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October 21, 2013

Via FedEx Overnight or First Class USPS Delivery

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

RECEIVED
OCT 22 2013
PUBLIC SERVICE
COMMISSION

*Also Licensed in Indiana

In the Matter of:

Application of Big Rivers Electric Corporation for a General Adjustment
in Rates – Case No. 2013-00199

Dear Mr. Derouen:

Big Rivers Electric Corporation (“Big Rivers”) hereby files an original and ten (10) copies of the following in the aforementioned docket:

1. Revised responses to Items 196 and Item 202 of the Office of the Attorney General’s Initial Request for Information dated September 3, 2013;
2. Revised response to Item 59 of the Office of the Attorney General’s Second Request for Information dated September 16, 2013;
3. Revised responses to Items 21 and Item 22 of the Kentucky Industrial Utility Customers, Inc.’s Initial Request for Information dated September 3, 2013;
4. Revised response to Item 9 of Ben Taylor and the Sierra Club’s Initial Request for Information dated September 3, 2013;

Big Rivers also encloses an original and ten (10) copies of a Petition for Confidential Treatment and a Motion for Deviation related to these responses.

Please confirm the Commission’s receipt of this information by having the Commission’s date stamp placed on the enclosed additional copy and returning to Big Rivers in the self-addressed, postage paid envelop provided.

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Letter to Mr. Jeff Derouen - Case No. 2013-00199

October 21, 2013

Page 2

I certify that on this date, a copy of this letter and a copy of the enclosures were served on each of the persons on the attached service list by either first class U.S. postage or overnight express delivery.

Should you have any questions about this matter, please contact me.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Tyson A. Kamuf". The signature is written in a cursive style with a large initial 'T' and 'K'.

Tyson A. Kamuf

C: Billie Richert
DeAnna Speed

Service List
PSC Case No. 2013-00199

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BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199**

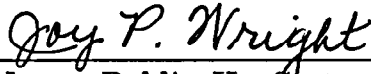
VERIFICATION

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

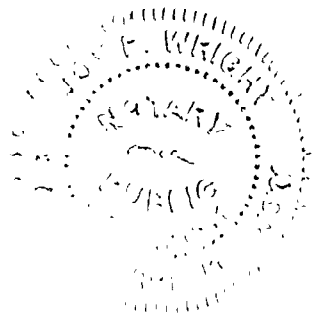

Robert W. Berry

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Robert W. Berry on this
the 18 day of October, 2013.


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

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199**

VERIFICATION

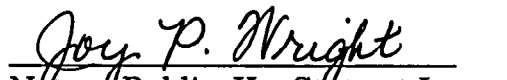
I, Billie J. Richert, verify, state, and affirm that I prepared or supervised the preparation of the revised data request responses filed with this Verification, and that those responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Billie J. Richert

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Billie J. Richert on this
the 21 day of October, 2013.



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



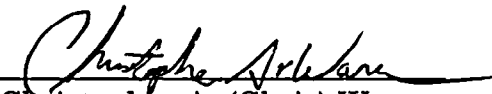
**Notary Public, Kentucky State-At-Large
My Commission Expires: July 3, 2014
ID 421951**

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199**

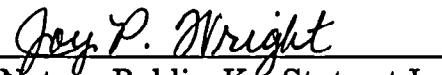
VERIFICATION

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

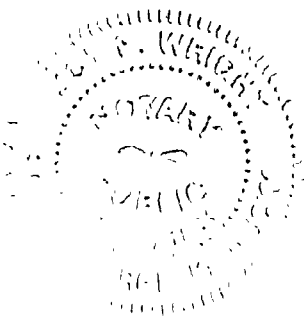

Christopher A. (Chris) Warren

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Christopher A. (Chris) Warren on this the 18 day of October, 2013.


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

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199**

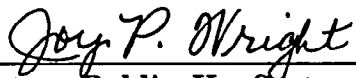
VERIFICATION

I, Jeffrey R. (Jeff) Williams, verify, state, and affirm that I prepared or supervised the preparation of the revised data request responses filed with this Verification, and that those responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

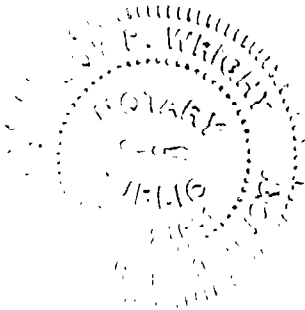

Jeffrey R. (Jeff) Williams

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Jeffrey R. (Jeff) Williams
on this the 18 day of October, 2013.


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

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



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 A) Case No. 2013-00199
GENERAL ADJUST IN RATES)

Revised Responses to the
Office of the Attorney General's Initial Request for Information
dated August 19, 2013

Revised Responses to the
Office of the Attorney General's Second Request for Information
dated September 16, 2013

Revised Responses to the
Kentucky Industrial Utility Customers' Initial Request for Information
dated August 19, 2013

Revised Responses to the
Ben Taylor and the Sierra Club's Second Request for Information
dated September 16, 2013

FILED: October 22, 2013

ORIGINAL

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199**

**Revised Response to the
Office of the Attorney General's
Initial Request for Information
dated August 19, 2013**

**September 3, 2013
Revision October 22, 2013**

1 **Item 196) *Please provide the operation and maintenance expense by RUS***
2 ***O&M expense account for the Wilson plant included in the Company's***
3 ***revenue requirement and for actual FY 2012, for the base period (show***
4 ***actual and forecasted amounts separately) and the forecasted test period***
5 ***(separately for base and FCR rates). Provide all assumptions, data, and***
6 ***computations.***

7

8 **Response) Subsequent to its filing of September 3, 2013, Big Rivers discovered**
9 **that accounts 50010000 and 51010000 were inadvertently missing from the Base**
10 **Period worksheet. A revised Excel file correcting these omissions is being**
11 **provided in electronic format under a Petition for Confidential Treatment. The**
12 **totals in the September 3, 2013, filing, however, are correct.**

13

14

15 **Witness) Jeffrey R. Williams**

16

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199

Revised Response to the
Office of the Attorney General's
Initial Request for Information
dated August 19, 2013

September 3, 2013
Revision October 22, 2013

Revised Response to AG 1-196

Attachment filed electronically under a Petition for Confidential Treatment.

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199**

**Revised Response to the
Office of the Attorney General's
Initial Request for Information
dated August 19, 2013**

**September 3, 2013
Revision October 22, 2013**

1 **Item 202) *Please provide the operation and maintenance expense by RUS***
2 ***O&M expense account for the Coleman plant included in the Company's***
3 ***revenue requirement and for actual FY 2012, for the base period (show***
4 ***actual and forecasted amounts separately) and the forecasted test period***
5 ***(separately for base and ECR rates). Provide all assumptions, data, and***
6 ***computations.***

7

8 **Response) Subsequent to its filing of September 3, 2013, Big Rivers discovered**
9 **that the totals in the right-most column and the grand total were incorrect in the**
10 **Base Period worksheet. A revised Excel file correcting these sums is being**
11 **provided in electronic format under a Petition for Confidential Treatment.**

12

13

14 **Witness) Jeffrey R. Williams**

15

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199

Revised Response to the
Office of the Attorney General's
Initial Request for Information
dated August 19, 2013

September 3, 2013
Revision October 22, 2013

Revised Response to AG 1-202

Attachment filed electronically under a Petition for Confidential Treatment.

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199

Revised Response to the
Kentucky Industrial Utility Customers'
Initial Request for Information
dated August 19, 2013

September 3, 2013
Revision October 22, 2013

1 **Item 21)** *Please provide the Wilson plant costs included in the base and*
2 *ECR revenue requirements in the test year by month, including labor and*
3 *labor-related overheads expense, fixed departmental expense, property tax*
4 *expense, property insurance expense, depreciation expense, interest*
5 *expense, each other expense, and the TIER margin. Please provide all*
6 *support for amounts that were calculated, including, but not limited to,*
7 *depreciation expense and interest expense.*

8

9 **Response)** Subsequent to its filing of September 3, 2013, Big Rivers discovered
10 that it had inadvertently included dollars in the 'ECR' line items which should
11 have been included in the 'Base' line items. The revised attachment provided with
12 this response reflects this adjustment; this attachment if being provided with a
13 Petition for Confidential Treatment.

14

15

16 **Witness)** Jeffrey R. Williams

17

Big Rivers Electric Corporation
Case No. 2013-00199
Wilson Plant Costs
For the Forecasted Test Period

Type of Filing: Original - _____; Updated - _____; Revised - X

Line No.	DESCRIPTION	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Jan-15
1	Labor Expense	132,509	143,227	136,406	145,176	124,714	136,406	145,176	126,968	151,742	124,986	128,950	140,360
2	Fixed Departmental Expense												
3	Property Tax Expense Base	90,103	90,103	90,103	90,103	90,103	90,103	90,103	90,103	90,103	90,103	90,103	91,097
4	Property Tax Expense ECR	1,201	1,201	1,201	1,201	1,201	1,201	1,201	1,201	1,201	1,201	1,201	1,913
5	Property Insurance Expense Base	103,414	103,414	103,414	103,414	103,414	103,414	103,414	103,414	103,414	103,414	103,414	107,427
6	Property Insurance Expense ECR	543	543	543	543	543	543	543	543	543	543	543	1,727
7	Depreciation Expense Base	1,671,036	1,671,036	1,671,106	1,671,238	1,671,395	1,671,517	1,671,517	1,672,175	1,672,450	1,672,474	1,672,474	1,672,505
8	Depreciation Expense ECR	0	0	0	0	0	0	0	23,288	23,288	23,288	23,288	23,288
9	Interest Expense Base	1,612,140	1,749,205	1,707,050	1,754,261	1,703,129	1,752,551	1,752,552	1,701,568	1,754,313	1,707,281	1,750,135	1,750,264
10	Interest Expense ECR	13,341	14,771	21,285	21,994	21,285	28,026	28,026	27,122	28,026	27,122	28,026	28,026
11													

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199

Revised Response to the
Kentucky Industrial Utility Customers'
Initial Request for Information
dated August 19, 2013

September 3, 2013
Revision October 18, 2013

1 **Item 22)** *Please provide the Coleman plant costs included in the base*
2 *and ECR revenue requirements in the test year by month, including labor*
3 *and labor-related overheads expense, fixed departmental expense,*
4 *property tax expense, property insurance expense, depreciation expense,*
5 *interest expense, each other expense, and the TIER margin. Please*
6 *provide all support for amounts that were calculated, including, but not*
7 *limited to, depreciation expense and interest expense.*

8

9 **Response)** Subsequent to its filing of September 3, 2013, Big Rivers discovered
10 that it had inadvertently included dollars in the 'ECR' line items which should
11 have been included in the 'Base' line items. The revised attachment provided with
12 this response reflects this adjustment; this attachment if being provided with a
13 Petition for Confidential Treatment.

14

15

16 **Witness)** Jeffrey R. Williams

17

Big Rivers Electric Corporation
Case No. 2013-00199
Coleman Plant Costs
For the Forecasted Test Period

Type of Filing: Original - ____; Updated - ____; Revised - X

Line No.	DESCRIPTION	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Jan-15
1	Labor Expense	973,074	1,048,002	1,100,936	148,174	104,141	114,019	121,427	106,368	127,355	104,689	108,047	116,321
2	Fixed Departmental Expense												
3	Property Tax Expense Base	39,075	39,075	39,075	39,075	39,075	39,075	39,075	39,075	39,075	39,075	39,075	39,939
4	Property Tax Expense ECR	522	522	522	522	522	522	522	522	522	522	522	835
5	Property Insurance Expense Base	60,469	60,469	60,469	60,469	60,469	60,469	60,469	60,469	60,469	60,469	60,469	62,816
6	Property Insurance Expense ECR	317	317	317	317	317	317	317	317	317	317	317	1,010
7	Depreciation Expense Base	513,002	513,033	513,075	513,215	513,866	513,866	513,866	517,376	517,376	517,376	517,407	517,407
8	Depreciation Expense ECR	0	0	0	0	0	0	0	57,065	57,065	57,065	57,065	57,065
9	Interest Expense Base	493,039	534,330	506,841	520,601	505,573	507,218	507,219	492,652	507,788	494,500	506,437	506,479
10	Interest Expense ECR	32,691	36,194	52,155	53,894	52,155	68,675	68,675	66,459	68,675	66,459	68,675	68,675
11													

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199**

**Revised Response to the
Office of the Attorney General's
Second Request for Information
dated September 16, 2013**

**September 30, 2013
Revision October 22, 2013**

1 **Item 59) *BREC's response to AG 1-82 states: "In designing its rates and***
2 ***planning for its operations after Century's and/or Alcan's termination,***
3 ***Big Rivers planned for long-term success and developed an operational***
4 ***strategy likely to produce long-term benefits to its members and their***
5 ***member-owners. To address the long-term interests of its members, Big***
6 ***Rivers researched and developed its mitigation plan over the past several***
7 ***years to help mitigate the adverse financial consequences of potential***
8 ***smelter closure."***

9

10 ***a. Provide all net present value and/or discounted cash flow***
11 ***analyses performed by or for Big Rivers to inform its***
12 ***choices in "developing an operational strategy."***

13 ***b. Provide all net present value and/or discounted cash flow***
14 ***analyses performed by or for Big Rivers that estimates or***
15 ***quantifies the expected "long-term benefits to its member***
16 ***and their member-owners."***

17 ***c. Provide all net present value and/or discounted cash flow***
18 ***analyses performed by or for Big Rivers associated with its***
19 ***choice to "lay up:"***

20 ***i. The Wilson Plant; and,***

BIG RIVERS ELECTRIC CORPORATION

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199

Revised Response to the
Office of the Attorney General's
Second Request for Information
dated September 16, 2013

September 30, 2013
Revision October 22, 2013

- 1 *ii. The Coleman Plant.*
- 2 *d. Provide documents which show and explain the basis for*
- 3 *any "discount rate" used in the above net present value*
- 4 *and/or discounted cash flow analyses.*
- 5 *e. Provide annual cash outlays associated with the Wilson*
- 6 *Plant beginning with the layup of the plant in 2013*
- 7 *through the entire layup period for:*
- 8 *i. All layup costs (capital and expense), including*
- 9 *severance;*
- 10 *ii. Ongoing capital items and expenses while in layup,*
- 11 *including FDE and maintenance, property taxes,*
- 12 *insurance, etc.;*
- 13 *iii. Capital and expense costs of restarting the plant to*
- 14 *bring it out of "layup";*
- 15 *iv. Budgeted or expected maintenance and capital*
- 16 *investment to meet pollution control and other*
- 17 *environmental mandates;*
- 18 *v. Allocated interest costs; and,*
- 19 *vi. Any other cash expenditures Big Rivers believes to be*
- 20 *relevant to the operation of the Wilson Plant.*

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199**

**Revised Response to the
Office of the Attorney General's
Second Request for Information
dated September 16, 2013**

**September 30, 2013
Revision October 22, 2013**

- 1 *vii. Identify which of the above costs have been included*
2 *in this rate case, and provide worksheet and cell*
3 *reference to those amounts in the Financial Model.*
4 *viii. Identify which of the above costs have not been*
5 *included in this rate case.*
6 *f. Provide annual cash net margins associated with the*
7 *operation of the Wilson Plant from the time it is brought*
8 *out of "layup" into operating status, through 2027 (or*
9 *beyond if available), and any other net cash inflows Big*
10 *Rivers believes to be relevant to the operation of the*
11 *Wilson Plant.*
12 *g. Provide annual cash outlays associated with the Coleman*
13 *Plant beginning with the layup of the plant in 2014*
14 *through the entire layup period for:*
15 *i. All layup costs (capital and expense), including*
16 *severance;*
17 *ii. Ongoing capital items and expenses while in layup,*
18 *including FDE and maintenance, property taxes,*
19 *insurance, etc.;*

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199**

**Revised Response to the
Office of the Attorney General's
Second Request for Information
dated September 16, 2013**

**September 30, 2013
Revision October 22, 2013**

- 1 *iii. Capital and expense costs of restarting the plant to*
2 *bring it out of "layup";*
- 3 *iv. Budgeted or expected maintenance and capital*
4 *investment to meet pollution control and other*
5 *environmental mandates;*
- 6 *v. Allocated interest costs; and,*
- 7 *vi. Any other cash expenditures Big Rivers believes to be*
8 *relevant to the operation of the Coleman Plant.*
- 9 *vii. Identify which of the above costs have been included*
10 *in this rate case, and provide worksheet and cell*
11 *reference to those amounts in the Financial Model.*
- 12 *viii. Identify which of the above costs have not been*
13 *included in this rate case.*
- 14 *h. Provide annual cash net margins associated with the*
15 *operation of the Coleman Plant from the time it is brought*
16 *out of "layup" into operating status, through 2027 (or*
17 *beyond if available), and any other net cash inflows Big*
18 *Rivers believes to be relevant to the operation of the*
19 *Coleman Plant.*
- 20

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2013-00199**

***Revised* Response to the
Office of the Attorney General's
Second Request for Information
dated September 16, 2013**

**September 30, 2013
Revision October 22, 2013**

1 **Response)** Subsequent to its filing of September 3, 2013, Big Rivers discovered
2 that it had inadvertently included dollars in the 'Interest Expense ECR' line item
3 which should have been included in the 'Interest Expenses Base' line item for both
4 the Wilson Plant and Coleman Plant schedules. The revised schedules provided
5 with this response reflect this adjustment; these schedules are being provided
6 with a Petition for Confidential Treatment.

7

8

9 **Witnesses)** Jeffrey R. Williams and
10 Christopher A. Warren

11

Big Rivers Electric Corporation
Case No. 2013-00199
Wilson Plant Costs
Attachment 1 - Revised

Line No.	DESCRIPTION	2013	2014	2015	2016	2017	2018
1	Layup Capital						
2	Layup Fixed Departmental Expense						
3	Labor Expense	10,914,913	1,633,639	1,669,094	1,710,020	1,752,770	11,907,178
4	Ongoing Fixed Departmental Expense						
5	Ongoing Capital						
6	Property Tax Expense Base	1,048,464	1,081,241	1,093,163	1,107,493	1,136,043	1,165,526
7	Property Tax Expense ECR	14,169	14,417	22,956	21,773	21,454	20,909
8	Property Insurance Expense Base	1,127,161	1,240,971	1,289,128	1,354,001	1,387,745	1,422,328
9	Property Insurance Expense ECR	5,945	6,511	20,724	21,345	21,986	22,645
10	Interest Expense Base	22,160,093	20,658,667	20,621,730	20,509,890	21,037,823	21,578,989
11	Interest Expense ECR	66,636	273,794	329,984	329,984	323,048	315,904
12							

Depreciation expense is not broken out by location in the financial model
Wilson is assumed to layup September 2013 and to come out of layup in 2018
Excludes startup cost in 2018

Big Rivers Electric Corporation
Case No. 2013-00199
Coleman Plant Costs
Attachment 2 - Revised

Line No.	DESCRIPTION	2013	2014	2015	2016	2017	2018	2019
1	Layup Capital							
2	Layup Expense							
3	*Labor Expense	12,059,190	5,063,365	1,384,331	1,419,971	1,455,470	3,292,354	13,580,606
4	*Ongoing Fixed Departmental Expense							
5	Ongoing Capital							
6	Property Tax Expense Base	438,274	468,898	479,268	482,978	495,429	508,288	521,461
7	Property Tax Expense ECR	5,936	6,266	10,020	9,509	9,370	9,132	8,893
8	Property Insurance Expense Base	658,951	725,628	753,789	791,722	811,453	831,675	852,400
9	Property Insurance Expense ECR	3,475	3,807	12,115	12,479	12,853	13,239	13,636
10	Interest Expense Base	6,782,569	6,099,296	5,967,836	5,931,664	6,117,166	6,307,391	6,502,458
11	Interest Expense ECR	163,284	670,901	808,588	808,588	791,592	774,086	756,055
12								

Depreciation expense is not broken out by location in the financial model
Coleman is assumed to layup February 2014 and to come out of layup in 2019
Excludes startup cost in 2019
*Does not include pro-forma adjustments

BIG RIVERS ELECTRIC CORPORATION

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Second Request for Information
dated September 16, 2013**

**September 30, 2013
Revision October 22, 2013**

- 1 **Item 9)** ***Refer to the Attachment to BREC's response to PSC 2-14.***
2
3 ***a. For each of the four market energy price forecasts***
4 ***identified therein, state whether the forecast assumed***
5 ***implementation of each of the following finalized,***
6 ***proposed, or potential environmental regulations and, if***
7 ***so, the year in which such implementation is assumed.***
8 ***i. Mercury Air Toxics Standards ("MATS")***
9 ***ii. Clean Air Interstate Rule ("CAIR")***
10 ***iii. Cross-State Air Pollution Rule ("CSAPR")***
11 ***iv. Effluent Limitation Guidelines ("ELGs")***
12 ***v. Coal Combustion Residuals ("CCR")***
13 ***vi. Greenhouse house gas New Source Performance***
14 ***Standards ("GHG NSPS")***
15 ***b. For each of the four market energy price forecasts***
16 ***identified therein, state whether the forecast assumes a***
17 ***price on carbon emissions in any of the years of the***
18 ***forecast.***
19 ***i. If so:***
20 ***1. Identify the carbon price assumed for each of the***
21 ***years 2014 through 2027.***
22 ***2. Explain how such prices were identified.***

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3. Identify and produce any study or analysis supporting such carbon price projection.

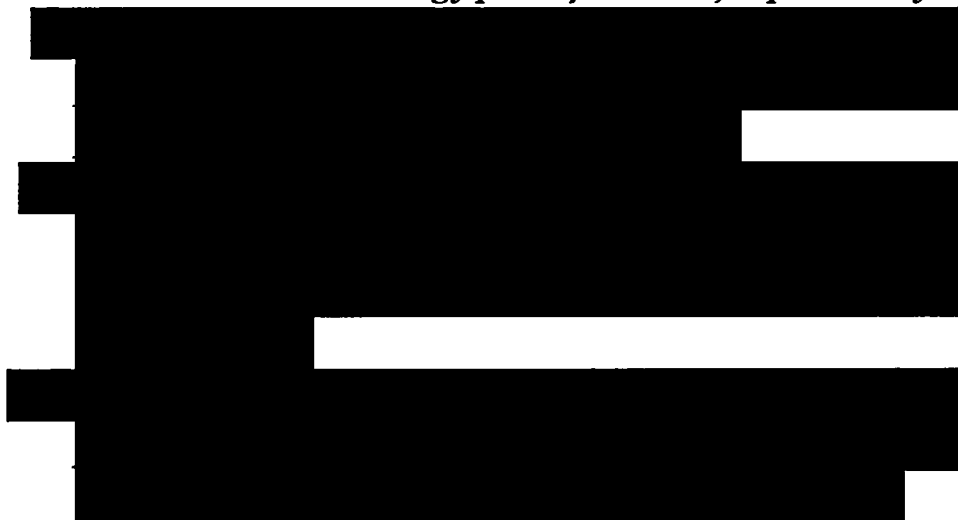
ii. If not:

1. Explain why not.

2. Identify and produce any study or analysis supporting the assumption of no price on carbon emissions between now and 2027.

3. Identify any other utility that BREC is aware of that assumes in its long term financial forecasting that there will be no price on carbon emissions between now and 2027.

c. For the ACES market energy price forecasts, explain why:



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- [REDACTED]
- d. State whether Big Rivers has considered the use of other market energy price forecasts in its long term forecasting in order to reduce dependence on the [REDACTED] ACES forecasts.*
- i. If not, explain why not.*
- e. Please clarify what role, if any, the IHS price forecast plays in Big Rivers' long-term forecasting.*

Response)

- a. For the ACES market energy price forecasts, please see the attached letter from ACES to Big Rivers. For IHS, please see attached CONFIDENTIAL chart displaying the EPA's regulatory timeline under IHS CERA's planning scenario.
- b. There is no change to the response filed September 30, 2013.
- c. There is no change to the response filed September 30, 2013.
- d. There is no change to the response filed September 30, 2013.
- e. There is no change to the response filed September 30, 2013.

Witness) Robert W. Berry

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Revised Response to SC 2-9

Attachment 2 filed under a Petition for Confidential Treatment.