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October 22, 2010

RECEIVED

OCT 25 2010

PUBLIC SERVICE
COMMISSION

Via Federal Express

Jeff DeRouen
Executive Director
Public Service Commission
211 Sower Boulevard, P.O. Box 615
Frankfort, Kentucky 40602-0615

Re: In the Matter of: An Examination of the Application of the Fuel
Adjustment Clause of Big Rivers Electric Corporation
Case No. 2010-00269

Dear Mr. DeRouen:

Enclosed for filing on behalf of Big Rivers Electric Corporation ("Big Rivers") are an original and ten copies of Big Rivers' response to the post hearing data requests in the above referenced matter, along with an original and ten copies of a Petition for Confidential Treatment relating to Big Rivers' response to Item 4 of those data requests. One sealed copy of the unredacted response to Item 4 is also enclosed. I certify that a copy of this letter, a copy of the petition, and a copy of the responses (including the redacted response to Item 4) have been served on the attached service list.

Sincerely,



Tyson Kamuf

TAK/bh

cc: Mark A. Bailey
Albert Yockey
Service List

Telephone (270) 926-4000
Telecopier (270) 683-6694

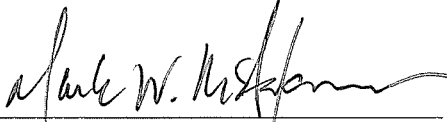
100 St. Ann Building
PO Box 727
Owensboro, Kentucky
42302-0727

Service List
Case No. 2010-00269

Michael L. Kurtz, Esq.
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36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202

VERIFICATION

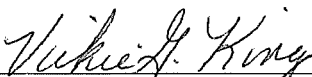
I verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Mark W. McAdams

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

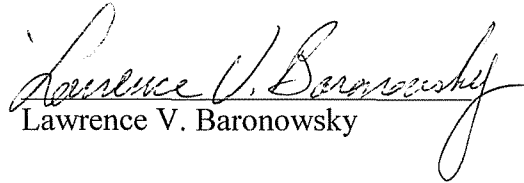
SUBSCRIBED AND SWORN TO before me by Mark W. McAdams on this the 21st day of October, 2010.



Notary Public, Ky. State at Large
My Commission Expires 03/03/2010

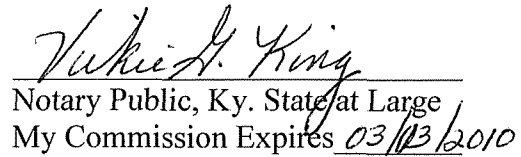
VERIFICATION

I verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


Lawrence V. Baronowsky

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Lawrence V. Baronowsky on this the 21st day of October, 2010.


Notary Public, Ky. State at Large
My Commission Expires 03/13/2010

VERIFICATION


I verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Michael J. Mattox

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Michael J. Mattox on this the 21st day of October, 2010.



Notary Public, Ky. State at Large
My Commission Expires 03/13/2010

1 COMMONWEALTH OF KENTUCKY
2 BEFORE THE PUBLIC SERVICE COMMISSION

3
4 In the Matter of:

5
6 AN EXAMINATION OF THE APPLICATION)
7 OF THE FUEL ADJUSTMENT CLAUSE OF)
8 BIG RIVERS ELECTRIC CORPORATION) CASE NO. 2010-00269
9 FROM NOVEMBER 1, 2009 THROUGH)
10 APRIL 30, 2010)

11
12 **PETITION OF BIG RIVERS ELECTRIC CORPORATION FOR CONFIDENTIAL**
13 **PROTECTION**
14

15 1. Big Rivers Electric Corporation (“Big Rivers”) hereby petitions the Kentucky
16 Public Service Commission (“Commission”), pursuant to 807 KAR 5:001 Section 7 and KRS
17 61.878(1)(c), to grant confidential protection to part of Big Rivers’ response to the information
18 requested at the October 12, 2010, hearing in this matter. The information Big Rivers seeks to
19 protect as confidential is part of its response to Item 4 of the Commission’s post-hearing data
20 requests (the “Confidential Information”) and a fuel contract solicitation bid tabulation sheet that
21 is being provided in response to that Item 4

22 2. Big Rivers seeks confidential treatment of the entirety of the bid tabulation sheet.
23 One (1) sealed copy of the bid tabulation sheet printed on yellow paper (since the entirety of the
24 document is confidential) is attached to this Petition. One (1) sealed copy of the response to Item
25 4 with the Confidential Information highlighted is attached to this Petition. A copy of the
26 response to Item 4 with the Confidential Information redacted and with a statement noting that the
27 bid tabulation sheet is attached only to the unredacted response to Item 4 is included with each of
28 the ten (10) copies of Big Rivers’ responses to the post-hearing data requests filed with this
29 Petition. 807 KAR 5:001 Sections 7(2)(a)(2), 7(2)(b).

1 3. This is to certify that a copy of this Petition and a copy of the redacted response to
2 Item 4 have been served on all parties to this proceeding. 807 KAR 5:001 Section 7(2)(c).

3 4. If and to the extent the Confidential Information or the bid tabulation sheet
4 becomes generally available to the public, whether through filings required by other agencies or
5 otherwise, Big Rivers will notify the Commission and have its confidential status removed. 807
6 KAR 5:001 Section 7(9)(a).

7 5. The Confidential Information contains descriptions relating to the bid tabulation
8 sheet. As discussed below, the Confidential Information and the bid tabulation sheet are entitled
9 to confidential protection based upon KRS 61.878(1)(c)(1), which protects “records
10 confidentially disclosed to an agency or required by an agency to be disclosed to it, generally
11 recognized as confidential or proprietary, which if openly disclosed would permit an unfair
12 commercial advantage to competitors of the entity that disclosed the records.” KRS
13 61.878(1)(c)(1).

14 **I. Big Rivers’ Faces Actual Competition**

15 6. Big Rivers competes in the wholesale power market to sell energy excess to its
16 members’ needs. Big Rivers’ ability to successfully compete in the wholesale power market is
17 dependent upon a combination of its ability to get the maximum price for the power sold, and
18 keeping the cost of producing that power as low as possible. Fundamentally, if Big Rivers’ cost
19 of producing a kilowatt hour increases, its ability to sell that kilowatt hour in competition with
20 other utilities is adversely affected. As is well-documented in multiple proceedings before this
21 Commission, Big Rivers’ margins are derived almost exclusively from its off-system sales.

22 7. Big Rivers also competes for reasonably-priced credit in the credit markets, and
23 its ability to compete is directly impacted by its financial results. Any event that adversely

1 affects Big Rivers' margins will adversely affect its financial results and potentially impact the
2 price it pays for credit. As was described in the proceeding before this Commission in the Big
3 Rivers unwind transaction case, Big Rivers expects to be in the credit markets on a regular basis
4 in the future.¹

5 **II. The Confidential Information and the Bid Tabulation Sheet are Generally**
6 **Recognized as Confidential or Proprietary**

7 8. The bid tabulation sheet and the descriptions relating to the bid tabulation sheet
8 that make up the Confidential Information contain the type of information that is generally
9 recognized as confidential or proprietary under Kentucky law. The bid tabulation sheet and the
10 Confidential Information contain confidential bids supplied by fuel suppliers, information related
11 to those bids, and Big Rivers' ranking of those bids, and they give insight into the internal,
12 confidential bid selection methodology that Big Rivers uses.

13 9. The bid tabulation sheet and the Confidential Information are precisely the sort of
14 documents meant to be protected by KRS 61.878(1)(c)(1), and the Commission has often found
15 that similar information relating to competitive bidding is generally recognized as confidential
16 and proprietary. *See, e.g.,* Order dated August 4, 2003, in *In the Matter of: Application of the*
17 *Union Light, Heat and Power Company for Confidential Treatment*, PSC Case No. 2003-00054
18 (finding that bids submitted to a utility were confidential).

19 10. In fact, the Commission has granted confidential protection to the same type of
20 information that is presented in the bid tabulation sheet and the Confidential Information when
21 provided by other utilities in cases involving a review of their fuel adjustment clauses. *See, e.g.,*

¹ See Order dated March 6, 2009, *In the Matter of: Joint Application of Big Rivers, E.ON, LG&E Energy Marketing, Inc., and Western Kentucky Energy Corporation for Approval to Unwind Lease and Power Purchase Transactions*, PSC Case No. 2007-00455, pages 27-30 and 37-39.

1 letter from the Commission dated October 23, 2009, granting confidential protection to East
2 Kentucky Power Cooperative, Inc.'s bid tabulation sheet and related information in Case No.
3 2009-00286; letter from the Commission dated December 11, 2009, granting confidential
4 protection to Kentucky Utilities Company's coal bid analysis procedure in Case No. 2009-00287.
5 The Commission has also granted confidential protection to the bid tabulation sheet that Big
6 Rivers filed in the first review of its fuel adjustment clause, to explanations related to that bid
7 tabulation sheet, and to an earlier version of the bid tabulation sheet that Big Rivers filed in
8 response to Item 19b of the Commission's data requests in this matter. *See* letter from the
9 Commission dated May 10, 2010, in Case No. 2009-00510; letter from the Commission dated
10 April 22, 2010, in Case No. 2010-00510; letter from the Commission dated September 22, 2010,
11 in Case No. 2010-00269.

12 11. The bid tabulation sheet and the Confidential Information are not publicly
13 available, are not disseminated within Big Rivers except to those employees and professionals
14 with a legitimate business need to know and act upon the information, and are not disseminated
15 to others without a legitimate need to know and act upon the information. As such, the bid
16 tabulation sheet and the Confidential Information are generally recognized as confidential and
17 proprietary.

18 **III. Disclosure of the Bid Tabulation Sheet and the Confidential Information Would**
19 **Permit an Unfair Commercial Advantage to Big Rivers' Competitors**

20 12. Disclosure of the bid tabulation sheet and the Confidential Information would
21 permit an unfair commercial advantage to Big Rivers' competitors. As discussed above, Big
22 Rivers faces actual competition in the wholesale power market and in the credit market. It is
23 likely that Big Rivers would suffer competitive injury if the bid tabulation sheet and the

1 descriptions related to the bid tabulation sheet that make up the Confidential Information were
2 publicly disclosed. In PSC Case No. 2003-00054, the Commission granted confidential
3 protection for bids submitted to Union Light Heat & Power (“ULH&P”). ULH&P’s argued, and
4 the Commission implicitly accepted, that the bidding contractors would not want their bid
5 information publicly disclosed, and that disclosure would reduce the contractor pool available to
6 ULH&P, which would drive up ULH&P’s costs, hurting its ability to compete with other gas
7 suppliers. Order dated August 4, 2003, in *In the Matter of: Application of the Union Light, Heat*
8 *and Power Company for Confidential Treatment*, PSC Case No. 2003-00054. In PSC Case No.
9 2005-00433, the Commission recognized that public disclosure of confidential information
10 contained in a company’s financial statements could shrink the pool of investors available to that
11 company, resulting in competitive harm to that company. Order dated April 3, 2006, in *In the*
12 *Matter of: The Joint Application of Nuon Global Solutions USA, BV, Nuon Global Solutions*
13 *USA, Inc., AIG Highstar Capital II, LP, Hydro Star, LLC, Utilities, Inc. and Water Service*
14 *Corporation of Kentucky for Approval of an Indirect Change in Control of a Certain Kentucky*
15 *Utility Pursuant to the Provisions of KRS 278.020(5) and (6) and 807 KAR 5:001, Section 8,*
16 PSC Case No. 2005-00433. And in *Hoy v. Kentucky Indus. Revitalization Authority*, the
17 Kentucky Supreme Court found that without protection for confidential information provided to
18 a public agency, “companies would be reluctant to apply for investment tax credits for fear the
19 confidentiality of financial information would be compromised. *Hoy v. Kentucky Indus.*
20 *Revitalization Authority*, 907 S.W.2d 766, 769 (Ky. 1995).

21 13. In Big Rivers’ case, with respect to the bid tabulation sheet, if confidential
22 treatment is denied, potential bidders would know that their bids would be publicly disclosed,
23 which could reveal information to their competitors about their competitiveness. Because many

1 companies would be reluctant to have such information disclosed, public disclosure of Big
2 Rivers' bid tabulation sheet would likely suppress the competitive bidding process and reduce
3 the pool of bidders willing to bid to supply Big Rivers' fuel needs, driving up Big Rivers' fuel
4 costs (which could then drive up the cost of credit to Big Rivers) and impairing its ability to
5 compete in the wholesale power market.

6 14. Also, the information contained in the bid tabulation sheet and the Confidential
7 Information reveals the procedure and strategies Big Rivers follows and the factors and inputs it
8 considers in evaluating bids for fuel supply. If the documents are publicly disclosed, potential
9 bidders could manipulate the bid solicitation process to the detriment of Big Rivers and its
10 members by tailoring bids to correspond to and comport with Big Rivers' bidding criteria and
11 process. In PSC Case No. 2003-00054, the Commission granted confidential protection to bids
12 submitted to ULH&P. In addition to the other arguments discussed above, ULH&P argued, and
13 the Commission implicitly accepted, that if the bids it received were publicly disclosed,
14 contractors on future work could use the bids as a benchmark, which would likely lead to the
15 submission of higher bids. Order dated August 4, 2003, in *In the Matter of: Application of the*
16 *Union Light, Heat and Power Company for Confidential Treatment*, PSC Case No. 2003-00054.
17 The Commission also implicitly accepted ULH&P's further argument that the higher bids would
18 lessen ULH&P's ability to compete with other gas suppliers. *Id.* Similarly, potential bidders
19 manipulating Big Rivers' bidding process would lead to higher fuel costs to Big Rivers and
20 would place it at an unfair competitive disadvantage in the wholesale power market.

21 15. Additionally, the power producers and marketers with which Big Rivers competes
22 could use the information to determine Big Rivers' power production costs and could use those

1 figures to potentially underbid Big Rivers in wholesale transactions, which would further
2 constitute an unfair competitive disadvantage to Big Rivers.

3 **IV. The Bid Tabulation Sheet and the Confidential Information are Entitled to**
4 **Confidential Protection**

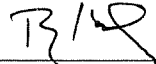
5 16. Based on the foregoing, the bid tabulation sheet and the Confidential Information
6 are entitled to confidential protection.

7 **V. The Commission is Required to Hold an Evidentiary Hearing**

8 17. The bid tabulation sheet and the Confidential Information should be given
9 confidential protection. If the Commission disagrees that Big Rivers is entitled to confidential
10 protection, due process requires the Commission to hold an evidentiary hearing. *Utility*
11 *Regulatory Com'n v. Kentucky Water Service Co., Inc.*, 642 S.W.2d 591 (Ky. App. 1982).

12 WHEREFORE, Big Rivers respectfully requests that the Commission classify and protect
13 as confidential the bid tabulation sheet and the Confidential Information.

14 On this the ___ day of October, 2010.

15
16 
17 _____
18 James M. Miller
19 Tyson Kamuf
20 Sullivan, Mountjoy, Stainback
21 & Miller, P.S.C.
22 100 St. Ann Street
23 P.O. Box 727
24 Owensboro, Kentucky 42302-0727
25 (270) 926-4000
26
27 COUNSEL FOR BIG RIVERS
ELECTRIC CORPORATION

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2009 THROUGH APRIL 30, 2010
CASE NO. 2010-00269**

Response to Data Requests from the Formal Hearing of October 12, 2010

October 25, 2010

1 **Item 1)** *See the response to Item 5 from the Commission's Initial Data Requests,*
2 *dated August 13, 2010, ("Commission's Initial Requests"). The response states that*
3 *Big Rivers has a contract to purchase power from Southern Illinois Power Cooperative*
4 *for certain days during the winter season because of a planned outage at the Wilson*
5 *Station. Explain why an outage was scheduled for the Wilson Station during the*
6 *winter heating season.*

7
8 **Response)** The first Wilson Unit #1 outage, which extended into the current FAC
9 review period from October, 2009, was originally scheduled from September 26, 2009,
10 through November 14, 2009, for a turbine/generator inspection and overhaul. As
11 reported in Big Rivers' response to the Commission Staff's data request in the previous
12 FAC review (*see* Big Rivers' response to Item 7, Item 7 – Attachment, page 10 of 10,
13 filed on February 17, 2010 in Case No. 2009-00510), market conditions postponed the
14 outage commencement date to October 3, 2009, and pushed the expected completion date
15 to November 21, 2009. During the inspection, some damage was discovered to the
16 turbine rotor that required Big Rivers to ship it to the Siemens shop in Charlotte, NC for
17 repairs. Due to this unexpected repair, the outage was extended for twelve (12) days and
18 scheduled to end on December 3, 2009

19
20 During the first outage, Big Rivers inspected the exciter and determined that it would
21 need to be refurbished. Big Rivers further determined that the old exciter could not be
22 refurbished and re-installed during the outage. So, Big Rivers replaced the original
23 exciter with a rented exciter from Siemens, which allowed Wilson Unit #1 to be brought
24 back online while the original exciter was being refurbished. Big Rivers scheduled a
25 second Wilson Unit #1 outage to replace the rented exciter with the refurbished exciter.
26 Big Rivers chose December 27, 2009, through January 3, 2010, for the second outage
27 because it expected its load demand and market exposure to be the least during that year-
28 end holiday period.

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2009 THROUGH APRIL 30, 2010
CASE NO. 2010-00269**

Response to Data Requests from the Formal Hearing of October 12, 2010

October 25, 2010

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Witness) Lawrence V. Baronowsky

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2009 THROUGH APRIL 30, 2010
CASE NO. 2010-00269**

Response to Data Requests from the Formal Hearing of October 12, 2010

October 25, 2010

1 The October 11 filing also stated “*that arrows appearing in the “From”*
2 *columns represent outages which began before the beginning date of the FAC review*
3 *period (November 1, 2009), while arrows in the “To” columns represent outages which*
4 *extended beyond the ending date of the FAC review period (April 30, 2010). Finally, in*
5 *such cases, the reported hours will include hours outside the FAC review period.” In this*
6 October 25 filing, the duration times have been corrected to reflect only those hours
7 which apply to the current review period. The only duration time so affected is at Green
8 Unit #1 and appears in Item 2 – Attachment [SECOND REVISION to Original Item 7 –
9 Attachment], page 5 of 10, Hours of Duration for April.

10 All duration times were checked and verified resulting in a change in
11 Hours of Duration for Wilson Unit #1 for December from 58:45 hours to 44:45. That
12 change was due to a calculation error in the original schedule. The change is highlighted
13 in pale blue on the attached schedule. (See Item 2 – Attachment [SECOND REVISION to
14 Original Item 7 – Attachment], page 10 of 10.) This review produced no such changes
15 for other units.

16 Also, formulas were added to automatically calculate outage duration
17 times and, to do so, some start or ending times changed from 2400 hours to 0000 hours,
18 as necessary. These changes are highlighted in pale blue for Wilson Unit #1. (See Item 2
19 – Attachment [SECOND REVISION to Original Item 7 – Attachment], page 10 of 10, for
20 November, December, and January.) The formula additions created no changes for the
21 other units. For Wilson Unit #1, the Hours of Duration changed from 721:00 to 720:00.

- 22
- 23 a. The Henderson Station Two Unit #1 forced outage dates for January
24 should have read (From) 1/28/2010 at 1541 hours to (To) 1/29/2010 at
25 0545 hours. The reported duration of 14:04 was correct. (See Item 2 –
26 Attachment [SECOND REVISION to Original Item 7 – Attachment],
27 page 3 of 10)

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2009 THROUGH APRIL 30, 2010
CASE NO. 2010-00269**

Response to Data Requests from the Formal Hearing of October 12, 2010

October 25, 2010

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- b. The Green Unit #1 forced outage beginning on (From) December 29, 2009 at 0158 hours should have read (To) December 30, 2009 at 1851. The reported duration of 40:53 is correct. (See Item 2 – Attachment [SECOND REVISION to Original Item 7 – Attachment], page 5 of 10)

- c. For the Coleman Unit #3 scheduled outage beginning on (From) 2/27/2010 at 000 hours, the scheduled and actual duration of 48:00 and 47:27 were switched on the original submission, but were corrected in the Company’s filing of October 11, 2010 (see Item 7 – Attachment [REVISED], page 9 of 10).

- d. The Wilson Station, Unit # 1 scheduled outage beginning on (From) 12/1/2009 at 0000 hours to (To) 12/2/2009 at 2045 hours should have had a scheduled duration of 70:00. The original submission reported that duration at 82:00. This amount was corrected in the Company’s filing of October 11, 2010 (see Item 7 – Attachment [REVISED], page 10 of 10).

- e. The Wilson Station Unit # 1 outage for January that read beginning on (From) 1/1/2010 at 0000 hours to (To) 12/2/2010 at 0851 hours on the original submission should have had an ending date of 1/2/2010 at 0851 hours. This was corrected in the Company’s filing of October 11, 2010 (see Item 7 – Attachment [REVISED], page 10 of 10).

Witness) Lawrence V. Baronowsky

BIG RIVERS ELECTRIC CORPORATION

Response to Information Request Requested in Appendix of
Commissioner's Order dated August 13, 2010

Schedule of Scheduled ("S"), Actual ("A"), and Forced ("F") Outages for the Period November 1, 2009, through April 30, 2010

Big Rivers Electric Corporation
Reid Station Unit#1 - Coal - 65MW Net
November 1, 2009 thru April 30, 2010

Schedule vs Actual

Month	TYPE	MAINTENANCE		Actual		HOURS OF DURATION			REASON FROM DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled	TO	FROM	TO	Scheduled	Forced	Actual	
November	F				11/3/2009 0600		54:00		Generator seal oil system
December									No Outages
January	F			1/10/2010 2045	1/11/2010 0333		6:48		Low Condenser Vacuum trip
	F			1/27/2010 1610	1/27/2010 1758		1:48		Tripped on low drum level during start up and failed to meet 8 hour start time limit
February									No Outages
March	F			3/1/2010 2229	3/2/2010 1239		14:10		Bottom Ash Removal System failure
	F			3/3/2010 0918	3/3/2010 1159		2:41		Flame Scanner failure
	F			3/3/2010 1214	3/3/2010 1253		0:39		Low Drum Level trip
	F			3/17/2010 0700	3/17/2010 1830		11:30		Removed from reserve standby status for unplanned maintenance activities
April									No Outages

Case No. 2010-00269

Witness: Lawrence V. Baronowsky

Item 2 - Attachment [SECOND REVISION to Original Item 7 - Attachment]

Item 1 of 10

Post-Hearing Data Response

BIG RIVERS ELECTRIC CORPORATION

Response to Information Request Requested in Appendix of
Commission's Order dated August 13, 2010

Schedule of Scheduled ("S"), Actual ("A"), and Forced ("F") Outages for the Period November 1, 2009, through April 30, 2010

Big Rivers Electric Corporation
Reid Station Unit#2 - Combustion Turbine - Oil/Gas - 65MW Net
November 1, 2009 thru April 30, 2010

Schedule vs Actual

Month	TYPE	MAINTENANCE				HOURS OF DURATION		REASON FROM DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE, AS APPROPRIATE
		Scheduled FROM	Scheduled TO	Actual FROM	Actual TO	Scheduled	Actual	
November	F	11/13/2009 0758	11/13/2009 1050			2:52		Fuel Oil Leak
December	F	12/1/2009 2145	12/2/2009 0000			2:15		Removed from standby status to investigate excessive fuel flow alarm
	F	12/2/2009 0751	12/2/2009 0830			0:39		Removed from standby status to investigate excessive fuel flow alarm during start up
	F	12/11/2009 1100	12/11/2009 1231			1:31		Removed from standby status to adjust fuel forwarding pressure
	F	12/18/2009 0900	12/18/2009 1700			8:00		Removed from standby status to repair fuel igniters
January	No Outages							
February	S, A	2/20/2010 1000	2/20/2010 1400	2/20/2010 1000	2/20/2010 1358	4:00	3:58	Removed from standby status to replace generator output metering current transformer
March	S, A	3/13/2010 0615	3/13/2010 1845	3/13/2010 0615	3/13/2010 1835	12:30	12:20	Removed from standby status to repair Auxiliary Lube Oil Pump
	F			3/25/2010 0850	3/25/2010 1150		3:00	Removed from standby status to replace power supply in control unit
April	No Outages							

BIG RIVERS ELECTRIC CORPORATION

Response to Information Request Requested in Appendix of
Commission's Order dated August 13, 2010

Schedule of Scheduled ("S"), Actual ("A"), and Forced ("F") Outages for the Period November 1, 2009, through April 30, 2010

Big Rivers Electric Corporation
Henderson Station Two - Unit#1 - Coal - 153MW Net
November 1, 2009 thru April 30, 2010

Schedule vs Actual

Month	TYPE	MAINTENANCE		Actual		HOURS OF DURATION		REASON FROM DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled FROM	Scheduled TO	Actual FROM	Actual TO	Scheduled	Actual	
November	F	11/13/2009 0551	11/14/2009 0143	11/18/2009 0730	11/18/2009 1144	19:52	4:14	Repair boiler wall at observation door Slag fall caused high furnace pressure trip
December		No Outages						
January	F	1/4/2010 0814	1/4/2010 1240	1/26/2010 0621	1/28/2010 1407	4:26	55:46	Tripped on high drum level due to frozen feedwater flow transmitter sensing line Tube leak in pendent superheater
	F	1/28/2010 1541	1/29/2010 0545			14:04		Turbine differential expansion alarm following start up
February	F	2/9/2010 0228	2/11/2010 2140			67:12		Tube leak in economizer section and repair superheater attemperator spray nozzle
March	F	3/22/2010 1200	3/27/2010 2211	3/27/2010 2239	3/27/2010 2355	130:11	1:16	Turbine reheat stop valves sticking Tripped on high drum level following start up
	F	3/30/2010 1935	3/31/2010 0551			10:16		Left side turbine stop valve servo valve failure
April		No Outages						

Case No. 2010-00269

Witness: Lawrence V. Baronowsky

Item 2 - Attachment [SECOND REVISION to Original Item 7 - Attachment]

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Post-Hearing Data Response

BIG RIVERS ELECTRIC CORPORATION

Response to Information Request Requested in Appendix of
Commission's Order dated August 13, 2010

Schedule of Scheduled ("S"), Actual ("A"), and Forced ("F") Outages for the Period November 1, 2009, through April 30, 2010

Big Rivers Electric Corporation
Henderson Station Two - Unit#2 - Coal - 159MW Net
November 1, 2009 thru April 30, 2010

Schedule vs Actual

Month	TYPE	MAINTENANCE		HOURS OF DURATION		REASON FROM DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled FROM	TO	Scheduled	Actual	

November	No Outages					
December	F	12/4/2009 1302	12/4/2009 1506	2:04		Tripped on low secondary air flow while technician was performing maintenance
January	F	1/15/2010 2125	1/17/2010 1154	38:29		Tube leaks in primary reheater and rear water wall
February	F	2/15/2010 2051	2/16/2010 0110	4:19		Tripped on high furnace pressure due to slag fall
March	F	3/5/2010 0414	3/6/2010 1509	34:55		Tube leak in primary superheater
April	S, A	4/23/2010 2200	4/23/2010 2113	504:00	488:05	Planned maintenance outage

Case No. 2010-00269

Witness: Lawrence V. Baronowsky

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Post-Hearing Data Response

BIG RIVERS ELECTRIC CORPORATION

Response to Information Request Requested in Appendix of
Commission's Order dated August 13, 2010

Schedule of Scheduled ("S"), Actual ("A"), and Forced ("F") Outages for the Period November 1, 2009, through April 30, 2010

Big Rivers Electric Corporation
Green Station Unit#1 - Coal/Petcoke - 231MW Net
November 1, 2009 thru April 30, 2010

Schedule vs Actual

Month	TYPE	MAINTENANCE				Actual		HOURS OF DURATION		REASON FROM DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled FROM	Scheduled TO	Actual FROM	Actual TO	Scheduled	Actual			
November	No Outages									
December	S, A F	12/17/2009 0600	12/17/2009 0600	12/15/2009 0549 12/29/2009 0158	12/17/2009 0707 12/30/2009 1851	48:00	40:53	49:18	Wash air heater and clean "A" ID Fan wheel and ductwork Tube leak in primary superheater section	
January	F			1/2/2010 1451	1/3/2010 2152		31:01		Tube leak in primary superheater section	
February	No Outages									
March	No Outages									
April	F S, A	4/30/2010 2200		4/26/2010 0238 4/30/2010 2207	4/26/2010 0911	2:00	6:33	1:53	Tripped on #8 turbine bearing high vibration - Replaced CMM module in control cabinet Planned maintenance outage	

Case No. 2010-00269

Witness: Lawrence V. Baronowsky

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Post-Hearing Data Response

BIG RIVERS ELECTRIC CORPORATION

Response to Information Request Requested in Appendix of
Commission's Order dated August 13, 2010

Schedule of Scheduled ("S"), Actual ("A"), and Forced ("F") Outages for the Period November 1, 2009, through April 30, 2010

Big Rivers Electric Corporation
Green Station Unit #2 - Coal/Petcoke - 223MW Net
November 1, 2009 thru April 30, 2010

Schedule vs Actual

Month	TYPE	MAINTENANCE		HOURS OF DURATION		REASON FROM DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled	Actual	Scheduled	Actual	
		FROM	TO	FROM	TO	
November	No Outages					
December	No Outages					
January	F			1/29/2010 03:55	1/30/2010 18:13	38:18 Tube leak in secondary superheater section
February	No Outages					
March	No Outages					
April	No Outages					

Case No. 2010-00269

Witness: Lawrence V. Baronowsky

Item 2 - Attachment [SECOND REVISION to Original Item 7 - Attachment]

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Post-Hearing Data Response

BIG RIVERS ELECTRIC CORPORATION

Response to Information Request Requested in Appendix of
Commission's Order dated August 13, 2010

Schedule of Scheduled ("S"), Actual ("A"), and Forced ("F") Outages for the Period November 1, 2009, through April 30, 2010

Big Rivers Electric Corporation
Coleman Station Unit #1 - Coal - 150MW Net
November 1, 2009 thru April 30, 2010

Schedule vs Actual

Month	TYPE	MAINTENANCE		SCHEDULED		ACTUAL		HOURS OF DURATION		REASON FROM DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		FROM	TO	FROM	TO	FROM	TO	Scheduled	Actual	
November	F	11/16/2009	1740	11/19/2009	1405			68:25		Tube leaks in economizer section and water wall
December		No Outages								
January		No Outages								
February		No Outages								
March	F	3/2/2010	1110	3/2/2010	1516			4:06		Tripped when technician was replacing east side secondary air flow transmitter
		3/9/2010	2254	3/12/2010	0300			52:06		Tube leaks in reheater section and heat recovery area
April	F	4/12/2010	2147	4/13/2010	1813			20:26		Air heater drive gearbox input shaft bearing failure
	F	4/14/2010	0853	4/14/2010	1749			7:56		Generator speed control card failed causing frequency correction alarm

BIG RIVERS ELECTRIC CORPORATION

Response to Information Request Requested in Appendix of
Commission's Order dated August 13, 2010

Schedule of Scheduled ("S"), Actual ("A"), and Forced ("F") Outages for the Period November 1, 2009, through April 30, 2010

Big Rivers Electric Corporation
Coleman Station Unit #2 - Coal - 138MW Net
November 1, 2009 thru April 30, 2010

Schedule vs Actual

Month	TYPE	MAINTENANCE		Actual		HOURS OF DURATION		REASON FROM DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		FROM	TO	Scheduled	Actual	Scheduled	Actual	
November								
	No Outages							
December	F	12/13/2009	0544	12/13/2009	2218	16:34		Replace 2A boiler feed pump balance drum leak off isolation valve
January	S, A	1/17/2010	1530	1/19/2010	1245	48:00	45:16	Wash air heaters
February								
	No Outages							
March	F	3/6/2010	1853	3/8/2010	2251	75:58		Tube leaks in reheat section and heat recovery area
April	F	4/26/2010	2324	4/29/2010	0900	57:36		Repair oil leak on auxiliary transformer low side bushing
	F	4/30/2010	1722	4/30/2010	2007	2:45		Replace C phase generator potential transformer

BIG RIVERS ELECTRIC CORPORATION

Response to Information Request Requested in Appendix of
Commission's Order dated August 13, 2010

Schedule of Scheduled ("S"), Actual ("A"), and Forced ("F") Outages for the Period November 1, 2009, through April 30, 2010

Big Rivers Electric Corporation
Coleman Station Unit#3 - Coal - 155MW Net
November 1, 2009 thru April 30, 2010

Schedule vs Actual

Month	TYPE	MAINTENANCE		Actual		HOURS OF DURATION		REASON FROM DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		Scheduled FROM	TO	Scheduled FROM	TO	Scheduled	Actual	
November	F			11/8/2009 2357	11/9/2009 0047			Tripped due to communication failure in control cabinet
	F			11/14/2009 1919	11/14/2009 2112		0:50	Tripped due to communication failure in control cabinet
	S, A	11/21/2009 2200	11/25/2009 0600	11/21/2009 2200	11/25/2009 0604	80:00	80:04	Replace control components and repair boiler gas leaks
December	F			12/11/2009 1659	12/14/2009 0617		61:18	Tube leaks in economizer section and water wall
January	S, A	1/19/2010 1600	1/20/2010 0400	1/19/2010 1536	1/20/2010 0051	12:00	9:15	Replace shaft seals on B boiler-feed pump
February	S, A	2/27/2010 0000		2/27/2010 0033		48:00	47:27	Tube leak in water wall - repair B boiler feed pump check valve - wash air heaters
March	S, A		3/1/2010 1200		3/1/2010 0822	12:00	8:22	Tube leak in water wall - repair B boiler feed pump check valve - wash air heaters
April	F			4/22/2010 6:09	4/23/2010 18:30		36:21	Tube leaks in reheater section

Case No. 2010-00269

Witness: Lawrence V. Baronowsky

Item 2- Attachment [SECOND REVISION to Original Item 7 - Attachment]

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Post-Hearing Data Response

BIG RIVERS ELECTRIC CORPORATION

Response to Information Request Requested in Appendix of
Commission's Order dated August 13, 2010

Schedule of Scheduled ("S"), Actual ("A"), and Forced ("F") Outages for the Period November 1, 2009, through April 30, 2010

Big Rivers Electric Corporation
Wilson Station - Unit#1 - Coal/Pet-Coke - 417MW Net
November 1, 2009 thru April 30, 2010

Schedule vs Actual

Month	TYPE	MAINTENANCE		Actual		HOURS OF DURATION		REASON FROM DEVIATION FROM SCHEDULED MAINTENANCE OR REASON FOR FORCED OUTAGE AS APPROPRIATE
		FROM	TO	FROM	TO	Scheduled	Forced	
November	S, A			11/1/2009 0000	12/1/2009 0000	720:00		Planned Maintenance Outage
December	S, A			12/3/2009 2200	12/2/2009 2045	70:00		Planned Maintenance Outage
	F			12/3/2009 1234	12/3/2009 1509		2:35	Tripped on low drum level due to #1 boiler feed pump trip
	S, A	12/27/2009 0000		12/26/2009 2319		120:00		Remove rented generator exciter and install rebuilt exciter
January	S, A			1/3/2010 0000	1/2/2010 0851	48:00		Remove rented generator exciter and install rebuilt exciter
February	F			2/14/2010 1012	2/14/2010 1559		5:47	Replace 86GB-1 lockout relay
March								No Outages
April	F			4/1/2010 1303	4/1/2010 2247		9:44	MCC 12B12 tripped resulting in loss of auxiliary equipment that caused boiler to trip
	F			4/5/2010 2249	4/8/2010 1849		68:00	Tube leak in superheat section
	F			4/8/2010 1854	4/8/2010 2005		1:11	#4 mill tripped following start up causing boiler to trip
	F			4/23/2010 1014	4/23/2010 1411		3:57	#5 mill tripped causing unit runback and boiler tripped on high drum level

Case No. 2010-00269

Witness: Lawrence V. Baronowsky

Item 2- Attachment [SECOND REVISION to Original Item 7 - Attachment]

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Post-Hearing Data Response

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2009 THROUGH APRIL 30, 2010
CASE NO. 2010-00269**

Response to Data Requests from the Formal Hearing of October 12, 2010

October 25, 2010

1 **Item 3)** *See the response to Item 11 from the Commission's Initial Requests.*
2 *What is the current inventory level (in days) for the Wilson Station? The inventory*
3 *level at the end of September 2010 is acceptable.*

4
5 **Response)** The end-of-September inventory for Wilson Station was 22 days based
6 upon the planned 70% coal / 30% pet coke blending scenario. Wilson Station can utilize
7 petroleum coke blends in excess of 30%, which would increase the days of inventory.
8 For instance, a 40% pet coke blend would produce a 24 to 25 days supply, while a 50%
9 blend would yield an inventory of approximately 29 to 30 days (depending upon the
10 generation plan, calculation, *etc.*).

11
12 Also, based upon industry response to a written bid solicitation for spot coal, which
13 followed this FAC review period, the Company procured 150,000 tons of spot coal
14 specifically for delivery to Wilson Station over the fourth quarter of 2010. Given the
15 additional spot coal purchase and planned blend scenario, the end-of-year inventory is
16 forecasted to be at least 60 days at Wilson Station.

17
18
19 **Witness)** Mark W. McAdams

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2009 THROUGH APRIL 30, 2010
CASE NO. 2010-00269**

Response to Data Requests from the Formal Hearing of October 12, 2010

October 25, 2010

1 **Item 4)** *See the response to Item 19 from the Staff's Initial Requests (including*
2 *the Big Rivers Bid Tabulation Spreadsheet which was filed under a Petition for*
3 *Confidential Treatment).*

- 4 a. *Re-file your bid tabulation sheets and indicate which bids were from*
5 *the coal companies which you selected.*
6 b. *If any bid with a lower delivered cost per MMBTU basis was not*
7 *selected, explain why that bid was not selected.*
8 c. *On page 10 of 52 of the confidential response, explain the notation*
9 *in the far, right-hand column ('did receive an Ult Anal.').*

10
11 **Response)**

12 4a.

13 Big River's bid tabulation spreadsheet, revised to reflect the bids which
14 were selected, is being provided under a Petition for Confidential Treatment and is
15 attached only to the unredacted version of this response. [REDACTED]

16 [REDACTED]
17 [REDACTED]
18 [REDACTED]

19
20 4b.

21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2009 THROUGH APRIL 30, 2010
CASE NO. 2010-00269**

Response to Data Requests from the Formal Hearing of October 12, 2010

October 25, 2010

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4c.

[REDACTED]

Witness) Mark W. McAdams

BIG RIVERS ELECTRIC CORPORATION

**AN EXAMINATION OF THE APPLICATION OF THE FUEL ADJUSTMENT
CLAUSE OF BIG RIVERS ELECTRIC CORPORATION
FROM NOVEMBER 1, 2009 THROUGH APRIL 30, 2010
CASE NO. 2010-00269**

Response to Data Requests from the Formal Hearing of October 12, 2010

October 25, 2010

1 **Item 5)** *See the response to Item 21 from the Commission's Initial Requests.*
2 *Provide the average line loss, on Big Rivers' and third parties' transmission systems,*
3 *for intersystem sales transactions made from the Big Rivers System from January 2010*
4 *through April 2010.*

5

6 **Response)** The average loss for all Big Rivers intersystem sales, including those
7 made on behalf of the smelters, for January 2010 through April 2010 was 1.95%. This
8 result reflects the lines loss amounts reported in the footnotes to the Power Transaction
9 Schedule which Big Rivers provided the Commission in its monthly Form B filings.

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12 **Witness)** Michael J. Mattox

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