

SULLIVAN, MOUNTJOY, STAINBACK & MILLER PSC

ATTORNEYS AT LAW

Ronald M. Sullivan
Jesse T. Mountjoy
Frank Stainback
James M. Miller
Michael A. Fiorella
Allen W. Holbrook
R. Michael Sullivan
Bryan R. Reynolds
Tyson A. Kamuf
Mark W. Starnes
C. Ellsworth Mountjoy
Mary L. Moorhouse

June 28, 2011

Via Federal Express

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

RECEIVED

JUN 29 2011

PUBLIC SERVICE
COMMISSION

Re: In the Matter of: Notice and Application of Big Rivers
Electric Corporation for a General Adjustment in Rates,
PSC Case No. 2011-00036

Dear Mr. DeRouen:

On June 24, 2011, Big Rivers Electric Corporation ("Big Rivers") filed supplemental responses to certain requests for information, including its Third Supplemental Response to the Commission Staff's Initial Request for Information dated February 18, 2011, Item 52 ("PSC 1-52"), its First Supplemental Response to Kentucky Industrial Utility Customers, Inc.'s First Set of Data Requests dated April 1, 2011, Item 110 ("KIUC 1-110"), and its First Supplemental Response to the Attorney General's Initial Request for Information dated March 30, 2011, Item 8 ("AG 1-8"). The attachments to Big Rivers' supplemental responses to PSC 1-52, KIUC 1-110, and AG 1-8 were filed electronically on a CD. Big Rivers filed an original and ten copies of the CD with the supplemental responses. However, Commission Staff has indicated that hard copies of those attachments are required. Enclosed are an original and ten copies (in hard copy form) of the attachment to Big Rivers' Third Supplemental Response to PSC 1-52. Also enclosed are two hard copies of each of the attachments to Big Rivers' supplemental responses to KIUC 1-110 and AG 1-8, along with an original and ten copies of a motion for a deviation from the requirement that Big Rivers be required to file an original and ten copies of those two attachments. I certify that a copy of this

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

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

Jeff DeRouen
June 28, 2011
Page 2

letter, a copy of the attachments to the supplemental responses to PSC 1-52, KIUC 1-110, and AG 1-8, and a copy of the motion have been served on all parties to this proceeding.

Sincerely,



Tyson Kamuf

TAK/ej
Enclosures

cc: Mark A. Bailey
Albert Yockey
Douglas Beresford, Esq.
Service List

SERVICE LIST
BIG RIVERS ELECTRIC CORPORATION
PSC CASE NO. 2011-00036

Dennis G. Howard, II, Esq.
Lawrence W. Cook, Esq.
Assistant Attorneys General
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

Sanford Novick
President and CEO
Kenergy Corp.
3111 Fairview Drive
P.O. Box 1389
Owensboro, Kentucky 42302-1389

Michael L. Kurtz, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OH 45202
**COUNSEL FOR KENTUCKY
INDUSTRIAL UTILITY CUSTOMERS,
INC.**

G. Kelly Nuckols
President and CEO
Jackson Purchase Energy Corporation
2900 Irvin Cobb Drive
P.O. Box 4030
Paducah, KY 42002-4030

David C. Brown, Esq.
Stites & Harbison
1800 Providian Center
400 West Market Street
Louisville, KY 40202
**COUNSEL FOR ALCAN PRIMARY
PRODUCTS CORPORATION**

Burns E. Mercer
President/CEO
Meade County R.E.C.C.
1351 Highway 79
P.O. Box 489
Brandenburg, KY 40108-0489

J. Christopher Hopgood, Esq.
Dorsey, King, Gray, Norment & Hopgood
318 Second Street
Henderson, KY 42420
COUNSEL FOR KENERGY CORP.

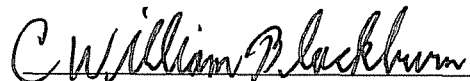
Melissa D. Yates
Denton & Keuler, LLP
555 Jefferson Street
P.O. Box 929
Paducah, KY 42002-0929
**COUNSEL FOR JACKSON PURCHASE
ENERGY CORPORATION**

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2011-00036**

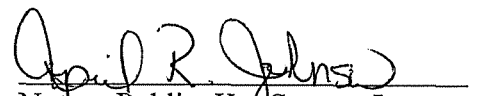
VERIFICATION

I, C. William Blackburn, verify, state, and affirm that I prepared or supervised the preparation of my data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


C. William Blackburn

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by C. William Blackburn on this the
28th day of June, 2011.


Notary Public, Ky. State at Large
My Commission Expires 8-9-14

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2011-00036**

Attachment for
Big Rivers' Third Supplemental Response to PSC 1-52

RECEIVED

JUN 29 2011

**PUBLIC SERVICE
COMMISSION**



Our Mission: Make Our Clients Successful

March 29, 2011

Federal [redacted]
Client PO: 119451
Client Agreement: June 29, 2010
BMCD Invoice: 57670-9

<p>BIG RIVERS ELECTRIC CORP JEREMY GARRETT 201 THIRD ST HENDERSON KY 42420</p>	<p>SEND PAYMENT TO: P.O. Box 411883 Kansas City, MO 64141-1883</p> <p>Enclose Invoice Copy with Payment</p> <p>TERMS: PAYABLE UPON RECEIPT - LATE CHARGE AFTER 30 DAYS</p>	<p>WIRE INSTRUCTIONS:</p> <p>Account Routing [redacted]</p> <p>UMB Bank, N.A. 1010 Grand P.O. Box 419226 Kansas City, MO 64141 (816) 860-7000</p>
---	--	--

Professional Services for Big Rivers Electric Corp Depreciation Study.

SERVICE THROUGH: 02/28/11

LABOR

Labor Classification	Level	Regular Hours	Regular Rate	Amount
Staff	10	5.00	126.00	630.00
Senior	13	31.00	163.00	5,053.00
Associate	17	14.00	196.00	2,744.00
		50.00		8,427.00

EXPENSE

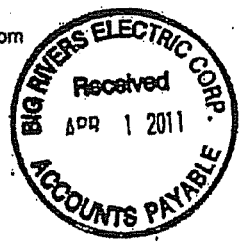
See Attached 495.00

TOTAL AMOUNT DUE THIS INVOICE \$8,922.00 USD

Agreed Maximum	\$108,000.00
Total Billed to Date	104,616.51
Remaining Fee	\$3,383.49

Thank you for your business. We appreciate the opportunity to serve you.

cc: BMCD Project Manager: Ted Kelly 816-822-3208 tkelly@burnsmcd.com
Invoice Inquiry: Vicki Jones 816-333-9400 x6422



0314
BRA0011
~~928225~~-0000
928225
RRA 4/1/11
MWA 4/1/11



Details for Invoice 57670-9

Labor Summary

<u>Regular Hours</u>	<u>Premium Hours</u>	<u>Employee No.</u>	<u>Employee Name</u>	<u>Bill Level</u>	<u>Classification</u>
5.00		7280	Blackwell, Gerron	10	Staff
31.00		6823	Summerville, Jon	13	Senior
14.00		4744	Kelly, Ted	17	Associate
50.00	0.00	Totals			

Technology Charge

Technology Charge \$9.90 * 50.00 Hours 495.00

Total 495.00



Our Mission: Make Our Clients Successful

March 29, 2011

Federal ID: [REDACTED]
 Client PO: [REDACTED]
 Client Agreement: June 29, 2010
 BMCD Invoice: 57670-9

<p>BIG RIVERS ELECTRIC CORP JEREMY GARRETT 201 THIRD ST HENDERSON KY 42420</p>	<p>SEND PAYMENT TO: P.O. Box 411883 Kansas City, MO 64141-1883</p> <p>Enclose Invoice Copy with Payment</p> <p>TERMS: PAYABLE UPON RECEIPT - LATE CHARGE AFTER 30 DAYS</p>	<p>WIRE INSTRUCTIONS:</p> <p>Account: [REDACTED] Routing: [REDACTED]</p> <p>UMB Bank, N.A. 1010 Grand P.O. Box 419226 Kansas City, MO 64141 (816) 860-7000</p>
---	--	--

Professional Services for Big Rivers Electric Corp Depreciation Study.

SERVICE THROUGH: 02/28/11

LABOR

<u>Labor Classification</u>	<u>Level</u>	<u>Regular Hours</u>	<u>Regular Rate</u>	<u>Amount</u>
Staff	10	5.00	126.00	630.00
Senior	13	31.00	163.00	5,053.00
Associate	17	14.00	196.00	2,744.00
		<u>50.00</u>		<u>8,427.00</u>

EXPENSE

See Attached 495.00

TOTAL AMOUNT DUE THIS INVOICE	\$ 8,922.00 USD
--------------------------------------	------------------------

Agreed Maximum \$108,000.00
 Total Billed to Date 104,616.51
 Remaining Fee \$3,383.49

Thank you for your business. We appreciate the opportunity to serve you.

cc: BMCD Project Manager: Ted Kelly 816-822-3208 tkelly@burnsmcd.com
 Invoice Inquiry: Vicki Jones 816-333-9400 x6422

The Prime Group

Invoice for Services Rendered

Invoice Date: April 1, 2011

To: Sullivan, Mountjoy, Stainback & Miller P.S.C.
P.O. Box 727
Owensboro, KY 42302-0727

Attn: Mr. James M. Miller

Rate Case Preparation

81.5 hours of consulting work by John Wolfram @ \$175.00/hr \$ 14,262.50
during March for assistance with rate case preparation for Big Rivers.

22.0 hours of consulting work by Steve Seelye @ \$200.00/hr \$ 4,400.00
during March for assistance with rate case preparation for Big Rivers.

4.5 hours of consulting work by Jeff Wernert @ \$150.00/hr \$ 675.00
during March for assistance with rate case preparation for Big Rivers.

Expenses

Wolfram 828 miles @ \$0.51 \$ 422.28

Wolfram meals \$ 19.18

Total Amount due for March \$ 19,978.96

Please remit payment to:

The Prime Group, LLC
P.O. Box 837
Crestwood, KY 40014-0837

0314
BR0011
928 225
-0000
MA 4/8/11
CW



The Prime Group, LLC
P. O. Box 837 • Crestwood, KY • 40014-0837
Phone 502-425-7882 FAX 502-326-9894

Case No. 2011-00036

Witness: Mark A. Hite

Attachment to Third Supplemental Response to PSC 1-52

Page 4 of 12

SULLIVAN, MOUNTJOY, STAINBACK & MILLER PSC
ATTORNEYS AT LAW

Ronald M. Sullivan
Jesse T. Mountjoy
Frank Stainback
James M. Miller
Michael A. Fiorella
Allen W. Holbrook
R. Michael Sullivan
Bryan R. Reynolds
Tyrone A. Kainuf
Mark W. Swines
C. Ellsworth Mountjoy
Susan Montalvo-Gesser
Mary L. Moorhouse

April 5, 2011

PERSONAL AND CONFIDENTIAL

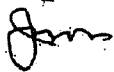
Mr. C. William Blackburn
Vice President and Chief Financial Officer
Big Rivers Electric Corporation
201 Third Street, P.O. Box 24
Henderson, KY 42419-0024

Re: The Prime Group
Invoice Date: April 1, 2011

Dear Bill:

Enclosed is an invoice from The Prime Group for the month of March 2011, in connection with its latest work in providing assistance with rate case preparation. Please issue payment directly to The Prime Group.

Sincerely yours,



James M. Miller

JMM/ej

Enclosure

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

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

The Prime Group

April 1, 2011

Mr. James M. Miller
Sullivan, Mountjoy, Stainback & Miller P.S.C.
P.O. Box 727
Owensboro, KY 42302-0727

Dear Mr. Miller:

Enclosed is an invoice for the consulting services that The Prime Group has provided during March in providing assistance with rate case preparation and support for Big Rivers Electric Cooperative. Thank you for giving us the opportunity to work with you on this project.

Sincerely,

Marty Blake

Martin Blake
Principal

Enclosure

The Prime Group, LLC
P. O. Box 837 • Crestwood, KY • 40014-0837
Phone 502-425-7882 FAX 502-326-9894

Case No. 2011-00036
Witness: Mark A. Hite
Attachment to Third Supplemental Response to PSC 1-52
Page 6 of 12



Public Financial Management

Two Logan Square
Suite-1600
18th & Arch Streets
Philadelphia, PA
19103-2770

215 567-6100
215-567-1493 fax
www.pfm.com

Sullivan, Mountjoy, Stainback & Miller
Mr. James M. Miller
100 St. Ann Street
P.O. Box 727
Owensburg, KY 42303-4144

March 03, 2011

INVOICE: PFM-116903-0-0
SEQ.: 001-000-000

RE: For Services provided to Big Rivers Electric Corporation for Testimony.

INVOICE

Description	Total
Fee	\$25,000.00
Total Professional Fees	\$25,000.00
Amount Due	\$25,000.00

BRACORP 03/14
928225-0000
CWP
3/9/11

Thank You.

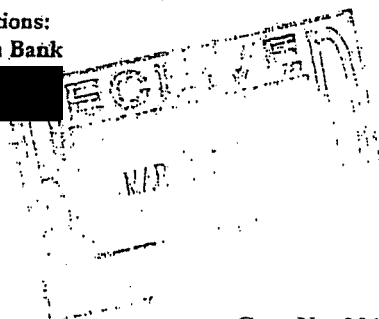


Public Financial Management, Inc.

AC
William W. Cummings
Billing Administrator

Remittance Address:
Public Financial Management, Inc.
Two Logan Square, Suite 1600
18th and Arch Streets
Philadelphia, PA 19103

Wire Instructions:
Susquehanna Bank
ABA# [REDACTED]
Acct# [REDACTED]

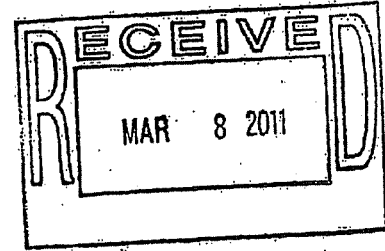


INVOICE TERMS: UPON RECEIPT

Client ID: 08218.001

SULLIVAN, MOUNTJOY, STAINBACK & MILLER PSC
ATTORNEYS AT LAW

Ronald M. Sullivan
Jesse T. Mountjoy
Frank Stainback
James M. Miller
Michael A. Fiorelli
Allen W. Holbrook
R. Michael Sullivan
Bryan R. Reynolds
Tyson A. Kamuf
Mark W. Sarnes
C. Ellsworth Mountjoy
Susan Montalvo-Geisler



March 7, 2011

PERSONAL AND CONFIDENTIAL

Mr. C. William Blackburn
Sr. Vice President Financial & Energy Services
and Chief Financial Officer
Big Rivers Electric Corporation
201 Third Street, P.O. Box 24
Henderson, KY 42419-0024

Re: Public Financial Management
Invoice No.: PFM-116903-0-0

Dear Bill:

Enclosed is an invoice from Public Financial Management, Inc. ("PFM") pursuant to the engagement agreement with PFM and our firm in providing testimony for the 2011 rate case. The amount billed is consistent with our agreement with Alan Spen about the cap on his charges for the period up to the filing of the testimony. Please issue payment directly to Public Financial Management, Inc.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Jim".

James M. Miller

JMM/ej

Enclosure

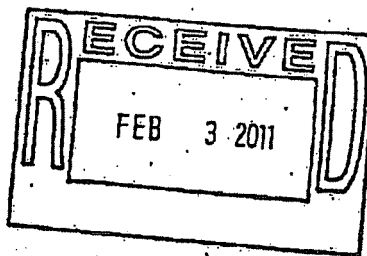


Telephone (270) 926-4000
Telecopier (270) 683-6694

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

Sullivan, Mountjoy, Stainback & Miller, P.S.C.
 100 St. Ann Street
 P.O. Box 727
 Owensboro, KY 42302-0727

Tax ID# [REDACTED]



February 01, 2011

Big Rivers Electric Corp.
 Attn: C. William Blackburn,
 Vice President and Chief Financial Officer
 P. O. Box 24
 Henderson, KY 42419-002

Invoice # 105,659
 Our file # 17355
 Billing through 01/31/2011

Preparation for Board Meetings

Balance Forward for this Matter	3,529.50
Payments Applied to this Matter	3,529.50
Total Fees for this Matter	3,682.50
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	3,682.50
Balance Due for this Matter	<u>\$3,682.50</u>

MAD

Approved by:
 BRA0001
 923100-2205
 0314
 [Signature]
 2/6/11

General Finance & Administrative Matters

Balance Forward for this Matter	0.00
Payments Applied to this Matter	0.00
Total Fees for this Matter	265.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	265.00
Balance Due for this Matter	<u>\$265.00</u>

CWD

BRA0017 0314
923101-0000
CWD 2/6/11

Fuel Procurement

Balance Forward for this Matter	2,340.00
Payments Applied to this Matter	2,340.00
Total Fees for this Matter	1,311.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	1,311.00
Balance Due for this Matter	<u>\$1,311.00</u>

CWD

BRA0022 0314
923101-0000
CWD 2/6

Re: Large Industrial Contracts

Balance Forward for this Matter	12,250.00
Payments Applied to this Matter	12,250.00
Total Fees for this Matter	11,910.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	11,910.00
Balance Due for this Matter	<u>\$11,910.00</u>

AMY

923103-0000
0314
12/019
AMY 12/13
BRA0019
923100-0000
0314

Smelter Contracts

Balance Forward for this Matter	400.00
---------------------------------	--------

MAR 15

WJ

2

Payments Applied to this Matter	400.00
Total Fees for this Matter	105.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	105.00
Balance Due for this Matter	<u>\$105.00</u>

CWP

BRA0017 0314
923161-0000
CWP 2/6

Re: General Power Marketing Agreements

Balance Forward for this Matter	0.00
Payments Applied to this Matter	0.00
Total Fees for this Matter	210.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	210.00
Balance Due for this Matter	<u>\$210.00</u>

CWP

BRA0025 0314
923161-0000
CWP 2/6

Re: Integrated Resource Plan

Balance Forward for this Matter	1,480.00
Payments Applied to this Matter	1,480.00
Total Fees for this Matter	6,369.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	6,369.00
Balance Due for this Matter	<u>\$6,369.00</u>

CWP

BRA0025 0314
923161-0000
CWP 2/6

General Engineering & Transmission Matters

Balance Forward for this Matter	0.00
Payments Applied to this Matter	0.00
Total Fees for this Matter	336.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	336.00
Balance Due for this Matter	<u>\$336.00</u>

DGC

BRA014 0314
923161-0000
DGC 2/15

Land Department Matters

Balance Forward for this Matter	21,551.00
Payments Applied to this Matter	21,551.00
Total Fees for this Matter	16,772.50
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	16,772.50
Balance Due for this Matter	<u>\$16,772.50</u>

DGC

RA370
DGC 2/15
See Details

Re: RTO Analysis

Balance Forward for this Matter	1,460.00
Payments Applied to this Matter	1,460.00
Total Fees for this Matter	680.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	680.00
Balance Due for this Matter	<u>\$680.00</u>

AM7

GRA0019
923250-0000
0314

LA 019
DGC 2/15
6-12-15

Vectren

Balance Forward for this Matter	520.00
Payments Applied to this Matter	520.00
Total Fees for this Matter	1,420.00
Total Expenses for this Matter	0.00

DGC

DGC 2/15
52100791
RA 370
reimbursable from
Vectren
3

Total Current Charges for this Matter	1,420.00
Balance Due for this Matter	<u>\$1,420.00</u>

Contract Administration, Regulatory Affairs & General Litigation

Balance Forward for this Matter	240.00
Payments Applied to this Matter	240.00
Total Fees for this Matter	3,497.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	<u>3,497.00</u>
Balance Due for this Matter	<u>\$3,497.00</u>

AMY

AMY
2/14/17
BRAD019
923100-2218
0314

Rate Cases

Balance Forward for this Matter	15,204.50
Payments Applied to this Matter	15,204.50
Total Fees for this Matter	16,098.50
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	<u>16,098.50</u>
Balance Due for this Matter	<u>\$16,098.50</u>

AMY

LA019
AMY
(2/14/17)
BRAD019
923725-0000
0314

Re: General Litigation

Balance Forward for this Matter	180.00
Payments Applied to this Matter	180.00
Total Fees for this Matter	1,102.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	<u>1,102.00</u>
Balance Due for this Matter	<u>\$1,102.00</u>

JVA

Rel Call → 923725-0000
0314
BRAD019
9231000000
2-17-17

HMP&L Litigation

Balance Forward for this Matter	1,457.50
Payments Applied to this Matter	1,457.50
Total Fees for this Matter	5,290.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	<u>5,290.00</u>
Balance Due for this Matter	<u>\$5,290.00</u>

MAB

756 BRAD019
14373000
256 BRAD019
923100-00
BRAD019
3/10/16

Re: General Environmental Matters

Balance Forward for this Matter	3,478.00
Payments Applied to this Matter	3,478.00
Total Fees for this Matter	6,364.50
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	<u>6,364.50</u>
Balance Due for this Matter	<u>\$6,364.50</u>

AMY

BRAD019
923100-2218
0314
RA-015
AMY
1/14/17

Re: Administrative Cases

Balance Forward for this Matter	1,115.00
Payments Applied to this Matter	1,115.00
Total Fees for this Matter	1,984.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	<u>1,984.00</u>
Balance Due for this Matter	<u>\$1,984.00</u>

AMY

RA 015
AMY
2/17/2011
BRAD019
923100-0000
0314
4

HMP&L General

Balance Forward for this Matter	1,897.00
Payments Applied to this Matter	1,897.00
Total Fees for this Matter	5,117.50
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	<u>5,117.50</u>
Balance Due for this Matter	<u>\$5,117.50</u>

RWD

BRA 002
Row B
3/3/11
923103-2218
0012, 0314

Re: Worthington v. Big Rivers

Balance Forward for this Matter	882.00
Payments Applied to this Matter	882.00
Total Fees for this Matter	817.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	<u>817.00</u>
Balance Due for this Matter	<u>\$817.00</u>

JWH

BRA 0010
923100-0000
2-17-11

Fuel Adjustment Clause

Balance Forward for this Matter	60.00
Payments Applied to this Matter	60.00
Total Fees for this Matter	1,217.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	<u>1,217.00</u>
Balance Due for this Matter	<u>\$1,217.00</u>

MAH

60.00 0314
60.00 BRA 0011
923100-0000
MAH
3-28-11

Environmental Surcharge

Balance Forward for this Matter	3,775.00
Payments Applied to this Matter	3,775.00
Total Fees for this Matter	286.00
Total Expenses for this Matter	0.00
Total Current Charges for this Matter	<u>286.00</u>
Balance Due for this Matter	<u>\$286.00</u>

AMY

AMY BRA 0019
2-17-10 923100-0000
0314

Expenses

Balance Forward for this Matter	4,243.76
Payments Applied to this Matter	4,243.76
Total Fees for this Matter	0.00
Total Expenses for this Matter	1,824.44
Total Current Charges for this Matter	<u>1,824.44</u>
Balance Due for this Matter	<u>\$1,824.44</u>

MAB

MAB
2/10/10

Total Balance Due for These Bills

	<u>\$86,658.94</u>
--	--------------------

BRA 001
923100-2205

5

1 COMMONWEALTH OF KENTUCKY
2 BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

RECEIVED

JUN 29 2011

3
4
5 In the Matter of:

PUBLIC SERVICE
COMMISSION

6
7 Notice and Application of Big Rivers Electric)
8 Corporation for a General Adjustment in Rates)

Case No. 2011-00036

9
10
11 **MOTION FOR DEVIATION**

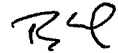
12 Big Rivers Electric Corporation ("Big Rivers") hereby moves the Kentucky Public
13 Service Commission ("Commission") for a deviation from the requirement in the Commission's
14 March 17, 2011, Order in this matter requiring that an original and ten copies of responses to
15 requests for information be filed with the Commission. On June 24, 2011, Big Rivers filed
16 supplemental responses to certain requests for information, including its First Supplemental
17 Response to the Attorney General's Initial Request for Information dated March 30, 2011, Item 8
18 ("AG 1-8") and its First Supplemental Response to Kentucky Industrial Utility Customers, Inc.'s
19 First Set of Data Requests dated April 1, 2011, Item 110 ("KIUC 1-110"). The attachments to
20 Big Rivers' supplemental responses to AG 1-8 and KIUC 1-110 were filed electronically on a
21 CD. Big Rivers filed an original and ten copies of the CD with the supplemental responses.
22 However, Commission Staff has indicated that the Commission's March 17 Order requires a
23 hardcopy original and ten paper copies of the attachments.

24 The attachments to Big Rivers' supplemental responses to AG 1-8 and KIUC 1-110 are
25 voluminous. The attachment to the supplemental response to AG 1-8 is 183 pages. The
26 attachment to the supplemental response to KIUC 1-110 is 56 pages. As such, Big Rivers
27 requests that it be granted a deviation from the requirement to file an original and ten copies of

1 these attachments. Big Rivers is, however, filing two hardcopies of each attachment with this
2 motion.

3 WHEREFORE, Big Rivers respectfully requests that the Commission enter an order
4 granting a deviation to Big Rivers from the requirement to file an original and ten copies of the
5 attachments to its supplemental responses to AG 1-8 and KIUC 1-110.

6 On this the 28th day of June, 2011.

7
8 

9 _____
10 James M. Miller
11 Tyson Kamuf
12 SULLIVAN, MOUNTJOY, STAINBACK
13 & MILLER, P.S.C.
14 100 St. Ann Street, P. O. Box 727
15 Owensboro, Kentucky 42302-0727
16 (270) 926-4000

17 Douglas L. Beresford
18 HOGAN LOVELLS U.S., LLP
19 Columbia Square
20 555 Thirteenth Street, NW
21 Washington, D.C. 20004
22 (202) 637-5600

23
24 Counsel for Big Rivers Electric Corporation