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November 11, 2013

**Via Federal Express**

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

Re: *In the Matter of: The Application of  
Big Rivers Electric Corporation for a General  
Adjustment in Rates, PSC Case No. 2013-00199*

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 the Attorney General; (ii) Big Rivers' first request for information to Kentucky Industrial Utility Customers, Inc.; and (iii) Big Rivers' first request for information to Ben Taylor and Sierra Club. I certify that on this date, a copy of this letter and a copy of the requests for information were served by Federal Express or first class mail on each of the persons listed on the attached service list.

Sincerely,



Tyson Kamuf

TAK/ej  
Enclosures

cc: Billie Richert  
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1 COMMONWEALTH OF KENTUCKY  
2 BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

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3  
4  
5 In the Matter of:

6  
7 APPLICATION OF BIG RIVERS ELECTRIC )  
8 CORPORATION FOR A GENERAL )  
9 ADJUSTMENT IN RATES )

Case No. 2013-00199

10  
11  
12 **BIG RIVERS ELECTRIC CORPORATION'S FIRST REQUEST FOR INFORMATION**  
13 **TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**  
14

15 Big Rivers Electric Corporation submits these first requests for information to Kentucky  
16 Utility Industrial Utility Customers, Inc., to be answered in accordance with the following  
17 Definitions and Instructions.

18 **DEFINITIONS**

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

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

27 3. "Aleris" means Aleris International, Inc., Rolled Products North America of  
28 Aleris International, Inc., and the agents, officers, directors, and employees of Aleris  
29 International, Inc. or Rolled Products North America of Aleris International, Inc.

1           4.     “Domtar” means Domtar Paper Company, LLC and the agents, officers, directors,  
2 and employees of Domtar Paper Company, LLC.

3           5.     “Kimberly-Clark” means Kimberly-Clark Corporation and the agents, officers,  
4 directors, and employees of Kimberly-Clark Corporation.

5           6.     “KIUC,” “you,” or “your” means Kentucky Industrial Utility Customers, Inc.,  
6 Aleris, Domtar, Kimberly Clark, and the agents, officers, directors, employees, and consultants  
7 of KIUC, Aleris, Domtar, or Kimberly-Clark.

8           7.     “Century” means Century Aluminum of Kentucky General Partnership.

9           8.     “Alcan” means Alcan Primary Products Corporation.

10          9.     “Commission” means the Kentucky Public Service Commission.

11          10.    “Document” means any written, recorded, transcribed, printed or impressed  
12 matter of whatever kind, however produced, stored or reproduced, including, but not limited to,  
13 sound or pictorial recordings, computerized information, books, pamphlets, letters, memoranda,  
14 telegrams, electronic or mechanical transmissions, communications of all kinds, reports, notes,  
15 working papers, handwritings, charts, papers, writings, printings, transcriptions, tapes and  
16 records of all kinds. Document includes, without limitation, all workpapers produced by or  
17 relied upon by the witness.

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

20          12.    Wherever in these information requests you are asked to “identify,” you are  
21 requested:

22           a.     when identifying a person, to give such person’s:

23                 (1)   full name,

- 1 (2) business address, residence address, and telephone number,  
2 (3) his or her present or last known position and business affiliation at  
3 the time in question, and  
4 (4) the nature of such person's participation in, and the scope of his  
5 responsibility with regard to, the facts and events underlying the  
6 present case;
- 7 b. when identifying an oral communication, to:
- 8 (1) identify the author thereof and the parties thereto,  
9 (2) state the date of the communication,  
10 (3) state the place of the communication,  
11 (4) state the substance of the communication, and  
12 (5) state whether such communication has been reduced to writing  
13 and, if so, identify each document and the present custodian  
14 thereof;
- 15 c. when identifying other information, to state:
- 16 (1) the source thereof,  
17 (2) any oral communications pertaining thereto,  
18 (3) any documents pertaining thereto, and  
19 (4) the substance of the information;
- 20 d. when identifying a document, to:
- 21 (1) identify the author thereof and the parties thereto,  
22 (2) state its title or other identifying data,

- 1 (3) state the date of the document or if no date appears thereon, the  
2 approximate date,  
3 (4) state the exact nature and substance thereof;  
4 (5) identify each person having possession, care, custody or control of  
5 the original and any copies thereof; and  
6 (6) if such document was, but no longer is, in your possession or  
7 subject to your control, state what disposition was made of it.  
8

9 INSTRUCTIONS

- 10 1. If any document called for by any of these data requests is withheld based upon a  
11 claim of privilege or work product, please produce so much of the document as to which you do  
12 not claim privilege or protection, and for each document or part of a document for which you  
13 claim privilege or protection, describe or identify:
- 14 a. The nature, subject matter and substance of the document or part of the  
15 document withheld;
  - 16 b. The nature of the privilege or protection claimed;
  - 17 c. The date, author or authors, addressee or addressees, and distribution of  
18 the document;
  - 19 d. Each person in whose possession, custody or control any copy of the  
20 document is or has been; and
  - 21 e. Paragraph number of the schedule of documents to which the document or  
22 part of the document is responsive.

1           2.     If, for reasons other than a claim of privilege or work product, you refuse to  
2 answer any data request or to produce any document requested, state the grounds upon which the  
3 refusal is based with sufficient specificity to permit a determination of the propriety of such  
4 refusal.

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

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

15

16

DATA REQUESTS

17          1.     Please identify, by name and address, all entities and individuals that KIUC  
18 purports to represent in this proceeding.

19          2.     For the period from January 1, 2012, forward, please provide a copy of all  
20 correspondence related to this case or to other Big Rivers' rate changes between (i) KIUC,  
21 Aleris, Domtar, Kimberly Clark, or any other entity or person identified in the response to Item 1  
22 above and (ii) any other entity.



1           3.     Please produce all documents, including without limitation correspondence and  
2 calculations, in the possession, custody, or control of any entity identified in the response to Item  
3 1 above that pertain to KIUC's (or its members', witnesses', consultants' and advisors') analysis  
4 regarding Tab 56 of Big Rivers' application in the proceeding.

5           4.     For all entities and individuals identified in the response to Item 1 above, and for  
6 Domtar, Aleris, and Kimberly Clark:

7           a.     Please designate—by name, position, and contact information—a witness or  
8 witnesses who consent to testify on each entity's behalf on all matters related to  
9 this proceeding.

10          b.     Of each such entity's total operating expenses for its facilities served indirectly by  
11 Big Rivers, please state what percentage of those expenses constitute electricity  
12 costs for each of the past three calendar years. Electricity procured from sources  
13 other than Kenergy Corp. should be excluded from this calculation. Provide this  
14 data separately for each entity's facilities, by facility and by total entity.

15          5.     Refer to the Direct Testimony of Stephen J. Baron at page 9, where Mr. Baron  
16 states, "We have modified the Company's financial forecast model to reflect our  
17 recommendation to use the Rural Economic Reserve equally for all Big Rivers' customers."

18          a.     Please provide the modified financial forecast model in electronic format with all  
19 formulas intact.

20          b.     Please identify each cell of the Big Rivers' financial forecast model that was  
21 changed to arrive at the modified financial forecast model, explain the reason for  
22 the change, and provide all reasons and documents supporting the change.

1           6.     Refer to the Direct Testimony of Stephen J. Baron at page 9, where Mr. Baron  
2 states, “If the KIUC recommendation is adopted by the Commission (using the Rural Economic  
3 Reserve equally for Rural and Large Industrial customers), the Rural Economic Reserve fund is  
4 depleted in February 2015, only two months earlier.”

5           a. Does the projected February 2015 date include the impact of all of KIUC  
6 proposals that KIUC makes or references in this case, including the “KIUC Rate  
7 Plan” set forth on page 10 of the Direct Testimony Lane Kollen and the cost of  
8 additional professional advisors and counsel recommended on page 11 of the  
9 Direct Testimony of Lane Kollen? If not, please explain why that impact was not  
10 included, provide the projected date the Rural Economic Reserve fund will be  
11 depleted if the impact of all such proposals is included, and provide all supporting  
12 documents for that calculation in electronic format with formulas intact.

13           b. Does the projected February 2015 date include the impact of Mr. Baron’s  
14 proposal that Large Industrial customers be permitted to purchase some of the  
15 power at market-based rates? If not, please provide the projected date the Rural  
16 Economic Reserve fund will be depleted if the impact of all proposals made by  
17 KIUC in this proceeding, including Mr. Baron’s proposal relating to market-based  
18 rates, is included, and provide all supporting documents in electronic format with  
19 formulas intact.

20           c. What is the estimated impact of all proposals made by KIUC in this proceeding  
21 on remaining customers’ rates?

22           7.     Refer to the Direct Testimony of Stephen J. Baron at page 18, where Mr. Baron  
23 states KRS 278.455 “specifically excludes special contract customers.” Does Mr. Baron agree

1 that Aleris, Kimberly-Clark, Domtar, and all other Large Industrial customers are special  
2 contract customers? If not, please explain why not.

3 8. Refer to the Direct Testimony of Stephen J. Baron at page 23. Is it Mr. Baron's  
4 position that the Commission has the legal authority and should amend the existing retail power  
5 contracts of the Large Industrial customers in a wholesale rate case? Please explain in detail the  
6 basis for that opinion, and provide a copy of all documents supporting that view.

7 9. Refer to the Direct Testimony of Stephen J. Baron at page 23, lines 11-16. Please  
8 refer to the 15%, 5% and 25% values proposed in this section. What is the basis for each of  
9 these values? Please provide the support and supporting calculations for each of these values.

10 10. Refer to the Direct Testimony of Lane Kollen at page 7, lines 14-18. Please  
11 provide all calculations for the purported rate increases described therein in electronic format  
12 with formulas intact.

13 11. Refer to the Direct Testimony of Lane Kollen at page 11, where Mr. Kollen states  
14 that EKPC "now is financially healthy and stable."

15 a. Please explain in detail the basis for Mr. Kollen's conclusion and provide all  
16 studies and other documents that form the basis for that conclusion.

17 b. Provide the wholesale rates for EKPC and the retail rates for each of its member  
18 distribution cooperatives.

19 c. Provide EKPC's current debt to equity ratio.

20 12. Refer to the Direct Testimony of Lane Kollen at pages 12-13. Please provide the  
21 charts on those pages in electronic format with all formulas intact.

1           13.     Refer to the Direct Testimony of Lane Kollen at page 13. Please explain why the  
2 chart for the Rural class on that page does not include the Rural Economic Reserve, and provide  
3 a revised chart in electronic format with formulas intact including the Rural Economic Reserve.

4           14.     Refer to the Direct Testimony of Lane Kollen at page 13. Please explain why the  
5 charts for the Rural and Large Industrial classes on that page show zero for the Economic  
6 Reserve for the Alcan Test Year, and provide a revised chart in electronic format with formulas  
7 intact including the Economic Reserve amounts from the Big Rivers Financial Model for the test  
8 period.

9           15.     Refer to the Direct Testimony of Lane Kollen at page 17, lines 19-22.

10           a.     Is it Mr. Kollen's position that a rate increase designed to force Big Rivers'  
11 creditors to make concessions will maintain and improve Big Rivers' credit  
12 metrics?

13           b.     Is it Mr. Kollen's position that a rate increase designed to force Big Rivers'  
14 creditors to make concessions will maintain and improve Big Rivers' credit  
15 rating?

16           16.     Refer to the Direct Testimony of Lane Kollen at page 37, where Mr. Kollen  
17 states, "In contrast, the stranded costs resulting from market changes typically are shared among  
18 impacted parties." Please provide each example upon which Mr. Kollen relies for this  
19 statement, any other basis for this statement, and any relevant Kentucky statutes, regulations, or  
20 Commission orders that support this assertion.

21           17.     Refer to the Direct Testimony of Lane Kollen at page 48, where Mr. Kollen  
22 states, "However, during the period when the plants are shutdown, there will be no loss in  
23 service value." Please provide the basis for this statement and all studies and other documents

1 upon which Mr. Kollen relied in making this statement. Provide the professional qualifications  
2 of Mr. Kollen upon which he relies to qualify him to give such an opinion.

3 18. Refer to the Direct Testimony of Lane Kollen at page 48, lines 21-28.

4 a. Is it Mr. Kollen's position that an idled plant cannot suffer a loss in service value  
5 due to "decay?" If so, please explain.

6 b. Is it Mr. Kollen's position that an idled plant cannot suffer a loss in service value  
7 due to "action of the elements?" If so, please explain.

8 c. Is it Mr. Kollen's position that an idled plant cannot suffer a loss in service value  
9 due to "inadequacy?" If so, please explain.

10 d. Is it Mr. Kollen's position that an idled plant cannot suffer a loss in service value  
11 due to "obsolescence?" If so, please explain.

12 e. Is it Mr. Kollen's position that an idled plant cannot suffer a loss in service value  
13 due to "changes in the art?" If so, please explain.

14 f. Is it Mr. Kollen's position that an idled plant cannot suffer a loss in service value  
15 due to "changes in demand?" If so, please explain.

16 g. Is it Mr. Kollen's position that an idled plant cannot suffer a loss in service value  
17 due to "requirements of public authorities?" If so, please explain.

18 19. Refer to the Direct Testimony of Lane Kollen at page 53. Please provide a copy  
19 of the referenced NARUC Depreciation Manual.

20 20. Refer to the Direct Testimony of Lane Kollen at page 56.

21 a. Please provide all pleadings or other documents in which Northern States Power  
22 Company made the referenced proposal, and provide all orders or other

1 documents which reflect that the Administrative Law Judge “accepted the  
2 Company’s offer.”

3 b. Please provide all pleadings, orders, and other documents filed in the proceeding  
4 cited in footnote 13 on page 56 of Mr. Kollen’s testimony that address the  
5 referenced proposal to defer depreciation expense.

6 21. Refer to the Direct Testimony of Lane Kollen at page 59. Did KIUC argue in  
7 Case No. 2013-00221 that Century should be required to pay the depreciation expense on  
8 Coleman while Coleman was in must run status? If so, please provide all citations to the record  
9 in Case No. 2013-00221 where KIUC made such an argument.

10 22. Refer to the Direct Testimony of Lane Kollen at page 59, line 20. Please explain  
11 the basis for the percentages cited therein, and provide all workpapers, calculations, and other  
12 documents used in the derivation of those percentages. Provide the documents in electronic  
13 format with formulas intact.

14 23. Refer to the Direct Testimony of Lane Kollen at pages 65-66. Please confirm that  
15 the referenced effects of the MATS capital expenditures are not included in Big Rivers’ proposed  
16 base rates because the effects of any MATS capital expenditures would be included in the Big  
17 Rivers’ environmental surcharge.

18 24. Refer to the Direct Testimony of Lane Kollen at page 69. Please explain how the  
19 KIUC Rate Plan “will capture the deferral and amortization expense if the cost is incurred or the  
20 savings if the cost is not incurred.”

21 25. Refer to the Direct Testimony of Lane Kollen at page 73.

22 a. Please provide the basis of Mr. Kollen’s assertion that the effect of his  
23 recommendation is that the reserve funds will be depleted in early February 2015,

1 provide all supporting documents, and provide all supporting calculations in  
2 electronic format with formulas intact.

3 b. Please explain the statement, "That is because only one of the KIUC  
4 recommendations will affect the depletion of that Reserve fund, i.e., the  
5 adjustment to reflect a sharing of the stranded fixed costs associated with excess  
6 capacity with the creditors."

7 c. Please explain why Mr. Kollen's recommendation with respect to Case No. 2012-  
8 00535 does not affect the depletion of the reserve funds, given that KIUC also  
9 recommends that Big Rivers be able to draw from the reserve funds to maintain a  
10 1.24 TIER.

11 d. Please explain why Mr. Kollen's recommendation with respect to transmission  
12 revenues from Century Hawesville and Century Sebree does not affect the  
13 depletion of the reserve funds, given that KIUC also recommends that Big Rivers  
14 be able to draw from the reserve funds to maintain a 1.24 TIER.

15 e. Please explain why each of Mr. Kollen's other recommendations does not affect  
16 the depletion of the reserve funds, given that KIUC also recommends that Big  
17 Rivers be able to draw from the reserve funds to maintain a 1.24 TIER.

18 26. Please describe in detail Mr. Kollen's experience in directly advising, managing,  
19 or placing debt in the capital markets.

20 27. Please describe in detail Mr. Kollen's experience in appearing before the rating  
21 agencies.

22 28. Please provide any analysis KIUC has performed of the impact of the reduced  
23 equity, margins, and available collateral that would result from Big Rivers retiring its Wilson and

1 Coleman generating stations on Big Rivers' ability to borrow and on the interest rate Big Rivers  
2 would pay if it were able to borrow.

3 29. Please provide Exhibit LK-13 in electronic format with all formulas intact.

4 30. Please provide a copy of all documents showing communications between you  
5 and any representative of another intervenor regarding, arising out of, or related to this case.

6 31. Please provide a copy of all documents showing communications between or  
7 among any of KIUC, Aleris, Domtar, Kimberly Clark, and your witnesses regarding, arising out  
8 of, or related to this case.

9 32. Please provide a copy of all documents showing communications between or  
10 among you, your witnesses, and any person not a party to this case regarding, arising out of, or  
11 related to this case.

12 33. Refer to the Direct Testimony of Kelly Thomas at page 5. Please describe the  
13 investment options Aleris is considering and the length of time Aleris has been considering each  
14 option. Has Aleris made a determination to deny any investment options at the Aleris  
15 Hawesville facility as a result of the rates Big Rivers is proposing in this case? Provide all  
16 communications and other documents evidencing all such determinations, and provide all  
17 communications and other documents evidencing or supporting the time period the investment  
18 options have been under consideration.

19 34. Provide the effective, all-in power rate, by electric service provider, of each Aleris  
20 facility for each of the last three calendar years, excluding any revenue or credit due to self-  
21 generation.

22 35. Refer to the Direct Testimony of Bill Cummings at page 4, where Mr. Cummings  
23 states that the rate increases requested by Big Rivers "could disadvantage [the Owensboro Mill]



1 in relation to competing Kimberly-Clark mills and discourage future Kimberly-Clark investment  
2 in the Owensboro Mill.” Please list all investment decisions that Kimberly-Clark has changed  
3 because of the rate increase proposed by Big Rivers in this case. Provide all communications  
4 and other documents evidencing such decisions.

5 36. Refer to the Direct Testimony of Bill Cummings at page 6, lines 13-15. Please  
6 describe each of the referenced energy efficiency projects Kimberly-Clark has determined to  
7 complete, identify the cost of the project and the date when the project will be complete, and  
8 provide the expected reduction in energy usage from the project.

9 37. Please provide the amount of power in MWh that Domtar cogenerated for each  
10 month in 2012 and 2013, excluding Backup Power. Provide the monthly production cost of such  
11 cogenerated power for each month in 2012 and 2013, excluding Backup Power. Provide the  
12 amount of power in MWh that Domtar purchased from Kenergy Corp. for each month in 2012  
13 and 2013, excluding Backup Power. Provide the monthly cost of such purchased power for each  
14 month in 2012 and 2013, excluding Backup Power. Provide the amount of Backup Power in  
15 MWh that Domtar purchased for each month in 2012 and 2013. Provide the monthly production  
16 cost of such Backup Power for each month in 2012 and 2013. Provide all supporting documents,  
17 workpapers, assumptions, and calculations.

18 38. Please produce the following information regarding each of the company affiliates  
19 whose power costs are discussed in the testimonies of the testifying representatives of Aleris,  
20 Domtar, and Kimberly Clark:

- 21 a. Location of each facility.
- 22 b. Power supplier to each facility.

1 c. Effective date of the rates for electric service identified in the representative's  
2 testimony.

3 d. The current power cost of each facility, both including and excluding self-  
4 generation.

5 e. Any proposed electric rate increases by the electric utility serving each facility  
6 and the estimated percentage of the increase being sought.

7 39. Please provide the percentage of the production cost of the Aleris Hawesville  
8 facility that is represented by the cost of retail electric service from Kenergy Corp. in each month  
9 of the years 2012 and 2013.

10 40. Please provide the percentage of the production cost of the Domtar Hawesville  
11 facility that is represented by the cost of retail electric service from Kenergy Corp. in each month  
12 of the years 2012 and 2013.

13 41. Please provide the percentage of the production cost of the Kimberly-Clark  
14 Owensboro mill that is represented by the cost of retail electric service from Kenergy Corp. in  
15 each month of the years 2012 and 2013.

16 42. For each of Aleris, Domtar, and Kimberly Clark, please provide the "all-in"  
17 effective electrical rates each paid during each year 2010, 2011, 2012, and year-to-date 2013 at  
18 their respective plants in the United States that are comparable to those described in their  
19 testimonies, both including and excluding self-generation.

20 43. Please refer to the Direct Testimony of Steve Henry at page 8, where Mr. Henry  
21 states, "These rate increases jeopardize access to what should be Hawesville's share of corporate  
22 capital funding for projects needed to keep our manufacturing processes both modern and  
23 competitive."

- 1           a. Please provide all communications and other documents that support this  
2           statement.
- 3           b. Please clarify whether the referenced “increases” refers to only the rate changes  
4           sought in Big Rivers’ application in this matter.
- 5           c. Has Domtar reduced, planned to reduce, or announced a reduction in  
6           “Hawesville’s share of corporate capital funding” as a result of the rate changes at  
7           issue in this proceeding?
- 8           d. Please quantify the amount that “should be Hawesville’s share of corporate  
9           capital funding for projects needed to keep our manufacturing processes both  
10          modern and competitive,” and please explain whether the cost of electricity is the  
11          sole determinant in that decision. If electricity cost is but one component, please  
12          identify all other components that are considered in that decision-making process.
- 13          44. Please provide all employee newsletters and similar documents related to  
14          production expanses or reductions, capital investments, energy costs, or energy usage at the  
15          Domtar Hawesville facility since January 1, 2010.
- 16          45. Please provide a comparison of all budgeted and actual Operating and  
17          Maintenance and Capital expenditures for the Domtar Hawesville facility for the past three  
18          calendar years.
- 19          46. Refer to the Direct Testimony of Philip Hayet at page 5. Is it Mr. Hayet’s  
20          position that if the Commission adopts KIUC’s recommendations, Big Rivers will be on “solid  
21          financial footing?” If so, please provide all analyses and studies performed by Mr. Hayet  
22          supporting that position.

1           47.    Please provide all analyses and studies Mr. Hayet has performed regarding the  
2 impact of KIUC’s proposals on Big Rivers’ ability to borrow or on the interest rates Big Rivers  
3 would pay if it is able to borrow. Explain in detail all assumptions upon which Mr. Hayet relied  
4 in developing such analyses and studies.

5           48.    Please provide all analyses and studies Mr. Hayet has performed regarding the  
6 impact of retiring the Wilson and Coleman generating stations on Big Rivers’ ability to borrow  
7 or on the interest rates Big Rivers would pay if it is able to borrow.

8           49.    Refer to the Direct Testimony of Philip Hayet at page 8, lines 4-7. Refer to the  
9 statement that “becoming a merchant generator has proven quite challenging for the most  
10 sophisticated and well financed companies...” Please provide a list of utility companies for  
11 which becoming a merchant generator has proven challenging, explain why that is the case, and  
12 provide support for this assertion.

13          50.    Refer to the Direct Testimony of Philip Hayet at page 11, lines 15-16, where Mr.  
14 Hayet states, “The impact on coal generation costs will far exceed the benefit of increased  
15 market sales revenues.” Please provide the basis and support for this statement.

16          51.    Refer to the Direct Testimony of Philip Hayet at page 31, lines 14-16. Please  
17 explain in detail the basis for Mr. Hayet’s assumption that “the \$/MWH impact on market prices  
18 would be half of the \$/MWH impact on coal generating units,” and provide all supporting studies  
19 and other documents.

20          52.    Refer to the Direct Testimony of Philip Hayet at page 32.

- 21           a. Please describe the software used to develop the referenced production cost  
22 summary and each sensitivity; identify what licenses are required to run the  
23 software; and identify the software vendor.

1           b. Provide the production cost summary and each sensitivity in electronic format  
2           with all formulas intact.

3           c. Provide all inputs, outputs, input files, and output files, in electronic format with  
4           all formulas intact, used in the development of the production cost summary and  
5           each sensitivity.

6           53. Please explain whether Mr. Hayet's production cost summary and sensitivities  
7 include the impact on market prices from each of the following potential regulations: CCR,  
8 Cooling Water Intake, a successor to CSAPR, and fracking. If so, explain the methodology used  
9 to determine the impact of those potential regulations, identify where in the analysis those  
10 impacts are shown, and provide all supporting documents and calculations.

11          54. Please explain whether Mr. Hayet's production cost summary and sensitivities  
12 include the impact on fuel prices (and, therefore, market prices) from increased exports of natural  
13 gas. If so, explain the methodology used to determine the impact of this possibility, identify  
14 where in the analysis those impacts are show, and provide all supporting documents and  
15 calculations.

16          55. Please explain whether Mr. Hayet's production cost summary and sensitivities  
17 include the impact on fuel prices (and, therefore, market prices) from an increasing incidence of  
18 coal-fired generating plants converting to or being replaced by natural-gas fired generating  
19 plants. If so, explain the methodology used to determine the impact of this possibility, identify  
20 where in the analysis those impacts are show, and provide all supporting documents and  
21 calculations.

22          56. Are one of more of Domtar, Kimberly Clark, and Aleris involved in any  
23 discussions concerning proposed legislation that may be developed and introduced in the 2014

1 regular session of the Kentucky General Assembly that arises out of, relates to, or concerns  
2 electric service to their respective Kentucky facilities? If so, please describe in detail those  
3 discussions, and provide a copy of any documents that are related in any respect to those  
4 discussions.

5 On this the 11<sup>th</sup> day of November, 2013.

6  
7 Respectfully submitted,

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
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31  
32 Counsel for Big Rivers Electric Corporation  
33  
34  
35

**Certificate of Notice**

I certify that a true and accurate copy of the foregoing was served by electronic mail on each party to this proceeding on the 11<sup>th</sup> day of November, 2013, and will be served by either first class mail or by Federal Express upon the persons listed on the service list accompanying these requests, on the 12<sup>th</sup> day of November, 2013.

  
\_\_\_\_\_  
Tyson Kamuf