORPORATION	)	
FILING OF WHOLESALE CONTRACTS	)	CASE NO.
PURSUANT TO KRS 278.180 AND KAR 5:011	)	2014-00134
§13	)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION  
TO BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation ("Big Rivers"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before July 16, 2014. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, 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.

Big Rivers shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which

Big Rivers fails or refuses to furnish all or part of the requested information, Big Rivers shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to the application, the Summary of Nebraska PPAs.
  - a. Refer to page 1, Section A, which states that “Big Rivers will supply or procure all electric services required by each Purchaser, including capacity, energy, reserve capacity and transmission and ancillary services....” For each of the three purchase power agreements (“PPAs”), state which services will be provided and which will be procured by Big Rivers.
  - b. Refer to page 1, Section B, the second paragraph, fourth sentence. Explain why the information is not known with certainty and when it will be known.
  - c. Refer to page 2, Section C, which makes reference to Midcontinent Independent System Operator, Inc. (“MISO”) and Southwestern Power Pool (“SPP”) studies. Provide any studies conducted by MISO and SPP regarding Big Rivers’ ability to deliver power under each of the PPAs. If the studies are not yet completed, provide the estimated date(s) of completion.
  - d. Refer to page 2, Section E. State whether it is anticipated that Big Rivers will need to hire additional staff to provide service under the three PPAs. If yes,

state the number of additional employees needed and the estimated annual cost related to the additional employees.

e. Refer to page 2, Section F. Explain why this provision is necessary and, for each PPA, state the estimated cost to Big Rivers over the life of the PPA.

f. Refer to page 3, Section H, which states that “Big Rivers’ analysis estimated the rates to be paid by the Nebraska entities based upon the NPPD rates that are currently in effect and that are most recently projected by NPPD.”

(1) Provide the current rates paid to the Nebraska Public Power District (“NPPD”) by the cities of Wayne and Wakefield, and the Northeast Nebraska Public Power District.

(2) Provide the analysis conducted by ACES on the NPPD projected rates.

g. Refer to page 4, Section I. Explain how the rate per megawatt-hour referenced in the first paragraph was calculated.

h. Refer to page 5, Section L. State whether Big Rivers has held any discussions with the PPA counterparties regarding any potential costs of complying with environmental legislation. If yes, explain the counterparties’ reaction and provide any estimates prepared by Big Rivers related to future environmental compliance.

i. Refer to page 6, Section P.

(1) State whether retail choice currently exists in Nebraska for electric consumers. If no, state whether discussions are being held to allow retail choice in Nebraska for electric consumers.

(2) Refer to the fourth paragraph of this Section. Explain the reason for the first of the two prohibitions discussed in this paragraph.

2. State whether Big Rivers anticipates that it would need to return an idled generating unit to service in order to meet the requirements of the PPAs. If yes, identify the unit and provide the annual fixed-cost savings realized by idling the unit.

3. State whether the amount received by Big Rivers under the PPAs will exceed the variable costs of providing service under the PPAs. Include supporting documentation in the response.



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DATED JUN 27 2014

cc: Parties of Record

Case No. 2014-00134

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