

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)	
CORPORATION FOR APPROVAL TO)	CASE NO.
TRANSFER FUNCTIONAL CONTROL OF ITS)	2010-00043
TRANSMISSION SYSTEM TO MIDWEST)	
INDEPENDENT TRANSMISSION SYSTEM)	
OPERATOR, INC.)	

DATA REQUEST OF COMMISSION STAFF
TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Kentucky Industrial Utility Customers, Inc. ("KIUC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and nine copies of the following information, with a copy to all parties of record. The information requested herein is due on or before June 21, 2010. 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.

KIUC 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 KIUC fails or refuses to furnish all or part of the requested information, KIUC 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 Direct Testimony of Dr. Mathew J. Morey (“Morey Testimony”) on page 4, line 10.

a. What additional alternatives regarding the NERC reserve sharing requirements has Big Rivers continued to explore that have not been presented to the Commission?

b. How did the respondent become aware of such alternatives?

2. Refer to page 11, line 15 of the Morey Testimony.


a. Has the answer to this question changed since the May 28, 2010 response? If yes, please explain the changes.

b. What has been the impact of the changes upon Big Rivers’ cost of MISO membership?

3. Refer to page 17, line 21, continuing on to page 18, line 2 of the Morey Testimony. Dr. Morey’s reference to the smelters’ possibly providing up to 320 MW of interruptible power is the first such reference in this proceeding. Provide a detailed

description of how, in light of the physical issues related to the closure and reopening of a pot line, the smelters might provide this level of interruptible power.

4. Refer to page 19, lines 13 - 17, of the Morey Testimony. Explain how Mr. Morey considered the cost of non-compliance penalties levied against Big Rivers while searching for less expensive alternatives to MISO membership.


for: Jeff Derouen
Executive Director
Public Service Commission
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DATED: JUN 10 2010

cc: Parties of Record

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