

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF BIG RIVERS)	
ELECTRIC CORPORATION FOR APPROVAL OF)	CASE NO.
PROPOSED CHANGES TO ITS QUALIFIED)	2023-00102
COGENERATION AND SMALL POWER)	
PRODUCTION FACILITIES TARIFFS)	

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

Big Rivers Electric Corporation (BREC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on August 18, 2023. The Commission directs BREC to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 Case No. 2019-00365,² Application, Direct Testimony of Paul Smith, page 6. During the discussion of the Large Industrial Customer Expansion (LICX) tariff, BREC stated that if certain economic development contracts were executed, BREC would have a capacity shortfall.

² Case No. 2019-00365, *Electronic Joint Application of Big Rivers Electric Corporation and Meade County Rural Electric Cooperative Corporation for (1) Approval of Contracts for Electric Service with Nucor Corporation; and (2) Approval of Tariff* (Ky. PSC Aug. 17, 2020).

a. Explain whether BREC has executed any such contracts or expects to in the next year. If so, provide the total load for these customers.

b. Explain whether BREC still expects to be capacity deficient in the event that economic development customers locate in its service territory. If so, provide the minimum amount of additional load that would place BREC in a capacity deficit. If not, explain why not.

2. Refer to Case No. 2020-00183,³ final Order, pages 6 and 12–13.

a. Provide an update on the status of BREC's contracts with Owensboro Municipal Utilities (OMU) and the Kentucky Municipal Energy Agency (KyMEA).

b. Explain whether BREC still expects to be capacity deficient in the event that OMU and KyMEA both renew their respective contracts. If so, provide the amount and timing of the capacity deficit. If not, explain why not.

c. Refer also to Case No. 2022-00296,⁴ final Order, page 4. Explain whether BREC will be capacity deficient without the fulfillment of all solar purchase power agreements (PPA) approved in Case No. 2020-00183. If so, provide the amount and timing of the capacity deficit. If not, explain why not.

3. Refer to Case No. 2022-00296,⁵ June 13, 2023 Order and BREC's proposed tariff Sheet No. 41. Explain why BREC is purchasing capacity through solar

³ Case No. 2020-00183, *Electronic Application of Big Rivers Electric Corporation for Approval of Solar Power Contracts* (Ky. PSC Sept. 28, 2020), final Order at 6 and 12-13.

⁴ Case No. 202-00296, *Electronic Application of Big Rivers Electric Corporation for Approval of Amendment to Power Purchase Agreement* (Ky. PSC June 13, 2023), final Order at 4.

⁵ Case No. 2022-00296, June 13, 2023 final Order at 6.

PPAs but proposes not to provide capacity payments for non-dispatchable qualifying facilities.

4. Refer to Case No. 2021-00282,⁶ October 14, 2021 Order, pages 12–13.

Explain whether BREC still expects the same amount of capacity deficit.

5. Refer to BREC's response to Commission Staff's First Request for Information, Item 5(a). Explain how often QF Members are given or have the opportunity to change the designation of their respective generation to dispatchable, register with MISO and receive capacity payments.

6. Refer to BREC's response Commission Staff's Second Request for Information (Staff's Second Request), Item 2-7 and to Case No. 2020-00299,⁷ Staff Report, page 41. BREC's Integrated Resource Plan (IRP) indicated that it would continue running a capacity deficit through 2028.

a. Provide an update to Load and Generation forecast tables in Item 2-

7. For the load forecast, include a breakout of Native Load, MISO capacity requirements, Non-member sales obligations and any anticipated economic development load. For the Generation table, provide unit generation on an unforced capacity (UCAP) basis, and BREC resulting reserve Margin. The Solar PPA Henderson generation should reflect the capacity credit amounts as counted by MISO.

⁶ Case No. 2021-00282, *Electronic Tariff Filing of Big Rivers Electric Corporation and Jackson Purchase Energy Corporation for Approval and Confidential Treatment of a Special Contract and Cost Analysis Information and a Request for Deviation from the Commission's September 24, 1990 Order in Administrative Case No. 327* (Ky. PSC Oct. 14, 2021).

⁷ Case No. 2020-00299, *Electronic 2020 Integrated Resource Plan of Big Rivers Electric Corporation* (Ky. PSC Nov. 22, 2021), Commission Staff Report at 41–43.

b. Explain whether the Solar PPA Henderson capacity is considered firm and dispatchable and if it is registered with MISO. In addition, explain whether BREC counts any of the solar capacity toward its MISO obligations.

c. The IRP preferred plan called for the addition of 90 MW of natural gas combined cycle (NGCC) generation assuming the Green Coal Units were idled.⁸ Explain whether BREC still intends to add NGCC generation to its fleet and if so, the current projected in-service date.



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DATED AUG 09 2023

cc: Parties of Record

⁸ Case No. 2020-00299, *Electronic 2020 Integrated Resource Plan of Big Rivers Electric Corporation* (Ky. PSC Sept. 21, 2020), IRP, Section 8.2.2 at 155–156.

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