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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BIG RIVERS ELECTRIC CORPORATION FILING)	CASE NO.
OF WHOLESale CONTRACTS PURSUANT TO)	2014-00134
KRS 278.180 and KAR 5:011 § 13)	

ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS
PUBLIC REDACTED VERSION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Requests for Information to Big Rivers Electric Corporation [hereinafter referred to as "Big Rivers"] to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for Big Rivers with an electronic version of these questions, upon request.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information

within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from Counsel for the Office of Attorney General.

(7) . To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) 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.

(11) 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.

(12) 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.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL



JENNIFER BLACK HANS
LAWRENCE W. COOK
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE
SUITE 200
FRANKFORT, KY 40601-8204
(502) 696-5453
FAX: (502) 573-8315
jennifer.hans@ag.ky.gov
Larry.Cook@ag.ky.gov

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:

Hon. James M Miller
Sullivan, Mountjoy, Stainback & Miller,
PSC
P.O. Box 727
Owensboro, KY 42302-0727

Hon. Michael L. Kurtz
Boehm, Kurtz & Lowry
36 E. 7th St.
Ste. 1510
Cincinnati, Ohio 45202

this 30th day of July, 2013



Assistant Attorney General

Big Rivers Electric Corporation Filing
of Wholesale Contracts Pursuant To
KRS 278.180 and KAR 5:011 § 13
Case No. 2014-00134
Attorney General's Supplemental Data Requests
PUBLIC REDACTED VERSION

1. Regarding the "[REDACTED]
[REDACTED]" [hereinafter: [REDACTED]] provided in response to PSC 1-3, please provide the following information:
 - a. Electronic copies of all analysis performed for the [REDACTED] and each of the six [REDACTED] as shown in Figure 1 on p. 4 of 20.
 - b. The latest production cost model and financial models generated by Big Rivers with the proposed contract sales.
 - c. Describe how revenues were calculated for the [REDACTED] and each of the six [REDACTED] with each of the different financial models and production cost models used for each case.
 - d. To the extent the production cost models and financial models have already been provided in response to AG 1-12, please explain the following:
 - i. Which of the five model runs are used for each of the six [REDACTED].
 - ii. Description of how Figure 1 [REDACTED] were derived with the model runs. Explanation should include references to cells in the model run spreadsheets.
2. Regarding the [REDACTED], please provide the following information:
 - a. At the top of page 15 the following statement is made: [REDACTED]
[REDACTED] Given that SPP does not have a capacity market, please explain this statement in detail.
 - b. All spreadsheets in electronic format used to develop all figures provided in the study, with data and formulas in all cells and rows fully intact and accessible.
3. Regarding the Term Sheet found in the Appendix to the [REDACTED] please provide the following information:
 - a. Per the term sheet, the agreement [REDACTED]
[REDACTED]
[REDACTED] Please explain this apparent discrepancy, and provide any and all analyses performed by Big Rivers or on its behalf which evaluates the effect of this difference.

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- b. [REDACTED]
[REDACTED]
[REDACTED] Please explain this apparent discrepancy, and provide any and all analyses performed by Big Rivers or on its behalf which evaluates the effect of this difference.
- c. The term sheet refers to a [REDACTED]
[REDACTED] Please explain this apparent discrepancy, and provide any and all analyses performed by Big Rivers or on its behalf which evaluates the effect of this difference.
4. In response to AG 1-4 (a)(i), Big Rivers states that it is "unsure of what information is sought through this question." Specifically, Network Integrated Transmission Service Agreements (NITSAs) under the SPP OATT require that the load listed in the NITSA have adequate network resources to serve the load. Additionally, all generation capacity necessary to cover the load plus reserves must have firm transmission service to meet the SPP reliability criteria. The questions are specifically:
- a. What [REDACTED] does the Company assume will be used as [REDACTED], listed in the subsequent [REDACTED]?
- b. Will there be one [REDACTED]?
- c. [REDACTED]?
5. Referencing the production cost models and financial models provided in response to AG 1-12, please explain the following:
- a. Which specific model addresses which specific sensitivity;
- b. Which specific cells in the models have been changed for each sensitivity;
- c. Referencing question 1 above, please explain how each of the models address the [REDACTED].