

COMMONWEALTH OF KENTUCKY  
BEFORE THE KENTUCKY STATE BOARD  
ON ELECTRIC GENERATION AND TRANSMISSION SITING

In the Matter of: )  
 )  
The Application of Thoroughbred )  
Generating Company, LLC for a ) Case No. 2002-00150  
Merchant Power Plant Construction )  
Certificate in Muhlenberg County, Kentucky )

BIG RIVERS ELECTRIC CORPORATION'S  
FIRST DATA REQUEST TO APPLICANT

Big Rivers Electric Corporation ("Big Rivers") propounds this First Data Request to the applicant, Thoroughbred Generating Company, LLC.

INSTRUCTIONS

Please follow the directions given in the Board Consultant's First Data Request in responding to Big Rivers' First Data Request, and in addition:

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce each such document for inspection and copying.
2. Please restate each question before stating the answer to the questions.
3. If multiple witnesses have a response to a question, please have each witness respond separately.
4. The following defined terms, when used by Big Rivers with initial capitalization in a question, are intended by Big Rivers to have the meanings stated in the "Definitions."

## DEFINITIONS

“Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, electronic messages, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence, investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.

“Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issues or situation, in whatever detail, whether or not the consideration of the issues or situation is in a preliminary state, and whether or not the consideration was discontinued prior to completion.

“Thoroughbred” means Thoroughbred Generating Company, LLC, the applicant in this matter, and any individual person, employee, consultant, attorney, director, agent, representative, parent company, subsidiary or affiliated organization acting for or on behalf of Thoroughbred Generating Company, LLC in any manner related to, arising out of or connected with the electric generating project that is the subject of this proceeding.

## DATA REQUESTS

1. Are the statements of fact and conclusions of studies contained in the application filed by Thoroughbred accurate as of the date of your responses to these information requests? If “no,” please state what amendments must be made to the statements of fact and conclusions of studies contained in the application to correct them as of that date.
2. Will the power generated by the Thoroughbred generating units be delivered to loads in Kentucky or outside of Kentucky? If your answer is “both,” please state the percentage of that power that you anticipate will be delivered to loads in Kentucky, and the percentage of that power that you anticipate will be delivered to loads outside of Kentucky.
3. Has Thoroughbred made any arrangements for transmission service to deliver power from the Thoroughbred facility to intended loads?
4. Thoroughbred states in its application that it will connect its proposed generating facility to the Big Rivers transmission system with a new 345 kV transmission line from its facility to the Big Rivers Wilson generating station. Does Thoroughbred acknowledge full responsibility for the costs of constructing and operating that interconnection, and any other upgrades or additions to the Big Rivers transmission system that may be necessitated by the flows of power from the Thoroughbred generating facility over the Big Rivers transmission system? If the answer is “no,” please state the portion of those costs that Thoroughbred contends Big Rivers should pay, and describe in the detail the justification for requiring Big River to pay those costs.

5. Has Thoroughbred performed any analysis of the impact of the output of its facility on any transmission system that is not directly connected to the Thoroughbred facility? If so, please provide a copy of each such analysis.
6. If the flows of power from Thoroughbred across the Big Rivers transmission system into neighboring transmission systems that are not directly connected with Thoroughbred require improvements to those neighboring transmission systems, does Thoroughbred accept full responsibility for the costs of constructing and operating those improvements? If the answer is “no,” please state (i) who should be responsible for those costs, (ii) the amount of those costs for which Thoroughbred contends that entity should be responsible, and (iii) describe in the detail the justification for requiring that entity to pay those costs.
7. If the flows of power from Thoroughbred cause parallel flows on neighboring transmission systems not directly interconnected with Thoroughbred, does Thoroughbred acknowledge any responsibility for the costs of correcting those parallel flows? If the answer is “no,” please state (i) who should be responsible for those costs, (ii) that amount of those costs that Thoroughbred contends that entity should be responsible for, and (iii) describe in detail the justification for requiring that entity to pay those costs.
8. Does Thoroughbred agree that any schedule for transmission of power to or from Thoroughbred’s facility across the Big Rivers transmission system must be subject to curtailment, without compensation to Thoroughbred (or any party with whom Thoroughbred has contracted for the purchase, sale or

transmission of power) in the event Big Rivers must curtail that scheduled transmission to comply with KRS 278.214?

9. Please identify the control area of which the Thoroughbred facility will be a part.
10. Does Thoroughbred desire to be a member of the MISO, or any other regional transmission organization? If the Thoroughbred facility is connected to the Big Rivers transmission system, will Thoroughbred expect Big Rivers to join the MISO, or any other regional transmission organization? If so, is Thoroughbred willing to assume any additional costs that Big Rivers may incur from joining the MISO, or any other regional transmission organization?
11. What is the position of Thoroughbred on the subject of retail open access (deregulation) in Kentucky? Please explain the response thoroughly.
12. Please state the volume of coal reserves owned or leased by Peabody in Muhlenberg County.
13. Please state the volume of coal reserves owned or leased by Peabody in Ohio County.
14. Has Thoroughbred communicated with any retail electric consumer in Kentucky about selling it power from the Thoroughbred facility? If so, please identify each of those retail electric consumers, and the person or persons associated with that consumer with whom Thoroughbred communicated on this subject.

15. Does Thoroughbred anticipate ever becoming a “utility” under KRS Chapter 278, and making retail sales of the output of the Thoroughbred facility in Kentucky?
16. Has Thoroughbred contracted to sell any power from the proposed Thoroughbred facility? If so, with respect to each such contract please state the location of the load, the volume of the sale and the transmission path that will be used to transmit the power purchased to the load.
17. Peabody spokesman Vic Svec is quoted in the August 11, 2003 “*Platts Coal Trader*” as saying that: “A move to Wilson would make a TVA interconnect more difficult.” Please explain in detail the supporting basis for this statement, including identifying any transmission study that Thoroughbred contends supports this statement.
18. Has Thoroughbred performed an economic analysis of the impact the Thoroughbred plant may have on Big Rivers, its members, and its members’ consumers? If so, please provide that analysis.
19. Section 9 of the application (“Efforts to Utilize Existing Electric Generating Facility Sites”) refers, in the second paragraph, to “permit applications which fixed the site location” that were filed at least a year before passage of SB 257. Please identify (i) each of those permit applications, (ii) the permitting agency with whom each permit application was filed, and (iii) the date on which each permit application was filed.
20. Can the boilers of the Thoroughbred facility burn any fuel other than Kentucky #8 and #9 seam coal? If “yes,” please provide a copy of every

document in the possession of Thoroughbred that contains information concerning or related to burning fuels other than Kentucky #8 and #9 seam coal in the Thoroughbred facility.

21. Please provide a map showing the location of the coal reserves that Thoroughbred expects to be the source of fuel for the Thoroughbred facility.
22. If an evidentiary hearing is ordered in this proceeding, please identify the name, position and responsibility of each person whom Thoroughbred will offer as a witness in support of its application.
23. State the specific amount of Class II increment that the proposed Thoroughbred generating facility will consume in Ohio County for the pollutants SO<sub>2</sub>, NO<sub>x</sub>, and PM<sub>10</sub> for 3 hour, 24 hour and annual averaging periods based on the maximum permitted emissions for the Plant at full capacity, and state the amount of Class II increment remaining for use by new or modified sources in Ohio, McLean and Muhlenberg counties for all such pollutants after the Plant is constructed.
24. State whether Thoroughbred included in its Class II and Class I increment analysis any possible contribution from the Tennessee Valley Authority Paradise Plant.
25. State the specific amount of Class I increment for all criteria pollutants that the proposed Thoroughbred generating facility will consume at Mammoth Cave National Park and state the remaining Class I increment that will be available for consumption by any new or modified sources within 100 kilometers of the Class I area.

26. How will the proposed water withdrawal for the proposed Thoroughbred generating facility affect downstream water supplies during periods of low stream flow?
27. Have you modeled the impact of the proposed water withdrawal on downstream users, and if so, how will the withdrawal affect downstream users.
28. How will permit limitations on water withdrawal affect operation of the proposed facility?
29. Please state in detail how Thoroughbred determined that the proposed Thoroughbred generating facility will operate within the 2 ppmv NH<sub>3</sub> slip operating conditions specified in the supporting cumulative impacts and visibility analyses. Has Thoroughbred studied the impact on visibility in the affected region if the facility's NH<sub>3</sub> slip operating conditions exceed 2 ppmv? If "yes," please provide a copy of each such study, and any documents that refer to or incorporate information from each such study.
30. Has Thoroughbred studied the impact of NH<sub>3</sub>, HCl, Sulfuric Acid Mist, and Mercury emissions from the proposed Thoroughbred generating facility on the potential for economic development in areas downwind of that facility? If "yes," please provide a copy of each such study, and any documents that refer to or incorporate information from each such study.
31. Has Thoroughbred studied, or compiled any data regarding ambient air quality in Muhlenberg and surrounding counties for PM<sub>2.5</sub>? If "yes," please

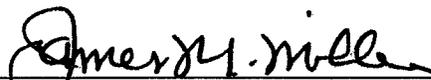
provide a copy of each such study or data, and any documents that refer to or incorporate information from each such study or data.

32. Has Thoroughbred studied the effect that operation of the Thoroughbred facility at full capacity will have on attainment of the PM2.5 standard in Muhlenberg, Ohio, and McLean Counties? If "yes," please provide a copy of each such study, and any documents that refer to or incorporate information from each such study.
33. Has Thoroughbred studied the economic consequences for Muhlenberg, McLean and Ohio Counties if the counties do not achieve attainment status for PM2.5? If "yes," please provide a copy of each such study, and any documents that refer to or incorporate information from each such study.
34. Has Thoroughbred studied ambient air quality in Muhlenberg and surrounding counties for compliance with the 8 hour ozone standard? If "yes," please provide a copy of each such study, and any documents that refer to or incorporate information from each such study.
35. Has Thoroughbred studied the impact of operation of the proposed Thoroughbred generating facility at full capacity on attainment of the 8-hour ozone standard in Muhlenberg, McLean and Ohio Counties? If "yes," please provide a copy of each such study, and any documents that refer to or incorporate information from each such study.
36. Has Thoroughbred studied the economic consequences for Muhlenberg, McLean and Ohio Counties if the counties do not achieve attainment status under the 8 hour ozone standard? If "yes," please provide a copy of each

such study, and any documents that refer to or incorporate information from each such study.

37. Please describe in detail the state of construction on the site as of April 24, 2002, including but not limited to whether there had been any clearing or excavation, and whether there had been any physical on-site placement, assembly, or installation of materials or equipment which will make up part of the ultimate structure of the proposed Thoroughbred generating facility.
38. Has Thoroughbred studied whether the construction and operation of its proposed electric generating facility will have any negative economic impact on the affected region and the state? If "yes," please provide a copy of each such study, and any documents that refer to or incorporate information from each such study.
39. The Hill & Associates, Inc. report titled "Economic Benefits of a Coal-Fueled Power Plant Compared to Natural Gas," filed as Section 6.2 of the application, states on page 2 that "modern coal plants in the Midwest will force some of the smaller/older plants to be shut down." Please provide a copy of any document or study in the possession of Thoroughbred in which the effect of the proposed Thoroughbred generating facility on the future economic viability of existing coal-fired generating plants in the affected region and the state is discussed.

August 25, 2003



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