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July 13, 2012

Via Federal Express

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

RECEIVED

JUL 16 2012

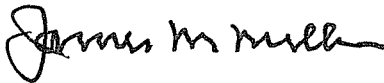
PUBLIC SERVICE
COMMISSION

Re: *In the Matter of: Application of Big Rivers Electric Corporation for Approval of its 2012 Environmental Compliance Plan, for Approval of its Amended Environmental Cost Recovery Surcharge Tariff, for Certificates of Public Convenience and Necessity, and for Authority to Establish a Regulatory Account, P.S.C. Case No. 2012-00063*

Dear Mr. DeRouen:

Enclosed for filing on behalf of Big Rivers Electric Corporation ("Big Rivers") are an original and ten copies of: (i) Big Rivers' updated response to Item 1 of the Public Service Commission Staff's First Request for Information; (ii) Big Rivers' updated responses to Item 43 and Item 44 of Kentucky Industrial Utility Customers, Inc.'s First Set of Data Request; (iii) Big Rivers' updated responses to Item 2-33c of Sierra's Club's Second Requests for Information; and (iv) Big Rivers' updated response to Item 26b of Kentucky Industrial Customers, Inc.'s Supplemental Set of Data Requests (attaching the confidential exhibit referred to in Big Rivers' petition for confidential treatment dated July 6, 2012. Copies of this letter and the updated responses have been served on each of the persons on the attached service list.

Sincerely yours,



James M. Miller

JMM/ej
Enclosures

cc: Mark A. Bailey
Albert Yockey

Telephone (270) 926-4000
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PSC Case No. 2012-00063

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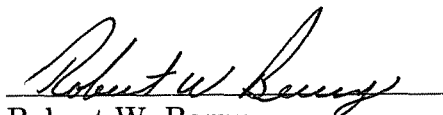
BIG RIVERS ELECTRIC CORPORATION

**THE APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR
APPROVAL OF ITS 2012 ENVIRONMENTAL COMPLIANCE PLAN AND
REVISIONS TO ITS ENVIRONMENTAL SURCHARGE TARIFF, FOR
CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY, AND FOR
AUTHORITY TO ESTABLISH A REGULATORY ACCOUNT**

CASE NO. 2012-00063

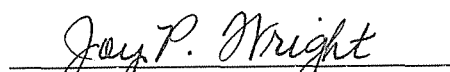
VERIFICATION

I, Robert W. Berry, verify, state, and affirm that I prepared or supervised the preparation of the 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.


Robert W. Berry

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Robert W. Berry on this the
12 day of July, 2012.


Notary Public, Ky. State at Large
My Commission Expires _____

**Notary Public, Kentucky State-At-Large
My Commission Expires: July 3, 2014
ID 421951**


BIG RIVERS ELECTRIC CORPORATION

**THE APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR
APPROVAL OF ITS 2012 ENVIRONMENTAL COMPLIANCE PLAN AND
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CASE NO. 2012-00063

VERIFICATION

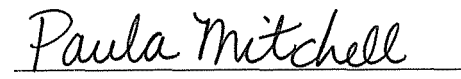
I, Mark A. Hite, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Mark A. Hite

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Mark A. Hite on this the 10th
day of July, 2012.



Notary Public, Ky. State at Large
My Commission Expires 1-12-13

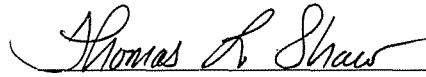
BIG RIVERS ELECTRIC CORPORATION

**THE APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR
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CASE NO. 2012-00063

VERIFICATION

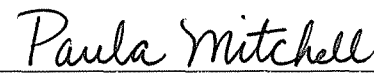
I, Thomas L. Shaw, verify, state, and affirm that I prepared or supervised the preparation of the data responses filed with this Verification, and that those data responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Thomas L. Shaw

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Thomas L. Shaw on this the
10th day of July, 2012.



Notary Public, Ky. State at Large
My Commission Expires 1-12-13

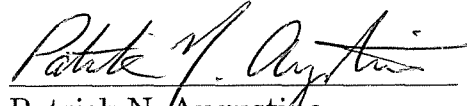
BIG RIVERS ELECTRIC CORPORATION

**THE APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR
APPROVAL OF ITS 2012 ENVIRONMENTAL COMPLIANCE PLAN AND
REVISIONS TO ITS ENVIRONMENTAL SURCHARGE TARIFF, FOR
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AUTHORITY TO ESTABLISH A REGULATORY ACCOUNT**

CASE NO. 2012-00063


VERIFICATION

I, Patrick N. Augustine, verify, state, and affirm that I prepared or supervised the preparation of the 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.


Patrick N. Augustine

COMMONWEALTH OF VIRGINIA)
COUNTY OF FAIRFAX)

SUBSCRIBED AND SWORN TO before me by Patrick N. Augustine on this
the 10 day of July, 2012.


Notary Public, Commonwealth of
Virginia
My Commission Expires June 30, 2013
7251149

ORIGINAL



Your Touchstone Energy® Cooperative 

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR APPROVAL OF ITS)
2012 ENVIRONMENTAL COMPLIANCE)
PLAN, FOR APPROVAL OF ITS AMENDED)
ENVIRONMENTAL COST RECOVERY)
SURCHARGE TARIFF, FOR CERTIFICATES)
OF PUBLIC CONVENIENCE AND)
NECESSITY, AND FOR AUTHORITY TO)
ESTABLISH A REGULATORY ACCOUNT)

Case No.
2012-00063

Second Updated Response to the Commission Staff's
Initial Request for Information dated May 21, 2012

First and Second Updated Response to the Kentucky Industrial
Utility Customers' Initial Request for Information dated May 21, 2012

Supplemental Response to the Kentucky Industrial Utility
Customers' Second Request for Information dated June 22, 2012

Supplemental Response to the Sierra Club's
Second Request for Information dated June 22, 2012

FILED: July 16, 2012

ORIGINAL

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR APPROVAL OF ITS 2012 ENVIRONMENTAL COMPLIANCE PLAN,
FOR APPROVAL OF ITS AMENDED ENVIRONMENTAL COST
RECOVERY SURCHARGE TARIFF, FOR CERTIFICATES OF PUBLIC
CONVENIENCE AND NECESSITY, AND FOR AUTHORITY TO
ESTABLISH A REGULATORY ACCOUNT
CASE NO. 2012-00063**

**Second Updated Response to Commission Staff's
Initial Request for Information
Dated May 21, 2012**

June 1, 2012

First Update June 15, 2012

Second Update July 16, 2012

1 **Item 1)** *Refer to the Application, page 7, which states that Big Rivers*
2 *is requesting authority to establish a regulatory account. The Application*
3 *states, “[a]s explained further in Mr. Hite’s testimony, Big Rivers has*
4 *incurred costs in developing this Application, and it will incur additional*
5 *costs to prosecute this case. These costs primarily stem from the retention*
6 *of experts in the legal, regulatory, and engineering professions.” Provide*
7 *the actual costs incurred to date by type and vendor. Consider this an*
8 *ongoing request to be updated by the 15th of the month, to report the prior*
9 *month’s expense, for each month up to and including the month of the*
10 *hearing in this case.*

11

12 **Response)** Attached hereto is Big Rivers’ July 15th update for the costs incurred
13 to-date in its Environmental Compliance Plan Application.

14

15 **Witness)** Mark A. Hit

16

Big Rivers Electric Corporation
Case No. 2012-00063
Cost Incurred To-date for Environmental Compliance Plan Application
Second Update to Big Rivers' Response to Item 1 of
Commission Staff's Initial Request for Information dated May 21, 2012

Entity/Vendor	Amount	Invoice Number	Invoice Date	Purpose/Type
Total Per Response Dated June 1, 2012	\$ 277,454.41			
Vantage Energy Consulting, LLC	\$ 12,080.00	20,120,501	6/1/2012	Commission Consultants
Aces Power Marketing LLC	6,855.23	12/5813-IN	6/15/2012	Risk Management Services
Sargent & Lundy LLC	25,870.50	10794377	6/11/2012	Engineering Consultants
Total For The Remainder Of May 2012	\$ 44,805.73			
Total To-Date	<u>\$ 322,260.14</u>			

Note: Per Big Rivers' response to Item 1 of the Staff's Initial Request for Information, dated June 1, 2012, the estimated cost to develop and prosecute this Case is \$900,000. Big Rivers will seek to update this estimate throughout the proceeding.

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
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RECOVERY SURCHARGE TARIFF, FOR CERTIFICATES OF PUBLIC
CONVENIENCE AND NECESSITY, AND FOR AUTHORITY TO
ESTABLISH A REGULATORY ACCOUNT
CASE NO. 2012-00063**

***Second Updated* Response to the Kentucky Industrial Utility Customers'
Initial Request for Information
Dated May 21, 2012**

June 1, 2012

***First Updated* June 15, 2012**

***Second Updated* July 16, 2012**

1 **Item 43)** *Please provide a copy of all minutes from the Company's*
2 *Board of Directors meetings since January 2010 through the most recent*
3 *month available. This is a continuing request and the response should be*
4 *supplemented as each additional month is available.*

5

6 **Response)** Big Rivers objects to this request on the grounds that it is overly
7 broad and seeks information that is irrelevant to this proceeding. Without
8 waiving this objection, Big Rivers provides the relevant minutes from Big Rivers'
9 Board of Directors meeting of June 15, 2012.

10

11

12 **Witnesses)** Robert W. Berry and Mark A. Hite

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BIG RIVERS ELECTRIC CORPORATION
REGULAR BOARD OF DIRECTORS MEETING
JUNE 15, 2012

The regular meeting of the Board of Directors of Big Rivers Electric Corporation was called to order at 8 a.m., CDT, on Friday, June 15, 2012, at 201 Third Street, Henderson, Kentucky 42420.

[REDACTED]

There being no unfinished business, the Chair called for new business. The Chair called for discussion of a proposed CFC engagement letter and term sheet. After an explanation by Mr. Hite, Director Elliott moved that the following resolution be approved:

WHEREAS, Big Rivers Electric Corporation (the "Corporation") is seeking construction financing for the capital portion of its 2012 environmental compliance plan; and

WHEREAS, representatives of the Corporation have had promising initial discussions with the National Rural Utilities Cooperative Finance Corporation (“CFC”) regarding a revolving credit facility that may satisfy the interim financing needs for the capital portion of Big Rivers’ 2012 environmental compliance plan; and

WHEREAS, the Corporation’s management has determined it prudent to seek Board of Director authorization to negotiate the terms and documents necessary for obtaining from CFC a revolving credit agreement to finance the capital portion of Big Rivers’ 2012 environmental compliance plan.

NOW, THEREFORE, the Board hereby resolves as follows:

RESOLVED, that each of the following is an Authorized Representative: The President and Chief Executive Officer, the Vice President Production, and the Vice President Accounting and Interim CFO of the Corporation;

RESOLVED, FURTHER, that the Authorized Representatives be, and each of them hereby is, authorized and directed to seek and negotiate the terms and documents necessary for obtaining from CFC a revolving credit agreement in an amount not to exceed \$300 million, for a term not to exceed five years, including such other terms and conditions as the Authorized Representatives believe are in the best interest of the Corporation (the “Credit Transaction”), with the final terms and documents being subject to approval by the Board of Directors of the Corporation;

RESOLVED, FURTHER, that the Authorized Representatives be, and each of them hereby is, authorized and directed to execute and deliver to CFC on behalf of the Corporation, at such time as the Authorized Representatives are satisfied with the terms for the Credit Transaction negotiated with CFC, an engagement letter reflecting the basic terms for the Credit Transaction that are acceptable to the Authorized Representatives in their judgment, for purposes of finalizing drafts of the definitive documents for the Credit Transaction that can be submitted to the Board of Directors of the Corporation for approval;

RESOLVED, FURTHER, that the Authorized Representatives be, and each of them hereby is, authorized and directed to execute and deliver to CFC on behalf of the Corporation, an agreement in a form acceptable to the Authorized Representatives and consistent with

agreements customarily provided under these circumstances, by which the Authorized Representatives commit the Corporation to pay the reasonable counsel fees and expenses incurred by CFC in connection with the Credit Transaction; and

RESOLVED, FURTHER, that the Authorized Representatives of the Corporation be, and each of them hereby is authorized and directed for, and on behalf of the Corporation, to execute all such agreements, documents, instruments certificates, and other papers, and to do all such acts and things as may be necessary or desirable to accomplish the tasks contemplated in these resolutions, including, without limitation, initiating the processes to obtain all approvals or consents from the Corporation's other creditors, and the Kentucky Public Service Commission, and the carrying out of the terms of the various agreements and documents authorized or approved in the foregoing resolutions, and to otherwise carry out the purposes and intent of the foregoing resolutions; and any such acts or things done or accomplished prior to the date hereof in furtherance of the foregoing be, and they hereby are, in all respects approved and ratified. The motion was seconded and unanimously adopted.

After an explanation by Mr. Hite, Travis Siewert and Eric Robeson, and discussion by the Board on the RUS loan application requirements for a FFB loan, Director Butler moved that the following resolution be approved:

WHEREAS, management has presented to the board of directors the 2012 - 2015 Generation Construction Work Plan, as amended by the 2012 Environmental Compliance Plan of Big Rivers Electric Corporation (the "Corporation"), and

WHEREAS, it has been determined on the basis of the 2012 Environmental Compliance portion of the 2012 – 2015 Generation Construction Work Plan that financing is needed for electric facilities as shown on Rural Utilities Service ("RUS") form 740C, Cost Estimates and Loan Budget for Electric Borrowers, as follows:

Generation plant improvements and replacements as submitted in the 2012 Environmental Compliance portion of the Construction Work Plan for electric plant facilities - \$283,490,000.

NOW, THEREFORE, BE IT RESOLVED, that the 2012 – 2015 Generation Construction Work Plan of the Corporation, as amended and presented, is approved;

BE IT ALSO RESOLVED, that the Corporation is authorized, through its management,

to make application to the RUS pursuant to 7 CFR Part 1710 for a guaranteed Federal Financing Bank (“FFB”) loan in the approximate amount of \$283,490,000 to be used in accordance with the provisions of 7 CFR Part 1710 to finance the above mentioned facilities; and

BE IT ALSO RESOLVED, that the RUS guaranteed FFB loan shall bear a maturity date to cover an approximate period of thirty (30) years; and

BE IT ALSO RESOLVED, that the Board of Directors of the Corporation authorizes its officers to execute and attest on behalf of the Corporation all necessary papers, documents, and applications related to the foregoing; and

BE IT ALSO RESOLVED, that the President/Chief Executive Officer and Vice President/Chief Financial Officer are authorized on behalf of the Corporation (a) to execute and deliver from time to time advance requests, maturity extension election notices, prepayment election notices, and refinancing election notices, in the form of such instruments attached to the note payable to FFB , (b) to specify information and select options as provided in such instruments, and (c) to seek such regulatory and other approvals as may be required or desirable in connection with the proposed RUS guaranteed FFB loan; and

BE IT FURTHER RESOLVED, that the Corporation hereby authorizes the RUS to release appropriate information and data relating to the Corporation’s application to the FFB. The motion was seconded and unanimously adopted.

Director Elder moved that the following resolution be approved:

WHEREAS, the fifteen (15) Year Long Range Financial Forecast for the period of 2012 through 2026 is an acceptable projection of the financial trend and conditions of Big Rivers Electric Corporation (the “Corporation”) and shall be included in the Corporation’s loan application to be submitted to the Rural Utilities Service (RUS); and

WHEREAS, the Board of Directors of the Corporation has reviewed the attached 15 Year Long Range Financial Forecast prepared by the Corporation’s staff; and

WHEREAS, the 15 Year Long Range Financial Forecast is based on a Board approved Power Requirement Study and a Four (4) Year Construction Work Plan; and

WHEREAS, the 15 Year Long Range Financial Forecast is based upon Board approved policies, operating rules and plans and sets forth appropriate management goals, all of which are

acceptable to the Board of Directors as an overall plan of operations;

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Corporation hereby approves and accepts the 15 Year Long Range Financial Forecast, as proposed, as a plan of operations; has reviewed the projected rates which are included in the 15 Year Long Range Financial Forecast; and is committed to take whatever action may be necessary to implement such rate changes as may be required, on a timely basis to achieve the goals outlined therein, including submission of the 15 Year Long Range Financial Forecast to the RUS for approval.

The motion was seconded and unanimously adopted.

[REDACTED]

[REDACTED]

Mr. Bailey advised that the Coordinating Committee met on May 23. The next meeting is scheduled for August 8. Management also met with RTA corporate representatives on May 30.

The chair noted that the board's executive committee noted that a copy of the report had been distributed to the board members for their review prior to the board meeting and based on the information provided, the board will act as emergency case. The following items were presented to the board for their information: Ours Report for Early 2012, Underpinning of the RTA's Safety and 2012, the 2012 Safety Incident Report, the Ethical and Monthly Compliance and Integrity Report, the corporate scorecard and dashboard and the monthly board pack.

The board meeting adjourned. After reconvening in regular session, the board

Adjourned by [redacted]

Secretary-Treasurer

APPROVED:

Chair

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR APPROVAL OF ITS 2012 ENVIRONMENTAL COMPLIANCE PLAN,
FOR APPROVAL OF ITS AMENDED ENVIRONMENTAL COST
RECOVERY SURCHARGE TARIFF, FOR CERTIFICATES OF PUBLIC
CONVENIENCE AND NECESSITY, AND FOR AUTHORITY TO
ESTABLISH A REGULATORY ACCOUNT
CASE NO. 2012-00063**

***First Updated* Response to the Kentucky Industrial Utility Customers'
Initial Request for Information
Dated May 21, 2012**

**June 1, 2012
First Updated July 16, 2012**

1 Item 44) *Please provide the current balance (as of April 2012 or May*
2 *2012, if available) in the Economic Reserve Fund and the Rural Economic*
3 *Reserve ("RER") fund. This should be considered a continuing request*
4 *and updates should be provided monthly as actual information for each*
5 *succeeding month is available.*

6
7 **Response)** The month-end balances in the Economic Reserve fund account and
8 in the Rural Economic Reserve (RER) fund account are shown in the table below.

Big Rivers Electric Corporation Fund Account Balances as of Listed Dates		
	Economic Reserve Fund	Rural Economic Reserve Fund
April 30, 2012	\$ 93,878,033.55	\$ 63,887,762.11
May 31, 2012	\$ 92,253,460.12	\$ 63,984,670.78
June 30, 2012	\$ 90,341,556.06	\$ 64,081,579.43

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Witness) Mark A. Hite

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
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**Supplemental Response to the Kentucky Industrial Utility Customers'
Second Request for Information
Dated June 22, 2012**

July 6, 2012

Supplemental Response July 16, 2012

- 1 **Item 26) *Regarding data found in the file - PACE_Big Rivers Data***
2 ***Request Inputs_120524.xlsx***
3
4 ***a. Is it correct, that this is one of just two files that PACE***
5 ***developed and was produced based on a KIUC request (the***
6 ***other being PACE_Big Rivers Data Request***
7 ***Outputs_120524.xlsx)?***
8 ***b. The file contains natural gas prices, coal prices, load***
9 ***forecast, CO2 costs, and Capital Cost Recovery Target***
10 ***Inputs for New Regional Expansion units. For all of these***
11 ***categories of data, PACE supplied 200 sets of data (200***
12 ***iterations). Please provide a detailed explanation of the***
13 ***process, methodology, and assumptions used by PACE in***
14 ***creating the 200 iterations worth of data for each of these***
15 ***categories of data. Be sure to explain what was done to***
16 ***create this large number of iterations.***
17 ***c. How has the 200 iterations of data factored into any***
18 ***analyses that were discussed in any of Big Rivers'***
19 ***witnesses testimony?***

Case No. 2012-00063

Supplemental Response to KIUC 2-26

**Witnesses: Patrick N. Augustine (a., b., d., and e.) and
Robert W. Berry (c.)**

Page 1 of 4

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR APPROVAL OF ITS 2012 ENVIRONMENTAL COMPLIANCE PLAN,
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CASE NO. 2012-00063**

**Supplemental Response to the Kentucky Industrial Utility Customers'
Second Request for Information
Dated June 22, 2012**

July 6, 2012

Supplemental Response July 16, 2012

- 1 d. *Please provide the revenue requirements model that led to*
2 *the calculation of the Capital Cost Recovery Target Inputs*
3 *for New Regional Expansion for each resource CC, CT and*
4 *Wind.*
5 e. *Why did PACE supply coal prices for only the Illinois*
6 *Basin region, when its market price analysis clearly must*
7 *have included a forecast of coal prices in other regions?*
8
9 Response)
10 a. Yes.
11 b. *Please see the attachment entitled Pace Global Processes Methods*
12 *and Assumptions which is submitted with a Petition for*
13 *Confidential Treatment.*
14 c. Pace used the 200 iterations to calibrate its hourly reference
15 case prices. The Pace reference case was used as input to some
16 of the production cost models run by ACES and financial model
17 runs performed by Big Rivers.
18 d. Pace first develops capital cost inputs on a dollar per kW basis
19 by technology based on its review of actual project developments
20 and data in the public domain, including expert input from its

Case No. 2012-00063

Supplemental Response to KIUC 2-26

Witnesses: Patrick N. Augustine (a., b., d., and e.) and
Robert W. Berry (c.)

Page 2 of 4

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
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**Supplemental Response to the Kentucky Industrial Utility Customers'
Second Request for Information
Dated June 22, 2012**

July 6, 2012

Supplemental Response July 16, 2012

1 engineering staff. These estimates are developed into
2 uncertainty bands as discussed in sub-part b. above. Pace then
3 deploys a proprietary financial pro forma model to convert these
4 capital costs to the cost recovery target inputs provided. This
5 model assumes a 20-year recovery time period, a 50:50 debt to
6 equity ratio, with a 15 percent required return on equity and an
7 8.25 percent interest rate on debt over the long term. Wind
8 technology costs are evaluated in the context of appropriate tax
9 depreciation schedule benefits and other incentives like the
10 federal production tax credit.

11 e. Pace provided detailed Illinois Basin coal price inputs as this
12 coal price is most relevant to the region of interest. Pace's
13 supplemental data request file includes basin level input
14 distributions for Central Appalachian ("CAPP"), Northern
15 Appalachian ("NAPP"), and Powder River Basin ("PRB") coals,
16 which are also used in the wider market dispatch analysis.
17 Please see the attachment entitled Coal Price Projections which
18 is being submitted with a Petition for Confidential Treatment
19
20

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR APPROVAL OF ITS 2012 ENVIRONMENTAL COMPLIANCE PLAN,
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RECOVERY SURCHARGE TARIFF, FOR CERTIFICATES OF PUBLIC
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**Supplemental Response to the Kentucky Industrial Utility Customers'
Second Request for Information
Dated June 22, 2012**

July 6, 2012

Supplemental Response July 16, 2012

1 **Witnesses) Patrick N. Augustine (a., b., d., and e.) and**
2 **Robert W. Berry (c.)**
3

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR APPROVAL OF ITS 2012 ENVIRONMENTAL COMPLIANCE PLAN,
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**Supplemental Response to the Sierra Club's
Second Request for Information
Dated June 22, 2012**

July 6, 2012

Supplemental Response July 16, 2012

- 1 ***Item 33) Refer to your responses to SC 1-36 and KIUC 1-7. For each of***
2 ***SO2, HCl, and mercury:***
3
4 ***a. State whether the results from each stack test are***
5 ***reflective of the average 30-day emissions of each***
6 ***pollutant from each coal unit.***
7 ***i. If so, explain how they are reflective.***
8 ***ii. If not, explain why not.***
9 ***b. State whether the results from each stack test are***
10 ***reflective of the average annual emissions of each***
11 ***pollutant from each coal unit.***
12 ***i. If so, explain how they are reflective.***
13 ***ii. If not, explain why not.***
14 ***c. Produce the results of any other stack test for any of the***
15 ***those pollutants that has been carried out at any of the***
16 ***Big Rivers coal units since 2005.***
17 ***d. State whether information regarding the emissions of any***
18 ***of those pollutants has been provided to U.S. EPA in***
19 ***response to any Information Collection Request.***
20 ***i. If so, produce all such information.***
21

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR APPROVAL OF ITS 2012 ENVIRONMENTAL COMPLIANCE PLAN,
FOR APPROVAL OF ITS AMENDED ENVIRONMENTAL COST
RECOVERY SURCHARGE TARIFF, FOR CERTIFICATES OF PUBLIC
CONVENIENCE AND NECESSITY, AND FOR AUTHORITY TO
ESTABLISH A REGULATORY ACCOUNT
CASE NO. 2012-00063**

***Supplemental* Response to the Sierra Club's
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1

2 **Response)**

3

a. The results are expected to be representative of a 30-day
average.

4

5

i. The coal utilized during the testing was of the same general
quality that has been used in the past and is expected to be
utilized in the future. Additionally, the units were operated
as they have been in the past and as they are expected to be
operated in the future.

6

7

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10

ii. Not applicable.

11

b. The results are expected to be representative of the average
annual emissions of SO₂, HCl, and mercury given the fact that
the fuel used during the test was similar in quality to the fuel
used in the past and the same quality that is expected to be used
in the future.

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i. See the response to part b, above.

17

ii. See the response to part b, above.

18

c. There are no additional stack tests for SO₂ or HCl. *A document
reflecting additional mercury testing is attached.*

19

20

d. Big Rivers provided test results for HCl for Green Unit 2 and
HMP&L Units 1 and 2 to EPA.

21

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1 i. The test results are attached.

2

3 Witness) Thomas L. Shaw

4

Big Rivers Electric Corporation
Case No. 2012-00063
Big Rivers Mercury Emission Rate

	Henderson One	Henderson Two	Green One	Green Two	Wilson	Coleman FGD Common - Units 1, 2 and 3	Reid
Date:	9/21/2006			9/20/2006	9/19/2006	9/25/2006	11/16/2006
Rate: lbs/TrillionBTU	0.66			3.77	1.05	2.11	6.70
Date:	9/25/2007	9/25/2007					
Rate: lbs/TrillionBTU	0.60	0.70					
Date:				5/19/2010			
Rate: lbs/TrillionBTU				2.39			
Date:	1/19/2011		2/28/2011		4/21/2011	2/15/2011	3/30/2011
Rate: lbs/TrillionBTU	0.87		4.51		1.00	2.12	4.92
	(100%coal)						
Date:	8/3/2011	8/4/2011	7/27/2011	7/29/2011	7/15/2011	7/13/2011	
Rate: lbs/TrillionBTU	0.81	0.69	2.93	2.57	1.89	3.52	
	(petcoke blend)						
Date:					7/19/2011		
Rate: lbs/TrillionBTU					1.85		
	(100%coal)						
Date:					9/29/2011		
Rate: lbs/TrillionBTU					1.18		
	(reduced load)						