## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

FILING OF AGREEMENT FOR THE PURCHASE	)	
AND SALE OF FIRM CAPACITY AND ENERGY	)	CASE NO.
BETWEEN BIG RIVERS ELECTRIC	)	2016-00306
CORPORATION AND THE KENTUCKY	)	
MUNICIPAL ENERGY AGENCY	)	

## COMMISSION STAFF'S FIRST 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 October 6, 2016. 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 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. Refer to the Agreement for the Purchase and Sale of Firm Capacity and Energy between Big Rivers Electric Corporation and the Kentucky Municipal Energy Agency ("KyMEA") dated July 13, 2016, ("Agreement") page 9. Section 3.4 states, "... Buyer will sell, and the KyMEA Members will purchase, the full Capacity and Energy requirements of such KyMEA Members ... where the reasonably projected collective annual peak demand for calendar year 2019 of the KyMEA Members under such executed agreements is at least 200 MW." Reconcile this amount of capacity with the amount of Contract Capacity shown in Section 4.2 of the Agreement.
- State whether KyMEA intends to purchase power from entities other than Big Rivers.

 Provide the name and associated load of each KyMEA Member who would be served by power provided by Big Rivers under the Agreement.

> Talina R. Mathews Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED SEP 2 7 2016

cc: Parties of Record

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