COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT AND ACQUIRE A 345 KV TRANSMISSION LINE IN HANCOCK COUNTY, KENTUCKY

CASE NO. 2018-00004

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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 10 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before June 12, 2018. 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 Big Rivers' response to Commission Staff's Initial Request for Information ("Staff's Initial Request"), Item 4. When does Big Rivers anticipate executing the Joint Functional Control Agreement?

2. Refer to Big Rivers' response to Commission Staff's Initial Request, Item 8, lines 16–19, regarding the MISO Selected Developer Agreement requirements that Big Rivers will be obligated to continue to conform to once it purchases the Kentucky portion of the proposed transmission project. The response states that "Big Rivers will be responsible for complying with NERC Standards relating to ratings methodology; TADS reporting; misoperation reporting; protection system coordination, maintenance, and testing; and vegetation management on the portion of the MISO Project that Big Rivers will own."

a. Does Big Rivers currently undertake these type of responsibilities in maintaining its transmission system?

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b. Refer also to Big Rivers' response to Staff's Initial Request, Item 22, regarding the \$18,000 estimated annual operating cost of the proposed transmission project. Does this estimated annual operating cost includes those responsibilities that Big Rivers will be obligated to assume as referenced in Big Rivers' response to Staff's Initial Request, Item 8, lines 16–19?

3. Refer to Big Rivers' response to Staff's Initial Request, Item 12, regarding benefits provided by the proposed transmission project to the Big Rivers' system as a whole. The response states, in part, that "[t]he proposed transmission project will significantly stiffen the transmission system against voltage excursions due to development of large blocks of static VARs (capacitors located at Century Aluminum, Coleman Switchyard, and Coleman EHV Substation)." Explain in detail what is meant by this statement.

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Gwen R. Pinson Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

DATED MAY 2 5 2018

cc: Parties of Record

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