

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION OF THE	)	
APPLICATION OF THE FUEL ADJUSTMENT	)	CASE NO.
CLAUSE OF BIG RIVERS ELECTRIC	)	2022-00268
CORPORATION FROM NOVEMBER 1, 2021	)	
THROUGH APRIL 30, 2022	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation (BREC), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on October 28, 2022. The Commission directs BREC to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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 the person supervising the preparation of the response on behalf of the entity that the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

BREC shall make timely amendment to any prior response if BREC obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which BREC fails or refuses to furnish all or part of the requested information, BREC 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 filing a paper containing personal information, BREC 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 Direct Testimony of Natalie, R. Hankins (Hankins Testimony), page 4, lines 4–11. Explain how and why the net capacity of the Green Gas units relates to the need to amend the Power Purchase Agreement between BREC and Unbridled Solar, LLC.

2. Refer to the Hankins Testimony, page 4, lines 12–14.
  - a. Explain why the solar contracts with Community Energy is at best delayed and at worst will not perform at all. Include in the response whether the desire to amend the contracts was BREC's or Community Energy's.

b. To the extent that these contracts were entered into with the expectation of using the renewable energy to satisfy industrial customers' demand for renewable energy, explain what recourse BREC has to satisfy industrial customers' demand.

c. To the extent that the delay or nonperformance is partly due to the increased costs of interconnection in MISO, if known, explain the nature of the increased interconnection costs.

3. Refer to the Hankins Testimony, page 5, lines 13–15. Explain how the approval of MISO's seasonal capacity construct has added uncertainty to the market and how that uncertainty affects BREC in terms of the capacity markets, energy markets and any ancillary service markets.

4. Refer to BREC's Response to Commission Staff's First Request for Information (Staff's First Request), Item 2, page 5. Alliance Coal, LLC is almost 50 percent behind on its required delivery of coal. Explain whether BREC expects this amount to be made up and whether Alliance Coal, LLC is continuing to have trouble meeting its commitments.

5. Refer to BREC's Response to Staff's First Request, Item 3, pages 2–3. Wilson Station's coal supply is 16 days over its target level. If this is by design, explain the reasons for the excess inventory and what, if anything, BREC is doing to bring its inventory level back to within target levels.

6. Refer to BREC's Response to Staff's First Request, Item 15. BREC has multiple outages listed as "Forced" that are less than six hours long. Explain how BREC

treats power purchases during forced outages that are less than six hours in the Fuel Adjustment Clause.

7. Refer to BREC's Response to Staff's First Request, Items 29b and 29c, Attachment, and the Hankins Testimony, page 7, lines 1–12, referring to the Attachment, Green Unit 1 Tab, rows 817, 841, and 865. Green Unit 1 was on standby status for December 4–6, 2021, but the commitment status is Economic.

a. If BREC offers in its units with an Economic commitment status, explain what entity decides to place a unit on standby.

b. Explain how a unit is operating when the unit cost is greater than the average day-ahead price and the unit is on standby.

c. Explain whether Midcontinent Independent System Operator (MISO) selects BREC's units to operate based on the average cost at full load clearing the average day ahead energy price. If not, provide further explanation of the criteria for whether BREC's units are selected to run.

8. Explain if BREC was subjected to any performance penalties by MISO during the period under review.

9. For each month of the review period, provide the total amount of fuel related cost that occurred during a forced outage that was disallowed pursuant to 807 KAR 5:056 or was unable to be collected via any other means.

10. For each month in the current six-month review period, provide, separately, the amounts of purchased power fuel during scheduled/extended outages and forced outages in both kWh and dollars, the amounts of purchased power cost recovered through the Fuel Adjustment Clause and through the Purchase Power Agreement, and

any amounts not recovered through either. The response should be provided in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

11. Provide the case number in which the Commission initially approved BREC's Non-FAC PPA tariff and provide any subsequent case numbers of any Commission cases in which any changes made to the Non-FAC PPA tariff were approved.



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DATED OCT 14 2022

cc: Parties of Record

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