



COMMONWEALTH OF KENTUCKY
OFFICE OF THE ATTORNEY GENERAL

JACK CONWAY
ATTORNEY GENERAL

February 10, 2014

RECEIVED

FEB 10 2014

PUBLIC SERVICE
COMMISSION

1024 CAPITAL CENTER DRIVE
SUITE 200
FRANKFORT, KENTUCKY 40601

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

RE: *In Re* Application of Big Rivers Electric Corporation, Inc.
for an Adjustment of Rates; Case No. 2012-00535, On Rehearing

Dear Mr. Derouen:

On this date, Monday, February 10, 2014, the Joint Intervenors in the Rehearing of Case No. 2012-00535 are filing Supplemental Data Requests to Big Rivers Electric Corp. ["Big Rivers"] in the Rehearing of the above-styled matter. These Supplemental Requests include certain items for which the petitioner, Big Rivers, has sought confidential protection. As you may be aware, each of the Joint Intervenors entered into a confidentiality agreement with Big Rivers in which they, among other things, agreed to protect the confidentiality of information which Big Rivers deems confidential, and for which it seeks confidential protection from the Public Service Commission. Big Rivers has filed with the Commission several petitions for confidential treatment. To date, it appears that the Commission has yet to rule on any of these petitions.

In accordance with Commission procedures, the Attorney General has separately printed each page containing any information for which Big Rivers has sought confidential protection, and is placing these pages in a sealed envelope marked "Confidential."

Please advise if you should have any questions, or require any further information.

Yours truly,

A handwritten signature in black ink, appearing to read "L. W. Cook".

Lawrence W. Cook
ASSISTANT ATTORNEY
GENERAL



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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS)
ELECTRIC CORPORATION, INC.) Case No. 2012-00535
FOR AN ADJUSTMENT OF RATES)

JOINT INTERVENORS' SUPPLEMENTAL DATA REQUESTS
PUBLIC REDACTED VERSION

Come now the Kentucky Industrial Utility Customers, Inc., The Attorney General of the Commonwealth of Kentucky, Ben Taylor and Sierra Club [jointly referred to hereinafter as "Joint Intervenors"], and submit the following Supplemental Requests for Information to Big Rivers Electric Corporation [hereinafter referred to as "Big Rivers" or "BREC"] to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

DEFINITIONS

1. "Document(s)" as used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or

labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

2. "Correspondence" is used in its customary broad sense and includes electronic email, including all attachments, and all written mail, messages and communications between the persons or parties named in the request.
3. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion whether preliminary or final, and whether or not referred to in Big Rivers' direct testimony.
4. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, including the type of document, its date, the date or approximate date it was lost, discarded or destroyed, the identity of the person (s) who last had possession of

the document and the identity of all persons having knowledge of the contents thereof.

5. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
6. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
7. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it.
8. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
9. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
10. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
11. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
12. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.
3. In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.
4. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
5. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
6. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
7. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

8. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
9. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
10. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

Respectfully submitted,

JACK CONWAY
ATTORNEY GENERAL



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**COUNSEL FOR KENTUCKY
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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Mark A. Bailey
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Henderson, KY 42420

Billie Richert, CFO
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this 10th day of February, 2014



Assistant Attorney General

Application of Big Rivers Electric Corporation, Inc. for an Adjustment of Rates
Case No. 2012-00535
On Rehearing
Joint Intervenors' Supplemental Data Requests
PUBLIC REDACTED VERSION

1. Please provide the amount of Coleman plant fixed costs in the corporate financial model used for the test year revenue requirement in this proceeding before the Company decided in its rebuttal case to idle the Coleman plant instead of the Wilson plant. Separate the fixed costs into payroll costs (expense), FDE costs (expense), plant G&A costs (expense), headquarters G&A costs (expense) and each other cost, including, but not limited to, depreciation expense, interest expense, and TIER. Provide a copy of all workpapers, including, but not limited to, the calculation/allocation of interest expense. If the Company used a rate base allocation to determine interest expense, then provide the rate base used for this purposes showing each component. Source each of the amounts included in your response to the corporate financial model and/or underlying workpapers.
2. Refer to pages 37-38 of the Commission's Order dated October 29, 2013 in this proceeding. Please provide the amount of Coleman plant fixed costs included in the revenue requirement approved by the Commission in this proceeding. Separate the fixed costs into payroll costs (expense), FDE costs (expense), plant G&A costs (expense), headquarters G&A costs (expense) and each other cost, including, but not limited to, depreciation expense, interest expense, and TIER. Provide a copy of all workpapers. Source each of the amounts included in your response to the corporate financial model and/or underlying workpapers.
3. Refer to the file named "Confid Century - November 2013 Monthly Invoice 12.23.2013" provided in response to Rehearing JII-1(a).
 - a. Please provide a copy of all subsequent monthly invoices and/or corrections to prior months billed to Century or MISO in the same format as the referenced file.
 - b. Please provide all account detail and all workpapers used to develop the amounts shown on all of the invoices to date billed to Century and MISO.
4. Provide the Coleman capital expenditures that were included in the rate base and capitalization in the corporate financial model that was used to quantify the revenue requirement as originally filed in this proceeding (before the Company switched the plant layup from Wilson to Coleman in its Rebuttal case). Separate these amounts between environmental capital expenditures and non-environmental capital expenditures.
5. Refer to the Company's confidential response to Rehearing PSC 1-1(a).

Application of Big Rivers Electric Corporation, Inc. for an Adjustment of Rates
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a. [REDACTED]

b. [REDACTED]

c. [REDACTED]

6. [REDACTED]

a. [REDACTED]

b. [REDACTED]

c. [REDACTED]

Application of Big Rivers Electric Corporation, Inc. for an Adjustment of Rates
Case No. 2012-00535
On Rehearing
Joint Intervenors' Supplemental Data Requests
PUBLIC REDACTED VERSION

[REDACTED]

i. [REDACTED]

ii. [REDACTED]

iii. [REDACTED]

d. [REDACTED]

i. [REDACTED]

ii. [REDACTED]

Application of Big Rivers Electric Corporation, Inc. for an Adjustment of Rates
Case No. 2012-00535
On Rehearing
Joint Intervenors' Supplemental Data Requests
PUBLIC REDACTED VERSION

iii.

[REDACTED]

7.

[REDACTED]

a.

[REDACTED]

b.

[REDACTED]

c.

[REDACTED]

d.

[REDACTED]

e.

[REDACTED]

8.

[REDACTED]

a.

[REDACTED]

Application of Big Rivers Electric Corporation, Inc. for an Adjustment of Rates
Case No. 2012-00535
On Rehearing
Joint Intervenors' Supplemental Data Requests
PUBLIC REDACTED VERSION

b.

[REDACTED]

c.

[REDACTED]

d.

[REDACTED]