ATTORNEYS AT LAW

RECEIVED

NOV 3 0 2015

PUBLIC SERVICE COMMISSION

November 30, 2015

Jeff Derouen Executive Director Public Service Commission 211 Sower Boulevard, P.O. Box 615 Frankfort, Kentucky 40602-0615

 Also Licensed in Indiana
 Also Licensed in Indiana and New York

Ronald M. Sullivan Jesse T. Mountjoy

> Frank Stainback James M. Miller

Michael A. Fiorella

R. Michael Sullivan

Bryan R. Reynolds* Tyson A. Kamuf Mark W. Starnes

C. Ellsworth Mountjoy

John S. Wathen

K. Timothy Kline**

*

Re: In the Matter of: an Examination by the Public Service Commission of the Environmental Surcharge Mechanism of Big Rivers Electric Corporation for the Two-Year Billing Period Ending July 31, 2015 and the Pass Through Mechanism of its Three Member Distribution Cooperatives, PSC Case No. 2015:00320

Dear Mr. Derouen:

Enclosed for filing are an original and seven (7) copies of Big Rivers Electric Corporation's responses to the Public Service Commission Staff's second request for information in the above-referenced matter. I certify that on this date, a copy of this letter and a copy of the responses were served on all parties of record.

Sincerely,

Tyson Kamuf

TAK/lm Enclosures

cc:

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

> 100 St. Ann Building PO Box 727 Owensboro, Kentucky 42302-0727

DeAnna Speed Jeff Hohn Dennis L. Cannon Marty Littrel

www.westkylaw.com

ORIGINAL



Your Touchstone Energy* Cooperative

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

AN EXAMINATION BY THE PUBLIC SERVICE)COMMISSION OF THE ENVIRONMENTAL)SURCHARGE MECHANISM OF BIG RIVERS)ELECTRIC CORPORATION FOR THE TWO-YEAR)BILLING PERIOD ENDING JULY 31, 2015)AND THE PASS THROUGH MECHANISM)OF ITS THREE MEMBER DISTRIBUTION)COOPERATIVES)	Case No. 2015-00320
--	------------------------

Responses to Commission Staff's Second Request for Information dated November 18, 2015

FILED: November 30, 2015



BIG RIVERS ELECTRIC CORPORATION

AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIRONMENTAL SURCHARGE MECHANISM OF BIG RIVERS ELECTRIC CORPORATION FOR THE TWO-YEAR BILLING PERIOD ENDING JULY 31, 2015 AND THE PASS THROUGH MECHANISM OF ITS THREE MEMBER DISTRIBUTION COOPERATIVES CASE NO. 2015-00320

VERIFICATION

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

in MAG

Eric M. Robeson

COMMONWEALTH OF KENTUCKY) COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Eric M. Robeson on this the <u>30</u> day of November, 2015.

Paula Mitchell

Notary Public, Ky. State at Large My Commission Expires 1-12-17

BIG RIVERS ELECTRIC CORPORATION

AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIRONMENTAL SURCHARGE MECHANISM OF BIG RIVERS ELECTRIC CORPORATION FOR THE TWO-YEAR BILLING PERIOD ENDING JULY 31, 2015 AND THE PASS THROUGH MECHANISM OF ITS THREE MEMBER DISTRIBUTION COOPERATIVES CASE NO. 2015-00320

Response to Commission Staff's Second Request for Information dated November 18, 2015

November 30, 2015

Item 1) Refer to Big Rivers' response to Commission Staff's First
 Request for Information, Item 6, wherein Big Rivers stated that the Wilson
 generating station ("Wilson") may not be idled in the foreseeable future.

- a. Explain what the impact would be on the dry sorbent injection project at Wilson if Big Rivers determined it was necessary to idle Wilson prior to completion of construction.
 b. Provide the current time table for completion of the dry
 - sorbent injection project.

11 **Response**)

4 5

6

7

8

9

10

12 13

14

15

16

17

18

19

20

a. Most of the costs for this dry sorbent injection ("DSI") project have been either incurred or committed by the end of 2015. Big Rivers plans to continue the remaining construction activities and finish construction by mid-January 2016. Big Rivers also plans to commission and start up the system as Wilson is required to operate to support power sales made for both 2016 and 2017. The MATS compliance deadline is April 16, 2016; therefore, without this equipment, the Wilson facility will not be able to meet the MATS emission limits.

21b. Construction of the Wilson DSI project began in October 2015 and22is currently scheduled to complete mid-January 2016. All major

Case No. 2015-00320 Response to Staff Item 1 Witness: Eric M. Robeson Page 1 of 2

BIG RIVERS ELECTRIC CORPORATION

.

AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIRONMENTAL SURCHARGE MECHANISM OF BIG RIVERS ELECTRIC CORPORATION FOR THE TWO-YEAR BILLING PERIOD ENDING JULY 31, 2015 AND THE PASS THROUGH MECHANISM OF ITS THREE MEMBER DISTRIBUTION COOPERATIVES CASE NO. 2015-00320

Response to Commission Staff's Second Request for Information dated November 18, 2015

November 30, 2015

 1
 components are either on site or will be delivered by early

 2
 December 2015. Commissioning and start-up activities would

 3
 commence in January 2016, and Big Rivers expects those

 4
 activities to last approximately one month.

 5
 6

 7
 Witness)

 8
 Eric M. Robeson

Case No. 2015-00320 Response to Staff Item 1 Witness: Eric M. Robeson Page 2 of 2