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July 30, 2012

Via Federal Express

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

RECEIVED

JUL 30 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' First Request for Information to Kentucky Industrial Utility Customers, Inc.; and (ii) Big Rivers' First Request for Information to Sierra Club. A copy of this letter and a copy of the requests for information have been served on each of the persons on the attached service list.

Sincerely,



Tyson Kamuf

TAK/ej
Enclosures

cc: Albert Yockey
Service List

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1 COMMONWEALTH OF KENTUCKY
2 BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY
3
4

5 In the Matter of:

6
7 Application of Big Rivers Electric Corporation)
8 for Approval of its 2012 Environmental)
9 Compliance Plan, for Approval of its Amended)
10 Environmental Cost Recovery Surcharge Tariff,) Case No. 2012-00063
11 for Certificates of Public Convenience and)
12 Necessity, and for Authority to Establish a)
13 Regulatory Account)
14
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16 **BIG RIVERS ELECTRIC CORPORATION'S FIRST REQUEST FOR INFORMATION**
17 **TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**
18

19 Big Rivers Electric Corporation submits this first request for information to Kentucky
20 Utility Industrial Utility Customers, Inc., to be answered in accordance with the following
21 Definitions and Instructions.

22 DEFINITIONS

23 1. Whenever it is necessary to bring within the scope of these information requests
24 documents that otherwise might be construed to be outside their scope (1) the use of "and" as
25 well as "or" shall be construed both disjunctively and conjunctively; (2) the use of a word in its
26 singular form shall be construed to include within its meaning its plural form as well, and vice
27 versa; (3) the use of "include" and "including" shall be construed to mean "without limitation";
28 and (4) the use of a verb in any tense or voice shall be construed as the use of that verb in all
29 other tenses and voices.

30 2. "Big Rivers" means Big Rivers Electric Corporation.

31 3. "KIUC," "you," or "your" means Kentucky Industrial Utility Customers, Inc., its
32 agents, officers, directors, employees, attorneys, consultants, and members.

1 4. “Smelter” or “Smelters” means one or both of Century Aluminum of Kentucky
2 General Partnership and Alcan Primary Products Corporation, and includes their agents, officers,
3 directors, employees, attorneys, consultants, parent companies, divisions, subsidiaries, and other
4 related companies.

5 5. “Commission” means the Kentucky Public Service Commission.

6 6. “Kentucky Attorney General” includes his agents, employees, and consultants.

7 7. “Ventyx” includes its agents, officers, directors, employees, attorneys,
8 consultants, parent companies, divisions, subsidiaries, and other related companies.

9 8. “Sierra Club” includes its agents, officers, directors, employees, attorneys,
10 consultants, divisions, subsidiaries, chapters, and other related organizations.

11 9. “APM” means Alliance for Cooperative Energy Services Power Marketing, its
12 agents, officers, directors, employees, attorneys, and consultants.

13 10. “Pace” means Pace Global, LLC.

14 11. “NPVRR” means net present value revenue requirement.

15 12. “MISO” means Midwest Independent Transmission System Operator, Inc.

16 13. “Document” means any written, recorded, transcribed, printed or impressed
17 matter of whatever kind, however produced, stored or reproduced, including, but not limited to,
18 sound or pictorial recordings, computerized information, books, pamphlets, letters, memoranda,
19 telegrams, electronic or mechanical transmissions, communications of all kinds, reports, notes,
20 working papers, handwritings, charts, papers, writings, printings, transcriptions, tapes and
21 records of all kinds.

22 14. “Person” includes a natural person, a business organization of any type, an
23 unincorporated association, a governmental subdivision, agency, or entity, and a business trust.

- 1 15. Wherever in these information requests you are asked to “identify,” you are
2 requested:
- 3 a. when identifying an oral communication, to:
- 4 i. identify the author thereof and the parties thereto,
5 ii. state the date of the communication,
6 iii. state the place of the communication,
7 iv. state the substance of the communication, and
8 v. state whether such communication has been reduced to writing and, if so,
9 identify each document and the present custodian thereof;
- 10 b. when identifying other information, to state:
- 11 i. the source thereof,
12 ii. any oral communications pertaining thereto,
13 iii. any documents pertaining thereto, and
14 iv. the substance of the information;
- 15 c. when identifying a document, to:
- 16 i. identify the author thereof and the parties thereto,
17 ii. state its title or other identifying data,
18 iii. state the date of the document or if no date appears thereon, the
19 approximate date,
20 iv. state the exact nature and substance thereof;
21 v. identify each person having possession, care, custody or control of the
22 original and any copies thereof,

1 possible the content of each such document, the date such document and its copies were
2 destroyed or lost and, if destroyed, the identity of the person authorizing such destruction, and
3 the identity of the last known custodian of such document prior to its destruction.

4 4. These data requests shall be deemed continuing and you should serve upon Big
5 Rivers' counsel (1) supplemental responses to these data requests if additional information or
6 information that changes your response to any data request is obtained during the course of this
7 proceeding, and (2) any documents requested herein that become available or that are discovered
8 after the date your responses to these data requests are due.

9 INFORMATION REQUESTS

10 1. Please provide supplements to Exhibits SJB-2 and SJB-3, in the existing format,
11 but using data for 2017 instead of 2016. Separately, please do the same using data for 2018.
12 Please provide these exhibits in electronic spreadsheet form with all cell formulas intact, and
13 provide any other workpapers, calculations and assumptions used in developing the revised
14 exhibits.
15

16 2. Please refer to pages 4 and 9 of Mr. Baron's testimony. Please explain why Mr.
17 Baron thinks "the inclusions of fuel...in the 'allocator' is not appropriate" when allocating
18 environmental costs among classes but is appropriate when allocating costs between off-system
19 sales and sales to Big Rivers' members.

20 3. Please provide all workpapers, spreadsheets (in electronic form with formulas
21 intact), and other documents supporting the calculations contained on page 10 of Mr. Baron's
22 testimony.

23 4. Please refer to Baron Exhibits SJB-2 and SJB-3. Please provide these exhibits in
24 electronic spreadsheet form with all cell formulas intact.

1 5. Have Domtar Paper Co., LLC and Kimberly-Clark Corporation each agreed to
2 Mr. Baron's proposed cost allocation methodology?

3 6. Please refer to page 3 of Mr. Hayet's testimony. Please list each project in which
4 Mr. Hayet has performed production cost modeling using the Planning and Risk model, the name
5 of the utility involved, and the year Mr. Hayet performed each such modeling.

6 7. Please refer to page 13 of Mr. Hayet's testimony, lines 14-17. Please identify
7 each Pace market price forecast iteration that included CO₂ and each Pace market price forecast
8 iteration that did not include CO₂.

9 8. Please refer to page 17 of Mr. Hayet's testimony, line 19. Please identify each
10 case that Mr. Hayet could not get to run and what precisely was done to resolve the issue.

11 9. Please provide the dates and times of all correspondence and communications
12 between Mr. Hayet and anyone at APM, including direct telephone calls, conference calls, e-
13 mails, faxes, or any other communications. Please provide a copy of all correspondence and a
14 brief description of the subject and nature of each communication.

15 10. Please refer to page 18 of Mr. Hayet's testimony, lines 12-13. For each case Mr.
16 Hayet performed, please list each input and assumption he changed, explain why the input or
17 assumption was changed, and provide all analyses, documents, or other bases supporting the
18 change.

19 11. Please refer to page 18 of Mr. Hayet's testimony, lines 12-13. For each case Mr.
20 Hayet performed, please provide all input files, input assumptions, output files, databases, run
21 definitions, and any other files or information needed to replicate the results.

22 12. Please provide all spreadsheets, models, and supporting documentation, with
23 formulas intact, for the table depicting the NPVRR on page 21 of Mr. Hayet's testimony.

- 1 13. Please refer to the table on page 21 of Mr. Hayet's testimony.
- 2 a. Please provide the annual figures for each of the cases in nominal dollars before
- 3 they are discounted to present value.
- 4 b. Please provide this information both as a hard copy and in electronic format with
- 5 formulas intact.
- 6 c. Please provide the discount rate used by Mr. Hayet.
- 7 14. Please refer to page 22 of Mr. Hayet's testimony, lines 17-18. Please list each
- 8 item of incremental VO&M costs he claims is not included in the results.
- 9 15. Please refer to page 8 of Mr. Kollen's testimony, lines 10-11.
- 10 a. Please provide all analyses, documents, or other bases for his assertion that Big
- 11 Rivers' management team is relatively inexperienced in large scale construction
- 12 projects.
- 13 b. Please quantify, on a net present value basis, the dollar impact Mr. Kollen claims
- 14 the alleged inexperience will have on the Build Case and the Buy Case.
- 15 16. Please refer to page 15 of Mr. Kollen's testimony, lines 2-12. What dollar impact
- 16 does correcting the alleged error have on the NPVRR of the Build Case, the Buy Case, and the
- 17 difference between the two cases?
- 18 17. Please refer to Mr. Kollen's testimony, page 15 line 13 through page 16 line 7.
- 19 What dollar impact does correcting the alleged error have on the NPVRR of the Build Case, the
- 20 Buy Case, and the difference between the two cases?
- 21 18. Please refer to page 23 of Mr. Kollen's testimony, lines 10 and 13. Are the
- 22 percent increases he refers to wholesale or retail increases?

1 19. Please refer to page 24 of Mr. Kollen’s testimony, lines 12-14. Please list all of
2 the “necessary steps” Mr. Kollen recommends that the Commission take to ensure that the
3 smelters do not terminate their contracts, and provide a detailed explanation of how each step
4 will achieve that objective.

5 20. Please provide all spreadsheets, models and supporting documentation, with
6 formulas intact, for the table depicting “all-in” non-smelter member revenue requirements, found
7 on page 25 of Mr. Kollen’s testimony.

8 21. Please refer to page 29 of Mr. Kollen’s testimony, lines 7-11, where Mr. Kollen
9 states that “if the Commission authorizes Big Rivers to proceed with ECP projects 4 and 5, then
10 it will commit the Company, its creditors, and all of its customers to the completion of the
11 projects, the financing of the projects, and the obligation to pay through rates for the projects.”

12 a. Does Mr. Kollen believe that by approving projects 4 and 5 in the instant case, the
13 Commission is waiving its authority to address future construction, operation, and
14 ratemaking issues related to these projects? Please explain in detail.

15 b. Does Mr. Kollen believe that if the Commission approves projects 4 and 5, then
16 Big Rivers, its creditors, and/or its members waive any rights related to future
17 consideration of the projects, their construction, operation, and future ratemaking
18 treatment? Please explain in detail.

19 22. To the extent not provided in connection with a response to another Big Rivers
20 information request, please provide all spreadsheets, models, and supporting documentation,
21 with formulas intact, for each table in Mr. Kollen’s testimony.

1 23. Does KIUC agree with Ms. Wilson’s testimony that Big Rivers should retire all of
2 its coal units and construct natural gas combined cycle units? Please explain your response in
3 detail.

4 24. Please provide all emails, memos, and other documents, sent by KIUC to the
5 Kentucky Attorney General, Ventyx, or Sierra Club since January 1, 2012.

6 25. Please provide all emails, memoranda, and other documents sent to KIUC from
7 the Kentucky Attorney General, Ventyx, or Sierra Club since January 1, 2012.

8 26. Please provide all emails, memos, and other documents, sent by KIUC to persons
9 other than Big Rivers, the Kentucky Attorney General, Ventyx, or Sierra Club since January 1,
10 2012, regarding this case or analyses performed relating to Big Rivers’ environmental
11 compliance options.

12 27. Please provide all emails, memos, and other documents, sent to KIUC from
13 persons other than Big Rivers, the Kentucky Attorney General, Ventyx, or Sierra Club since
14 January 1, 2012, regarding this case or analyses performed relating to Big Rivers’ environmental
15 compliance options.

16 28. Please provide the dates and times of all correspondence and communications
17 between Mr. Hayet and anyone at Ventyx, including direct telephone calls, conference calls, e-
18 mails, faxes, or any other communications. Please provide a copy of all documents concerning,
19 regarding, or related to that correspondence and a brief description of the subject and nature of
20 each communication.

21 29. Please provide a copy of all documents, whether hardcopy or electronic, Mr.
22 Hayet received from Ventyx or that were prepared by or for him, in whole or in part, while at
23 Ventyx.

1 COMMONWEALTH OF KENTUCKY
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7 Application of Big Rivers Electric Corporation)
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16 **BIG RIVERS ELECTRIC CORPORATION'S FIRST REQUEST FOR INFORMATION**
17 **TO SIERRA CLUB**
18

19 Big Rivers Electric Corporation submits this first request for information to Sierra Club
20 to be answered in accordance with the following Definitions and Instructions.

21 **DEFINITIONS**

22 1. Whenever it is necessary to bring within the scope of these information requests
23 documents that otherwise might be construed to be outside their scope (1) the use of "and" as
24 well as "or" shall be construed both disjunctively and conjunctively; (2) the use of a word in its
25 singular form shall be construed to include within its meaning its plural form as well, and vice
26 versa; (3) the use of "include" and "including" shall be construed to mean "without limitation";
27 and (4) the use of a verb in any tense or voice shall be construed as the use of that verb in all
28 other tenses and voices.

29 2. "Big Rivers" means Big Rivers Electric Corporation.

30 3. "Sierra Club," "you," or "your" means Sierra Club, its agents, officers, directors,
31 employees, attorneys, consultants, divisions, subsidiaries, chapters, and other related
32 organizations.

1 4. “Synapse” means Synapse Energy Economics, Inc., its agents, officers, directors,
2 employees, attorneys, consultants, parent companies, divisions, subsidiaries, and other related
3 companies.

4 5. “KIUC,” means Kentucky Industrial Utility Customers, Inc., its agents, officers,
5 directors, employees, attorneys, consultants, and members.

6 6. “Smelter” or “Smelters” means one or both of Century Aluminum of Kentucky
7 General Partnership and Alcan Primary Products Corporation.

8 7. “Commission” means the Kentucky Public Service Commission.

9 8. “Kentucky Attorney General” includes his agents, employees, and consultants.

10 9. “Ventyx” includes its agents, officers, directors, employees, attorneys,
11 consultants, parent companies, divisions, subsidiaries, and other related companies.

12 10. “APM” means Alliance for Cooperative Energy Services Power Marketing, its
13 agents, officers, directors, employees, attorneys, and consultants.

14 11. “Pace” means Pace Global, LLC.

15 12. “NPVRR” means net present value revenue requirement.

16 13. “NGCC” means natural gas combined cycle.

17 14. “DSM” means demand-side management.

18 15. “MISO” means Midwest Independent Transmission System Operator, Inc.

19 16. “Document” means any written, recorded, transcribed, printed or impressed
20 matter of whatever kind, however produced, stored or reproduced, including, but not limited to,
21 sound or pictorial recordings, computerized information, books, pamphlets, letters, memoranda,
22 telegrams, electronic or mechanical transmissions, communications of all kinds, reports, notes,

1 working papers, handwritings, charts, papers, writings, printings, transcriptions, tapes and
2 records of all kinds.

3 17. "Person" includes a natural person, a business organization of any type, an
4 unincorporated association, a governmental subdivision, agency, or entity, and a business trust.

5 18. Wherever in these information requests you are asked to "identify," you are
6 requested:

- 7 a. when identifying an oral communication, to:
 - 8 i. identify the author thereof and the parties thereto,
 - 9 ii. state the date of the communication,
 - 10 iii. state the place of the communication,
 - 11 iv. state the substance of the communication, and
 - 12 v. state whether such communication has been reduced to writing and, if so,
13 identify each document and the present custodian thereof;
- 14 b. when identifying other information, to state:
 - 15 i. the source thereof,
 - 16 ii. any oral communications pertaining thereto,
 - 17 iii. any documents pertaining thereto, and
 - 18 iv. the substance of the information;
- 19 c. when identifying a document, to:
 - 20 i. identify the author thereof and the parties thereto,
 - 21 ii. state its title or other identifying data,
 - 22 iii. state the date of the document or if no date appears thereon, the
23 approximate date,

- 1 iv. state the exact nature and substance thereof;
- 2 v. identify each person having possession, care, custody or control of the
3 original and any copies thereof,
- 4 vi. if such document was, but no longer is, in your possession or subject to
5 your control, state what disposition was made of it, and
- 6 vii. produce the document.

7 INSTRUCTIONS

8 1. If any document called for by any of these data requests is withheld based upon a
9 claim of privilege or work product, please produce so much of the document as to which you do
10 not claim privilege or protection, and for each document or part of a document for which you
11 claim privilege or protection, describe or identify:

- 12 a. The nature, subject matter and substance of the document or part of the document
13 withheld;
- 14 b. The nature of the privilege or protection claimed;
- 15 c. The date, author or authors, addressee or addressees, and distribution of the
16 document;
- 17 d. Each person in whose possession, custody or control any copy of the document is
18 or has been; and
- 19 e. Paragraph number of the schedule of documents to which the document or part of
20 the document is responsive.

21 2. If, for reasons other than a claim of privilege or work product, you refuse to
22 answer any data request or to produce any document requested, state the grounds upon which the

1 refusal is based with sufficient specificity to permit a determination of the propriety of such
2 refusal.

3 3. If any copy of any document requested herein or any record which refers or
4 relates to any document requested herein has been destroyed or lost, set forth to the extent
5 possible the content of each such document, the date such document and its copies were
6 destroyed or lost and, if destroyed, the identity of the person authorizing such destruction, and
7 the identity of the last known custodian of such document prior to its destruction.

8 4. These data requests shall be deemed continuing and you should serve upon Big
9 Rivers' counsel (1) supplemental responses to these data requests if additional information or
10 information that changes your response to any data request is obtained during the course of this
11 proceeding, and (2) any documents requested herein that become available or that are discovered
12 after the date your responses to these data requests are due.

13 INFORMATION REQUESTS

14 1. Please refer to page 10 of Dr. Steinhurst's testimony, lines 13-16, where he states
15 that Synapse compared the Build Case to a natural gas combined cycle unit "using several
16 combinations of more appropriate assumptions." Please list each input and assumption Synapse
17 changed, explain why the input or assumption was changed, and provide all analyses,
18 documents, or other bases supporting the change.

19 2. Please refer to page 11 of Dr. Steinhurst's testimony, beginning at line 20, where
20 he states, "It is also contrary to the experience of national leaders in energy efficiency who have
21 found it possible to achieve savings in excess of 1% of retail sales per year consistently for a
22 decade or more."

23 a. Please provide all documents upon which Mr. Steinhurst bases that statement.

- 1 b. Please list each utility Mr. Steinhurst is referring to in that statement, and for each
2 utility listed:
- 3 i. please provide the percentage of residential load to total load for each of
4 the last 10 years, and
- 5 ii. please state whether all of the energy savings Mr. Steinhurst mentions
6 came from a reduction in residential energy consumption, and if not,
7 provide the annual energy consumption reductions from residential
8 consumers.
- 9 3. Please refer to page 12 of Dr. Steinhurst's testimony, lines 6-12. Using Big
10 Rivers' proposed Build Case, provide a detailed analysis showing how DSM and energy
11 efficiency programs will eliminate the need for Big Rivers to build one or more of the proposed
12 projects, and still permit Big Rivers to comply with all environmental regulations in a timely and
13 less cost manner than the Build Case.
- 14 4. Please refer to the table on page 14 of Dr. Steinhurst's testimony.
- 15 a. Please provide all workpapers, models, databases, and other documents, in
16 electronic form with formulas intact, used in developing each number in the table.
- 17 b. Please provide the basis, including all assumptions and supporting documents,
18 used in developing each number in the table.
- 19 5. For each table in Ms. Wilson's testimony.
- 20 a. Please provide all workpapers, models, databases, and other documents, in
21 electronic form with formulas intact, used in developing each number in the table.
- 22 b. Please provide the basis, including all assumptions and supporting documents,
23 used in developing each number in the table.

1 6. For each input and assumption used in Ms. Wilson’s analysis that differs from the
2 inputs and assumptions in Big Rivers’ Build Case, please list the input or assumption, and
3 provide the basis for the input or assumption and all supporting worksheets or other documents.

4 7. Please refer to the testimony of Ms. Wilson.

5 a. Please explain in detail the extent to which Ms. Wilson incorporated potential
6 future environmental laws or regulations relating to or affecting natural gas
7 production (including potential laws or regulations relating to hydraulic
8 fracturing) or natural gas combined cycle units into her analysis. If her answer is
9 that she did not incorporate consideration of those subjects in her analysis, please
10 explain why not.

11 b. Please provide a natural gas forward price curve showing the impact of such
12 environmental laws and regulations over the expected life of the proposed natural
13 gas combined cycle units.

14 c. Please provide all workpapers and other documents supporting the impact of
15 potential future environmental laws or regulations on the price of natural gas over
16 the expected life of the proposed natural gas combined cycle units.

17 d. Has Sierra Club adopted a public position regarding the appropriateness of the
18 technique of hydraulic fracturing in connection with the production of natural gas,
19 or advocated imposition of any limits, prohibitions, bans, or other laws or
20 regulations restricting use of the technique of hydraulic fracturing in connection
21 with the production of natural gas? If so, please provide all documents relating to
22 the positions taken by Sierra Club on those subjects, including details relating to
23 the positions, and an estimated impact on the natural gas forward prices used in

1 Ms. Wilson's analysis if the positions taken by Sierra Club on those subjects are
2 implemented by laws, regulations, or otherwise.

3 e. Does Sierra Club have an opinion about the likelihood that any limits,
4 prohibitions, bans, restrictions or other laws or regulations will be imposed on use
5 of the technique of hydraulic fracturing in connection with the production of
6 natural gas? If so, please provide all documents relating to such opinion, details
7 explaining the basis for the opinion, and an estimated impact on the natural gas
8 forward prices used in Ms. Wilson's analysis if the limits, prohibitions, bans,
9 restrictions or other laws or regulations Sierra Club believes are likely to be
10 imposed on use of the technique of hydraulic fracturing in connection with the
11 production of natural gas are implemented by laws, regulations, or otherwise.

12 f. Has Sierra Club proposed to any administrative agency or branch of a local, state
13 or federal government any limits, prohibitions, bans, restrictions or other laws or
14 regulations on use of the technique of hydraulic fracturing in connection with the
15 production of natural gas? If so, please provide all documents relating to such
16 proposals, details relating to the proposal, and an estimated impact on the natural
17 gas forward prices used in Ms. Wilson's analysis if the proposals offered by
18 Sierra Club are implemented by laws, regulations, or otherwise.

19 8. Please refer to the tables on pages 9 and 10 of Ms. Wilson's testimony.

20 a. Please provide all analyses and other documents showing the impact of the coal
21 retirements listed on power market prices in general and on power market prices
22 in MISO.

23 b. With regard to the 120 GW estimates:

- 1 i. Of the 120 GW, how many GW of coal retirements were from coal
2 generation in MISO?
- 3 ii. What is the total capacity of coal generation (in GW) in MISO?
- 4 iii. What is the total capacity of coal generation (in GW) in the United States?
- 5 iv. What percent of the total coal capacity in the United States would a
6 retirement of 120 GW represent?
- 7 v. What percent of MISO coal capacity would the MISO retirements
8 represent?
- 9 vi. Has Sierra Club made any estimates of the impact of retiring 120 GW of
10 coal on system reliability and resource adequacy, specifically in MISO?
- 11 vii. Did ICF/EEI provide a list of generators they expect to be retired (adding
12 up to the total GW of retirements reported)? If so, were any Big Rivers'
13 facilities on that list?

14 9. Please refer to page 12 of Ms. Wilson's testimony, lines 15-16. Provide any
15 allowance price forecast showing allowance prices different than the Pace forecast, and for each
16 price forecast, provide the impact to the NPVRR of the Big Rivers Build Case (using Big Rivers'
17 assumptions).

18 10. What modeling software did Ms. Wilson or Synapse use to perform the cost
19 comparisons of the natural gas combined cycle scenarios versus Big Rivers' scenarios referenced
20 in Ms. Wilson's testimony?

21 a. Provide copies of all models, databases, input and output files, input assumptions,
22 in electronic format with formulas intact.

1 11. What capital, fuel, allowance, and operation and maintenance costs did Ms.
2 Wilson assume in her analysis for the combined cycle build? Provide all such costs, the basis for
3 those assumptions, and all documents supporting those assumptions. Include the manufacturer
4 and model number of the combined cycle units used as the basis for any assumption.

5 12. What compliance option does Ms. Wilson use in her analysis for NAAQS, 316b,
6 CCR, and effluent limitations?

7 a. Provide all capital and operation and maintenance cost estimates used by Ms.
8 Wilson in her analysis for the equipment needed for compliance with NAAQS
9 316b, CCR and effluent limitations. Provide all bases for those estimates and all
10 supporting documents. Provide the in service date for the equipment.

11 13. Explain in detail how Ms. Wilson modeled Big Rivers' debt structure when
12 assuming retirement of the existing fleet and construction of new natural gas combined cycle
13 (NGCC) units?

14 a. How would retiring Big Rivers' entire fleet affect Big Rivers' financial statements
15 and equity as a percentage of assets?

16 b. How was Big Rivers' current debt modeled?

17 c. What sort of financing was assumed given Big Rivers' current debt structure and
18 the additional amount of debt required when constructing new NGCC units?

19 d. What is the additional amount of debt required to build new NGCC units?

20 e. What interest rate was assumed on the new debt?

21 14. Please refer to Exhibit RW-3. That exhibit is a study entitled, "EEI Preliminary
22 Reference Case and Scenario Results." At the bottom of each page of that study is a notice that
23 states, "EEI CONFIDENTIAL BUSINESS INFORMATION: Do Not Cite, Quote or Distribute."

1 Each page of the study, except the cover page, also includes a notice of ICF International's
2 copyright.

3 a. What rights or authority does Sierra Club have to copy, cite, quote, and distribute
4 the study? Please provide all evidence of such rights or authority.

5 b. Please provide the business contact information for each person who provided the
6 study to Sierra Club or who Sierra Club contacted to obtain the right or authority
7 to copy, cite, quote, and distribute the study.

8 15. Please provide all emails, memos, and other documents, sent by Sierra Club to the
9 Kentucky Attorney General, Ventyx, or KIUC since January 1, 2012.

10 16. Please provide all emails, memoranda, and other documents sent to Sierra Club
11 from the Kentucky Attorney General, Ventyx, or KIUC since January 1, 2012.

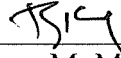
12 17. Please provide all emails, memos, and other documents, sent by Sierra Club to
13 persons other than Big Rivers, the Kentucky Attorney General, Ventyx or KIUC since January 1,
14 2012, regarding this case or analyses performed relating to Big Rivers' environmental
15 compliance options.

16 18. Please provide all emails, memos, and other documents, sent to Sierra Club from
17 persons other than Big Rivers, the Kentucky Attorney General, Ventyx or KIUC since January 1,
18 2012, regarding this case or analyses performed relating to Big Rivers' environmental
19 compliance options.

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On this the 30th day of July, 2012.



James M. Miller
Tyson Kamuf
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