## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION OF	)	
THE FUEL ADJUSTMENT CLAUSE OF BIG	)	CASE NO.
RIVERS ELECTRIC CORPORATION FROM MAY	)	2016-00006
1, 2015 THROUGH OCTOBER 31, 2015	í	

## COMMISSION STAFF'S SECOND 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 seven copies of the following information, with a copy to all parties of record. The information requested herein is due within ten days of the date of this request. 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 shall 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. When filling a paper containing personal information, Big Rivers shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

- 1. State whether Big Rivers leases or owns any barges, railcars, or other assets related to the transportation of coal. If so, provide the following:
  - a. The date each purchase/lease was entered into;
- b. The reason for entering into each purchase/lease, including the cost benefit;
- c. The types of costs associated with the lease/ownership that are recovered through the fuel adjustment clause ("FAC");
- d. By month, the amount of each cost identified in part c. above recovered through the FAC during the period under review; and
- e. The advantages and disadvantages of the lease/ownership compared to not leasing/owning.

- 2. When calculating its highest-cost unit available to be dispatched for purposes of power purchase exclusion from the fuel adjustment clause, state the level of operation for the unit used in the calculation (i.e., minimum level, actual level of operation during the month, maximum level, some other level of operation) and provide the unit heat rate used in the calculation.
- 3. Provide the current balance of each of the reserve funds and a projection of when the reserve funds will be depleted for each customer class.

James W. Gardner

Acting Executive Director Public Service Commission

P.O. Box 615

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DATED MAR 0 1 2016

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