

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR AN ORDER DECLARING THE CONSTRUCTION OF SEVEN SOLAR POWER FACILITIES TO BE ORDINARY EXTENSIONS OF EXISTING SYSTEMS IN THE USUAL COURSE OF BUSINESS	) ) ) ) ) ) )	CASE NO. 2016-00409
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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 January, 31, 2017. 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 filing 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 Application, paragraph 7, which states, "There will be a total of approximately 360 panels, each with a capacity of about 300 to 350 watts (dc)." Also refer to the diagrams in the Application, Exhibit D. Confirm that Big Rivers is planning to install only panels that are 315 watts, as shown in Exhibit D.

2. Refer to the Application, paragraph 8, regarding the land leases for each of the seven solar facilities ("Solar Facilities"). Also refer to the Direct Testimony of Russell L. Pogue ("Pogue Testimony"), regarding descriptions of the property at each proposed facility.

a. Provide the site selection criteria Big Rivers considered for the Solar Facilities.

b. Provide the status of the lease for each of the seven sites, stating whether the lease has been executed. For leases that have been executed, provide a copy of the executed land lease.

3. Refer to the Application, paragraph 10.
  - a. Provide an update to the status of Big Rivers' application for a Rural Energy for America Program grant. If a decision has not been made, provide a date for when a decision is expected.
  - b. Explain whether the proposed project will continue if Big Rivers does not receive the grant.
4. Refer to the Application, paragraph 10. Explain in detail how Big Rivers determined that the proposed Solar Facilities will not result in any increased charges to Big Rivers' Members.
5. Refer to the Application, paragraph 11.
  - a. Provide any questions or inquiries from either Big Rivers' Members or Members' end-use customers concerning solar projects.
  - b. Provide any educational materials that will be available to retail customer and members of the public.
6. Refer to the Application, paragraph 13.
  - a. Big Rivers states that its Members will decide how to offer the power to their retail customers. Explain the options Big Rivers' Members have in offering the power to their retail customers.
  - b. If Big Rivers' Members choose to offer the solar power to their retail customers, explain how the Members will know how much energy was generated by the solar panels if it is not separately shown on the bill from Big Rivers.
  - c. Explain how the energy produced by the solar panels will be allocated to Big Rivers' Members.

7. Refer to the Application, paragraph 25. Provide the basis for the estimated \$500 annual cost of operation for each array.

8. Refer to the Pogue Testimony, page 6, lines 4–13.

a. Explain in detail why Big Rivers decided to sell the power generated by the proposed project under its existing Standard Rate Schedule – Rural Delivery Service, rather than a special tariff or the Standard Rate Schedule – Large Industrial Customer.

b. Provide a comparison of the estimated cost per kilowatt-hour for the proposed solar facilities and the existing Standard Rate Schedule – Rural Delivery Service.

9. Refer to the Pogue Testimony, page 6, line 17, through page 7, line 4. Provide a screen shot of the on-line information that can be viewed by a customer or student.

10. Refer to the Pogue Testimony, page 8, lines 1–10.

a. Explain in detail the process Big Rivers used to select the vendor to construct the project.

b. Provide a list of bidders and a copy of any report prepared in order to evaluate and select the vendor.

11. Refer to the Pogue Testimony, page 8, lines 8–10.

a. Confirm that the final contract with Harvest Energy Solutions has not been executed.

b. Confirm that the contract will be not executed unless and until the Commission approves.

12. Refer to page 9, lines 1–7. Provide the total capacity of the solar arrays in MW in alternating current after inverter losses.

13. Provide any estimates or studies that support the 4–6 month timetable for construction of the Solar Facilities.

14. If notice of the locations of the proposed Solar facilities was provided to persons who own property in close proximity to or adjacent to the proposed sites, describe the notice and provide a copy if the notice was written.

a. If any meetings were held with property owners, provide a list of attendees and meeting notes.

b. Provide a copy of public comments, if any, that Big Rivers has received regarding the proposed project.



Talina R. Mathews  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED JAN 13 2017

cc: Parties of Record

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